

REDLANDS RHNA REZONE PROJECT

SCH NO. 2016081041

Final Environmental Impact Report

Prepared for
City of Redlands
35 Cajon Street, Suite 20
Redlands, CA 92373

April 2025

Prepared by

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**FINAL
SUBSEQUENT ENVIRONMENTAL IMPACT
REPORT
REDLANDS RHNA REZONE PROJECT
REDLANDS, CALIFORNIA
STATE CLEARINGHOUSE NO. 2016081041**

PREPARED FOR:

CITY OF REDLANDS
35 CAJON STREET
REDLANDS, CA 92737
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APRIL 2025

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1. Introduction

This Final Subsequent Environmental Impact Report (EIR) has been prepared by the City of Redlands in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Redlands RHNA Rezone Project (proposed Project; Project).

According to CEQA Guidelines Section 15132, a Final Subsequent EIR shall consist of:

- (a) The Draft Subsequent EIR or a revision of the Draft Subsequent EIR;
- (b) Comments and recommendations received on the Draft Subsequent EIR, either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft Subsequent EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft Subsequent EIR during the public review period, which began on January 22, 2025, and ended on March 7, 2025. This document has been prepared in accordance with the State CEQA Guidelines and represents the independent judgment of the lead agency, the City of Redlands. This document and the circulated Draft Subsequent EIR comprise the Final Subsequent EIR in accordance with CEQA Guidelines Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following sections are contained within this document:

Section 1.0, Introduction. This section describes CEQA requirements and the contents of the Final Subsequent EIR.

Section 2.0, Response to Comments. This section provides a list of agencies and organizations who commented on the Draft Subsequent EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Section 3.0, Mitigation, Monitoring, and Reporting Program. This section includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment” (CEQA Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in this Final Subsequent EIR.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be “*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to*

comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204(d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final Subsequent EIR, with copies of this Final Subsequent EIR document, which conforms to the legal standards established for response to comments on the Draft Subsequent EIR pursuant to CEQA. Pursuant to CEQA Guidelines Section 15089(b), lead agencies may provide an opportunity for review of the Final Subsequent EIR by the public or by commenting agencies before a project is approved, but are not required to do so.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, the City of Redlands (City), to evaluate comments on environmental issues received from public agencies, organizations, companies, and individuals who reviewed the Draft Subsequent Environmental Impact Report (EIR) and prepare written responses. This section includes copies of all written comment letters received on the Draft Subsequent EIR and the City of Redlands' responses to the comment letters. Copies of the comment letters and responses to the comment letters will be provided to City decisionmakers as part of the Final Subsequent EIR. Comment letters and specific comments are numbered for reference purposes which correspond to the City's response. A summary of each numbered comment in the commenter's letter precedes the City's response.

The following is a list of public agencies, organizations, and individuals or interested parties that submitted comments on the Draft Subsequent EIR during the public review and comment period (January 22, 2025, through March 7, 2025). All of the comment letters received on the Draft Subsequent EIR and responses to those comments are provided on the following pages.

Table 2-1: Comments Received on the Draft EIR

Letter Number	Agency/Organization/Name	Comment Date Received
Agencies		
A1	San Bernardino County Department of Public Works	February 13, 2025
A2	California Department of Conservation	March 4, 2025

Letter A1: San Bernardino County Department of Public Works (5 pages)

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911



Department of Public Works

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

www.SBCounty.gov

Noel Castillo, P.E.
Director

Byanka Velasco, P.E.
Assistant Director

David Doublet, M.S., P.E.
Assistant Director

February 13, 2025

Transmitted Via Email
File: 10(ENV)-4.01

City of Redlands, Development Services Department
Attn: Kevin Beery, Senior Planner
P.O. Box 3005
Redlands, CA 92373
kbeery@cityofredlands.org

RE: PROJECT COMMENT – NOTICE OF AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (DSEIR) FOR THE PROPOSED REDLANDS HOUSING ELEMENT REZONE PROJECT IN THE CITY OF REDLANDS.

