CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS KAISER PERMANENTE REDLANDS MEDICAL CENTER FINAL ENVIRONMENTAL IMPACT REPORT (FEIR) (SCH # 2025010666)

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January 2026

Project: 7214

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ATTACHMENTS

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 (Findings) and 15093 (Statement of Overriding Considerations) of the CEQA Guidelines and Section 21081 of the California Public Resources Code. This document provides the findings required by CEQA for the Lead Agency City of Redland's (City) approval of the proposed Project.

The potential environmental effects of the proposed Kaiser Permanente Redlands Medical Center project (project or proposed project) have been analyzed in a Draft Program Environmental Impact Report (Draft PEIR) (State Clearinghouse (SCH) 2025010666) dated November 2025. A Final PEIR has also been prepared that incorporates the Draft PEIR, including supporting technical reports and appendices, and contains comments received on the Draft PEIR, responses to the individual comments, errata to the Draft PEIR, revisions to the Draft PEIR including any clarifications based on the comments and the responses to the comments, and a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. These findings are based upon all of the foregoing, as well as reports and presentations by City staff and consultants and all written and oral evidence contained in the administrative record of these proceedings.

1.1 Organization and Format of Findings

Section 1, Introduction, contains the general purpose of this Findings of Fact (Findings) and Statement of Overriding Considerations, organization of this document, and a description of the statutory requirements for the Findings and the Statement of Overriding Considerations.

Section 2 describes the project objectives.

Section 3 contains a summary project description, including the discretionary actions that support and are a part of the project.

Sections 4 – 7 describe the City's independently judged CEQA findings. Section 4 identifies the proposed project's potential environmental effects that were determined to be less than significant in the Initial Study and during the scoping process. Section 5 identifies the proposed project's environmental effects found in the PEIR to create no impact or a less than significant impact without mitigation. Section 6 identifies the proposed project's potentially significant environmental impacts determined in the PEIR to be mitigated to a less than significant level. Section 7 identifies environmental effects that cannot be mitigated to a less than significant level, even though all feasible mitigation measures have been identified and incorporated into the project.

Section 8 identifies the proposed project alternatives that were studied in the PEIR and findings regarding same.

Section 9 discusses the general CEQA findings in support of project approval including findings regarding the project's procedural and substantive compliance with CEQA..

Section 10 includes the Statement of Overriding Considerations providing the City's views on the balance between the project's significant environmental effects and the merits and objectives of the proposed project.

1.2 Statutory Requirements for Findings and Statement of Overriding Considerations

CEQA (CA. Pub. Res. Code §§ 21000, *et seq*.) and the State CEQA Guidelines (Guidelines) (14 CA. Code Regs- §§ 15000, *et seq*.) promulgated thereunder, require the environmental impacts of a project to be examined before a project is approved.

Guidelines Section 15043 (*Authority to Approve Projects Despite Significant Effects*) provides:

> A public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:
>
> (a) There is no feasible way to lessen or avoid the significant effect (see Section 15091); and
>
> (b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project. (See Section 15093.)

In relevant part, Guidelines Section 15090 (*Certification of the Final EIR*) provides:

> (a) Prior to approving a project the lead agency shall certify that:
>
> (1) The final EIR has been completed in compliance with CEQA;
>
> (2) The final EIR was presented to the decision making body of the lead agency and that the decision making body reviewed and considered the information contained in the final EIR prior to approving the project; and
>
> (3) The final EIR reflects the lead agency's independent judgment and analysis.

Regarding findings, Guidelines Section 15091 (*Findings*) provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project~~,~~ unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. Changes or alterations have been required in, or incorporated into, the project~~,~~ which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
>
> 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370 (*Mitigation*), including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Guidelines Section 15092 (*Approval*) provides, in relevant part:

(a) After considering the final EIR and in conjunction with making findings under Section 15091, the lead agency may decide whether or how to approve or carry out the project.

(b) A public agency shall not decide to approve or carry out a project for which an EIR was prepared unless either:

(1) The project as approved will not have a significant effect on the environment, or

(2) The agency has:

(A) Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under Section 15091, and

(B) Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093. …

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 (*Statement of Overriding Considerations*) provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

2.0 PROJECT OBJECTIVES

As described in the Project Description in Chapter 2.0 of the PEIR, the proposed Kaiser Permanente Redlands Medical Center project aims to achieve the following primary objectives:

1. Provide health care capacity for Kaiser Permanente members in the San Bernardino-Redlands region.

2. Incorporate numerous sustainability features such as vegetated swales, tree-based infiltration, and inert bioswales; high-performance building enclosure systems, external shading, energy efficient and carbon neutral building systems and equipment selections, and solar panels. The buildings will meet or exceed Leadership in Energy and Environmental Design (LEED) Gold certification.

3. Develop the project site in accordance with the Medical Facilities designation in Redlands Business Center Concept Plan No. 1.

4. Phase development over 25 years to keep pace with projected increase in Kaiser Permanente membership in the facility's service area over that period.

3.0 PROJECT DESCRIPTION

The Kaiser Permanente Redlands Medical Center project involves the expansion and full buildout of an approximately 37-acre healthcare campus located at 1301 California Street in the City of Redlands, within Concept Plan No. 1 of the East Valley Corridor Specific Plan. The campus is currently developed with a 120,000-square-foot medical office building and associated parking on the eastern portion of the site; the remaining area consists of undeveloped land. The site is bounded by Almond Avenue to the north, California Street to the east, and West Lugonia Avenue to the south, with a trailer parking area to the west. Interstate 10 lies approximately 0.25 mile to the south, and the San Bernardino International Airport runway system is approximately 1.4 miles to the northwest.

The project requires City approval of Amendment No. 8 to Concept Plan 1 to create a Development Plan entitlement procedure under the East Valley Corridor Specific Plan, and Planned Development No. 6, which establishes a phased development plan for future construction of the proposed facility. The proposed project is consistent with the "Commercial Industrial" General Plan designation and the CP-1 Medical Facilities District zoning.

Development would occur in four phases extending through approximately 2050 and ultimately establish a regional medical center anchored by a 213-bed acute care hospital with the ability for future expansion. Key facility components include:

- Phase 1 – Ambulatory Services Center/Medical Office Building No. 2
- Phase 2 – 213-Bed Acute Care Hospital, parking structure, and Central Utility Plant
- Phase 3 – Medical Office Building No. 3
- Phase 4 – Hospital expansion adding 108 beds

Upon completion, the campus would include approximately 948,000 square feet of medical facilities, structured parking, designated patient and emergency access, photovoltaic systems, and a micro-grid-enabled central utility plant. The project would provide 2,803 parking spaces, exceeding City requirements.

The project includes external roadway and utility improvements to support hospital operations, including widening of Almond Avenue and installation of new and upgraded utility connections. Construction would be phased to maintain existing medical office operations on the campus and would comply with City development standards as well as State hospital licensing requirements under the California Department of Health Care Access and Information (HCAI). Additional CEQA review will be conducted as required prior to approval of subsequent phases pursuant to CEQA Guidelines §§15162–15164.

3.1 Program Environmental Report And Discretionary Actions

The Final PEIR addresses the direct, indirect, and cumulative environmental effects associated with the adoption of the project. The Final PEIR provides the environmental information necessary for the City to make a final decision on the requested discretionary actions. Discretionary actions to be considered by the City may include, but are not limited to, the following:

- Certification of the Kaiser Permanente Redlands Medical Center project Program Environmental Impact Report (SCH 2025010666)

- The proposed project will require the City of Redlands Planning Commission and City Council approval of:
    - Amendment No. 8 to Concept Plan 1, which would amend the permitting procedure in Concept Plan No. 1, Section IV, Part A (Discretionary Actions) under the East Valley Corridor Specific Plan; and
    - Planned Development No. 6.
- All mitigation measures identified for earlier phases of the project must be fully implemented to the satisfaction of the City of Redlands Planning Division prior to Planning Commission consideration or approval of any subsequent phases.
- Each phase of the project will require a development permit from the City of Redlands Planning Commission, pursuant to East Valley Corridor Specific Plan § EV1.0405(c), and in accordance with the City's Commission Review and Approval Process set forth in City of Redlands Municipal Code chapter 18.12 (amlegal.com, 2025). In addition, any work within the public right-of-way, including required off-site improvements, will require issuance of an encroachment permit by the City of Redlands Municipal Utilities & Engineering Department. Further, prior to approval of subsequent project phases, the City will evaluate whether additional environmental analysis is required under CEQA to address project changes, updated conditions, or new information; such review would occur in compliance with CEQA Guidelines §§ 15162–15164.

Other Permits and Approvals

Following the City's approval of the PEIR, the following permits/approvals would be required prior to the start of construction.

- City of Redlands: Grading Permit, Building Permits, and Encroachment Permits.
- City of Redlands and/or Caltrans: Street closure(s)/traffic controls.
- California Department of Health Care Access and Information (HCAI): Hospital permitting.
- SCAQMD: Permit to Construct and Permit to Operate central utility plant under Rule 203 and other SCAQMD rules.
- Santa Ana Regional Water Quality Control Board: Will be determined through a jurisdictional delineation conducted in accordance with applicable mitigation measures.
- United States Army Corps of Engineers: Will be determined through a jurisdictional delineation conducted in accordance with applicable mitigation measures.
- California Department of Fish and Wildlife: Will be determined through a jurisdictional delineation conducted in accordance with applicable mitigation measures.
- Southern California Edison Co.: Approval of application for interconnection and operation of microgrid.

4.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT IN THE INITIAL STUDY AND DURING THE SCOPING PROCESS

The City of Redlands, acting as Lead Agency under CEQA, issued a Notice of Preparation (NOP) pursuant to State CEQA Guidelines §15082 to initiate preparation of the Draft Program Environmental Impact Report.

CEQA Guidelines Section 15128 (*Effects Not Found to be Significant*) requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based on substantial evidence in the record, including the environmental evaluation presented in the Initial Study (**Appendix A**) and further analyzed in **Chapter 4.0 of the EIR**, the City determined and now finds that the project would result in either no impact or less than significant impacts for the environmental topics listed below and no mitigation measures are required for these topics pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a).

4.1 Aesthetics

Except as provided in public resources code Section 21099, would the project:

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

The City finds no state-designated scenic highways are located in the project vicinity; therefore, the project would not damage scenic resources such as trees, rock outcroppings, or historic buildings along a state scenic highway and the project would have no significant impacts. *(see Appendix A — §4.1).*

Threshold d): Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Exterior lighting would comply with applicable City standards requiring shielding and downward-direction, minimizing light spill and glare onto surrounding areas. Building materials would not create substantial reflective glare. Further, the areas surrounding the project site are already developed and any additional light or glare from the project is anticipated to be consistent with levels already present in the vicinity of the project site. The surrounding commercial businesses operate as logistical warehousing with semi tractor trailer trucks operating with large light beams continuously as well as many installations of security lighting. The City finds that the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and the project would have no significant impacts. *(see Appendix A — §4.1).*

4.2 Agriculture and Forestry Resources

In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and

forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Threshold 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?

