INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
Sunset Reservoir Project
CITY OF REDLANDS, CALIFORNIA

Prepared for:

CITY OF REDLANDS
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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE AND BACKGROUND

The City of Redlands (City) is proposing to construct two new reservoir tanks (Proposed Project) to be located on Helen Court, near East Sunset Drive in the City (Project site). The Proposed Project will safeguard public health by expanding the capacities of the reservoirs to meet public drinking water demands, which is critical as the City continues to be impacted by multi-decade drought. The Proposed Project will allow the City to treat and store more water during wet periods for distribution during dry periods.

A Condition, Seismic, and Structural Assessment (Assessment) was completed for water facilities located throughout the City. The results of the Assessment included recommendations for rehabilitating and/or replacing facilities and adding facilities within the City to improve drought resiliency by increasing storage capacity. Based on the water needs of the City, the Project proposes to install two new above ground factory-coated bolt carbon steel tank with an approximately 14 million gallon (MG) total capacity. To construct the tanks, the City requires a permit from the California State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) which requires California Environmental Quality Act (CEQA) documents to be submitted.

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Project Site Location

The Project site is located south of Helen Drive in the City. The existing City reservoir is located west of Helen Court. The proposed tanks will be located east of the existing reservoir. Both the existing reservoir and Project site are within City property. The City owns and manages the following parcels:

- APN 0300-451-13: 3.20 Acres
- APN 0300-451-14: 2.50 Acres
- APN 0300-451-24: 8.57 Acres
- APN 0300-451-25: 7.78 Acres

The reservoir tanks will be located at parcel 0300-451-25 and 0300-451-14.

1.2.2 Project Site Access and Circulation

Project site access would be via Helen Court along Helen Drive. Helen Drive is located south of East Sunset Drive. East Sunset Drive becomes Alta Vista Drive to the east. Helen Court is a publicly accessed road. Interstate 10 (I-10) is located approximately 1 mile to the north.

1.2.3 General Plan/Zoning

The Project site is within the Highland-Canyons subarea within the City's sphere of influence. The site is zoned as Specific Plan 59 (SP 59) / Flood Plain (FP-1 - Flood Plain District) according to the City's Zoning Map (City 2022a) and with a General Plan land use designation of Resource Preservation (City 2022b). SP 59, also known as the Sector 8 Specific Plan, is located within the central portion of the southeast General Plan Amendment. Land uses within SP 59 were noted as single family residential and open space (City 2006).

The land use designation of Resource Preservation limits the use in areas that possess a unique character and fragile ecology that have prime resources for water conservation, wildlife preservation, open space recreation, and agriculture. Limited permitted uses include public utilities (City 2017).

Land area to the immediate north, east, and south are zoned as SP 59. To the immediate west, the parcels are zoned as Single-Family Residential, Rural Residential District (R-R). General plan land uses to the west, south, and east are designated as Resource Preservation, and to the north as Very Low Density Residential.

1.3 PROJECT DESCRIPTION

The City of Redlands Municipal Utilites and Engineering Department proposes the construction of two new above ground factory-coated bolt carbon steel tank with an approximately 14 MG total capacity on City property, adjacent to the existing reservoir. The Proposed Project will develop on parcels 0300-451-25 and 0300-451-14, which will cover approximately 46% of the total City-owned parcels.

1.3.1 Parking and Hardscape

One driveway will connect the existing water tank and Helen Court. The driveway will be constructed utilizing asphalt/gravel. Two parking spaces will be installed for maintenance purposes. The site will remain unmanned.

1.3.2 Operations and Ongoing Maintenance

Maintenance will occur on a monthly and as-needed basis by City employees. Landscaping will be maintained by the City. The existing water tank will continue to function while the new reservoir tanks are constructed; once operational the existing water tank would cease operations.

1.3.3 Construction

Construction of the Proposed Project will require multiple workers using equipment such as loaders, pick-up trucks, backhoe, water truck for dust suppression, crane, asphalt paver, and excavators. Project materials will be staged within the existing vacant parcels currently managed by the City. Construction of the Proposed Project include, but are not limited to, excavation and grading to construct water tank pads and internal driveways, construction of two new above ground factory-coated bolt carbon steel tank with an approximately 14 MG total capacity and ancillary facilities such as a pump station, and valve vaults. A retaining wall with chain link fence will be installed to surround the reservoir. Architectural coatings will be added for the tanks to blend with the existing environment.

Construction Schedule

The Project is expected to break ground in 2024 and be completed by 2025. Construction activities will take place from 7:00 a.m. to 6:00 p.m. Monday through Saturday. No construction work will occur on Sundays or holidays per the City's Community Noise Control section Chapter 8.06 of the Municipal Code (City 2023).

1.4 REQUIRED PERMITS AND APPROVALS

Reviewing Agencies include those agencies that do not have discretionary authority but may review the Initial Study, Environmental Impact Report (EIR), and/or Negative Declaration for adequacy and accuracy.

Responsible Agencies have discretionary approval authority for a project. Potential Reviewing Agencies and Responsible Agencies include the following:

Responsible Agencies

- California State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW)

Reviewing Agencies

- South Coast Air Quality Management District (SCAQMD)
- Native American Heritage Commission (NAHC), and tribes requesting consultation

1.4.1 Permits and Approvals

The following permits and approvals may be required prior to construction of the Project:

- Site Plan review
- Grading Permit
- Building Permit
- Compliance with National Pollutant Discharge Elimination System (NPDES) Construction General Permit by the Regional Water Quality Control Board (RWQCB)

Figure 1 - Project Vicinity Map

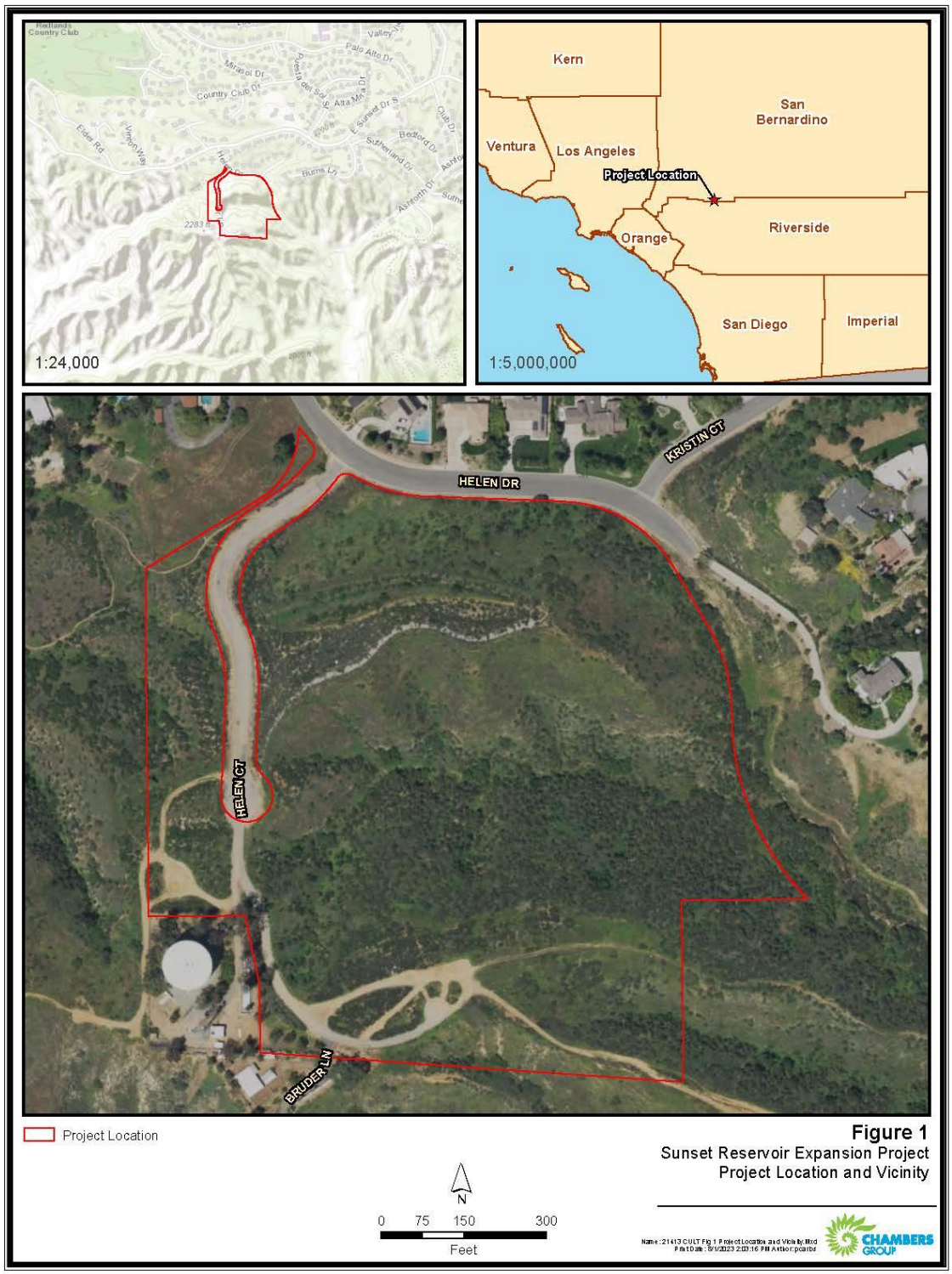
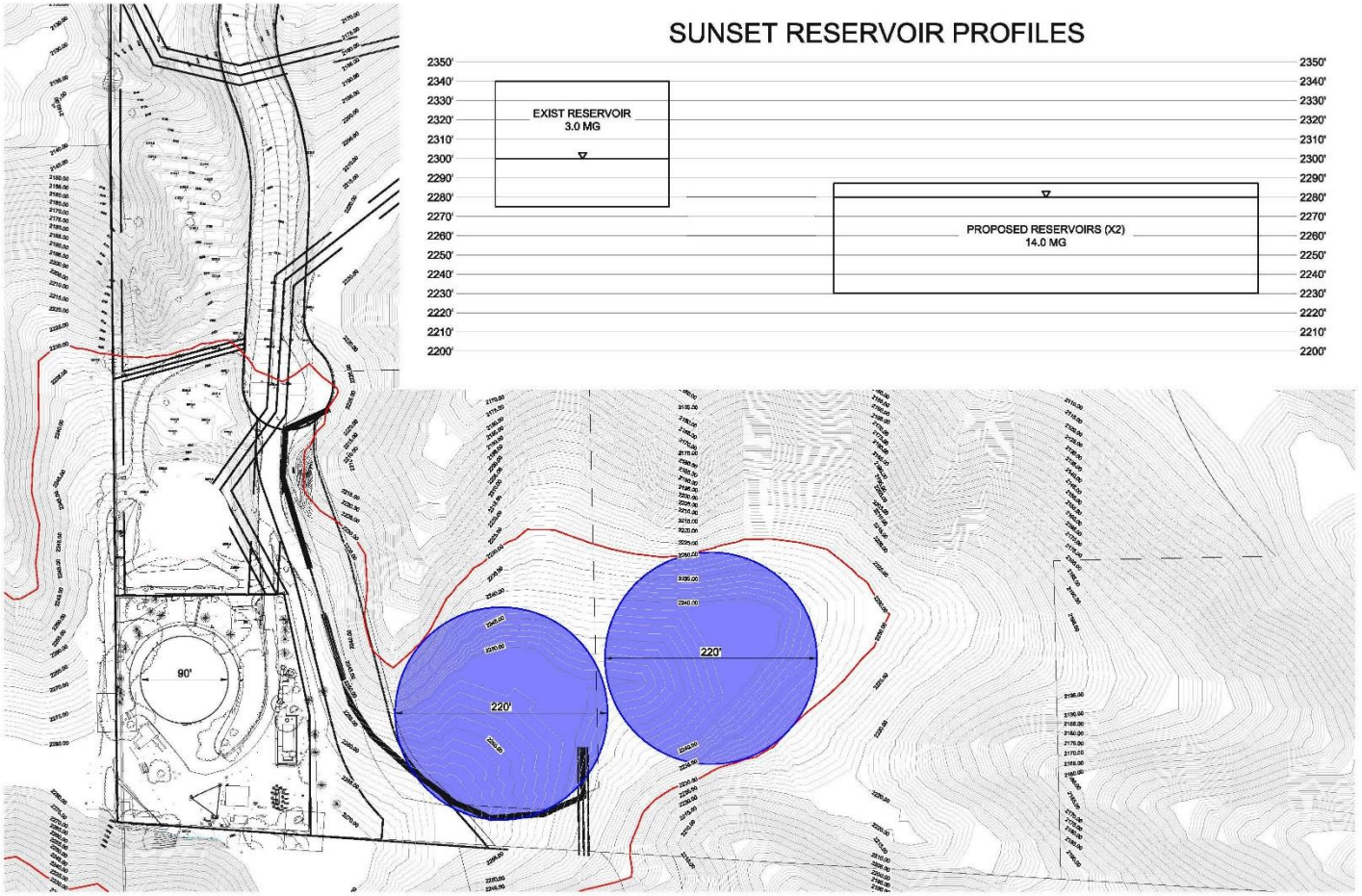