Dear Mr. Beery:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on January 21, 2025**, and pursuant to our review, the following comments are provided:

A1.1

Flood Control Planning/Water Resources/Operations Support Division (Michael Fam, Engineering Manager, (909) 387-8120):

The San Bernardino County Flood Control District (District) possesses fee-owned right-of-way directly adjacent to the eastern side of Site 16 of the project. See attached map. The District also possesses easement-owned right-of-way totally encumbered by Site 16A.

The District's recommendations are most often made for site specific conditions. Therefore, the recommendations made here are general in nature until more detailed plans become available.

A1.2

1. According to the most recent Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project lies within the Special Flood Hazard Area (SFHA).
2. We recommend that the project includes, and the city enforce, the most recent FEMA regulations for development in a SFHA.

BOARD OF SUPERVISORS

COL. PAUL COOK (RET.) Vice Chairman, First District	JESSE ARMENDAREZ Second District	DAWN ROWE Chair, Third District	CURT HAGMAN Fourth District	JOE BACA, JR. Fifth District	Luther Snook Chief Executive Officer
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City of Redlands_NOA_DSEIR_Redlands Housing Element Rezone
 February 13, 2025
 Page 2 of 2

3. If any encroachment on District right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations Support Section. Other on-site or off-site improvements may be required, which cannot be determined at this time.
4. We recommend that the San Bernardino County Comprehensive Storm Drain Plan (CSDP) No. 4, dated February 2013, be utilized in the design of drainage facilities.
5. The proposed Project may affect storm drains in and around the site. When planning for or altering existing or future storm drains, the Project will be subject to the San Bernardino CSDP No. 4, dated February 2013. It is to be used as a guideline for drainage in the area and is available in the County's Flood Control District offices. Any revision to the drainage should be reviewed and approved by the jurisdictional agency in which the revision occurs.

**A1.2
 Cont.**

Permits Division (Johnny Gayman, Engineering Manager, (909) 387-7995):

1. The proposed Project is located adjacent to District right-of-way. As noted in No. 3 above, an encroachment permit may need to be obtained if any work occurs within District right-of-way. If you have any questions regarding this process, please contact the District's Permit Section at (909) 387-7995.

A1.3

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

Sincerely,

Nancy Sansonetti

Nancy J. Sansonetti, AICP
 Supervising Planner
 Environmental Management Division