While regional mapping identifies limited Important Farmland in the area, the project site is urbanized and designated for non-agricultural use. The City finds that the project would not directly convert active farmland or disrupt agricultural production and would have no significant impacts. *(see Appendix A — §4.2).*

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

The site is not zoned for agricultural use and is not under a Williamson Act contract. Therefore, City finds that the project would not result in any conflicts with agricultural zoning or contracted agricultural lands and would have no significant impacts. *(see Appendix A — §4.2).*

Threshold 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 portion of the site or surrounding area is designated or zoned as forest land, timberland, or Timberland Production Zone. Therefore, the City finds that no such conflicts would occur and the project would have no significant impacts. *(see Appendix A — §4.2).*

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

The City finds that the project area is fully urbanized and contains no forest lands, timber resources, or comparable natural vegetation communities that could be converted or removed and the project would have no significant impacts. *(see Appendix A — §4.2).*

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

The City finds that the project's development would not introduce land use changes that could indirectly convert farmland located off-site and the project would have no significant impacts. The surrounding setting is urban, and no agricultural operations are present that could be affected by project-related land use incompatibility. *(see Appendix A — §4.2).*

4.3 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:

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

The largest potential source of odors during construction is equipment exhaust. Odors from these sources would be localized and generally confined to the immediate project area. The project would use typical construction techniques, and the odors would be typical of most construction sites, would be temporary in nature, and would not be sufficient to impact a substantial number of people or result in a nuisance per SCAQMD Rule 402. According to the SCAQMD *CEQA Air Quality Handbook (SCAQMD, 1993)*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project involves no industrial elements, so no long-term operational objectionable odors are anticipated. The City finds that the project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. *(see Appendix A — §4.3).*

4.4 Biological Resources

Would the project:

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

The project would not affect any protected trees, habitat conservation areas, or other sensitive biological resources subject to local ordinances or adopted conservation plans. The City finds that the project would remain consistent with the City's land use regulations-, does not conflict with any biological resource protection policies and would have no significant impacts. *(see Appendix A — §4.4).*

4.5 Geology and Soils

Would the project:

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

The project site would connect to the local sewer system and would not use septic tanks or alternative wastewater disposal systems. Therefore, the City finds that no significant impacts associated with septic tanks or alternative wastewater disposal systems would occur. *(see Appendix A — §4.7).*

4.6 Hazards and Hazardous Materials

Would the project:

Threshold 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?

There are no existing or proposed schools within 0.25 miles of the project site. Construction activities and medical operations would comply with applicable federal and state hazardous materials regulations. The City finds that the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and would have no significant impacts. *(see Appendix A — §4.9).*

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

The project site is outside of noise contours for San Bernardino International Airport (SBIA) approximately 1.3 miles to the north and there are no applicable zoning regulations relating to aviation-related hazards to persons on the ground. As such, the City finds that the project development would not cause airport-related hazards, or excessive noise, to people occupying the project area and would have no significant impacts. *(see Appendix A — §4.9).*

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

The project would comply with City emergency access requirements and maintain adequate emergency vehicle circulation during construction and operation. Coordination with fire and emergency services and standard traffic control measures would ensure that site access remains available. The City finds that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would have no significant impacts. *(see Appendix A — §4.9).*

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

The site is located within a developed urban area and is not within or adjacent to a Very High Fire Hazard Severity Zone or other wildland interface area. Construction and operational compliance with fire codes and building safety standards would further reduce any risk. The City finds that the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires and would have no significant impacts. *(see Appendix A — §4.9).*

4.7 Hydrology and Water Quality

Would the project:

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

Construction stormwater controls and post-construction best management practices (BMPs) consistent with the City's WQMP requirements and the NPDES Construction General Permit would prevent pollutants from entering stormwater runoff. The City finds the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and would have no significant impacts. *(see Appendix A — §4.10).*

Threshold 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:

i) result in substantial erosion or siltation on- or off-site;
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
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?

Project drainage systems would maintain overall drainage flows to existing discharge points. Engineering design and erosion control measures would prevent off-site erosion and avoid increased on- or off-site flood hazards. Accordingly, the City finds that the project would not 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 result in any of significant impacts of the types listed above. *(see Appendix A — §4.10).*

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

The City finds that the project would not modify or redirect a stream or river, nor is it located in a flood hazard area or subject to tsunami, seiche, or mudflow risk and would have no significant impacts. *(see Appendix A — §4.10).*

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

The City finds that stormwater design and operational requirements are fully consistent with the applicable water quality control plan or sustainable groundwater management plan, including the Santa Ana RWQCB Basin Plan and City stormwater management programs and the project would have no significant impacts. *(see Appendix A — §4.10).*

4.8 Land Use and Planning

Threshold a): Would the project physically divide an established community?

The site is already urbanized and surrounded by roadway infrastructure. The City finds that the project would be contained within existing parcels and would not create barriers-, alter established neighborhood circulation patterns, or physically divide an established community and the project would have no significant impacts. *(see Appendix A — §4.11).*

Threshold 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?

The project is consistent with the City's General Plan land use designation and zoning provisions for medical center development. The City finds that there are no adopted regional, community, or environmental land use plans that the project would conflict with and thus, the project would have no significant impacts. *(see Appendix A — §4.11).*

4.9 Mineral Resources

Threshold 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?

The project site is located within a fully developed urban area and is not mapped by the California Geological Survey as containing any known regionally significant mineral resource deposits. The City finds that the project's development would not restrict access to mineral resources and would have no significant impacts. *(see Appendix A — §4.12).*

Threshold 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?

There are no designated or active mineral extraction operations on or adjacent to the site, nor is the site identified in any local mineral resource management plans. Accordingly, the City finds that the project's implementation would not interfere with mineral extraction or reserve availability and would have no significant impacts. *(see Appendix A — §4.12).*

4.10 Noise

Threshold 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?

The nearest public-use airport to the project site is San Bernardino International Airport (SBIA) approximately 1.3 miles to the north. The project site is outside of noise contours for SBIA. The San Bernardino International Airport Authority Airport Layout Plan Narrative Report does not designate zones surrounding SBIA where land uses are regulated to minimize aviation-related hazards to persons on the ground (SBIA, 2010). Project development would not cause airport-related hazards, or excessive noise, to persons at the project site. No impacts would occur, and no mitigation is required. The City finds that the will not expose people residing or working in the project area to excessive noise levels and would have no significant impacts. *(see Appendix A — §4.13).*

4.11 Population and Housing

Threshold 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)?

The project would generate employment associated with hospital and medical office operations; however, staffing needs are consistent with regional growth forecasts and are not expected to directly result in substantial unplanned residential development. The project is located within a planned urban area with infrastructure to support anticipated growth. The City finds that the project will not induce substantial unplanned housing growth and that the project would have no significant impacts. *(see Appendix A — §4.14).*

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

The City finds that the project site does not contain residential units or housing-supportive uses, that no off-site displacement would occur as a result of construction or operation, and the project would have no significant impacts. *(see Appendix A — §4.14).*

4.12 Public Services

Threshold 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:

- Schools? The project involves medical, and hospital uses that do not generate student enrollment. Therefore, the City finds that there would be no demand for new school facilities or expansion of existing facilities and that the project would have no significant impacts. *(see Appendix A — §4.15).*

- Parks? Hospitals and medical offices do not induce recreational use in the same manner as residential development. The City finds that the project would not increase demand for parks or require development or expansion of recreational facilities and that the project would have no significant impacts. *(see Appendix A — §4.15).*

- Other public facilities? The City finds that the project would not generate new population that would require construction or expansion of libraries or other governmental service facilities, that existing public facilities adequately serve the site, and the project would have no significant impacts. *(see Appendix A — §4.15).*

4.13 Recreation

Threshold 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?

The City finds that the project would have no significant impacts as it would not increase demand for recreational amenities because it includes no residential uses and does not contribute to population growth that drives park usage. *(see Appendix A — §4.16).*

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

The City finds that the project would have no significant impacts as no recreational facilities are included in the project, none are required to support medical operations, and the project would not necessitate new or expanded park facilities. *(see Appendix A — §4.16).*

4.14 Transportation

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

.The City finds that the project would have no significant impacts as it would not conflict with any relevant transportation plans, ordinances and policies, including California's Statewide Transportation Improvement Program (STIP), San Bernardino County Congestion Management Program (CMP), City of Redlands General Plan – Connected City Chapter, City of Redlands Sustainable Mobility Plan, or the City of Redlands Bicycle Master Plan. *(see Appendix A — §4.17).*

Threshold 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)?

The City finds that the project would have no significant impacts as project driveways and circulation patterns are designed to City standards and adequate sight distance and access controls ensure safe vehicle, pedestrian, and emergency circulation. *(see Appendix A — §4.17).*

Threshold d): Would the project result in inadequate emergency access?

Emergency vehicle access would be maintained during both construction and operation. Coordination with fire and medical response agencies would ensure compliance with emergency access requirements. The City finds that the project would not result in inadequate emergency access and would have no significant impacts. *(see Appendix A — §4.17).*

4.15 Tribal Cultural Resources

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

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

The project site is highly disturbed, and no tribal cultural resources were identified during consultation and record review. Therefore, City finds that no impact to recognized tribal resources would occur. *(see Appendix A — §4.18).*

4.16 Utilities and Services Systems

Would the project:

Threshold 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?

The City finds that the project would be served by the City's existing wastewater treatment plant which has adequate wastewater treatment capacity. and ensures impacts would remain less than significant. *(see Appendix A — §4.19; Draft and Final PEIR §4.14).*

Threshold d): Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The project would be served by existing solid waste providers with adequate permitted landfill capacity. The City finds that compliance with state waste reduction requirements ensures impacts would remain less than significant. *(see Appendix A — §4.19; Draft and Final PEIR §4.14).*

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

The project would comply with the applicable local, state, and federal standards for solid waste disposal standards, including the California Integrated Waste Management Act (Assembly Bill (AB) 939 (1989)), AB 341 (2011), AB 1826 (2014), Senate Bill (SB) 1383 (2016), and Section 5.408 (*Construction Waste Reduction, Disposal, and Recycling*) of the 2022 California Green Building Standards Code, and therefore, the City finds that the impacts would be less than significant.. *(see Appendix A — §4.19; Draft and Final PEIR §4.14).*

4.17 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

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

Thresholds 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?

Thresholds 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?

Thresholds 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?

The site is located within an urbanized area and is not within or adjacent to a State-designated Very High Fire Hazard Severity Zone. The City finds that Compliance with the California Fire Code, defensible space requirements, and emergency access standards would ensure fire-related risks remain less than significant. *(see Appendix A — §4.20).*

5.0 EFFECTS FOUND IN THE PEIR TO CREATE NO IMPACT OR A LESS THAN SIGNIFICANT IMPACT WITHOUT MITIGATION

The City of Redlands, as Lead Agency, evaluated the Kaiser Permanente Redlands Medical Center project in the Final PEIR. CEQA Guidelines Section 15128 (*Effects Not Found to be Significant*) requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR.

Based on substantial evidence in the administrative record, including the environmental evaluation presented in the Initial Study, (**Appendix A**) and further analyzed in **Chapter 4.0** of the **Final PEIR**, among others, the PEIR determined and the City now finds the following environmental topics would result in No Impact or a Less Than Significant impact without mitigation. Therefore, no mitigation measures are required for these topics pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a).