Figure 2 – Preliminary Concept



NOT TO SCALE

Figure 2
Sunset Reservoir Expansion Project
Preliminary Concept

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the proposed project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. 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. ☐
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. 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. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature — Date: 3/28/2024

Veronica Medina — Name

Associate Engineer — Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

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

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

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

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

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

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

8. The explanation of each issue should identify:

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

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

**Note: Instructions may be omitted from final document.*

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

1.	**AESTHETICS.** **Except as provided in Public Resources Code Section 21099, would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

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

Less Than Significant Impact. The City implements regulations to protect and enhance the unique visual resources of the City. These visual resources include the community's hillside setting, diverse topographic forms, and scenic qualities. The Proposed Project site is located 2.80 miles southwest of Crafton Hills Open Space. This area adjacent to Yucaipa Regional Park is part of the San Bernardino County open space network and comprises land in the Crafton Hills, generally above an elevation of 2,400 feet in the eastern portion of the City's Planning Area. This is an important open space resource in the urbanizing Redlands/ Yucaipa area and has significant value as a relatively undisturbed habitat area, a scenic resource, and a potential area for recreational open space use, as there is a recreational trail system there (City 2018). While the Project site sits on the hillsides of the City and is on undeveloped property, the Proposed Project will not be located on the prominent ridgeline of Crafton Hills, and therefore, the proposed construction of the new tanks and decommissioning of the existing tank would not affect the scenic vistas within the City. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project site consists mostly of open spaces and rural residential areas along Helen Court and Boulder Lane. According to the California Department of Transportation (Caltrans) Scenic Highway System List (California Department of Transportation [Caltrans] 2023), Route 38 is listed as an eligible scenic highway. Route 38 is located approximately

3.80 miles north of the northern portion of the Proposed Project site. The Proposed Project is not located within a state scenic highway and there are no historic buildings or rock outcroppings within the Proposed Project vicinity. Impacts would be less than significant.

c) *Would the project, 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?*

Less than Significant Impact. The Proposed Project site's visual character is provided by the rural character of the Redlands area as well as the open space areas. The Proposed Project site is accessible through Helen Court and Boulder Lane. The Proposed Project would create a temporary impact to the existing visual quality with the construction of both water tanks. Construction activities would occur intermittently throughout the Project site and would be temporary in nature.

The installation of the water tanks would permanently alter the visual character of the area as it is currently vacant. However, the tanks would be coated to blend with the existing surroundings. Lots within the Specific Plan area have been designated for residential construction. However, the Specific Plan notes that all land contained within the specific plan boundaries shall be provided with water services and improvements may be permitted as long as the changes conform to all aspects in the Specific Plan. The Proposed Project intends to increase water storage within the City to address existing demand. Furthermore, the Proposed Project will occur within City property and will conform to the height requirements of no greater than two and one-half stories or thirty-five feet (City 2006).

The Proposed Project will not conflict with applicable zoning and other regulations governing scenic quality and will not substantially degrade the existing character because the Project site is not located within a visually sensitive area. The proposed construction of the new tanks and decommissioning of the existing tank is consistent with what is permitted under the Specific Plan. Impacts would be less than significant.

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

Less Than Significant Impact. Existing light sources within the Project vicinity include lights from vehicles along adjacent roadways, and outdoor lighting from residences located along Sunset Drive and Helen Drive. Night lighting is present for security purposes on the existing water tank. Outside of light spillover from existing structures and vehicle lights, no other lighting is currently located within the Project site. During construction, the Proposed Project would generate light and glare from the presence and operation of vehicles and equipment. Construction would be scheduled between the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday. No construction work will occur on Sundays or holidays per the City's Community Noise Control section Chapter 8.06 of the Municipal Code (City 2023). Once constructed, any security lighting will be designed per the City's Lighting Development Standards, 18.156.750 of the Municipal Code (City 2023). The proposed tanks would be designed and coated with antiglare coating and will blend in with the existing surroundings; therefore any impacts associated with light and glare would be less than significant.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	**AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	☐	☐	☒	☐

4.2.1 Impact Analysis

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

Less than Significant Impact. The Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation (DOC) produces maps and statistical data to analyze impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status. The Proposed Project site is categorized as grazing land which is land on which the

existing vegetation is suited to the grazing of livestock (DOC 2022a). The Project site is not within prime farmland, unique farmland, or farmland of statewide importance. The Project site is not currently utilized for grazing, animal keeping or farming use; therefore, there will not be a conversion of uses. Impacts would be less than significant.

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

No Impact. The Project site is zoned as Flood Plain (FP-1 - Flood Plain District) and is designated under the General Plan Land Use Map as Resource Preservation. None of the parcels are in a Williamson Act contract or conflict with any existing agricultural use (City 2018). No impact would occur.

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

No Impact. While the Proposed Project site does include various vegetation throughout the site, it is not currently zoned for forest land or timberland; the Proposed Project would therefore not result in the conversion of any farmland or forest land to another use. No impact would occur.

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

No Impact. See discussion in sections b) and c), above. The Project site is zoned as Flood Plain and is not located within forest land or timberland. No forest land would be lost or converted to non-forest uses for the purpose of the Proposed Project. No impact would occur.

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

Less than Significant Impact. The Proposed Project site contains one existing water tank and is adjacent to one single family residence. Additional residential neighborhoods are located north of the Project site as well as a golf course located to the northwest. Vegetation communities on-site are comprised mostly of non-native grassland. The Proposed Project will not result in conversion of farmland to nonagricultural use or non-forest use because the Project site is not designated as farmland or forest land. While the Project site has been categorized as grazing land, there are no current grazing operations occurring. Therefore, the impacts would be less than significant.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Impact Analysis

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

Less Than Significant Impact. An Air Quality and Greenhouse Gas Emissions (GHGs) Impact Analysis (Air Report) was prepared for the Proposed Project by Vista Environmental in October 2023. The analysis was prepared to determine the air quality and GHG impacts associated with the Proposed Project. The full report and models are provided in Appendix A.

The proposed project would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan (AQMP). The following section discusses the proposed project's consistency with the SCAQMD AQMP.

SCAQMD Air Quality Management Plan

The CEQA requires a discussion of any inconsistencies between a proposed project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD AQMP. Therefore, this section discusses any potential inconsistencies of the Proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the Proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that a proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

(2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in the Air Report, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance and local thresholds of significance. The ongoing operation of the Proposed Project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not exceed the air quality standards. Therefore, a less than significant long-term impact would occur, and no mitigation would be required.

Therefore, based on the information provided above, the Proposed Project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the Proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Proposed Project are based on the same forecasts as the AQMP. The AQMP is developed through use of the planning forecasts provided in the Connect SoCal and 2019 Fedeeral Transportation Improvement Program (FTIP). The Connect SoCal is a major planning document for the regional transportation and land use network within Southern California. The Connect SoCal is a long-range plan that is required by federal and state requirements placed on the Southern California Association of Governments (SCAG) and is updated every four years. The 2019 FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this Project, the City of Redlands General Plan's Land Use Plan defines the assumptions that are represented in AQMP.

The Project site is currently designated as Resource Preservation in the General Plan. The proposed reservoirs are an allowed use within this land use designation and would not require a General Plan Amendment. As such, the Proposed Project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the Proposed Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP.

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

Less Than Significant Project. The Proposed Project would not 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.

This analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project- specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin (Basin) is in nonattainment, and, therefore, would not be considered to have a significant adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The following section calculates the potential air emissions associated with the construction and operations of the Proposed Project and compares the emissions to the SCAQMD standards.