NJS:MC:aa

Cc: Manie Cruz, Planner II

Attachment: Maps_City of Redlands_NOA_DSEIR_Redlands Housing Element Rezone

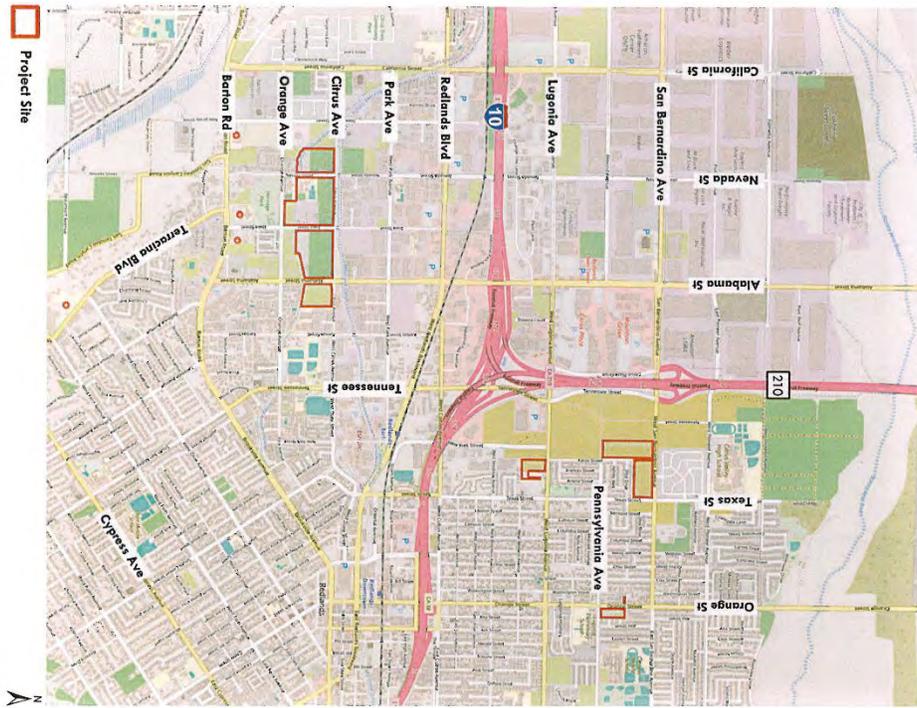


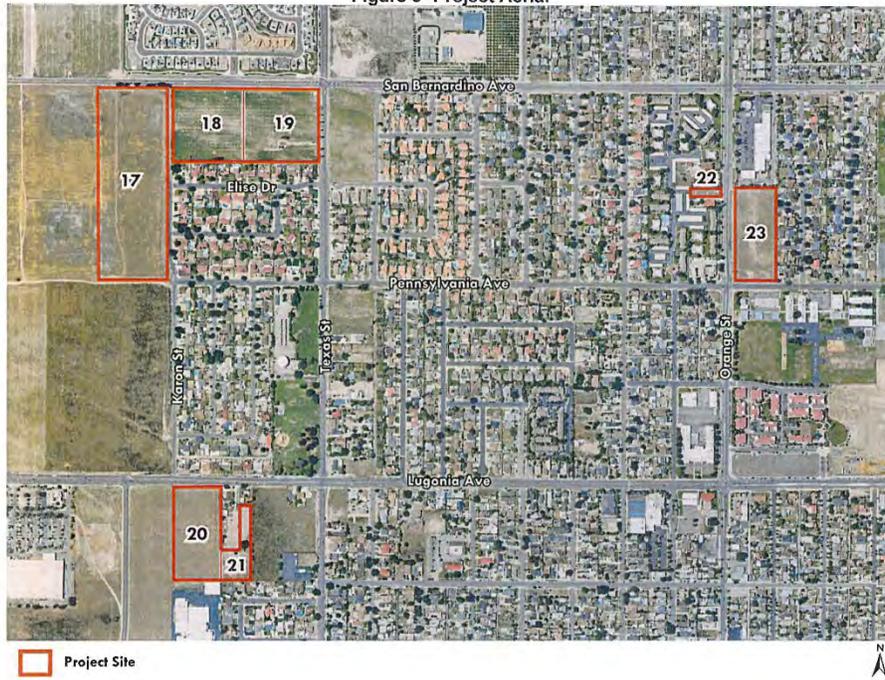
Figure 1 – Project Location

7

Figure 2 – Project Aerial



Figure 3- Project Aerial



Response to Letter A1: San Bernardino County Department of Public Works, dated February 13, 2025

Comment A1.1: The comment introduces the letter and states that the letter provides the comments on the Redlands RHNA Rezone Draft Subsequent EIR from the San Bernardino County Department of Public Works.

Response A1.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

Comment A1.2: This comment is provided from the San Bernardino Flood Control District which states that the Project should include FEMA regulations for parcels within a Special Flood Hazard Area. The comment further states that a permit shall be obtained if any encroachment on the District right-of-way is required. The comment also states that if the Project proposes any storm drain alterations, the Project would need to be subject to the San Bernardino County Comprehensive Storm Drain Plan.

Response A1.2: As discussed in Initial Study Section 5.10, *Hydrology and Water Quality* (included as Appendix A to the Draft Subsequent EIR), Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within FEMA flood zones. Future developments proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows.