5.1 Aesthetics

Except as provided in public resources code Section 21099:

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

The project is in an urbanized area without designated scenic vistas. Although distant mountain views exist, surrounding buildings already partially obstruct those views. Visual simulations confirm and the City finds that the project would not significantly alter scenic vistas or designated scenic corridors.
(see Draft and Final PEIR — §4.1).

Threshold c): Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project is located in an urbanized area and would adhere to and not conflict with applicable zoning and other regulations governing scenic quality, including under the City's General Plan, development and design guidelines of the East Valley Corridor Specific Plan, and Redlands Business Plan Concept Plan No. 1. Accordingly, the City finds that the project's impacts would be less than significant as the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings and would not conflict with applicable zoning and other regulations governing scenic quality.*(see Draft and Final PEIR — §4.1).*

5.2 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.

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

The project is consistent with the City's General Plan and with SCAG regional growth assumptions utilized in the South Coast AQMD 2022 Air Quality Management Plan (AQMP). Additionally,

construction- and operational-phase emissions would not exceed SCAQMD regional significance thresholds. Therefore, the City finds that the project would not conflict with or obstruct implementation of the applicable air quality plan and the impact would be less than significant. *(see Draft and Final PEIR — §4.2).*

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

Localized construction emissions would remain below SCAQMD screening thresholds at the nearest sensitive receptors, including onsite medical facilities. Emergency generator screening also shows cancer and non-cancer risks below SCAQMD significance criteria. Therefore, the City finds that the project would not expose sensitive receptors to substantial pollutant concentrations and the impact would be less than significant. *(see Draft and Final PEIR — §4.2).*

5.3 Biological Resources

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

No trees regulated by the City of Redland's Trees and Tree Protection Along Street and Public Places Ordinance (Chapter 12.52) were documented onsite during the biological surveys. Therefore, no impact on trees regulated by the City of Redlands would occur (Cadre Environmental, 2025, p. 48).

The City finds that the project would not conflict with any local policies or ordinances protecting biological resources, such as the City's General Plan and City Tree Ordinance, thus no impacts would occur. *(see Appendix A — §4.4; Draft and Final PEIR — §4.3).*

5.4 Energy

Threshold 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?

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

Construction and operation of the project would result in the use of electricity, transportation fuel, and minimal diesel; however, all activities would comply with applicable state efficiency regulations, including California Energy Code (Title 24) and CARB fuel-use requirements. The project includes a fuel cell micro-grid and on-site solar generation, which substantially reduces long-term reliance on the electrical grid and avoids inefficient energy consumption. The City finds that project would not require new off-site energy infrastructure nor interfere with adopted state or local renewable energy and energy-efficiency plans, including SB 100 and the City of Redlands Climate Action Plan and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.5).*

5.5 Geology and Soils

Thresholds a) Would the project 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?

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and the likelihood of surface fault rupture onsite is considered remote. Although the region is subject to seismic ground shaking, all proposed structures would be designed and constructed in compliance with the California Building Code seismic safety standards, which ensures appropriate structural protection. Site-specific geotechnical investigations confirm that groundwater is located at depths greater than 50 feet and the site is not mapped within a liquefaction hazard area, resulting in negligible liquefaction risk. The site is also situated on generally level terrain outside mapped landslide hazard areas. Therefore, the City finds that the project would have a less than significant impact regarding the rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, or landslides, and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.6).*

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

Construction activities would temporarily expose soils and create potential for erosion; however, the project must comply with the State Water Resources Control Board's General Construction Permit, including preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and use of required BMPs to control runoff and stabilize disturbed soils. Upon completion, the development would include permanent paving, structures, and landscaping that would minimize ongoing erosion potential. Therefore, the City finds that the project would not result in substantial soil erosion or loss of topsoil and therefore, impacts would be less than significant. *(see Draft and Final PEIR — §4.6).*

Threshold 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?

Site-specific geotechnical investigations confirm the project site is not located within an area of known geologic instability, nor is it susceptible to landslides, liquefaction, lateral spreading, or collapse. Groundwater depth is greater than 50 feet, further reducing liquefaction potential. Compliance with the California Building Code and implementation of the geotechnical recommendations provided for project design and construction ensure soil stability. The City finds that the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and that impacts would be less than significant. *(see Draft and Final PEIR — §4.6).*

Threshold 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?

Geotechnical laboratory testing indicates that on-site soils exhibit a very low expansion potential. Standard engineering design and construction practices required by the California Building Code will be implemented to ensure foundation stability. Based on the results of these potential expansion

index tests, the City finds that surficial soils have a very low expansion potential and the project would have a less than significant impact. *(see Draft and Final PEIR — §4.6).*

5.6 Hazards and Hazardous Materials

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

Routine transport, handling, and disposal of hazardous materials during construction and hospital operations would comply with applicable federal, state, and local requirements, including those governing medical waste. As a result, the City finds that the project would not create a significant hazard to the public or the environment and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.8).*

Threshold 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?

The project will comply with applicable hazardous materials regulations during construction and operation, including requirements for containment, spill response, and medical waste management. The City finds that these regulatory controls will ensure that reasonably foreseeable upset or accidental release of hazardous materials does not pose a significant hazard to the public or environment.
and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.8).*

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

The project site is not identified on the Cortese List of hazardous materials sites under Government Code §65962.5. Nearby listed facilities are closed cases or otherwise managed under regulatory oversight and do not present a significant risk to future occupants or the environment. Therefore, the City finds that the project would not create a significant hazard due to its location and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.8).*

5.7 Hydrology and Water Quality

Threshold 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?

Water use by project operation would not substantially decrease groundwater supplies. The proposed project would use approximately 107,594 gallons of water per day (0.33 af) or annual water demand of 120.5 af which is accounted for in the City of Redlands Municipal Utilities & Engineering Department (MUED) water demand forecasts. Further, low impact development (LID) BMPs (e.g., infiltration basin and bioretention basins) would retain most stormwater generated on the project site, remove trash and other contaminants specified in the project-specific Water Quality Management Plan, and allow stormwater to infiltrate the soil and contribute to, and not interfere with groundwater recharge. The City finds that the project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge such that the project

impedes sustainable groundwater management and that the project's impacts would be less than significant. *(see Draft and Final PEIR — §4.9).*

5.8 Noise

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

Unless an exception permit is granted, construction would be confined to City-allowed hours, and equipment would meet manufacturer muffler standards. Modeled maximum construction exposure at the nearest sensitive receiver is 80 dBA Leq (Phase 3 fine grading), which meets the FTA construction threshold. To ensure that the threshold is not exceeded, **BMP NOISE-1** shall be implemented with the review and approval of Phase 3. The City finds that the project would not cause a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of applicable noise standards and that impacts would be less than significant. *(see Draft and Final PEIR — §4.10).*

Threshold b): Would the project cause the generation of excessive groundborne vibration or groundborne noise levels?

Construction-related groundborne vibration would result from intermittent use of heavy equipment, jackhammers, and haul trucks. Vibration levels were modeled at distances to the nearest sensitive receptor (existing or newly built medical buildings). The highest predicted vibration, from large bulldozers at 342 feet, is 0.005 in/sec PPV and 53 VdB—well below the FTA thresholds of 0.12 in/sec PPV for potential structural damage and 80 VdB for human annoyance. Haul truck vibration on California Street is also below impact thresholds. No pile driving or other high-vibration methods are proposed. Thus, the City finds that construction activities would not generate excessive groundborne vibration, and impacts would be less than significant. Best Management Practice BMP NOISE-1 will ensure noise levels during Phase 3 are verified and do not result in new or greater impacts. (*see Draft and Final PEIR — §4.10*).

5.9 Public Services

Threshold a): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, 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: a) and b) Fire Protection, and Police Protection.

The project would be served by existing City of Redlands fire and police facilities. Development would comply with the California Building Code, California Fire Code, and City access and emergency response requirements, ensuring adequate fire and life safety protection. The project will also pay required Fire Protection Facilities Fees and Police Facilities Fees pursuant to Municipal Ordinance No. 2968, which fund capital improvements necessary to maintain acceptable service ratios and response performance. As such, the City finds that the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities and impacts would be less than significant. *(see Draft and Final PEIR — §4.11).*

5.10 Utilities and Service Systems

Threshold a): Would the project 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?

Project buildout will occur over four distinct phases, each generating incremental increases in water demand. Infrastructure upgrades and coordination with the City of Redlands Municipal Utilities & Engineering Department (MUED) will ensure service reliability, compliance with water quality standards, system adequacy, pressure zone performance, and consistency with the City's 2020 Urban Water Management Plan (UWMP). The City of Redlands Water Reclamation Plant (WRP) has a permitted capacity of 9.5 mgd and treats about 5.9 mgd on average, leaving substantial reserve capacity. Project wastewater generation is estimated at ~86,075 gpd (0.086 mgd), which can be accommodated within existing treatment and collection system capacities via standard on-site laterals to the Lugonia/Almond sewer mains. No off-site expansion of treatment facilities is required, and service will continue under existing Santa Ana Regional Water Quality Control Board (RWQCB) waste discharge requirements (WDRs). Compliance with National Pollutant Discharge Elimination System (NPDES) and municipal separate storm water system (MS4s, or storm drains) permit requirements would prevent exceedance of drainage system capacity and minimize pollutant discharges. The project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency. The project would not interfere with the operation of telecommunication facilities. Thus, the City finds project would have less than significant impacts as it would not 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. *(see Appendix A §4.19; Appendix D11 (Water Supply Assessment); Draft and Final PEIR — §§4.5, 4.9, 4.14).*

Threshold 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?

The City of Redlands Municipal Utilities & Engineering Department (MUED) projects water supply ranging from 31,039 AFY in 2025 to 35,544 AFY in 2045 under normal conditions, with comparable reliability during single-dry and multiple-dry years. The project demand of approximately 185 AFY (114.7 gpm average) represents less than 0.6 percent of total available supply and is already included in the City's 2020 Urban Water Management Plan. Water will be delivered through existing infrastructure in the Primary Pressure Zone, with phased connections to 16-inch and 12-inch mains in California Street and Lugonia Avenue, respectively. No new or expanded water supply facilities are required, and service will remain consistent with SB 610 WSA findings and City planning documents. Thus, the City finds project would have a less than significant impact on water supplies available to serve the project. *(see Appendix D11 (Water Supply Assessment); Draft and Final PEIR — §§ 4.9, 4.14)*.

Threshold 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?

As examined and explained with respect to thresholds a) and b), the WRP has substantial reserve capacity and the existing treatment and collection system capacities can accommodate the Project. The City finds that it has adequate wastewater treatment capacity to meet project wastewater generation and impacts would be less than significant. (*see Draft and Final PEIR — §4.14*).

6.0 POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS DETERMINED TO BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The City of Redlands, as Lead Agency, evaluated the Kaiser Permanente Redlands Medical Center project in the Final PEIR. The PEIR identified the potential for the project to cause significant environmental impacts in the areas of Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, and Tribal Cultural Resources.