Construction Emissions

The construction activities for the Proposed Project are anticipated to include site preparation and grading of approximately 6.2 acres, building construction of the proposed reservoirs, paving of an on-site driveway and parking spaces, and application of architectural coatings. The CalEEMod model has been utilized to calculate the construction-related emissions from the Proposed Project. The maximum daily construction-related criteria pollutant emissions from the Proposed Project are shown below in Table 4-1.

Table 4-1: Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Maximum Daily Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO_2	PM10	PM2.5
Summer 2024	3.74	36.1	34.4	0.05	8.04	4.26
Winter 2024	1.37	11.9	15.4	0.03	1.03	0.59
Summer 2025	35.8	11.0	15.8	0.03	0.96	0.53

Winter 2025	1.27	11.0	15.1	0.03	0.96	0.53
Maximum Daily Construction Emissions	**35.8**	**36.1**	**34.4**	**0.05**	**8.04**	**4.26**
SCAQMD Regional Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
SCAQMD Local Thresholds[1]	**--**	**356**	**3,630**	**--**	**59**	**15**
Exceeds Thresholds?	No	No	No	No	No	No

Note:
[1] The nearest sensitive receptor is a single-family home located as near as 280 feet (85 meters) south of the area that would be disturbed. As such, the 50 meter and 100 meter thresholds were interpolated to find the 85 meter thresholds. Calculated from SCAQMD's Mass Rate Look-up Tables for five acres in Air Monitoring Area 34, San Bernardino Valley.
Source: CalEEMod Version 2022.1.

Table 4-1: Construction-Related Criteria Pollutant Emissions shows that none of the analyzed criteria pollutants would exceed either the regional or local emissions thresholds during construction of the Proposed Project. Therefore, a less than significant regional or local air quality impact would occur from construction of the Proposed Project.

Operational Emissions

In general, operation of the new reservoir tanks will be passive as there will be no equipment installed on the reservoir tanks that creates air emissions. The existing water tank will continue to function while the new reservoir tanks are constructed. Currently, maintenance on the existing water tank occurs on a monthly and as-needed basis by City employees, which includes landscaping. No change would occur between the maintenance activities for the existing water tank and proposed reservoir tanks. As such, operation of the Proposed Project would not create any additional air emissions, over which is currently being created, and no operational air emission modeling was performed. As such, less than significant air quality impacts would occur from operation of the Proposed Project.

Therefore, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant.

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

Less Than Significant Impact. The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the Proposed Project, which may expose sensitive receptors to substantial concentrations, have been calculated for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from local criteria pollutant and toxic air contaminant emissions.

Construction-Related Sensitive Receptor Impacts

Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from on-site construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the Proposed Project have been analyzed and found that the construction of the Proposed Project would not exceed the local nitrogen oxides (NOx), carbon monoxide (CO), particulate matter (PM)10 and PM2.5 thresholds of significance. Therefore, construction of the Proposed Project would create a less than significant construction-related impact to local air quality and no mitigation would be required.

Toxic Air Contaminants (TAC) Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the Proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors.

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to California Air Resources Board (CARB) of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1, or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, due to the limitations in off-road construction equipment DPM emissions from implementation of Section 2448, a less than significant short-term TAC impacts would occur during construction of the proposed project from DPM emissions.

As such, construction of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

Operations-Related Sensitive Receptor Impacts

In general, operation of the new reservoir tanks will be passive as there will be no equipment installed on the reservoir tanks that creates air emissions. The existing water tank will continue to function

while the new reservoir tanks are constructed. Currently, maintenance on the existing water tank occurs on a monthly and as-needed basis by City employees, which includes landscaping. No change would occur between the maintenance activities for the existing water tank and proposed reservoir tanks. As such, operation of the Proposed Project would not create any additional air emissions, over which is currently being created, and no operational air emission modeling was performed. Therefore, operation of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact. The Proposed Project would not create objectionable odors affecting a substantial number of people. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the Project site, and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, and is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints, and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108, which limits volatile organic compounds (VOC) content in asphalt, and Rule 1113, which limits the VOC content in paints and solvents, would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries. Through compliance with the applicable regulations that

reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur, and no mitigation would be required.

Operations-Related Odor Impacts

The Proposed Project would consist of the development of two enclosed water reservoir tanks. Enclosed reservoir tanks are not a known source of odors. Therefore, a less than significant odor impact would occur from operation of the Proposed Project.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
(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?	☐	☐	☒	☐
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

4.4.1 Impact Analysis

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

Less Than Significant Impact With Mitigation Incorporated. A Biological Reconnaissance Assessment was prepared for the Proposed Project by Chambers Group in September 2023. The Biological Reconnaissance Assessment included a literature review and reconnaissance survey to assess the Project site's existing conditions. Complete details and results of the survey are provided in Appendix B. Based on the results of the literature review and reconnaissance survey, the Project site was found to have the following special status plants and wildlife conditions.

Special Status Plant Species

Based on desktop research, the Project site consists of one special status plant species to have a low potential of occurrence (slender-horned spineflower (*Dodecahema leptoceras*)) and eight to have moderate potential to occur within the Project site (chaparral sand-verbena (*Abronia villosa* var. *aurita*), Jaeger's milk-vetch (*Astragalus pachypus* var. *jaegeri*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Hall's monardella (*Monardella macrantha* subsp. *hallii*), Brand's star phacelia (*Phacelia stellaris*), chaparral ragwort (*Senecio aphanactis*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), and Santa Ana River woollystar (*Eriastrum densifolium* subsp. *sanctorum*)). While none of these species were found during the survey, they have low to moderate potential of occurrence during the blooming period (June). Therefore, focused protocol-level plant surveys shall be implemented (MM BIO-1) to identify if these species are present during the blooming period and to implement measures to result in a less than significant impact to these species.

MM BIO-1: The Project site has low to moderate potential for special status plant species to be present on-site. Per the Biological Reconnaissance Assessment, the following special status plant species have low to moderate potential of occurrence within the Project site: slender-horned spineflower (*Dodecahema leptoceras*), chaparral sand-verbena (*Abronia villosa* var. *aurita*), Jaeger's milk-vetch (*Astragalus pachypus* var. *jaegeri*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Hall's monardella (*Monardella macrantha* subsp. *hallii*), Brand's star phacelia (*Phacelia stellaris*), chaparral ragwort (*Senecio aphanactis*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), and Santa Ana River woollystar (*Eriastrum densifolium* subsp. *sanctorum*).

Therefore, a qualified botanist must be retained by the Project applicant to conduct a protocol-level focused plant survey prior to construction at the location of the water tanks to identify if any special status plant species are present on site. The focused plant survey shall be conducted during the appropriate blooming period or when each species is conspicuous and readily identifiable by a qualified botanist. If any special status plant species are observed, they will be mapped, counted, and recorded.

When feasible, construction activities will avoid impacts to the areas with special status plant species if found. The special status plants identified shall be protected by a buffer zone established by a qualified botanist prior to construction. If the qualified botanist determines that the special status plants cannot be avoided and a buffer zone cannot be established, then further mitigation for the impacted species will be required. This may include payment of an in-lieu fee, preservation of suitable habitat elsewhere off the Project site, collection of seeds, transplanting, or another form of mitigation as approved by the resource agencies.

Special Status Communities

Five special status communities, Riversidian Alluvial Fan Sage Scrub, Southern Coast Live Oak Riparian Forest, Southern Riparian Forest, Southern Sycamore Alder Riparian Woodland, and Southern Willow Scrub, were found within 5 miles of the proposed Project site but were not present on the Proposed Project site. Therefore, there is no impact on these communities.

Special Status Wildlife Species

The Project site has four wildlife species that were observed within two miles of the Project site (coastal patch-nosed snake, coastal whiptail, orange-throated whiptail, and southern California legless lizard). However, the Project site contains only marginal quality habitat and is not adjacent to any riparian areas, which are often associated with these species. Therefore, these species have a low potential to occur within the Project site and no impacts are likely to occur to these species as a result of Project activities. The Coastal California gnatcatcher and yellow-billed cuckoo have been recorded within two miles of the site; however, the Project site is composed of low to moderate quality habitat for California gnatcatcher and lacks any riparian habitat required by yellow-billed cuckoo. Therefore, these species are not likely occur within the site. No sensitive wildlife species were observed during the field survey.

Ground disturbing activities could impact nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) which may be present at the Project site. Therefore, MM BIO-2 shall be implemented to ensure that impacts to nesting birds would be less than significant.

MM BIO-2: **Pre-Construction Survey**

To minimize potential impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) within the Project, construction activities shall take place outside nesting season (February 1 to August 31) to the greatest extent practicable. The survey shall be scheduled with and conducted by a qualified biologist in coordination with the City and onsite construction manager.

If construction activities must occur during nesting season, a preconstruction nesting bird survey shall be conducted prior to initiation of ground-disturbing activities. The survey shall be completed within 14 days prior to ground disturbing activities which consists of but are not limited to tree removal, trenching, etc.

During the survey, should nesting birds or their nests be encountered, to the maximum extent practicable, a minimum buffer zone around occupied nests should be determined by a qualified biologist to avoid impacts to the active nest. The buffer shall range at a minimum of 100 to 300 feet. The buffer should be maintained during physical ground-disturbing activities. Avoidance measures that shall be implemented if the biologist finds that it is required to not impact the nests include but are not limited to noise, activity, and design modifications, worker education, signage, buffers and/or temporary fencing. Once the biologist has determined that the nesting has ceased and the nestlings have fledged, the buffer may be removed.

Implementation of these mitigation measures would result in the Proposed Project having a less than significant impact to candidate, sensitive, or special status species identified in the Project site.

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

No Impact. The results of the Biological Reconnaissance Assessment show that the Project site lacks riparian habits within and around the Project site. As previously discussed in part a) special status communities were found to be within 5 miles of the Project site but are not on the Project site. Therefore, the Proposed Project would have no impact on any riparian habitat or other sensitive natural community. No impact would occur.

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

Less Than Significant Impact. The Biological Reconnaissance Assessment reviewed the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI) and National Hydrography Database (NHD) blueline drainages. A general assessment of waters potentially regulated by the U.S. Army Corps of Engineers (USACE), RWQCB, and California Department of Fish and Wildlife (CDFW) was conducted for the Project site.