In addition, per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new “occupiable” finished floor must be at least 2 feet above the 1-percent (100-year) base flood elevation. Any floodplain cross-section modifications (earthen platforms) may not cause more than one-foot water surface elevation increase upstream. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City’s Engineering Division to ensure that the proposed drainage improvements would be consistent with the County’s Comprehensive Storm Drain Plan. Future implementing projects located within a FEMA flood zone may be required to obtain a Conditional Letter of Map Revision (CLOMR) or a Letter of Map Revision (LOMR) to show any changes to existing floodplains or flood elevations.

In regard to the need for an encroachment permit, it is acknowledged that an encroachment permit would need to be obtained for any work performed within the District’s right-of-way within Sites 16 and 16A. As future site-specific drainage plans are unknown at this time, at the time this improvement needs to be implemented, the City and future developers would coordinate with the District and an encroachment permit would be obtained, as required.

Comment A1.3: This comment is provided by the Permits Division stating that an encroachment permit may be required if any future improvements associated with the proposed Project occur within the District’s right-of-way. The comment then concludes with the letter by requesting to be put on the circulation list for all project notices.

Response A1.3: As stated above in Response A1.2, any implementing projects on Sites 16 and 16A requiring improvements within the District’s right-of-way would obtain an encroachment permit from the District, as required. The San Bernardino County Public Works department will be added to the notification list for the proposed Project and will receive all future notices for the proposed Project.

Letter A2: California Department of Conservation (3 pages)



Gavin Newsom, Governor
Jennifer Lucchesi, Director

MARCH 4, 2025

VIA EMAIL: KBEERY@CITYOFREDLANDS.ORG
CITY OF REDLANDS, PLANNING DIVISION
ATTN: KEVIN BEERY, AICP, CITY PLANNER
35 CAJON STREET, SUITE 20
REDLANDS, CA 92373

Dear Mr. Beery:

NOTICE OF COMPLETION AND AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED REDLANDS HOUSING ELEMENT REZONE PROJECT, SCH# 2016081041

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Completion and Availability of a Draft Subsequent Environmental Impact Report for the Proposed Redlands Housing Element Rezone Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents.

A2.1

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process, and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The City of Redlands is proposing to rezone 24 sites for the purpose of increasing residential development capacity. The Project includes the following components: a General Plan Amendment (GPA) to change the land use designations to enable the proposed rezoning, a Specific Plan Amendment (SPA) in order to remove 15 of the

A2.2

State of California Natural Resources Agency | Department of Conservation
715 P Street, MS 1904, Sacramento, CA 95814
conservation.ca.gov | T: (916) 324-0850

Project sites out of the East Valley Corridor Specific Plan, and a Zone Change to allow for medium and high-density residential development within the Project site. The Project sites contains Prime Farmland as designated by DOC's Farmland Mapping and Monitoring Program.

**A2.2
Cont.**

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

A2.3

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."]; see also *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

A2.4

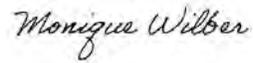
Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project's surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

California Council of Land Trusts

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

Thank you for giving us the opportunity to comment on the Notice of Completion and Availability of a Draft Subsequent Environmental Impact Report for the Proposed Redlands Housing Element Rezone Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Monique Wilber
Conservation Program Support Supervisor

A2.5

Response to Letter A2: California Department of Conservation, dated March 4, 2025

Comment A2.1: This comment introduces the comment letter and states that the Department of Conservation (DOC) has reviewed the Draft Subsequent EIR. The comment provides a summary of the DOC's responsibilities and their role in the review process of CEQA documents.

Response A2.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

Comment A2.2: This comment provides a summary of the proposed Project and states that based on the DOC's Farmland Mapping and Monitoring Program, the Project site contains Prime Farmland.

Response A2.2: This comment is informational in nature and does not provide any substantial evidence of significant environmental impacts not already disclosed in the Draft EIR. As discussed in the Draft Subsequent EIR Section 5.1, *Agriculture and Forest Resources*, and as shown in Figure 5.1-1 of the Draft Subsequent EIR, the site contains approximately 44.67 acres of Prime Farmland. This comment does not express any specific concern or question regarding the adequacy of the Draft EIR, and no further response is warranted.