With the exception of those unmitigable impacts discussed in **Section 7.0**, pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the CEQA Guidelines, the City finds that for each of these significant effects identified in the Final PEIR, changes or alterations have been required in, or incorporated into, the proposed project which mitigate or avoid the identified significant effects on the environment to less than significant levels. Specifically, measures have been identified that would mitigate the specific impacts in each area to a less than significant level. The City adopts all of the feasible mitigation measures for the project described in the Final PEIR and as set forth in the Mitigation Monitoring and Reporting Program (MMRP) as conditions of approval of the project and incorporates those into the project.

These findings are explained below and are supported by substantial evidence in the administrative record, including but not limited to the environmental evaluation presented in the Initial Study (**Appendix A**) and further analyzed in **Chapter 4.0** of the Final PEIR, among others.

6.1 Air Quality

The proposed Project would have a potentially significant impact related to air quality as follows:

- Air Quality Threshold B (net increase of any criteria pollutant)

6.1.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to air quality emissions to less than significant levels. These measures as provided include any revisions incorporated in the Final PEIR.

Mitigation Measure AQ-1:

Include in a Plan or Policy that Gas Powered Landscape Equipment must be replaced with Zero-Emission Landscape Equipment (listed at A-1 in the aforementioned CAPCOA Handbook, and LL-1 in CalEEMod). If feasible, landscape and maintenance contracts shall require only Zero-Emission Landscape Equipment be used.

Mitigation Measure AQ-2: Provide Electric Vehicle Charging Infrastructure (listed as T-14 in CalEEMod).

Mitigation Measure TRANS-1: Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a commute trip reduction program consisting of information sharing and marketing to promote and educate employees about their travel choices to the project site beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

Mitigation Measure TRANS-2: Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a ridesharing program for employees with similar commutes with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions. Existing programs including IE Commuter can be leveraged for this measure.

Mitigation Measure TRANS-3: Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.

Mitigation Measure TRANS-4: Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions. It was assumed that up to 2% of employees would participate in the vanpool program.

(*see Draft and Final PEIR — §§4.2, 4.12, 11*).

6.1.2 Air Quality Threshold B (net increase of any criteria pollutant)

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.

Threshold 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?

As demonstrated by CalEEMod modeling in Draft PEIR Tables 4.2-6 through 4.2-15, project-generated criteria pollutant emissions from both construction and operation would remain below South Coast AQMD regional significance thresholds with implementation of required mitigation measures (MM AQ-1, MM AQ-2, and MM TRANS 1 through 4). Because emissions do not exceed these thresholds and the project is consistent with the regional Air Quality Management Plan, the project's incremental contribution to cumulative air quality conditions in the South Coast Air Basin would not be cumulatively considerable. (*see Draft and Final PEIR — §4.2*).

6.1.2.1 Findings

Based on substantial evidence in the administrative record (including PEIR Section 4.2; Tables 4.2-6 through 4.2-15), the City finds that:

- With implementation of MM AQ-1, MM AQ-2, and MM TRANS-1 through MM TRANS-4, both construction and operational emissions of criteria pollutants and precursors would remain below South Coast AQMD regional significance thresholds.

- The project would not conflict with or obstruct implementation of the applicable Air Quality Management Plan.

- Accordingly, the project's incremental contribution to cumulative regional air quality impacts in the South Coast Air Basin would not be cumulatively considerable.

Therefore, air quality impacts under CEQA Guidelines Appendix G Threshold (b) would be less than significant with mitigation incorporated.

The City finds that MM AQ-1, MM AQ-2, and MM TRANS-1 through MM TRANS-4 are feasible, will reduce the potential air quality-related impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.1.2.2 Facts in Support of Findings

As demonstrated by CalEEMod modeling results in Tables 4.2-6 through 4.2-15 of the Draft PEIR, implementation of mitigation measures MM AQ-1 (enhanced dust control per SCAQMD Rule 403), MM AQ-2 (use of Tier 4 Final diesel construction equipment), and MM TRANS-4 (Transportation Demand Management to reduce vehicle trips) ensures that construction and operational emissions of criteria air pollutants remain below SCAQMD regional significance thresholds. Additional measures that were not incorporated in the emissions calculations but further reduce VMT-related emissions will also be implemented: MM TRANS-1 (Implement Commute Trip Reduction Marketing), MM TRANS-2 (Provide Employee Rideshare Program), and MM TRANS-3 (Provide End-of-Trip Bicycle Facilities).

The project's consistency with the applicable Air Quality Management Plan further supports the conclusion that it would not result in a cumulatively considerable contribution to air quality impacts within the South Coast Air Basin. These facts provide substantial evidence that the project's air quality impacts under CEQA Guidelines Appendix G Threshold (b) would be less than significant with mitigation. (*see Draft and Final PEIR — §§4.2, 4.12*).

6.1.2.3 Cumulative Impacts

As addressed in Section 6.1.1 and substantiated by emissions modeling in Draft PEIR Tables 4.2-6 through 4.2-15, the Kaiser Permanente Redlands Medical Center project would not generate construction or operational emissions that exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds. The South Coast Air Basin (SCAB), where the project is located, is currently designated as non-attainment for ozone (O_3) and particulate matter (PM_{10} and $PM_{2.5}$) under both federal and state standards.

The cumulative impact assessment incorporates both project-level emissions and region-wide sources of criteria pollutants. The project's consistency with the 2016 Air Quality Management Plan (AQMP), as well as its compliance with SCAQMD regulations and implementation of mitigation measures MM AQ-1 (enhanced dust control), MM AQ-2 (Tier 4 Final diesel equipment), MM TRANS-1 (Implement Commute Trip Reduction Marketing), MM TRANS-2 (Provide Employee Rideshare Program), MM TRANS-3 (Provide End-of-Trip Bicycle Facilities), and MM TRANS-4 (trip reduction through Transportation Demand Management), ensures that its incremental emissions do not make a cumulatively considerable contribution to regional non-attainment conditions.

6.2 Biological Resources

The proposed Project would have a potentially significant impact related to biological resources as follows:

- Biological Resource Threshold A (special status species)
- Biological Resource Threshold B (sensitive natural community)
- Biological Resource Threshold C (protected wetlands)
- Biological Resource Threshold D (wildlife corridors)

6.2.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to biological resources to less than significant levels. These measures as provided include any revisions incorporated in the Final PEIR.

Mitigation Measure BIO-1: Crotch's Bumble Bee Surveys. To ensure the proposed project does not result in direct or indirect impacts to the Crotch's bumble bee, focused presence/absence surveys shall be conducted based on the CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species Guidelines (June 6th, 2023), (CDFW, 2023). Focused surveys shall be started during the colony active period and when floral resources are present for the species by a qualified entomologist. Specifically, three surveys shall be conducted with at least two weeks between surveys from April to June. All regions within the project site where suitable floral resources are present shall be surveyed by walking meandering transects at least one hour after sunrise and/or at least two hours before sunset (ideally between 9am and 1pm) on warm sunny days with winds below eight miles per hour.

Focused surveys shall be conducted for a minimum of one person-hour of searching per three acres of suitable habitat. Bumble bees shall be captured with a net from blooms, avoiding destruction of the flower when possible. Each bee shall be carefully transferred into a sterile vial and moved to a cooler with only one bee per vial to avoid disease spread. The bee shall be kept in the vial for no more than 10 minutes in ambient temperature before being placed in a cooler as they have a tendency to over-heat (the amount of time will be decreased on hotter days). The vial shall be placed in a cooler at a temperature above 25 degrees Fahrenheit, as lower temperatures could freeze and kill the bee. The results of the focused surveys shall be summarized in a letter report including graphics and recommendations. At a minimum, the survey letter report shall provide the following:

1. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee.

2. Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.

3. Map(s) showing the location of nests/colonies; and,

4. A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

If the species is detected onsite, the CDFW shall be contacted to determine appropriate conservation measures to prevent direct/indirect impacts to the species, or acquisition of an Incidental Take Permit (ITP). To initiate the ITP process, the applicant or representative shall contact the appropriate CDFW Regional Office and submit a completed ITP application.

Mitigation Measure BIO-2: **Focused and Preconstruction Burrowing Owl Surveys.** To ensure the proposed project does not result in direct or indirect impacts to the burrowing owl, focused surveys shall be conducted in accordance with the March 7, 2012 Staff Report on Burrowing Owl Mitigation (CDFG, 2012) which recommends both a breeding and non-breeding season survey. Specifically, a total of four surveys shall be conducted by a qualified avian biologist during the breeding season: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three surveys, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Non-breeding season surveys shall include four surveys spread out evenly from July 15 to February 15. A report of the findings prepared by a qualified biologist shall be submitted to the City of Redlands prior to any permit or approval for ground disturbing activities.

Regardless of the findings of the focused surveys, a burrowing owl preconstruction survey shall be conducted no less than 14 days prior to the initiation of ground-disturbing activities to ensure protection for this species including a survey conducted with 24 hours of start of work. The preconstruction surveys shall be conducted in compliance with CDFW guidelines (CDFG, 2012). A report of the findings prepared by a qualified biologist shall be submitted to the City of Redlands prior to any permit or approval for ground disturbing activities. If burrowing owls are not detected onsite, the proposed project may proceed. However, if project initiation is delayed more than 14 days, updated preconstruction surveys may be required.

If burrowing owls are detected onsite during the focused or preconstruction surveys, a burrowing owl monitoring and/or relocation plan shall be developed and approved by the City of Redlands, CDFW and USFWS prior to any permit or approval for ground disturbing activities. At a minimum, the plan shall include the following:

1. Burrowing owl status, distribution, and habitat utilization within and adjacent to the project site.

2. Conservation objectives and goals developed in cooperation with CDFW and USFWS.

3. Results of burrowing owl monitoring activities.

    a. 350-foot minimum protective (no work) zone shall be designated around each of the occupied burrow sites and delineated by orange silt fencing. The installation of the fencing shall be monitored by a qualified biologist to ensure owls are not directly or indirectly impacted as a result of fence installation. The monitoring biologist will also be responsible for directing where the fencing shall be installed.

b. A qualified monitoring biologist shall monitor the owls weekly during the non-breeding season to determine if the 350-foot protective zone is adequate for their protection. The weekly monitoring events will also provide critical information regarding the status of the species onsite for purposes of developing a relocation plan.

c. A qualified monitoring biologist shall conduct an initial environmental briefing with any contractors which will be working onsite. The briefing shall include a discussion of burrowing owl natural history, identification of burrowing owl non-breeding season protection zones, and summary of penalties for directly and/or indirectly impacting the species.

d. A qualified monitoring biologist shall be authorized to stop all work activities in the event potential direct and/or indirect impacts to burrowing owl may occur as a result of proposed staging activities.

e. Monthly updates on the monitoring efforts including recommendations, as warranted, shall be submitted to the City of Redlands, CDFW and USFWS.

4. Passive and/or active relocation activities.

5. Burrowing owl management activities for active relocation sites.

Based on the candidacy or listing status of the species at the time of surveys, if detected, acquisition of an Incidental Take Permit may also be required.

Mitigation Measure BIO-3: **Pre-Construction Breeding Bird Survey.** To maintain compliance with the MBTA and California Fish and Game Code §§ 3503, 3503.5, and 3513, and to avoid impacts or take of migratory non-game breeding birds and other native birds, their nests, young, and eggs, the following measures shall be implemented.