No USFWS NWI features are present within the Project site. One NHD ephemeral feature is shown to historically flow through the Project site; however, based on the results of the field survey, no defined channelization or bank to bank was observed in the area of the NHD feature and it appears this area facilitates nuisance flow during rain events and becomes sheet flow at the bottom of the hill and does not appear to connect to any other features downstream. Project activities are proposed to occur on the top of the hill near the existing water tower and no work would occur along the hillside's areas. No impacts to jurisdictional waters would occur as a result of Project activities. During construction, any proposed work will include best management practices (BMPs) that are required for stormwater pollution and prevention. These will include, but are not limited to, silt fencing and straw waddles. Impacts therefore would be less than significant.

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

Less than Significant Impact. The results of the survey reported in the Biological Reconnaissance Assessment stated low to moderate occurrence of special status plant species and wildlife species based on historical data. Additionally, according to the County of San Bernardino's General Plan Open Space Element map, the Project site is not located within the listed major open space areas such as the San Timoteo Canyon, Live Oak Canyon, Santa Ana River, and Crafton Hills Grove (County 2007). The City's Critical Habitat and Principal Waters figure in the General Plan show that the Project is not

located within any listed critical habitats (City 2018). The Project site does not contain any designated habitats or wildlife corridors. Therefore, impacts are less than significant.

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

Less than Significant Impact. The City's General Plan outlines various preservation policies and ordinances to protect the City's resources. Preservation guidelines for the City's distinct elements include preservation of older neighborhoods, street trees and streetscapes, Citrus Groves, and managing activities within the Santa Ana River Wash and Upper Santa Ana River Land Management Habitat Conservation Plan. The Proposed Project would not conflict with any local policies or ordinances because the Project will not affect or interfere with the preservation guidelines within the General Plan and the proposed work will not occur within these distinct areas. Therefore, impacts would be less than significant.

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

Less than Significant Impact. As previously discussed, the Proposed Project is not located within the Upper Santa Ana River Habitat Conservation Plan area or other opens spaces areas within the County. The proposed work will occur within City property and would not trespass into sensitive habitats or areas that are part of a conservation plan. Impact therefore would be less than significant.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

4.5.1 Impact Analysis

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

Less than Significant Impact. A Cultural Resources Survey and Study Letter Report was prepared for the Proposed Project by Chambers Group in September 2023. The Cultural Resources Survey and

Study Letter Report included the results of the cultural resources survey, cultural records search, and literature review of a surrounding half-mile radius (known to be the cultural resource study area) (Appendix C).

The City of Redlands boasts a rich historical background and is the home of a variety of historic resources valued by the community. Redlands' early period of growth remains strongly visible in the community today, in the form of mature street trees, citrus groves, and exquisitely detailed historic buildings. Results of the record search review and archival research found that there were no previously recorded resources, or other listed or potentially significant properties were recorded within the Project site. Based on the review of available historic maps and imagery, the Project site was bisected by a dirt road by at least 1901, as illustrated on the 1901 Redlands United State Geological Survey (USGS) topographic map. By the mid-1930s, an access route to a water tank to the southwest of the Project site had already been established, as shown in the 1938 aerial photograph, and housing development and construction began in the immediate vicinity during the 1960s. The Project site was also partially cleared by 1980 for use during the development of the surrounding housing tracts to the north.

However, there was no physical evidence found within the Project site and therefore, the Proposed Project would not result in significant impact to a historical resource of architectural significance. Additionally, the existing water tank will not be affected by the Proposed Project. Impacts therefore are less than significant.

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

Less than Significant Impact with Mitigation Incorporated. As previously discussed, the results of the Cultural Resources Survey and Study Letter Report show that there was no surficial evidence of prehistoric or historic archaeological resources observed. The ground surface visibility during the survey was limited due to dense vegetation and steep slopes. Record searches identified two previous cultural resources that included the Project site; however, no cultural resources have been recorded within the Project site during the survey.

While the Project site has evidence of past disturbances, there is a possibility of buried resources being identified below surface disturbances due to the presence of dense vegetation. Excavation and grading to construct water tank pads could result in the unanticipated discovery of archaeological resources. Therefore, the following mitigation measures shall be implemented to ensure that potential impacts to cultural and archaeological resources would result in less than significant impacts.

MM CUL-1 The City shall retain the services of a Qualified Archaeologist, meeting the Secretary of the Interior Standards, or County requirements, whichever is the greater. The Qualified Archaeologist shall remain on-call throughout the Project. Upon approval or request by the City, a cultural resources mitigation plan (CRMP) outlining procedures for cultural resources monitoring, mitigation, treatment, and data recovery of any unanticipated discovery shall be prepared for the Project and submitted to the City for review and approval. The development and implementation of the CRMP shall include consultations

with the City as well as a requirement that the curation of any significant cultural resources recovered under any scenario shall be through an appropriate repository agreed upon by the City. If the City accepts ownership, the curation location may be revised.

MM CUL-2 In the event of the discovery of previously unidentified and/or potential cultural resources, the City, and/or its Contractor, shall immediately cease all work activities within an area of not less than 50 feet of the discovery. The City or its Contractor shall immediately contact the City and the City-retained on-call Qualified Archaeologist. Except in the case of cultural items that fall within the scope of the California Health and Safety Code 7050.5, CEQA Section 15064.5, or California PRC Section 5097.98, the discovery of any cultural resource within the Project site shall not be grounds for a project-wide "stop work" notice or otherwise interfere with the Project's continuation except as set forth in this mitigation measure. Additionally, any consulting Native American Tribal groups that requested notification of any unanticipated discovery of cultural resources on the Project shall be notified and included in subsequent consultation appropriately. In the event of an unanticipated discovery of cultural resources during construction, the City-retained Qualified Archaeologist shall be contacted to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If a CRMP is prepared for the Project, the protocols for mitigation or treatment of cultural resources will be implemented. If the Qualified Archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the City shall implement an archaeological data recovery program.

MM-CUL-3 If cultural resources are encountered during the Project, the Qualified Archaeologist shall prepare a report summarizing any and all prehistoric or historic archaeological finds as well as providing follow-up reports of any finds to the South Central Coastal Information Center (SCCIC), as required.

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

Less than Significant Impact. The Project site is vacant and undeveloped. No cultural resources were recorded within the Project site. The field survey found no evidence of cultural or paleontological resources and there are no cemeteries located within the immediate area of the Project site.

However, in the event that human remains are discovered during ground-disturbing activities, then the Proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California Public Resources Code Section 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the National American Heritage Commission (NAHC), which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials (National Park Service 1983).

Therefore, the Proposed Project would result in less than significant impacts related to human remains.

4.6 ENERGY

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

4.6.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project would impact energy resources during construction and operation. Energy resources that would potentially be impacted include electricity and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the Proposed Project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources is provided below.

Electricity is a man-made consumptive utility. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power to an appropriate level for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Petroleum-based fuels currently account for a majority of California's transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the state has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, petroleum-based fuel consumption in California has declined.

The Proposed Project would consume energy resources during construction in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g., hauling demolition material to off-site reuse and disposal facilities).
2. Electricity associated with the conveyance of water that would be used during Proposed Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power.
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

The ongoing operation of the Proposed Project would require the use of energy resources. No change would occur between the maintenance activities for the existing water tank and proposed reservoir tanks as City staff would continue to maintain the existing and proposed reservoirs. The Proposed Project would include installation of new electric-powered water pumps to fill the reservoir tanks. Operational electric use would not change from the existing conditions since the Proposed Project would not change the total water throughout that is currently occurring.

The Proposed Project would comply with all federal, state, and county requirements related to the consumption of transportation energy, including California Code of Regulations Title 24, Part 11, the CALGreen Code. Therefore, impacts regarding wasteful and inefficient consumption of energy, and conflicts with an applicable renewable energy or energy efficiency plan, would be less than significant.

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

No Impact. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plan for the Proposed Project is the City of Redlands General Plan: Sustainable Community section (City 2018). The Proposed Project would be consistent with the policy below:

> **8-P.1:** Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.

The Proposed Project would be consistent with all applicable energy-related policies from the General Plan. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact will occur.

4.7 GEOLOGY AND SOILS

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

4.7.1 Impact Analysis

a) i) Would the project 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.

Less Than Significant Impact. The Proposed Project site is in Southern California, which is a seismically active area. As such, many areas in Southern California could be subject to some seismic activity. Within the Project area, there are no currently known active surface faults that traverse or trend toward this site, and the Project site is not located within a currently designated Alquist-Priolo

Earthquake Fault Zone, or a fault zone delineated by the County or City. According to the Specific Plan, the area is not included within a State of California Special Studies Zone for fault rupture hazard. The closest known active or potentially active faults are within the Crafton Hills fault zone which is located approximately 600 feet north of the proposed location for the new water tanks. The Proposed Project will be designed and constructed to comply with the California Building Code's standards to protect life safety and prevent collapse and will implement the appropriate seismic design parameters as defined by the California Geological Survey. Because the Project site is not located within the Alquist-Priolo Earthquake Fault Zone and does not propose construction of buildings that would house residents, impacts would be less than significant.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less than Significant. As previously discussed, the Southern California region is seismically active and areas within this region will experience ground shaking. The Proposed Project will be developed according to the California Building Code, taking into account seismic load criteria. Conformance to building standards would result in less than significant impacts related to ground shaking.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of soil strength due to a buildup of excess pore-water pressure during strong and long-duration ground shaking. Liquefaction is associated primarily with loose (low density), saturated, relatively uniform fine-to medium-grained, clean cohesionless soils. As shaking action of an earthquake progresses, soil granules are rearranged, and the soil densifies within a short period. This rapid densification of soil results in a buildup of pore-water pressure. When the pore-water pressure approaches the total overburden pressure, soil shear strength reduces abruptly and temporarily and behaves similar to a fluid. According to the General Plan, the Propsed Project is not located in an area susceptible to liquefaction (City 2018).

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

Less Than Significant Impact. Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. The State of California and the County of San Bernardino have not prepared a map delineating zones of landslide potential for the quadrangle that contains the site. The City's General Plan shows that the Project site is in an area with medium to high susceptibility of landslides. A Preliminary Geotechnical Investigation was prepared for the Specific Plan area with the results provided in the appendices. Based on the investigations, the soil within the Specific Plan area will provide adequate support for residential structures near existing grade utilizing compacted fill mat under foundations and slabs-on-grade. While the Proposed Project does not involve residential construction, it will comply with the construction standards outlined in the Specific Plan and in accordance with the California Building Code related to seismic retrofitting. Prior to receipt of a building permit, as part of the City application process, the Proposed Project will require the preparation of a conceptual grading plan to assess the site's characteristics, constraints, and

requirements for development. Conformance with these guidelines would result in a less than significant impact to adverse effects involving landslides.