Comment A2.3: This comment states that the conversion of agricultural land is a permanent reduction and impact to California's agricultural land resources. The comment recommends discussion on the type, amount, and location of farmland conversion resulting from the proposed Project. The comment also recommends discussing impacts on any current and future agricultural operation in the vicinity; cumulative impacts on agriculture land; any City or County Agriculture Mitigation Plans, Programs and Policies; and discussion on proposed mitigation measures for impacted agriculture lands within the proposed Project area.

Response A2.3: As discussed in Draft Subsequent EIR Section 5.1, *Agriculture and Forest Resources*, the site contains approximately 44.67 acres of Prime Farmland, as shown in Figure 5.1-1 of the Draft EIR. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production. Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A are designated as Prime Farmland and currently utilized for agricultural production that includes orange groves. These sites have historically been utilized for orange groves.

However, as shown in Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-5a, *Existing Zoning*, of the Draft Subsequent EIR, these sites have a General Plan land use designation of Commercial/Industrial or Medium Density Residential and a zoning designation of Commercial Industrial or Multiple Family Residential within the East Valley Corridor Specific Plan (EVCSP), both of which are intended for urban uses. As evidenced by the site's current land use and zoning designations, urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2017. The site is not among the 948 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2017 and the Project does not represent an unplanned conversion of agricultural land.

As discussed within Section 5.1.2 of the Draft Subsequent EIR, the City of Redlands has several specific policies or programs related to farmland within the City's General Plan and Municipal Code. As discussed in Draft Subsequent EIR Section 5.6 *Land Use and Planning*, while Site 20 is zoned for agricultural use the Project site has not been used for agricultural purposes since at least 1994 and since then the site has remained vacant. Further, Site 20 is not designated as Prime Farmland and is designated as grazing land by the DOC. The remaining Project parcels are currently designated for urban development, and those policies do not apply to the proposed Project. Further, the City of Redlands does not currently have an adopted Agricultural Mitigation Plan. Nevertheless, the rezoning associated with the proposed Project could result in the future development of residential uses within areas designated as Prime Farmland or within agricultural production. Therefore, the Project would result in the direct loss of 44.67 acres of Prime

Farmland, which the Draft Subsequent EIR determined would result in a significant and unavoidable impact. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact not previously disclosed in the Draft Subsequent EIR.

Comment A2.4: This comment states that the DOC advises that the EIR address mitigation for the loss or conversion of agricultural land. The comment states that one potential form of mitigation would be a conservation easement through the outreach purchase of easements or payment of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The comment provides a resource for farmland mitigation strategies and states that the use of conservation easements is only one form of mitigation and the City should consider other mitigation forms as well.

Response A2.4: As discussed on page 5.1-8 within Section 5.1, *Agricultural Resources*, of the Draft Subsequent EIR, there are no feasible mitigation measures to reduce impacts associated with the Project's conversion of agricultural lands designated as Prime Farmland to nonagricultural uses. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production. However, retention of onsite agricultural uses would be infeasible as it would prevent the development of onsite buildings, which would inhibit implementation of the Project as a whole. Existing agricultural uses within the City are becoming economically unsustainable and represent land uses that are increasingly incongruous with continuing urbanization of the City. Furthermore, retention of agricultural uses on the Project site would create or maintain islands of agricultural uses within an urbanized setting, exacerbating potential land use conflicts and land use incompatibility. The transition of existing agricultural uses and farmland to non-agricultural uses is an unavoidable effect of implementing the previously approved General Plan, as detailed in the General Plan EIR. Urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2017. The site is not among the 948 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2017 and the Project does not represent an unplanned conversion of agricultural land.

Additional offsite mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the distant parcels have no relationship to the loss of agricultural lands within the City or County (See *Friends of King River v. County of Fresno* (2014) 232 Cal.App.4th 105, 126.). Replacement of agricultural resources offsite would be infeasible as creation of new farmland-status properties within the City is outside of the City and Applicant control. There is no available replacement acreage of lower quality farmland within the City or County that could be mitigated to Prime Farmland. Farmland within the City or County is either planned for future development of non-agricultural uses or already designated by the DOC as Unique Farmland, Farmland of Statewide Importance, or Prime Farmland.