Site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (generally September 15 to February 15 for songbirds; September 1 to January 14 for raptors, although the nesting season may be extended due to weather and drought conditions).

If site preparation activities are proposed during the nesting/breeding season, the project proponent shall retain a qualified avian biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the project to determine if active nests of species protected by the MBTA or the California Fish and Game Codes are present in the construction zone. The nest surveys shall include the project site where project activities have the potential to cause nest failure. The survey results shall be provided to the City of Redlands for review and approval. The project applicant shall adhere to the following:

1. The project applicant shall retain a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.

2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the property; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. However, if active nests (including nesting raptors) are located, then avoidance or minimization measures shall be undertaken in consultation with the City of Redlands, CDFW and USFW, as warranted. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The biologist shall monitor the nest at the onset of project activities and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Birds or their active nests will not be disturbed, captured, handled, or moved. Active nests cannot be removed or disturbed; however, nests can be removed or disturbed if determined inactive by a qualified biologist.

If listed bird species are observed within a project site during the preconstruction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and to determine if additional mitigation is necessary. Project activities may begin within the area only when concurrence is received from the appropriate resource agency.

Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City of Redlands for review and approval prior to initiation of construction activities.

Mitigation Measure BIO-4: Preconstruction Bat Survey. Prior to implementation of project activities, a qualified bat biologist shall be retained to determine whether potential roosting sites for yellow bats may be affected. For large ornamental trees and palms suitable for bat roosting/nursery, exit counts and acoustic surveys shall be performed prior to initial ground disturbance, vegetation, or structure removal to determine whether the project site and a 300-foot buffer supports a nursery or roost. This work will occur between late -spring and late summer and/or in the fall (generally mid-March through late October).

If the results of the bat survey find a total of a single roosting individual of a special status bat species or 25 or more individuals of a non-special status bat species with potential to be present in the project site, a Bat Management Plan shall be developed by a qualified bat biologist to ensure mortality to bats

does not occur. For each location confirmed to be occupied by bats, the Bat Management Plan must provide details both in text and graphically where exclusion devices/and or staged tree/palm removal will need to occur, the timing for exclusion work and the timeline and methodology needed to exclude the bats. The plan will need to be reviewed and approved by the City of Redlands and CDFW prior to disturbance of the roosts. The Bat Management Plan shall include:

1. Bat status, distribution, and habitat information within and adjacent to the project site.

2. Results of the bat surveys.

3. Project-specific measures for noise attenuation devices, acoustic and visual monitoring during high-vibration and sound activities (such as saw cutting, jackhammering, and pile driving), visual disturbance buffers, and the installation of bat exclusion devices to safely and humanely evict bats outside of the maternity season, in the event they are needed.

4. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young).

5. If roosts cannot be avoided or it is determined that construction activities may cause roost abandonment, such activities may not commence until permanent, elevated bat houses have been installed outside of, but near the construction area. Placement and height will be determined by a qualified wildlife biologist, but the height of bat house will be at least 15 feet. Bat houses will be multi-chambered and be purchased or constructed in accordance with CDFW standards. The number of bat houses required will be dependent upon the size and number of colonies found, but at least one bat house will be installed for each pair of bats (if occurring individually), or of sufficient number to accommodate each colony of bats to be relocated.

6. Consultation with the California Department of Fish and Wildlife would occur to finalize preparation of the Bat Management Plan for inclusion in other permits that are required from the CDFW, such as a Lake or Streambed Alteration Agreement (LSAA) under Section 1600-1616 of the Fish and Game Code. Each LSAA usually contains a section titled Measures to Protect Fish and Wildlife Resources, for which this plan would be incorporated.

7. A description of incidental monitoring and reporting that will take place during construction.

8. Details for post-construction monitoring.

9. Note that the Bat Management Plan is triggered only if the project requires high-vibration and sound activities causing shaking or vibration, generally resulting from saw cutting, jackhammering, pile driving, or similar activities (within 150 feet of a bat colony).

Mitigation Measure BIO-5: Jurisdictional Delineation and Permitting. Prior to approval of grading permits and initiation of project activities, a qualified biologist shall conduct a formal jurisdictional delineation on the project site to determine the presence/absence of jurisdictional resources, extent of jurisdictional areas, and impacts to resources regulated by the USACE, RWQCB, and CDFW. The delineation shall be conducted using the current USACE methods and definition

of "waters of the U.S." (most current as of this writing is March 2025 notice and data sheets) and the methods and wetland definitions specified in the *California State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (Procedures) (SWRCB, 2019) to delineate waters of the state.

Upon completion of the jurisdictional delineation survey, a jurisdictional delineation report shall be prepared according to the Minimum Standards for Acceptance of Aquatic Resources Delineation Reports for the USACE, Los Angeles Regulatory District (USACE-LA, 2017). This report shall be submitted to City of Redlands for review and approval.

If jurisdictional areas are present on the project site, the project applicant shall obtain a Clean Water Act Section 404 permit, California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement from CDFW and a CWA 401 or WDR permit issued by the RWQCB (Santa Ana RWQCB-Region 8) pursuant to the California Water Code § 13260, as warranted. If required, these permits shall be obtained prior to issuance of a grading permit. Construction activities (including but not limited to fencing, staging, and clearing) will not commence unless all requirements of the USACE, CDFW, RWQCB have been met and the RWQCB has issued a WDR permit, letter of permission, or other project-specific approval. All conditions of these permits shall be adhered to during project development.

(*see Draft and Final PEIR — §§4.3, 11*).

6.2.2 Biological Resource Threshold A (special status species)

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

The site is largely disturbed, with only small areas of marginal habitat that could support certain special-status wildlife species such as burrowing owl, nesting birds/raptors, bats, and Crotch's bumble bee. No federal or state listed species or critical habitat occur onsite. With implementation of required biological pre-construction surveys, avoidance buffers, seasonal timing, and species-specific protection measures (**MM BIO-1 through MM BIO-4**), the project would avoid or minimize potential direct disturbance to special-status species. Therefore, impacts would be less than significant with mitigation. *(see Draft and Final PEIR — §4.3).*

6.2.2.1 Findings

Substantial evidence in the administrative record, including the Draft PEIR (Section 4.3) supports the conclusion that special-status species may occur in limited disturbed habitats; however, implementation of **MM BIO-1** through **MM BIO-4** would ensure avoidance of individuals, active nests, or roosting/breeding sites, such that potential impacts would be reduced to less than significant levels and the project would not result in a substantial adverse effect on special-status species. The City finds that the MM BIO-1 through MM BIO-4 are feasible, will reduce the potential biological resource impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.2.2.2 Facts in Support of Findings

The project site consists primarily of previously developed and disturbed land, with only small patches of marginal habitat that could potentially support special-status species such as burrowing owl, nesting birds and raptors, bats, and Crotch's bumble bee. Biological field surveys conducted for the Draft PEIR did not detect any federally or state-listed species or designated critical habitat on-site. However, to address the potential for presence of other sensitive species, the project includes implementation of MM BIO-1 through MM BIO-4, which require pre-construction biological surveys, establishment of species-appropriate avoidance buffers, restrictions on timing of construction to avoid nesting or breeding seasons, and protective measures if individuals or habitat use is confirmed. These mitigation measures ensure that the project would avoid or substantially reduce the risk of direct or indirect disturbance to any special-status wildlife, resulting in less than significant impacts. (*see Draft and Final PEIR — §4.3*).

6.2.2.3 Cumulative Impacts

The South Coast region has experienced widespread urbanization and habitat fragmentation, contributing cumulatively to the decline of native biological resources. The proposed project is located on a previously disturbed site within an urbanized context and does not contain critical habitat or high-value ecological corridors. As documented in the Draft PEIR (Section 4.3), the project site supports only marginal and patchy habitat for special-status species such as burrowing owl, nesting birds/raptors, bats, and Crotch's bumble bee.

The project would not substantially contribute to regional cumulative biological impacts because:

- No federal- or state-listed species or designated critical habitat would be affected.
- The project's impacts are localized and avoidable with implementation of mitigation measures MM BIO-1 through MM BIO-4, which require pre-construction surveys, avoidance buffers, seasonal timing restrictions, and protection protocols if species are encountered.

Therefore, the project's incremental contribution to cumulative biological resource degradation is not considered cumulatively considerable under CEQA.

6.2.3 Biological Resource Threshold B (sensitive natural community)

Threshold 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, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project would remove disturbed land and a small area of mule fat scrub within an existing detention basin that may qualify as riparian habitat. No other sensitive natural communities are present. To ensure protection and compliance with resource agency requirements, a jurisdictional delineation and permitting will be completed, and avoidance/minimization measures implemented as necessary (**MM BIO-5**). With these measures, potential adverse effects on riparian habitat would be reduced to less than significant. *(see Draft and Final PEIR — §4.3).*

6.2.3.1 Findings

Substantial evidence in the administrative record demonstrates that any riparian vegetation impacts would be minimized, resource compliance requirements would be implemented through MM BIO-5, and impacts to sensitive natural communities would be less than significant with mitigation. The City finds that the MM BIO-5 is feasible, will reduce the potential biological resource impacts of the proposed project to less-than-significant levels, and is adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.2.3.2 Facts in Support of Findings

The project would remove a small area of mule fat scrub located within a disturbed detention basin that may qualify as riparian habitat, although no other sensitive natural communities are present on-site. As required by MM BIO-5, a formal jurisdictional delineation will be conducted to confirm the extent of any riparian features. Based on the results, the project will obtain all applicable regulatory permits and implement avoidance and minimization measures consistent with agency requirements. These actions will ensure compliance with federal and state resource protection laws and avoid or minimize impacts to riparian vegetation. Therefore, potential adverse effects on sensitive natural communities, including riparian habitat, would be reduced to less than significant. *(see Draft and Final PEIR — §4.3).*

6.2.3.3 Cumulative Impacts

Cumulative impacts to riparian habitat and sensitive natural communities in the South Coast region are generally associated with continued land conversion, stream channelization, and loss of hydrologically connected features due to urban development. These effects can degrade watershed function and reduce regional habitat connectivity.

The Kaiser Permanente Redlands Medical Center project would result in removal of a small area of disturbed mule fat scrub within a detention basin that may qualify as riparian habitat. No other sensitive natural communities are present on-site. This localized impact, while minimal, is addressed by MM BIO-5, which requires jurisdictional delineation, regulatory permitting (e.g., Clean Water Act Section 404 or Fish and Game Code §1602), and implementation of avoidance or compensatory mitigation as needed.

6.2.4 Biological Resource Threshold C (protected wetlands)

Threshold 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?