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

Less than Significant Impact. Topsoil is the top layer of soil that usually holds high concentrations of organic matter, which are typically found in fields and other vegetated areas. Loss of topsoil or any type of soil erosion occurs when dirt is left exposed to physical factors such as strong winds, rain, and flowing water. The Project site, while historically considered suitable for grazing, does not contain any existing soil for agricultural operations. While there is existing vegetation on the Project site, it is not currently used for agricultural purposes. Additionally, the Project site is not zoned for agricultural uses that would benefit from topsoil. Therefore, the Proposed Project would result in less than significant impacts related to topsoil.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. The Proposed Project site is not located within a liquefaction zone but is located within a landslide susceptibility area (DOC 2023, City 2018). However, the Specific Plan has noted that development within the Specific Plan area would not result in environmental impacts related to soil/ground conditions so long as the sites are adequately supported utilizing compacted fill mat under foundations and slabs-on-grade. The Project site has an existing water reservoir, and the area has historically been sufficient to support such structures. To date, no reports of landslides, lateral spreading, liquefaction, or collapse have been reported. As previously discussed, construction of the water reservoirs will be done in compliance with building standards and seismic retrofit requirements in addition to City requirements on preparing a conceptual grading plan. Activities associated with the Proposed Project would not cause ground disturbance or destabilization of the geologic unit. Potential for the Proposed Project to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is less than significant.

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

Less Than Significant Impact. Expansive soils are most often clay-based soils and are defined by the way they expand when water is introduced and shrink when they dry out. Approximately 15% of the soils within the Proposed Project area contain a clay component (USDA 2023). As noted in the Specific Plan, the soil within the Specific Plan Area is capable of providing adequate support to residential structures. As previously discussed, the Project site has an existing water tank and to date, there have been no reported concerns regarding soil stability. Furthermore, the Proposed Project will be constructed in conformance with City and building guidelines and conformance with these guidelines would result in a less than significant impact.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. As previously described, the Proposed Project would include the construction of two permanent water tanks. No habitable structures that require the use of septic tanks or alternative wastewater disposal systems would be built as a result of the Proposed Project. No impact would occur.

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

Less Than Significant with Mitigation Incorporated. On May 3, 2023, Chambers Group received the results of the paleontological records search from the Western Science Center (WSC). The results show that no fossil localities are documented directly within the Project site, but there are recorded fossil localities from the same sedimentary deposit that underlays the Project site.

Potential fossil-bearing units are present within the Project site, as stated in the WSC record search results. Based on the records search results, which covered only the records of the WSC, the paleontological sensitivity of the Project site could be moderate due to the previously recorded and known fossil localities in the same sedimentary deposits as mapped in the Project site and within the study area. Based on the records, search results, and review of publicly available geologic mapping, the Project site's underlying sedimentary deposits have potential to yield previously undocumented fossil localities during construction. Due to the potential sensitivity of the Project site for paleontological resources, the following mitigation measures shall be implemented to result in a less than significant impact to resources that may be uncovered.

MM PAL-1 Prior to issuance of a grading permit, the City shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. The paleontologist selected must be approved by the City. Upon approval or request by the City, a paleontological mitigation plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the City for review and approval. The development and implementation of the PMP shall include consultations with the District's Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. If the District accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered.

MM-PAL-2 At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any, as well as providing follow-up reports of any specific discovery, if necessary.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

4.8.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Proposed Project would consist of the development of two water reservoirs. The Proposed Project would generate GHG emissions from construction activities.

In general, operation of the new reservoir tanks will be passive as there will be no equipment installed on the reservoir tanks that creates GHG emissions. The Proposed Project would include installation of new electric-powered water pumps to fill the reservoir tanks. Since the pumps are electric-powered, the pumps would not create any air emissions on-site and it should be noted that the existing water tank currently utilizes an electric-powered water pump. The development of the proposed Project would not change the total water throughput that is currently occurring. Other than the initial filling of the tanks, the operational electric use would not change from the existing conditions with development of the Proposed Project.

The existing water tank will continue to function while the new reservoir tanks are constructed. Currently, maintenance on the existing water tank occurs on a monthly and as-needed basis by City employees, that includes landscaping. No change would occur between the maintenance activities for the existing water tank and proposed reservoir tanks. As such, operation of the proposed project would not create any additional GHG emissions, over which is currently being created, as such no operation related GHG emissions would be created from the Proposed Project.

The Project's GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters of the Proposed Project. A summary of the results is shown below in Table 4-2: Project Related Greenhouse Gas Annual Emissions
2 and the CalEEMod model-run annual printouts are provided in Appendix A.

Table 4-2: Project Related Greenhouse Gas Annual Emissions

	Greenhouse Gas Emissions (Metric Tons per Year)			
Year of Construction	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
2024	233	0.01	0.01	235
2025	174	0.01	<0.01	176
Total Construction Emissions	407	0.02	0.01	**411**
Amortized Construction Emissions[1] (30 years)				**13.7**
SCAQMD Draft Threshold				**3,000**
Exceed Threshold?				No

Notes:

[7] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2022.1.

The data provided in Table 4-2: Project Related Greenhouse Gas Annual Emissions **Error! Reference source not found.**above shows that the Proposed Project's construction activities would generate a total of 411 $MTCO_2e$ (metric tons of carbon dioxide equivalent). According to the SCAQMD recommended GHG emissions analysis methodology, construction related GHG emissions should be amortized over 30 years, which results in the Proposed Project creating 13.7 $MTCO_2e$ per year. According to the SCAQMD draft threshold of significance detailed above and in the Air Report (Appendix A), a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations wouldn't exceed 3,000 $MTCO_2e$ per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the Proposed Project. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. The applicable plan for the Proposed Project is the Redlands Climate Action Plan (CAP) that was prepared pursuant to Section 15183.5(b) of the CEQA Guidelines to be utilized as a tiering document for the General Plan as well as future projects within the City that are consistent with the General Plan. Since the proposed project is consistent with the General Plan, the Proposed Project meets the criteria allowed for use of the Redlands CAP for analysis of the Proposed Project .

In addition, the Proposed Project is anticipated to create 13.7 $MTCO_2e$ per year, which is well below the SCAQMD threshold of significance of 3,000 $MTCO_2e$ per year. The SCAQMD developed this threshold in order to meet the State GHG emissions reduction regulations that was based on substantial evidence supporting the use of the recommended thresholds. Therefore, the Proposed

Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

4.9.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project does not involve routine transport of large quantities of hazardous materials like other industrial facilities. As noted by the Department of Toxic Substances Control (DTSC) and Code of Federal Regulations, generators producing hazardous waste exceeding 220 pounds would be considered to be significant quantities. Small quantities of potentially hazardous substances (e.g., petroleum and other chemicals used to operate and maintain equipment,

fertilizers, pesticides, etc.) may be utilized and stored on-site. However, none of these materials will be stored at the Project facilities in quantities to be considered a significant hazard.

Construction of the Proposed Project would result in the generation, transport, and use of various waste materials that would require recycling and/or disposal. Some of the waste generated could be classified as hazardous wastes/hazardous materials. Hazardous materials typically consist of chemicals that may be toxic, corrosive, flammable, reactive, an irritant, or a strong sensitizer. During construction, the Proposed Project will use potentially hazardous materials from petroleum-based fuels, lubricants, cleaning products, and other similar materials. The quantities of the used chemicals that will be present at the Project site would be limited and temporary.

During ongoing operations of the water tanks, potentially hazardous materials such as grease, oils, cleaning products, fuel, and other similar materials will involve routine use, handling, and disposal. However, the listed materials above will not create a significant hazard to the public or the environment because the handling, storage, and disposal of these materials during construction and operations shall be done in compliance with the manufacturer's standards for storage and spill procedures, and with existing regulations such as the California Health and Safety Code, Hazardous Materials Transportation Act, and Resource Conservation and Recovery Act. Impacts would be less than significant.

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

Less Than Significant Impact. According to the DTSC databases, the Project site is not located within 1,000 feet of any listed site in the Geotracker (SWRCB 2022) and Envirostor database (DTSC 2022). Terracon Consultants, Inc. (Terracon) prepared a Phase I Environmental Site Assessment (ESA) report for the Project site to identify of any potential recognized environmental conditions (RECs, presence, or likely presence of hazardous substances) that may be uncovered. Based on the analysis and surveys conducted by Terracon, no RECs or controlled recognized environmental conditions (CRECs, resulting from a past release of hazardous substances) were found and no additional investigations were warranted (Appendix D).

As discussed in part a), the Proposed Project will utilize potentially hazardous chemicals during construction and operations. While hazardous materials will be present on-site, the quantities will be limited, and the materials will be handled and stored according to the manufacturer's guidelines and be disposed of according to local, state, and federal guidelines. Any potential spills will be addressed through implementing construction BMPs to minimize the risk of release of polluted runoff. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project site is located approximately 0.65 miles south of Mariposa Elementary School and at a lower elevation than the Project site (Google 2023). There are

no schools within a one-quarter mile of the Proposed Project. The potential for emission of hazardous materials within one-quarter mile of an existing or proposed school is less than significant.

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

Less Than Significant Impact. According to the SWRCB's GeoTracker database and the DTSC EnviroStor database, there are no listed hazardous waste sites within a one-mile radius and the results of the Phase I ESA indicated no RECs or CRECs recorded at the Project site (Appendix D). There is one listed hazardous waste site within an approximately 2-mile radius which is a 1.66-acre parcel located within the south-central part of the City of San Bernardino. The former gas plant site is currently vacant and fenced. The Proposed Project activities would not affect the former gas plant site due to its distance from the Project site. Less than significant impacts would occur associated with hazardous material sites located on the Project site.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The closest airport to the Proposed Project site is the Redlands Municipal Airport, approximately 4.8 miles to the north. The Proposed Project site is not within the an airport municipal zone (Redlands Municipal Airport, 2023). Therefore, the Proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Proposed Project area; therefore, no impact would occur.