Moreover, economic and environmental factors may preclude the long-term viability of agriculture within the City or County. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per DOC requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the DOC as well as other climate factors such as rainfall. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland to non-agricultural use (See *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 875-876.). Therefore, impacts would be significant and unavoidable, consistent with the findings of the General Plan EIR. Furthermore, an EIR is not required to adopt a mitigation measure that does not effectively address a significant impact (*Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA4th 342, 365). The commenter does not provide additional data or specific measures for consideration or incorporation when discussing "other feasible mitigation measures". Thus, no further response is warranted.

Comment A2.5: This comment requests that the DOC be notified with future hearing dates as well as staff reports pertaining to the Project. In addition, the comment provides contact information if the City has any questions on DOC's comment letter.

Response A2.5: The DOC will be added to the notification list for the proposed Project. This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

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3. Mitigation Monitoring and Reporting Program

3.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "...reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) was prepared to ensure that adopted mitigation measures are successfully implemented for the Redlands RHNA Rezone Project (Project). The City of Redlands (City) is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

3.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program that would be required to be implemented by the City for the Redlands RHNA Rezone Project. The table identifies the Plans, Programs, or Policies (PPPs) and Mitigation Measures required by the City to mitigate or avoid significant adverse impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As the PPPs and Mitigation Measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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**Table 3-1: Mitigation Monitoring and Reporting Program
Redlands RHNA Rezone Project**