Limited areas on-site may meet federal and/or State jurisdictional definitions. Any disturbance could result in a potentially significant impact absent mitigation. A formal jurisdictional delineation and any necessary regulatory permits (e.g., Clean Water Act §§ 404/401, Fish and Game Code §1602) will be secured prior to grading (**MM BIO-5**). With implementation of required regulatory approvals and compliance measures, impacts to jurisdictional waters would be reduced to less than significant. *(see Draft and Final PEIR — §4.3).*

6.2.4.1 Findings

Substantial evidence in the administrative record, including the Draft PEIR (Section 4.3) confirms that jurisdictional resources may occur within the proposed construction footprint; however, **MM BIO-5** ensures agency coordination, regulatory compliance, and implementation of required best practices. With mitigation, impacts would be less than significant. The City finds that the MM BIO-5 is feasible, will reduce the potential biological resource impacts of the proposed project to less-than-significant levels, and is adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.2.4.2 Facts in Support of Findings

The Draft PEIR identifies that limited portions of the project site may contain features that meet federal or state definitions of jurisdictional waters, such as those regulated under Clean Water Act §§ 404 or 401 or § 1602 of the California Fish and Game Code. To address potential impacts, MM BIO-5 requires the preparation of a formal jurisdictional delineation prior to any ground-disturbing activities. If jurisdictional features are confirmed, the project must obtain applicable permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and/or California Department of Fish and Wildlife. These permits will include conditions for avoidance, minimization, and mitigation of impacts. Compliance with these regulatory requirements ensures that potential effects to jurisdictional waters are reduced to less than significant. *(see Draft and Final PEIR — §4.3).*

6.2.4.3 Cumulative Impacts

At the regional scale, the cumulative loss of wetlands and other jurisdictional waters has significantly reduced hydrologic function, biodiversity, and flood control capacity in Southern California. Urban expansion, infrastructure development, and channel modification continue to fragment or degrade aquatic resources despite existing regulatory frameworks.

The Kaiser Permanente Redlands Medical Center project could potentially affect limited areas that may qualify as federally or state-protected jurisdictional waters. These features, if present, are expected to be small, degraded, and isolated within a detention basin setting. As required by MM BIO-5, the project will complete a formal jurisdictional delineation and obtain all necessary permits under Clean Water Act Sections 404/401 and California Fish and Game Code Section 1602 prior to grading. Any adverse effects will be mitigated in accordance with permit conditions, including avoidance, minimization, or compensatory mitigation measures.

Given the confined scale of potential impacts and the full implementation of regulatory compliance procedures, the project would not contribute meaningfully to cumulative wetland loss or hydrological disruption in the region.

6.2.5 Biological Resource Threshold D (wildlife corridors)

Threshold 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?

The project site is surrounded by existing urban development and does not function as a regional wildlife movement corridor or support wildlife nursery areas. However, vegetation on-site may provide nesting habitat for Migratory Bird Treaty Act (MBTA)- and Fish and Game Code-protected birds. To prevent disturbance of active nests, pre-construction nesting bird surveys and avoidance buffers will be implemented (**MM BIO-3**). With these measures, potential impacts would be reduced to a less-than-significant level.- *(see Draft and Final PEIR — §4.3).*

6.2.5.1 Findings

Substantial evidence in the administrative record, including the Draft PEIR's analyses (Section 4.3), verifies no essential wildlife corridors or wildlife nursery areas would be affected. With **MM BIO-3** ensuring avoidance of take of active nests, impacts to wildlife movement and nursery features would be less than significant with mitigation. The City finds that the MM BIO-3 is feasible, will reduce the potential biological resource impacts of the proposed project to less-than-significant levels, and is adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.2.5.2 Facts in Support of Findings

Although the project site is within a developed urban area and does not function as a regional wildlife corridor or support wildlife nursery areas, the existing vegetation could provide suitable nesting habitat for bird species protected under the MBTA and California Fish and Game Code. To avoid potential disturbance to active nests, MM BIO-3 requires that a qualified biologist conduct nesting bird surveys within the appropriate seasonal window prior to any construction activities. If active nests are found, species-specific no-disturbance buffers will be established and maintained until the young have fledged. These measures ensure compliance with state and federal protections for nesting birds and reduce potential impacts to less than significant. *(see Draft and Final PEIR — §4.3).*

6.2.5.3 Cumulative Impacts

Across the South Coast region, cumulative impacts to wildlife movement corridors and nursery sites result from progressive habitat fragmentation, roadway expansion, and intensifying urban development. These pressures limit habitat connectivity and can disrupt critical life-stage behaviors, particularly for wide-ranging mammals and nesting bird populations.

The Kaiser Permanente Redlands Medical Center site does not contribute to regional wildlife connectivity due to its urban setting and isolation from natural open space. No designated corridors or essential linkages traverse or adjoin the site. While some existing vegetation could provide nesting habitat for birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, this potential is localized and common in the urban landscape.

With implementation of MM BIO-3—which requires pre-construction nesting bird surveys and protective no-disturbance buffers—any potential nesting disturbance will be avoided. Given the site's developed context and the application of best practices, the project's contribution to cumulative disruption of wildlife movement or nursery habitat would be less than cumulatively considerable.

6.3 Cultural Resources

The proposed Project would have a potentially significant impact related to cultural resources as follows:

- Cultural Resources Threshold A (historical resources)
- Cultural Resources Threshold B (archeological resources)
- Cultural Resources Threshold C (human remains)

6.3.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to cultural resources to less than significant levels. These measures as provided include any revisions incorporated in the Final PEIR.

Mitigation Measure CUL-1. The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology to conduct monitoring of subsurface ground disturbance during construction activities. The archaeologist shall also take the opportunity to re-survey the parcel's ground surface as the vegetation is cleared for construction work. If unanticipated cultural resource discoveries are made the archaeologist will be afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist will recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-L) form and filed with the Eastern Information Center.

Mitigation Measure CUL-2. If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in a 50-foot radius and notify the project proponent and the City of Redlands. A Secretary of the Interior qualified archaeologist (Principal Archaeologist) shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The Principal Archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.

The Principal Archaeologist, depending on the type and extent of the finds, may prepare an Archaeological Resources Treatment Plan (ARTP) to guide future monitoring, the recovery of cultural resources, analysis and reporting of the finds, and curation of the finds. The ARTP shall be submitted to the City and the project proponent for approval. The ARTP shall include the following:

1. Results of the Cultural Resources Inventory: archaeological resources and their condition and threats on the project site.
2. Impact assessment.
3. Mitigation strategies, which may include:
    a. Potential avoidance measures.

b. Data recovery steps such as excavation and analysis of an archaeological site to collect information before it is destroyed.

c. Conservation measures such as cleaning, conserving, studying, cataloging, and storing recovered archaeological materials and associated records.

4. Procedures for archaeological monitoring during construction to record exposed resources.

5. Protocols for unanticipated discoveries: what construction workers should do if they find cultural resources unexpectedly, including ceasing work and contacting a qualified archaeologist.

6. Consultation with relevant groups, such as Native American tribes, historians, and regulatory agencies, to determine the value of resources and appropriate treatment measures.

7. Documenting and reporting format and procedures.

Mitigation Measure CUL-3. If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery, and the San Bernardino County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLDS (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

(*see Draft and Final PEIR — §§4.4, 11*).

6.3.2 Cultural Resources Threshold A (historical resources)

Would the project:

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

Buildings or features onsite qualify as historical resources under CEQA. Although the potential for previously unknown subsurface materials is low, ground disturbance could encounter buried resources. **MM CUL-1** and **MM CUL-2** require qualified monitoring and treatment of unanticipated discoveries consistent with CEQA and professional preservation standards. *(see Draft and Final PEIR — §4.4).*

6.3.2.1 Findings

Substantial evidence in the administrative record demonstrates that although no historical resources are present on the site, inadvertent discovery of buried resources remains possible. Implementation of **MM CUL-1** and **MM CUL-2** would ensure qualified oversight and compliance with established

discovery and treatment procedures, reducing impacts to less than significant with mitigation incorporated. The City finds that the MM CUL-1 and MM CUL-2 are feasible, will reduce the potential cultural resource impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.3.2.2 Facts in Support of Findings

The Draft PEIR confirms that no buildings or surface features on the project site qualify as historical resources under CEQA. However, due to the possibility of encountering previously unknown buried cultural materials during ground disturbance, the project includes MM CUL-1, requiring archaeological monitoring by a qualified professional during initial grading, and MM CUL-2, which outlines procedures for the evaluation and treatment of any inadvertent discoveries. These measures are consistent with CEQA Guidelines and Secretary of the Interior's Standards for Archaeological Documentation and ensure that any potential impacts to cultural resources are properly managed and mitigated to a less-than-significant level. (*see Draft and Final PEIR — §4.4*).

6.3.2.3 Cumulative Impacts

Cumulative impacts to historical resources may occur when multiple projects in a region result in the collective loss of built environment features or buried cultural deposits that contribute to local or regional heritage. In older urbanizing areas such as Redlands, cumulative degradation is of concern where historic structures or archaeological contexts are not adequately identified, preserved, or documented.

The Kaiser Permanente Redlands Medical Center project site contains no identified historical resources as defined under CEQA Guidelines §15064.5. However, due to the potential for undiscovered subsurface cultural materials, mitigation measures MM CUL-1 and MM CUL-2 require archaeological monitoring and establish procedures for treatment of inadvertent finds.

Because the project does not remove or alter any documented historical resources and includes measures to ensure proper handling of any buried materials that may be revealed during ground disturbance, it would not contribute to a cumulatively considerable loss of historical resources in the region.

6.3.3 Cultural Resources Threshold B (archeological resources)

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

Background research indicates a low likelihood of encountering archaeological resources due to prior disturbance on the site. However, unknown subsurface archaeological materials could be uncovered during excavation. The project includes **MM CUL-1** and **MM CUL-2**, which require archaeological monitoring where warranted, work stoppage procedures, and appropriate treatment if resources are discovered. *(see Draft and Final PEIR — §4.4).*

6.3.3.1 Findings

Substantial evidence in the administrative record demonstrates that while the probability of archaeological finds is low, inadvertent discovery remains possible during excavation. **MM CUL-1** and **MM CUL-2** ensure proper evaluation and preservation measures consistent with CEQA Guidelines §15064.5, reducing potential impacts to less than significant with mitigation incorporated. The City finds that the MM CUL-1 and MM CUL-2 are feasible, will reduce the potential cultural resource impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.3.3.2 Facts in Support of Findings

Although previous disturbance reduces the likelihood of encountering archaeological resources on the project site, the Draft PEIR acknowledges the potential for inadvertent discovery of buried materials during excavation and grading activities. MM CUL-1 requires archaeological monitoring by a qualified professional in areas where excavation could encounter native soils, while MM CUL-2 mandates immediate work stoppage, evaluation by a qualified archaeologist, and implementation of appropriate treatment measures if cultural resources are found. These protocols align with CEQA Guidelines §15064.5 and ensure any discovered archaeological materials are handled in a manner that avoids or substantially lessens impacts, resulting in a less-than-significant impact with mitigation incorporated. *(see Draft and Final PEIR — §4.4).*

6.3.3.3 Cumulative Impacts

Cumulative impacts to archaeological resources may result when successive development across a region disturbs or destroys subsurface cultural materials without adequate identification or treatment. This is particularly critical in areas where archaeological sensitivity is not fully mapped or where project-specific assessments fail to include appropriate discovery protocols.

For the Kaiser Permanente Redlands Medical Center project, although prior disturbance reduces the likelihood of encountering intact archaeological resources, there remains potential for inadvertent discovery during excavation. Mitigation Measures MM CUL-1 and MM CUL-2 require archaeological monitoring and treatment protocols in accordance with CEQA Guidelines §15064.5.