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

Less than Significant Impact. Emergency response plans within the City include the Emergency Management coordinated within the Fire Department, San Bernardino County Emergency Operations Plan, Redlands Hazard Mitigation Plan (HMP) and San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Development within the City, including during the preparation of the General Plan update sought to utilize the Redlands HMP, which is consistent with the MJHMP, as a guide for emergency planning to reduce local risks and improve emergency access, ingress, egress, and emergency preparedness (City 2018).

The Proposed Project will develop two new water tanks within City property. The Proposed Project is occurring on vacant and undeveloped land and does not propose construction of new facilities that would result in increased densities and new roadways that could affect implementing the HMP, thereby affecting adopted emergency plans. Because the Proposed Project would not impair or interfere with the City's emergency plans, impacts would be less than significant.

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

Less than Significant. The California Department of Forestry and Fire Protection's (CAL FIRE) Fire and Resource Assessment Program provides a Fire Hazards Severity Zone Viewer (FHSZ) to provide a visual reference to locate fire hazards areas in California. The maps were developed utilizing science and field-tested models that assign a hazard score based on factors that influence fire likelihood and behavior. Factors include but are not limited to fire history, existing and potential fuel (natural vegetation), predicted flame length, embers, terrain, and typical fire weather in the area. The Proposed Project site is not located within a very high fire hazard severity zone of state or local responsibility (Non-VHFHSZ) (CAL FIRE 2022). The nearest fire hazard zone within the City is located toward the north, towards Crafton Hills, approximately 1.2 miles. While the Project site is not located within a fire hazard zone, the open spaces could create an environment where wildland fires could occur especially during dry and high wind seasons. The Proposed Project will conform to City guidelines and regulations for new development to minimize fire hazard as outlined in the General Plan (Fire Hazards Principles and Actions). These requirements include but are not limited new using appropriate building material and design features, siting and designing development to avoid hazardous locations, incorporate fuel modification and brush clearances, and coordination with the Redlands Fire Department and other fire prevention agencies to review all applications for development. Conformance with these guidelines would result in less than significant impacts.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	☐	☐	☒	☐
	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	☐	☐	☒	☐
	iv) Impede or redirect flood flows?	☐	☐	☒	☐
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 Impact Analysis

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

Less Than significant Impact. Impacts related to water quality would be categorized under short-term construction related impacts and long-term operational impacts. Construction related activities have the potential to degrade surface and groundwater quality by exposing soils to surface runoff from debris and other materials, including runoff from various construction equipment. Pollutants of concern during typical construction activities include sediments, dry and wet solid wastes, petroleum products, solvents, cleaning agents and other similar chemicals. During ground-disturbing activities, excavated soil would be exposed, thereby creating a potential for soil erosion. During a storm event or water spill, these pollutants and soil could be spilled, leaked, or transported as runoff into drainages or downstream waters, and potentially into receiving waters.

The Proposed Project will construct two new reservoir tanks located on City property to treat and store more water to meet public demands. Construction and operation of the reservoir tanks will result in ground disturbances and introduce impervious surfaces to the Project site. However, only a portion of the City owned parcels will be paved and the rest will remain undisturbed.

The City of Redlands Storm Water Program's purpose is to implement the requirements of the NPDES Program which is federally mandated by the Environmental Protection Agency (EPA) to address water pollution. The disturbance area will be greater than 1 acre of soil, and therefore, the Proposed Project will be subject to the requirements of the SWRCB NPDES Permit and Waste Discharge Requirements (Order No. R8-2010-0036) for the San Bernardino County Flood Control District, County, and incorporated cities within the County and Santa Ana Region. This will require projects to implement a Storm Water Pollution Prevention Plan (SWPPP) and appropriate erosion and sediment control plans and construction and operational BMPs to ensure that runoff would not cause a nuisance to downstream properties and stream channels. Examples of BMPs include, but are not limited to, use of drip pans, stabilizers, dust control, temporary drains, and use of fences (RWQCB 2010).

The Proposed Project would not violate any water quality standards or waste discharge requirements, nor would it affect surface or groundwater quality. The Proposed Project will implement the requirements of the NPDES program by implementing construction and operational BMPs to minimize polluted runoff. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project is located within the Yucaipa groundwater subbasin, which is part of the Upper Santa Ana River Basin (City 2018). Water level records for the majority of the subbasin show small seasonal fluctuations with a steady decline. Groundwater within the basin is typically reached between 200 to 280 feet below the surface (California Department of Water Resources 2004).

According to the EPA's Sole Source Aquifer Program's mapping system, the Proposed Project is not located in an area containing sole source aquifers (EPA 2023). The Sustainable Groundwater Management (SGMA) Data Viewer does not show any groundwater monitoring sites within the Project area (California Department of Water Resources 2023).

The Proposed Project does not include activities involving groundwater wells. The installation of the water tanks will introduce impervious surfaces to the area which would introduce runoff. However, the majority of the City property will allow for continued percolation. Impacts therefore would be less than significant.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

d)

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

Less Than Significant Impact. According to the Biological Resources Assessment, there are no NWI features present or defined channelization or bank to bank in the area. While there was an NHD feature shown to historically flow, it did not appear to connect to any other features downstream (Appendix B). While there are no streams or rivers at the Project site, the topography of the Project site could result in erosion if stormwater runoff is not managed. The Proposed Project will introduce impervious surfaces to the area (approximately 46% of the total Project area) while the remainder of the parcels will be undisturbed, and the location of water tanks will be limited to the paved surfaces. The Proposed Project will implement construction and operational BMPs to address potential erosion at the Project site. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. As previously discussed, approximately 50% of the Project area will be impervious with the remainder to be undisturbed. The Proposed Project activities will not alter the path of any stream or rivers through the site as there are no features found and the majority of the existing drainage patterns will remain. The Proposed Project shall require compliance with the NPDES Program and implement BMPs involving site design source control, and other appropriate methods to minimize runoff. These include but are not limited to silt fencing and straw waddles. Conformance with these requirements would result in a less than significant impact.

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

Less Than Significant Impact. The Proposed Project will install two new water tanks within City property to increase water storage in the City to meet the existing demand. The Proposed Project would generate stormwater runoff with the introduction of impervious surfaces where the water tanks will be constructed. Approximately 50% of the remainder of the Project site will remain undeveloped to allow for water to percolate into the soil. Additionally, the Proposed Project does not introduce construction of new residences or businesses, or activities that would create a significant increase in water use that would create additional runoff. Therefore, the proposed Project would not result in a significant contribution to runoff that would exceed the drainage systems.

iv) impede or redirect flood flows?

Less than Significant Impact. Flood flows result from off-site flows of water during rainy periods or when a stream or river overflows due to debris. According to the General Plan and Federal Emergency Management Agency (FEMA), the Project site is not located within a dam inundation area or flood hazard area. Additionally, it is located on a hillside in the City and does not contain any nearby streams or permanent water features (FEMA 2023). However, because of the topography of the Project site, flows may occur during rainy seasons. The Proposed Project would implement stormwater BMPs to address runoff and redirect flood flows into the appropriate channels and basins. Various BMPs include but are not limited to silt fencing and straw waddles. Therefore, the Proposed Project would not result in obstruction or redirection of flood flows. No impact would occur.

e) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Proposed Project is located inland and is not near the coastline or near any large body of water that would result in the Project being located in a flood hazard, tsunami, or seiche zones (Google 2023). No impact would occur.

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

Less Than Significant Impact. As previously discussed, the Project is located in the Yucaipa subbasin where groundwater levels are typically found below 200 to 280 feet below the surface (California Department of Water Resources 2004). The Proposed Project does not include any improvements to the Santa Ana River and does not propose any groundwater extraction activities that could affect groundwater quality, or implementation of any groundwater management plan. Impacts therefore are less than significant.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	☐	☐	☐	☒
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

4.11.1 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The Proposed Project includes the construction of two reservoirs for the purpose of storing water. The Project site is located on land which currently contains a city water tank and is zoned as Flood Plain. The Project Site is located adjacent to one single family residence and a residential neighborhood located to the north of the Project site. While the Proposed Project site is adjacent to residential properties to the north and southeast and within a mile of an elementary school, Proposed Project activities would not prevent resident access to the nearby roadways, transit facilities, or any other public service and utility, either during constriction or operation of the facilities. No impact would occur.

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

Less Than Significant Impact. The Proposed Project site is surrounded by residential, institutional, and recreational land uses. As previously discussed, the Project site is located within SP 59 which permits residential development within its areas in addition to utility infrastructure. Therefore, the Proposed Project is consistent with the existing land use plans. Furthermore, the Project site is located within City property and adjacent to an existing water reservoir currently maintained and operated by the City. Therefore, impacts would be less than significant as the Proposed Project would not conflict with any land use policy or regulation.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

4.12.1 Impact Analysis

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the California Division of Mines and Geology, no significant mineral deposits are known to exist in the City. In addition, Redlands is required by the Surface Mining and Reclamation Act of 1975 (SMARA) to adopt policies recognizing the importance of the identified mineral resources, clarifying the intent that this information is to be used when making land use decisions in areas designated to be of statewide or regional significance, and emphasizing the conservation and development of identified mineral deposits. The nearest mineral resource zone according to the Mineral Resources map in the Vital Environment section of the Redlands General Plan, is located 5.24 miles north of the Proposed Project site within the Santa Ana River. Materials found here are construction aggregates (City 2018).

The Proposed Project site is not identified as being within a significant mineral resource zone in the DOC's Mineral Land Classification Map; nor would the Proposed Project involve any mining activities (DOC 1986). In addition, the Proposed Project will not include any oil exploration or drilling. No impact would occur.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Project proposes to develop on land that has not been designated to contain a locally significant resource for minerals. As noted above, no significant mineral deposits are known to exist in the City (City 2018). In addition, no mineral resource extraction would occur as part of the Proposed Project. No impact would occur.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
(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 levels?	☐	☐	☐	☒

4.13.1 Impact Analysis

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

Less than Significant Impact. A Noise Impact Analysis was prepared for the Proposed Project in October 2023 by Vista Environmental. The Noise Impact Analysis was prepared to determine the noise impacts associated with the proposed construction and operations of the Proposed Project. The complete report including the noise models are provided in Appendix E.

The Proposed Project would not generate 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 following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the Proposed Project and compares the noise levels to the City standards.