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AIR QUALITY			
<p>Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD’s most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:</p> <ul style="list-style-type: none"> • Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards. • Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes. • Require the use of “Super-Compliant” low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings. • The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines. 	<p>Prior to grading permit and building permit</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<ul style="list-style-type: none"> The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment. The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer’s specification. Maintenance records shall be available at the construction site for City verification. 			
<p>Mitigation Measure AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD’s most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized; Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC); Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insulation (R-8); Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF); Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards; 	<p>Prior to issuance of certificates of occupancy</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<ul style="list-style-type: none"> • Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. • Landscaping palette of drought tolerant plants exceeding City requirements; • Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use); • U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads. 			
<p>Mitigation Measure AQ-3: Toxic Air Contaminants. Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM₁₀ concentrations exceed 2.5 microgram per cubic meter (µg/m³), PM_{2.5} concentrations exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</p>	<p>Prior to issuance of development permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<ul style="list-style-type: none"> Air intakes located away from high volume roadways and/or truck loading zones. Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better). 			
BIOLOGICAL RESOURCES			
<p>Mitigation Measure BIO-1: Biological Assessment. Future projects proposed within the proposed Project site shall be surveyed by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur or if any riparian habitats, jurisdictional drainages, or wetlands are present onsite. If suitable habitat is present, a qualified biologist shall survey for special-status species during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating any ground disturbing activities in a given area. The focused surveys shall be conducted in accordance with CDFW guidelines. If special-status species are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure BIO-2: Jurisdictional Resources: If potential jurisdictional waters are determined to be present onsite through the biological assessment require by MM BIO-1 above, a jurisdictional assessment shall be conducted for future projects within Sites 1 through 24. Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW.</p> <p>Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction are subject to approval by permitting agencies and shall include, but are not limited to, the following:</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<ul style="list-style-type: none"> • Construction-related equipment shall be stored in developed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage. • Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants. • Substances harmful to aquatic life shall not be discharged into the drainage. All hazardous substances shall be properly handled and stored. • A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction. • To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. • Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. • Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities. 			
CULTURAL RESOURCES			
<p>PPP CUL-1: Municipal Code Chapter 2.62. The City of Redlands Historic Architectural Design Guidelines shall apply to all future projects within the proposed Project. The Secretary of the Interior’s <i>Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings</i> may also be applicable to properties or projects that may affect historic buildings and resources.</p>	<p>Prior to issuance of demolition permits</p>	<p>City of Redlands Building & Safety Division</p>	
<p>Mitigation Measure CUL-1. Demolition or alteration of a building or structure that is at least 50 years old at the time of permit application and has not previously been evaluated for demolition or renovation within the last five years from the time demolition or alternation is proposed shall be subject to review at the request of the City by a qualified architectural historian who meets the</p>	<p>Prior to issuance of demolition permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify if the building or structure proposed for demolition or alteration qualifies as a historical resource under CEQA guidelines. Buildings and structures shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the City for review and approval prior to the issuance of a building permit. If no historic resources are identified, no further analysis is warranted. If historic resources are identified, the applicant shall be required to implement Mitigation Measure CR-2.</p>			
<p>Mitigation Measure CUL-2. For renovations involving historical resources identified through the process described in the architectural history evaluation mitigation measure (MM CUL-2), project activities shall comply with the <i>Secretary of the Interior’s Standards for the Treatment of Historic Properties</i> (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the <i>Secretary of the Interior’s Professional Qualifications Standards</i> to ensure project compliance with the Standards for Rehabilitation. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. The memorandum should recommend design modifications necessary to bring projects into compliance with the Standards for Rehabilitation, which shall be incorporated into project designs to ensure compliance with the Standards. The memorandum shall be submitted to the City for review and approval prior to the issuance of a building permit.</p>	<p>Prior to issuance of building permits</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure CUL-3: Archeological Resources Assessment. Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G.</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior’s Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply.</p>			
<p>Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. <i>Highly Sensitive Sites:</i> Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.</p> <p>In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:</p> <ul style="list-style-type: none"> • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. <p>In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and</p>			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.</p> <p>If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.</p> <p>A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.</p> <p><i>Moderately Sensitive Sites:</i> If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:</p> <ul style="list-style-type: none"> Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. 			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<ul style="list-style-type: none"> • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. <p>In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.</p> <p>If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.</p> <p>A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.</p>			
GEOLOGY AND SOILS			