Because the project incorporates industry-standard discovery procedures and professional oversight, it ensures that any inadvertent finds will be managed in a way that avoids substantial loss of archaeological context. Therefore, the project would not make a cumulatively considerable contribution to regional archaeological resource degradation.

6.3.4 Cultural Resources Threshold C (human remains)

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

There are no known burial sites or cemeteries within the project boundaries, and the site has been previously disturbed. However, the possibility of encountering unknown human remains during ground-disturbing activities cannot be fully dismissed. **MM CUL-3** requires that if human remains

are discovered, work shall immediately cease, a qualified archaeologist shall evaluate the find, and the County Coroner and Native American Heritage Commission shall be notified and procedures under state law followed. *(see Draft and Final PEIR — §4.4).*

6.3.4.1 Findings

Based on substantial evidence in the administrative record, implementation of MM CUL-3 ensures that, if any human remains are encountered, proper respectful handling and statutory requirements are followed. Therefore, impacts related to disturbance of human remains would be less than significant with mitigation incorporated. The City finds that the MM CUL-3 is feasible, will reduce the potential cultural resource impacts of the proposed project to less-than-significant levels, and is adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.3.4.2 Facts in Support of Findings

The Draft PEIR confirms that there are no known cemeteries or documented burial sites within the project area and that the site has been subject to prior disturbance, reducing the likelihood of encountering human remains. However, given the inherent uncertainty in subsurface conditions, MM CUL-3 has been included to address the potential discovery of human remains during ground-disturbing activities. This measure requires that all work stop immediately if remains are found, a qualified archaeologist evaluate the discovery, and that the San Bernardino County Coroner and, if necessary, the Native American Heritage Commission (NAHC) be notified. Procedures outlined in California Health and Safety Code §7050.5 and Public Resources Code §5097.98 will be followed to ensure respectful and lawful treatment of any human remains. These actions reduce the potential for significant impacts to less than significant with mitigation incorporated. *(see Draft and Final PEIR — §4.4).*

6.3.4.3 Cumulative Impacts

Cumulative impacts related to the disturbance of human remains can occur when development activities across a region increase the risk of unintentional discoveries, particularly in areas with undocumented or ancestral burial sites. Without adequate protocols, such discoveries can result in the irreversible loss of cultural knowledge and violate statutory and cultural obligations.

The Kaiser Permanente Redlands Medical Center project site contains no known cemeteries or mapped burial locations and has undergone previous ground disturbance. However, because the potential for encountering unknown human remains cannot be entirely ruled out, the project includes MM CUL-3, which requires compliance with California Health and Safety Code §7050.5 and Public Resources Code §5097.98 in the event of a discovery.

With these safeguards in place including immediate work stoppage, evaluation by a qualified archaeologist, and coordination with the County Coroner and the Native American Heritage Commission as appropriate the project would not contribute to a cumulatively considerable impact on cultural resources involving human remains.

6.4 Geology and Soils

The proposed Project would have a potentially significant impact related to geology and soils as follows:

- Geology and Soils Threshold F (paleontological resources)

6.4.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to geology and soils to less than significant levels. The measures as provided include any revisions incorporated in the Final PEIR.

Mitigation Measure GEO-1. A qualified paleontologist, approved by the City of Redlands and the Western Science Center, must be retained prior to excavation and grading activities at the project site.

Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and include monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final paleontological survey report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project Paleontologist and requirements of the PRIMP. At a minimum, the PRIMP shall include the following:

1. Project and location
2. Regulatory setting
3. Geology of the site
4. Paleontological resources and survey results
5. Paleontological sensitivity of the site
6. Paleontological resources mitigation and monitoring measures such as:
    a. Coordination with construction personnel and training
    b. Details of training and materials
    c. Frequency and location of inspections
    d. When and how grading/excavation activities will be diverted

e. Procedures of fossil recovery, removal, treatment, transport, and deposition facility

f. Recording, documentation, and reporting procedures

Before the mitigation program begins, the paleontologist or monitor must coordinate with the appropriate construction contractor personnel to provide information regarding the requirements of the City or Redlands, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on the procedures to follow in the event that fossil remains, and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site.

The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the project site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and will depend on the depth of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist must temporarily divert or redirect the grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The authority of the paleontologist to temporarily halt construction in part of the project site must be included in the project grading and construction plans. A copy of the report of the paleontological survey is submitted to the Western Science Center. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

(*see Draft and Final PEIR — §§4.6, 11*).

6.4.2 Geology and Soils Threshold F (paleontological resources)

Would the Project:

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

The project site is underlain primarily by Holocene alluvial deposits with low potential for paleontological resources; however, deeper ground disturbance could encounter older, scientifically significant materials. The project incorporates project design feature (PDF) PDF-GEO-1, requiring adherence to all recommendations in the Geotechnical Investigation Report, and MM-GEO-1, which mandates professional paleontological monitoring, fossil recovery, and curation if resources are uncovered. Implementation of these measures will ensure that any unanticipated discoveries are properly managed and preserved, reducing potential impacts to less than significant. *(see Draft and Final PEIR — §4.6).*

6.4.2.1 Findings

Substantial evidence in the administrative record supports that although the potential for encountering paleontological resources is low at shallow depths, deeper excavation could encounter older, potentially significant fossil-bearing strata. Implementation of **PDF-GEO-1** and **MM GEO-1** requires professional monitoring, discovery protocols, and curation of fossil material consistent with CEQA Guidelines Appendix G, ensuring that any unanticipated discoveries are properly protected and managed. Therefore, impacts to paleontological resources under CEQA Geology and Soils Threshold (f) would be less than significant with mitigation incorporated. The City finds that MM GEO-1 is feasible, will reduce the potential geology and soils-related impacts of the proposed project to less-

than-significant levels, and is adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.4.2.2 Facts in Support of Findings

The Draft PEIR identifies that while the project site is primarily underlain by recent Holocene alluvial deposits with low potential for paleontological sensitivity, deeper excavations may reach older geologic units that could contain scientifically significant fossil resources. To address this, **PDF-GEO-1** ensures appropriate excavation and safety practices. by requiring the following:

PDF-GEO-1: The project would implement all geotechnical recommendations for the development of the site, including earthwork, seismic design, retaining walls, shoring, and foundation design as specified in the Geotechnical Investigation Report prepared for the Medical Office Building 2 (MOB 2) project at the Kaiser Redlands site located at 1301 California Street in Redlands. Prepared by Twining, dated March 31, 2023; provided in Appendix D7 of the PEIR.

Additionally, **MM GEO-1** requires monitoring by a qualified paleontologist during ground-disturbing activities below the upper disturbed layers, with provisions for the recovery, documentation, and curation of any fossil materials encountered. These measures align with CEQA Guidelines Appendix G and professional standards, ensuring that any unanticipated paleontological discoveries are adequately managed and protected, thereby reducing potential impacts to less than significant. (*see Draft and Final PEIR — §§ 1, 4.6*).

6.4.2.3 Cumulative Impacts

Cumulative impacts to paleontological resources can arise when multiple development projects across a region involve deep excavation in fossil-bearing geologic formations without proper monitoring or recovery protocols. Over time, such activities can lead to the incremental loss of scientifically important paleontological data and specimens, particularly in areas with known or potential fossil sensitivity.

The Kaiser Permanente Redlands Medical Center project site has low paleontological sensitivity at shallow depths due to Holocene alluvium but may encounter deeper fossil-bearing strata during grading or trenching. Mitigation Measure MM GEO-1 requires paleontological monitoring, fossil salvage, documentation, and curation if significant resources are discovered. Project Design Feature PDF-GEO-1 also ensures adherence to geotechnical recommendations that guide excavation procedures.

Because the project includes proactive and professionally guided measures to avoid, minimize, and manage any paleontological discoveries, it would not contribute to a cumulatively considerable loss of paleontological resources in the region.

6.5 Greenhouse Gas Emissions

The proposed Project would have a potentially significant impact related to greenhouse gas emissions as follows:

- Greenhouse Gas Emissions Threshold B (reducing emissions)

6.5.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to greenhouse gas emissions to less than significant levels. These GHG mitigation measures are taken from the California Air Pollution Control Officer's Association's (CAPCOA)'s Handbook For Analyzing Greenhouse Gas Emissions. These measures quantify GHG reductions that may be applied in potentially significant projects and include the range of potential GHG reductions in parentheses. The measures as provided include any revisions incorporated in the Final PEIR.

Mitigation Measure GHG-1. Using alternative fuels for construction equipment (0 to 22 percent).

Mitigation Measure GHG-2. Using electric or hybrid construction equipment (2.5 to 80 percent of GHG emissions from equipment that is electric or hybrid if used 100 percent of the time).

Mitigation Measure GHG-3. Limiting construction equipment idling beyond regulation requirements, which is typically 5 minutes as regulated by the ARB's Heavy-Duty Vehicle Idling Emission Reduction Program (percent reduced is equal to $(1 - tm/tb)100$, where tm is the mitigated idling period and tb is the baseline idling period) (CAPCOA, 2010, p. 429).

Mitigation Measure GHG-4. Instituting a heavy-duty offroad vehicle plan (range of effectiveness is not applicable because it only ensures compliances with other mitigation measures). At a minimum, the heavy-duty offroad vehicle plan shall include the following:

1. Fleet reporting and labeling: diesel-fueled vehicles operating in California, with engines 25 horsepower or greater, must be reported to CARB through the online DOORS system and labeled appropriately.

2. Emission reduction strategies: how you will meet emission reduction requirements by:

    a. Retiring/Replacing Vehicles: Phase out older, dirtier engines by replacing them with new, cleaner ones or equipment that meets the latest emission standards.

    b. Engine repowering: plan/schedule to replace older off-road diesel engines with newer, cleaner ones.

    c. Verified Diesel Emission Control Strategies (VDECS): Install verified diesel emission control strategies (e.g., exhaust retrofits) on existing engines.

3. Fuel acquisition: fleets must begin (2024) using renewable diesel (R99 or R100).

4. Idling restrictions: limit idling to five minutes and apply a written idling policy.

5. Fleet average goals: fleet average emission level standards/balancing emissions from vehicles.

Mitigation Measure GHG-5. Implementing a construction vehicle inventory tracking system (range of effectiveness does not reduce GHG emissions in and of itself; it only ensures compliance with other mitigation measures).

(*see Draft and Final PEIR — §§4.7, 11*).

6.5.2 Greenhouse Gas Emissions Threshold B (reducing emissions)

Would the project:

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

The project is designed to comply with statewide and local Greenhouse Gas (GHG)-reduction policies, including Title 24, CALGreen, and the City of Redlands Climate Action Plan. The all-electric building design, clean on-site energy systems, and transportation demand strategies support continued consistency with adopted GHG-reduction goals. The project incorporates numerous project design features (PDF) **GHG-PDF-1** through **GHG-PDF-9**, which reduce GHG emissions through the promotion of conservation and efficiency, as well as greenhouse gas emission mitigation measures for construction, **MM-GHG-1 through MM-GHG-5**, derived from CAPCOA's Handbook For Analyzing Greenhouse Gas Emissions. Implementation of **MM TRANS-1** through **MM TRANS-4** and **MM AQ-1** and **MM AQ-2** will further reduce operational emissions. With these measures, the project would not conflict with applicable GHG-reduction plans. and the impacts would be less than significant.