Construction-Related Noise

The construction activities for the Proposed Project would include site preparation and grading of approximately 6.2 acres, building construction of the proposed reservoirs, paving of an onsite driveway and parking spaces, and application of architectural coatings. Noise impacts from construction activities associated with the Proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptor to the project site is a single-family home that is located as near as 280 feet south of the area that would be disturbed as part of the Proposed Project. There are also single-family homes as near as 730 feet northeast and 780 feet north of the area that would be disturbed as part of the Proposed Project.

Section 8.06.120(G) of the City's Municipal Code exempts noise sources associated with new construction, remodeling, rehabilitation, or grading of any property from the City's noise standards provided construction activities that occur do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays and Saturdays, with no activities occurring at any time on Sundays or federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents.

In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the Federal Transit Administration (FTA) construction noise criteria thresholds detailed in Appendix D have been utilized, which shows that a significant construction noise impact would occur if construction noise exceeded 80 A-weighted decibels (dBA) during the daytime at any of the nearby homes or school classrooms. The dBA is an expression of the relative loudness of sounds as perceived by the human ear.

Construction noise impacts to the nearby sensitive receptors have been calculated through use of the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) and the parameters and assumptions detailed in Appendix D, which includes the construction equipment noise emissions and usage Factors. The results are shown below in Table 4-3 and the RCNM printouts are provided in Appendix D.

Table 4-3: Construction Noise Levels at the Nearby Sensitive Receptors

Construction Phase	Construction Noise Level (dBA Leq) at:		
	Home to South[1]	Home to Northeast[2]	Home to North[3]
Site Preparation	66	62	62
Grading	65	61	61
Building Construction	66	61	62
Paving	61	57	57
Painting	53	49	49
FTA Construction Noise Threshold	**80**	**80**	**80**
Exceed Thresholds?	No	No	No

Notes:
[1] The home to south is located as near as 530 feet from the center of the area disturbed.
[2] The home to northeast is located as near as 870 feet from the center of the area disturbed.
[3] The home to north is located as near as 840 feet from the center of the area disturbed.
Source: RCNM, Federal Highway Administration, 2006 (see Section 6.1 above for detailed description of modeling assumptions)

Table 4-3 shows that greatest construction noise impacts would occur during the site preparation, with noise levels as high as 66 dBA (equivalent sound level) at the nearest home to the south and 62 dBA at the homes to the northeast and north. All calculated construction noise levels shown in **Error! Reference source not found.** are within the FTA daytime construction noise standard of 80 dBA averaged over eight hours. Therefore, through adherence to the limitation of allowable construction times provided in Section 8.06.120(G) of the City's Municipal Code, construction-related noise levels would not exceed any standards established in the General Plan or Noise Ordinance, nor would

construction activities create a substantial temporary increase in ambient noise levels from construction of the proposed project. Impacts would be less than significant.

Operational-Related Noise

In general, operation of the new reservoir tanks will be passive as there will be no equipment installed on the reservoir tanks that creates noise. The Proposed Project would include installation of new electric powdered water pumps to fill the reservoir tanks. The pumps would be located either in underground vaults or inside a pump house to protect pumps from the elements. This would also result in insulating the noise from the pumps so that the pumps would not be audible at nearby residential properties.

The existing water tank will continue to function while the new reservoir tanks are constructed. Currently, maintenance on the existing water tank occurs on a monthly and as-needed basis by City employees, which includes landscaping. No change would occur between the maintenance activities for the existing water tank and proposed reservoir tanks. As such, operation of the proposed project would not create any additional sources of noise, over which is currently being created, and no operational noise modeling was performed. As such, less than significant noise impacts would occur from operation of the Proposed Project.

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

Less than Significant Impact.

Construction-Related Vibration Impacts

The construction activities for the Proposed Project would include site preparation and grading of approximately 6.2 acres, building construction of the proposed reservoirs, paving of an on-site driveway and parking spaces, and application of architectural coatings. Vibration impacts from construction activities associated with the Proposed Project would typically be created from the operation of heavy off-road equipment. The nearest sensitive receptor to the project site is a single-family home that is located as near as 280 feet south of the area that would be disturbed as part of the Proposed Project.

Section 9.06.090(G) limits vibration activities to vibration levels that are not discernible at or beyond the boundary line of private property or at 150 feet from the vibration source if on a public space or public right of way. Based on these standards, there is potential that groundborne vibration may expose persons to excessive vibration levels. Since the City does not provide any quantitative vibration thresholds for what is considered discernible, the Caltrans vibration thresholds have been utilized in this analysis, which defines the threshold for building damage to structures at 0.5 inch per second peak particle velocity (PPV) and the threshold for distinctly perceptible human annoyance of 0.24 inch per second PPV from transient sources.

The primary source of vibration during construction would be from the operation of a bulldozer. A bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet. Based on typical

propagation rates, the vibration level at the nearest sensitive receptors (280 feet to the south) would be 0.006 inch per second PPV, which would be below both the 0.5 inch per second PPV threshold for damage to structures, and the human annoyance threshold of 0.24 inch per second PPV. Impacts would be less than significant.

Operations-Related Vibration Impacts

The Proposed Project would consist of the development of two new reservoir tanks. The ongoing operation of the Proposed Project would not include the operation of any equipment that creates vibration and would not include any other known vibration sources. Therefore, a less than significant vibration impact is anticipated from operation of the Proposed Project.

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

No Impact. The Proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airport is Redlands Municipal Airport that is located approximately 4.8 miles north of the Project site. The Project site is located outside of the 60 dBA community noise equivalent level (CNEL) noise contours of Redlands Municipal Airport. No impact would occur from aircraft noise.

4.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial 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)?	☐	☐	☐	☒
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Impact Analysis

a) Would the project 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)?

No Impact. The Proposed Project does not provide permanent housing or include operations that could result in unplanned growth such as extension of roadways or expansion of existing infrastructure. The additional water storage would address water supply for the existing population and planned future growth. No impact would occur.

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

No Impact. The Proposed Project would not result in the displacement of a substantial number of people or housing and would not necessitate the construction of replacement housing. The Project site currently consists of constructing reservoir tanks on open land and is located adjacent to just one single standing residence to the southeast which will not be part of the Project activities. No impact would occur.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would 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:				
	i) Fire Protection?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☒	☐
	iv) Parks?	☐	☐	☒	☐
	v) Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

a) Would 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 fire protection?

Less Than Significant Impact. The Proposed Project would not affect the service standards related to fire protection. The Proposed Project site is located approximately 2 miles southeast of Redlands Fire Station 262 (Google 2023). The Proposed Project will safeguard public health by expanding the capacities of the reservoirs to meet public drinking water demands which is critical as the City continues to be impacted by multi-decade drought. Development of the Proposed Project would not necessitate the expansion of services as it would not result in permanent population growth. While there may be temporary travel delays during construction with the presence of construction vehicles and equipment traveling along the roadways, these would occur during construction and is not expected to create long term and significant delay for fire protection in the area. Impacts would be less than significant.

b) Would 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 police protection?

Less than Significant Impact. The Proposed Project would not affect the service standards related to police protection. The Proposed Project site is located approximately 4.31 miles southeast of the Redlands Police Station (Google 2023). The Proposed Project would not result in population growth

requiring the expansion of existing services or the creation of new services. In addition, there would be no demand for increased police protection throughout the area. The area is currently being serviced by the Redlands Police Station and would continue to receive the same services as nearby land uses. While there may be temporary travel delays during construction, these would occur during construction and is not expected to create a long-term and significant delay for police protection in the area. Impacts would be less than significant.

c) *Would 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 schools?*

Less than Significant Impact. The Proposed Project site is located approximately 0.65 miles south of Mariposa Elementary School. Despite its proximity, the development of the Proposed Project would not induce population growth requiring the creation of new services. Additionally, The Proposed Project would not increase the demand for schools in the City. While there may be temporary travel delays during construction with the presence of construction vehicles and equipment traveling along the roadway, these would occur during construction and is not expected to create long term and significant delay to those accessing the school campus. Impacts would be less than significant.

d) *Would 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 parks?*

Less than Significant Impact. The Proposed Project would not induce population growth requiring the extension of existing or creation of new park services. Oakmont and Caroline Park are located near the Project site. While there may be temporary travel delays during construction with the presence of construction vehicles and equipment traveling along the roadway, these would occur during construction and is not expected to create long term and significant delay in access to these parks. Impacts would be less than significant.

e) *Would 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 other public facilities?*

No Impact. The Proposed Project would not induce growth requiring the extension of existing or creation of new services. Construction of the two water tanks would not result in the demand for expansion or the addition of new service areas. The Proposed Project would not increase the demand for other public facilities. In fact, the intent of the Proposed Project is to increase water storage to meet existing demands in times of drought. No impact would occur.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

4.16.1 Impact Analysis

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

No Impact. The Proposed Project does not include features or activities that would contribute to the increased use of the surrounding neighborhoods, regional parks, other recreational facilities and would not cause substantial deterioration of existing public facilities. The Proposed Project would not induce population growth as it does not include permanent or temporary housing. No impact would occur.

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

No Impact. The Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The Proposed Project does not include introducing new job opportunities that would increase populations beyond what has been analyzed nor increase demands on recreational resources. No impacts will occur.

4.17 TRANSPORTATION

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

4.17.1 Impact Analysis

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

Less than Significant Impact. The Proposed Project does not include creation of new roadways, sidewalks, or modifying the existing circulation system. The Proposed Project will be located within City property, adjacent to an existing water tank that is being maintained and operated by the City. Access to the Project site will use the same driveways currently being used for maintaining the current water reservoir tank. Furthermore, operation of the Proposed Project is a consistent use of the site per the Specific Plan. While the Project site may experience delays during construction, this will be temporary in nature. Operation of the new reservoir tanks will not increase the presence of employees on the site that would create interference with the existing circulation. Because the Proposed Project would not conflict with an existing circulation system or affect transit and pedestrian facilities, impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project would not create additional transportation to the Project site that would have a significant effect on the VMT in the area. The Proposed Project activities do not involve any land use or zoning designation revisions that would create an increase in VMT to the area such as construction of new housing or businesses. According to the CEQA guidelines on evaluating VMT prepared by the Office of Planning and Research (OPR), projects involving residential, office and retail projects tend to have the greatest influence on VMT (OPR 2008).