<p>Mitigation Measure PAL-1: Paleontological Resources. Future project applicants within the Project sites shall provide a paleontological assessment by a qualified paleontologist meeting the standards of the Society of Vertebrate Paleontology (SVP) to determine whether grading for the project could impact underlying soil units or geologic formations that have a low to high potential to yield fossiliferous materials, prior to project approval. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and shall recommend a project-specific paleontological</p>	<p>Prior to issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>resources monitoring and mitigation plan (PRMMP), if warranted, based on paleontological sensitivity. This plan will address specifics of monitoring and mitigation for the development project, and will take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. This PRMMP must meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity:</p> <ul style="list-style-type: none"> • High- All projects involving ground disturbances in previously undisturbed areas sediments mapped as having high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist and shall be monitored by a qualified paleontological monitor on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be of scientific significance, professionally and efficiently recover the fossil specimens and collect associated data pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010). Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities. • Low to High- All projects involving ground disturbance in previously undisturbed areas mapped with low-to-high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist. The PRMMP shall specify that monitoring shall only be required when construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units shall require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account: a) the most recent local geologic mapping, b) depths at which fossils have been found 			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>in the vicinity of the project area, as revealed by the museum records search, and c) geotechnical studies of the project area, if available.</p> <ul style="list-style-type: none"> • Low- All projects involving ground disturbance in previously undisturbed areas mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found. Paleontological monitoring is usually not required for sediments with low paleontological sensitivity. • None- Projects determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological mitigation measures, but shall implement MM PAL-2, if incidental discoveries occur. 			
<p>Mitigation Measure PAL-2: Fossil Discovery. In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50 foot radius of the find until its significance can be determined by a Qualified Paleontologist. Scientifically significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP. A repository shall be identified and a curatorial arrangement will be signed prior to collection of the fossils. Any accredited institution may serve as a repository.</p>	<p>During grading activities</p>	<p>City of Redlands Planning Division</p>	
<p>GREENHOUSE GAS EMISSIONS</p>			
<p>Mitigation Measure AQ-1: Construction Emissions. As listed previously.</p>	<p>Prior to grading permit and building permit</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure AQ-2: Operational Emissions. As listed previously.</p>	<p>Prior to issuance of certificates of occupancy</p>	<p>City of Redlands Planning Division</p>	
<p>HAZARDS AND HAZARDOUS MATERIALS</p>			
<p>Plan, Program, or Policy PPP HYD-1: SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water</p>	<p>Prior to issuance of a grading permit</p>	<p>City of Redlands Building & Safety Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			
HYDROLOGY AND WATER QUALITY			
Plan, Program, or Policy PPP HYD-1: SWPPP. As listed previously.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
Plan, Program, or Policy PPP HYD-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be prepared by the Project applicant and submitted to and approved by the City Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
NOISE			
<p>Mitigation Measure NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors:</p> <ul style="list-style-type: none"> • Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity. • Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity. 	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>Mitigation Measure NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall:</p> <ul style="list-style-type: none"> • Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts; • Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and • Be removed and the site appropriately restored upon the conclusion of the construction activity. 	<p>Prior to issuance of demolition and/or grading permits</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.</p>	<p>Prior to issuance of demolition and/or grading permits</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent</p>	<p>Prior to issuance of demolition and/or grading permits</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.			
PUBLIC SERVICES			
Plans, Program, or Policy PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the Project site, and prior to issuance of any building permits for the implementing project, the Project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code Chapter 3.60 and/or adopted fee schedules.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
Plans, Program, or Policy PPP PS-2: As a Condition of Approval for implementing projects within the proposed Project, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
RECREATION			
Plans, Program, or Policy PPP PS-2: As listed previously.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
TRANSPORTATION			
<p>Mitigation Measure TR-1: VMT Screening & Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines.</p> <p>If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City’s significance threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association’s (CAPCOA) Final</p>	Prior to issuance of building permits	City of Redlands Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to:</p> <ul style="list-style-type: none"> • <i>Increase Residential Density:</i> Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT. • <i>Integrate Affordable and Below Market Rate Housing:</i> Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project. • <i>Implement Commute Trip Reduction Marketing:</i> Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA). • <i>Provide Ridesharing Program:</i> Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA. • <i>Implement Subsidized or Discounted Transit Program:</i> Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA. • <i>Limit Residential Parking Supply:</i> The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project. • <i>Unbundle Residential Parking Costs from Property Cost:</i> Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, 			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>this measure results in decreased vehicle ownership and, therefore, a reduction in VMT.</p> <ul style="list-style-type: none"> • <i>Provide Pedestrian Network Improvement:</i> Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT. • <i>Construct or Improve Bike Facility:</i> Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT. • <i>Construct or Improve Bike Boulevard:</i> Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT. • <i>Expand Bikeway Network:</i> Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT. • <i>Implement Conventional Carshare Program:</i> Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT. • <i>Implement Electric Carshare Program:</i> Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions. • <i>Implement Pedal (Non-Electric) Bikeshare Program:</i> Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT. • <i>Implement Electric Bikeshare Program:</i> Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible 			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT.</p> <ul style="list-style-type: none"> • <i>Implement Scooter Share Program:</i> Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT. • <i>Provide Community-Based Travel Planning (CBTP):</i> CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA. • <i>Implement Market Price Public Parking (On-Street):</i> Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. • <i>Implement Transit-Supportive Roadway Treatments:</i> Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT. 			
TRIBAL CULTURAL RESOURCES			
<p>Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist 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.</p> <p>If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation</p>	<p>Prior to issuance of grading permit</p>	<p>City of Redlands Planning Division</p>	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall 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:</p> <ul style="list-style-type: none"> 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) 			
<p>Mitigation Measure CUL-3: Archeological Resources Assessment. As listed previously.</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	
<p>Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. As listed previously.</p>	<p>Prior to the issuance of grading permits</p>	<p>City of Redlands Planning Division</p>	

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