The Proposed Project consists of installing two new water reservoir tanks on City property to provide additional water storage. There is an existing water reservoir tank located adjacent to the Project site currently operated and maintained by the City. Future maintenance/operations of the Proposed Project is currently being done by the City in the same capacity and therefore, would not result in

additional VMTs to the Project site. Because the Proposed Project would not generate a potentially significant level of VMT and is not inconsistent with the Specific Plan, impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project does not propose any hazardous design features such as sharp curves or dangerous intersections. The Proposed Project will utilize the existing entry way and roadways currently being used by the City to operate and maintain the existing water reservoir tank located adjacent to the Project. Furthermore, the Proposed Project will be on City property and be accessible only to City employees and is not open to the general public. Any additional roadways or entrances that may be included in the Project area will be done in conformance with City engineering guidelines and with the approval of the City Engineer. Impacts would be less than significant.

d) *Would the project result in inadequate emergency access?*

Less than Significant Impact. Project site access would be via Helen Court along Helen Drive. Helen Drive is located south of East Sunset Drive. East Sunset Drive becomes Alta Vista Drive to the east. Helen Court is a publicly accessed road which would not be altered as a result of construction. The Proposed Project would not result in inadequate emergency access; therefore, impacts would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

18.	**TRIBAL CULTURAL RESOURCES. 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:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	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	☐	☒	☐	☐
(b)	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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 Impact Analysis

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 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)?*

b) *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 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Assembly Bill 52 requires public agencies to consult with tribes that may have a traditional affiliation to a project area to gather information on a site's sensitivity and identify if any mitigation measures would be required to preserve discovered or undiscovered tribal cultural resources. The City sent letters to their list of tribes to conduct consultation on December 2023. The City received responses from the Yuhaaviatam of San Manuel Nation, Gabrieleno Band of Mission Indians – Kizh Nation, and Morongo Band of Mission Indians. The Gabrieleno Band of Mission Indians – Kizh Nation, and Morongo Band of Mission Indians requested consultation with the City. After review of the Project information, the Gabrieleno Band of Mission Indians – Kizh Nation responded deferring the Project

and the Morongo Band of Mission Indians – Kizh Nation provided mitigation measures to be incorporated to the Project. The Yuhaaviatam of San Manuel Nation provided their mitigation measures and noted that the measures may be modified to reflect other tribes' concerns.

Based on the consultation with the tribes, the Project area has potential for discovery of buried cultural resources. Therefore, the following mitigation measures provided by the tribes' shall be implemented.

MM TCR-1: Tribal Monitoring Services Agreement

Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI) for the Project. The Tribal Monitor shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.

MM TCR-2: Retention of Archaeologist

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

MM TCR-3: Cultural Resource Management Plan

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

MM TCR-4: Pre-Grade Meeting

The retained Qualified archeologist and Consulting Tribe[s] representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

MM TCR-5: On-site Monitoring

During all ground-disturbing activities the Qualified Archaeologist and the Tribal Monitor shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Tribal Monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The Qualified Archaeologist, in consultation with the Tribal Monitor, shall be responsible for determining the duration and frequency of monitoring.

MM TCR-6: Inadvertent Discovery of Cultural Resources

In the event that previously unidentified cultural resources are unearthed during construction, the Qualified Archaeologist and the Tribal Monitor shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

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

A. Full avoidance.
B. If avoidance is not feasible, Preservation in place.
C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

MM TCR-7: Inadvertent Discovery of Human Remains

The Morongo Band of Mission Indians requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the consulting Tribe[s].

a. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation,

excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.

b. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
c. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98

d. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (MLD), the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

MM TCR-8: FINAL REPORT

The final report[s] created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all parties, the final reports are to be submitted to the Eastern Information Center, and the Consulting Tribe[s].

4.19 UTILITIES AND SERVICE SYSTEMS

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

4.19.1 Impact Analysis

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?

Less Than Significant Impact. There are existing utility infrastructures within the Project area for telecommunications, electric, natural gas, and wastewater treatment (City 2006). The Proposed Project will connect to existing utility services during operations. No off-site expansions are proposed.

The Proposed Project will install two new water tanks on City property to increase water storage in the City. The intent of the Proposed Project is to meet the critical public drinking water demands as the City continues to be impacted by a multi-decade drought. The City's Municipal Utilities Department operates and maintains a water distribution system with an approximately 54.5-million-gallon maximum storage capacity (City 2023b). The Proposed Project would increase the existing capacity by 14 MG and will utilize existing infrastructure for water distribution.

The Proposed Project would result in an increase of impervious surfaces to the area causing additional runoff. As previously discussed, the Proposed Project will comply with the NDPES Program by implementing SWPPP BMPs to address additional runoff.

Impacts therefore would be less than significant.

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

Less than Significant Impact. The Proposed Project would not result in requiring a significant increase in water supplies as there are no increase in personnel expected at the Project site. There is no proposed irrigation or landscaping that would require an increase in water supplies. In fact, the Proposed Project is to install additional water tanks to increase the City's water storage. No additional expansions or new entitlements are required for the Proposed Project. Impacts would be less than significant.

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

Less than Significant Impact. The City's existing treatment facility will have adequate capacity to serve the Proposed Project because the proposed activities are not introducing additional water demands in the area. The Proposed Project intends to increase the City's water storage to address existing demands of the public. And as previously discussed, there are no proposed personnel increases or need of irrigation that would increase the need for wastewater treatment facilities. Impacts would be less than significant.

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?*

Less Than Significant Impact. The City's Sustainable Community Element identifies waste reduction and recycling goals within the City. Waste reduction goals include the reduction of generation of solid waste. These would meet the State's policy goal that not less than 75% of solid waste generated be source-reduced, recycled, or composted. .

The Proposed Project will be operating two new water tanks to be serviced by the existing employees maintaining the existing water tank adjacent to the Project site. The Project site would not result in a significant increase of employees that would create an increase of solid wastes generated.

Construction of the Proposed Project would result in generation of construction wastes. The construction activities will comply with the City's requirements for Construction and Demolition Recycling Requirements (Section 13.66.040 of the Municipal Code) which outlines the requirements for loading and collection areas, targeted materials for recycling, separation of materials, and compliance with the plan (City 2023a). There is no increase in long-term waste generation given that the Project site is not introducing new populations and will be serviced by existing employees of the City. Therefore, the Proposed Project would not result in generation of solid wastes in excess of state

or local standards and would not result in impairing solid waste reduction goals. Impacts therefore would be less than significant.

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

Less than Significant Impact. As discussed above, generation of solid waste would be limited during construction and will comply with the federal State and local requirements including the City's Construction and Demolition Requirements for managing solid waste, CalGreen Code, Chapter 13.64 Integrated Solid Waste Management ordinance. Impacts would be less than significant.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

4.20.1 Impact Analysis

a) Would the project impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Proposed Project site is not located within a very high fire hazard severity zone of state or local responsibility (CAL FIRE 2022). In addition, the Proposed Project would not interfere with an evacuation or emergency plan as discussed in Section 4.9 Hazards and Hazardous Materials. Impacts would be less than significant.

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

Less than Significant Impact. As discussed above, the Proposed Project site is not located within a very high fire hazard severity zone of state or local responsibility (CAL FIRE 2022). In addition, the Project site is in an underdeveloped area and not within or adjacent to an area identified as a very high fire hazard severity zone.

While the Project site is not located within a fire hazard zone, the open spaces could create an environment where wildland fires could occur especially during dry and high wind seasons. The Proposed Project will conform to City guidelines and regulations for new development to minimize fire hazard as outlined in the General Plan (Fire Hazards Principles and Actions). These requirements include but are not limited new using appropriate building material and design features, siting and designing development to avoid hazardous locations, incorporating fuel modification and brush clearances, and coordination with the Redlands Fire Department and other fire prevention agencies to review all applications for development. Conformance with these guidelines would result in less than significant impacts.

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

Less than Significant Impact. As noted in section a) and b), the Proposed Project is not located in an area deemed as a risk to wildfire. However, open spaces could create an environment where wildland fires could occur. Conformance with City guidelines and regulations for new development to minimize fire hazards would result in a less than significant impact.

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

Less than Significant Impact. The Proposed Project site is not in an area prone to wildfire or near any water bodies that could cause slope instability or drainage changes. However, as discussed in section a) and b), the open space and sloped hills could create an environment where wildfires could occur especially during dry and high wind seasons. The Proposed Project shall comply with City guidelines and regulations for new developments to minimize fire hazards (Fire Hazards Principles and Actions). Conformance with these guidelines would result in a less than significant impact.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(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?)	☐	☐	☒	☐
©	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

4.21.1 Impact Analysis

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?

Less than Significant Impact with Mitigation Incorporated. A Biological Reconnaissance Assessment and Cultural Resources Survey and Study Letter Report were prepared to identify if the Proposed Project would have the potential to substantially degrade the quality of the environment and eliminate important examples of major periods of California history or prehistory.

The results of the Biological Reconnaissance Assessment, as analyzed in Section 4.4, resulted in less than significant impacts to most of the resources identified such as riparian habitats and natural communities, federally protected wetlands, migratory fish, or wildlife species, and for areas that have been identified to be in habitat conservation plans. Mitigation measures were identified to be required to ensure that special status plant species and nesting birds would have a less than significant impact during construction (MM BIO-1 and MM BIO-2).

The results of the Cultural Resources Survey and Study Letter Report, as analyzed in Section 4.5 Cultural Resources, and 4.7 Geology and Soils, resulted in less than significant impacts to historical

resources and less than significant impacts with mitigation related to archaeological and paleontological resources. While the results of report indicated that there were no physical or archival evidence of resource within the project site, and the Project site has evidence of past disturbances, the possibility of buried resources being identified below surface disturbances in not diminished. Implementation of mitigation measures CUL-1, CUL-2, CUL-3, PAL-1, and PAL-2 would result in less than significant impacts to these resources.

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?)*

Less than Significant Impact. According to the City's Planning Division Major Project List 2023, updated in September 2023, there are no listed projects that are occurring on or adjacent to the Project site on Sunset Drive, Burns Lane, Kristin Court, Helen Court, or Copper Hill Lane (City 2023c).

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

Less than Significant Impact. Substantial adverse effects on human beings directly or indirectly are primarily resulting from impacts to air quality, geology and soil, greenhouse gas emissions, hazardous materials, land use, noise, and wildfire. As analyzed in this initial study, impacts have been determined to be less than significant as the Proposed Project's construction and operations will comply with the City's General Plan policies and Municipal Code. Impacts therefore will be less than significant.

SECTION 5.0 – REFERENCES

The following is a list of references used in the preparation of this document.

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