(see Draft and Final PEIR — §§ 1, 4.7).

6.5.2.1 Findings

Based on substantial evidence in the administrative record, the project would comply with applicable State and City GHG-reduction plans and building energy requirements, as well as incorporate GHG project design features beyond the minimum requirements of CalGreen (**GHG-PDF-1** through **GHG-PDF-9**). The project would further incorporate greenhouse gas emission mitigation measures **MM-GHG-1** through **MM-GHG-5** which will reduce construction emissions, and operational GHG emissions would be reduced through implementation of **MM TRANS-1** through **MM TRANS-4** and **MM AQ-1** and **MM AQ-2.** As such, the project would not generate GHG emissions that would conflict with adopted GHG-reduction strategies or result in a cumulatively considerable contribution to climate change. Impacts would be less than significant with mitigation incorporated.

The City finds that MM GHG-1 through MM GHG-5 are feasible, will reduce the potential greenhouse gas emission-related impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.5.2.2 Facts in Support of Findings

The Draft PEIR confirms that the project incorporates numerous design and operational features aligned with State and local GHG reduction goals, including compliance with Title 24 building energy efficiency standards, the CALGreen Code, and the City of Redlands Climate Action Plan. The project's all-electric building design, on-site renewable energy generation, and sustainable transportation measures contribute to minimizing GHG emissions. Additional conservation and efficiency GHG project design features are proposed beyond the minimum requirements of CalGreen:

Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent, based on the 2022 Building Energy Efficiency Standards requirements

GHG-PDF-2: Use of natural heating and cooling features.

GHG-PDF-3: Use of improved insulation.

GHG-PDF-4: Installation of PV panels.

GHG-PDF-5: Use of efficient and durable roofing materials and exterior finishes.

GHG-PDF-6: Use of efficient interior finishes.

Water Conservation

GHG-PDF-7: Water-efficient plumbing fixtures (17 to 31 percent of GHG emissions associated with non-residential indoor water use).

Solid Waste Conservation

GHG-PDF-8: Use of recycled foundation materials.

Other

GHG-PDF-9: No combustion of natural gas (100 percent reduction in emissions from natural gas use).

With respect to construction emissions, CAPCOA has developed a method of quantifying GHG reducing measures that may be incorporated into potentially significant projects. These quantifiable construction mitigation measures (MM GHG-1 through MM GHG-5) and range of potential GHG reductions in parentheses will be incorporated into this project. These measures reduce GHG emissions during construction through the use of alternative fuels and electrified or hybrid construction equipment, limiting idling times, institution of a heavy-duty offroad vehicle plan, and construction vehicle inventory tracking system.

To further reduce operational GHG emissions, MM TRANS-1 through MM TRANS-4 implement transportation demand management strategies to lower vehicle miles traveled, while MM AQ-1 and MM AQ-2 require the use of low-emission landscaping equipment and the provision of electric vehicle charging infrastructure.

These combined design features and mitigation measures ensure that the project does not conflict with any applicable GHG-reduction plans and that its contribution to cumulative GHG emissions and climate change would be less than significant with mitigation incorporated.

(see Draft and Final PEIR — §§ 1, 4.7).

6.5.2.3 Cumulative Impacts

Cumulative impacts related to greenhouse gas (GHG) emissions are inherently global in scope. Projects that fail to align with applicable climate action plans or exceed emission reduction targets may incrementally contribute to the broader impacts of climate change, including sea level rise, increased wildfire risk, and extreme weather events. CEQA requires that a project's GHG emissions be evaluated for consistency with adopted plans and policies aimed at reducing such emissions statewide and locally.

The Kaiser Permanente Redlands Medical Center project incorporates building electrification, on-site renewable energy, and energy-efficient design consistent with Title 24, CALGreen, and the City of Redlands Climate Action Plan. The project would also incorporate conservation and efficiency GHG project design features beyond the minimum requirements of CalGreen (GHG-PDF-1 through GHG-PDF-9). The project would incorporate greenhouse gas emission mitigation measures MM-GHG-1 through MM-GHG-5 which will reduce construction emissions. Operational GHG emissions are further reduced through transportation demand management (MM TRANS-1 through MM TRANS-4) and low-emission landscaping equipment and electric vehicle charging requirements (MM AQ-1 and MM AQ-2).

Because the project is consistent with applicable GHG-reduction policies and does not exceed relevant efficiency-based thresholds, it would not contribute to a cumulatively considerable GHG impact or conflict with the regional and statewide framework to combat climate change.

6.6 Tribal Cultural Resources

The proposed Project would have a potentially significant impact related to tribal cultural resources as follows:

- Tribal Cultural Resource Threshold A(i) and A(ii) (CA. Pub. Res Code §§ 5020.1(k), 5024.1(c))

6.6.1 Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to tribal cultural resources to less than significant levels. The measures as provided include any revisions incorporated in the Final PEIR.

MM-TCR-1: **Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities**

1. The project applicant shall retain a Native American Monitor(s) from one or more Consulting Tribe(s), including Gabrieleño Band of Mission Indians – Kizh Nation. Monitors from more than one tribe may coordinate and utilize a rotating schedule at their discretion.~~.~~ The monitor(s) shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

2. A copy of the executed monitoring agreement with each monitoring Consulting Tribe(s), including Gabrieleño Band of Mission Indians – Kizh Nation, shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
3. The monitor(s), including Gabrieleño Band of Mission Indians – Kizh Nation, will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe, including Gabrieleño Band of Mission Indians – Kizh Nation.
4. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Consulting Tribe(s) , including Gabrieleño Band of Mission Indians – Kizh Nation, from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Consulting Tribe(s) , including Gabrieleño Band of Mission Indians – Kizh Nation, to the project applicant and lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.

MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e. not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Consulting Tribe(s) , including Gabrieleño Band of Mission Indians – Kizh Nation, monitor(s) and/or archaeologist(s).

MM-TCR-3: Unanticipated Discovery of Human Remains and Less than Native American Monitor/Project Associated Funerary or Ceremonial Objects.

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

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

(*see Draft and Final PEIR — §§4.13, 11*).

6.6.2 Tribal Cultural Resource Threshold A(i) and A(ii) (CA. Pub. Res Code §§ 5020.1(k), 5024.1(c))

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

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

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

Although no tribal cultural resources were identified during the pedestrian survey, a NAHC Sacred Lands File search returned positive results and tribal outreach indicated cultural sensitivity in proximity to traditional use areas. Given limited ground visibility and potential for previously unknown resources, **MM TCR-1, MM TCR-2**, and **MM TCR-3** shall be implemented to ensure appropriate tribal monitoring, discovery procedures, and avoidance/treatment protocols during ground disturbance. (*see Draft and Final PEIR — §4.13*).

6.6.2.1 Findings

Substantial evidence in the administrative record demonstrates that while no known TCRs occur within the project boundaries, tribal input and Sacred Lands File records confirm that the broader area is culturally sensitive. **MM TCR-1** through **MM TCR-3** ensure compliance with AB 52 requirements, timely tribal notification, work stoppage procedures, and preservation/treatment consistent with tribal preferences. Therefore, potential impacts to tribal cultural resources would be less than significant with mitigation incorporated. The City finds that the MM TCR-1 through MM TCR-3 are feasible, will reduce the potential tribal cultural resource impacts of the proposed project to less-than-significant levels, and are adopted by the City. Accordingly, the City finds, that pursuant to PRC Section 21081(a)(1), and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project, which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR.

6.6.2.2 Facts in Support of Findings

Although the pedestrian survey of the project site did not identify any specific tribal cultural resources (TCRs), the Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) returned positive results, and consultation with tribes under AB 52 indicated cultural sensitivity in the surrounding area. Due to limited ground surface visibility and the potential for previously unrecorded subsurface TCRs, the project includes MM TCR-1, requiring a tribal

monitor be present during initial ground-disturbing activities; MM TCR-2, which establishes work stoppage and evaluation protocols if potential TCRs are discovered; and MM TCR-3, ensuring treatment measures are developed in consultation with affiliated tribes. These mitigation measures ensure compliance with CEQA and AB 52 requirements and provide a culturally appropriate framework for the protection and management of any tribal resources that may be encountered, reducing potential impacts to less than significant with mitigation incorporated. (*see Draft and Final PEIR — §4.13*).

6.6.2.3 Cumulative Impacts

Cumulative impacts to tribal cultural resources may result when multiple development projects in culturally sensitive areas incrementally disturb or destroy landscapes, objects, or places of significance to California Native American tribes—particularly when appropriate tribal consultation, monitoring, and treatment protocols are not implemented. Such cumulative degradation can lead to irreversible loss of cultural heritage and spiritual value.

While no known tribal cultural resources (TCRs) were identified on the Kaiser Permanente Redlands Medical Center project site, the positive Sacred Lands File result and input received through AB 52 consultation confirm that the surrounding area holds cultural sensitivity. Due to the potential for unanticipated discoveries during excavation, the project includes MM TCR-1 (tribal monitoring), MM TCR-2 (work stoppage and evaluation protocols), and MM TCR-3 (treatment in coordination with consulting tribes).

These mitigation measures ensure tribal involvement in ground-disturbing activities and provide a culturally respectful framework for discovery and management of any TCRs. As a result, the project would not result in a cumulatively considerable contribution to the loss or degradation of tribal cultural resources.

7.0 ENVIRONMENTAL EFFECTS THAT REMAIN SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION

Pursuant to CEQA Guidelines §15126.2 and §15092, this section identifies environmental effects that would remain significant and unavoidable despite implementation of all feasible mitigation measures.

Pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the CEQA Guidelines, the City finds that for each of these significant and unavoidable effects identified in the Final PEIR, changes or alterations have been required in, or incorporated into, the proposed project which avoid or substantially lessen the significant environmental effect as identified in the final PEIR. The City adopts all of the feasible mitigation measures for the project described in the Final PEIR and as set forth in the Mitigation Monitoring and Reporting Program (MMRP) as conditions of approval of the project and incorporates those into the project.

However, there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant. Therefore, the following impacts would remain significant and unavoidable after mitigation.

Pursuant to CA. Pub. Res. Code § 21081 and CEQA Guidelines §§ 15093 and 15043, for those significant impacts that cannot be mitigated to a less than significant level, a public agency may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits render its unavoidable adverse environmental effects "acceptable." In accordance with Section 15093 of the State CEQA Guidelines, a Statement of Overriding Considerations is set forth below in **Section 10** to substantiate the City's decision to accept these unavoidable substantial, adverse environmental effects because of the benefits afforded by the Project.

These findings are explained below and are supported by substantial evidence in the administrative record, including but not limited to the environmental evaluation presented in the Initial Study (Appendix A) and further analyzed in Chapter 4.0 of the Final PEIR, among others.

7.1 Greenhouse Gas (GHG) Emissions

7.1.1 Significant and Unavoidable Impact – GHG Threshold A (GHG emissions)

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

Even with project design features and feasible measures (including for example, fleet electrification/renewable diesel during construction (e.g., **MMs GHG-1**, **MM GHG-2,** and **MM GHG-4**); on-site energy efficiency exceeding Title 24 (e.g., **GHG-PDF-1**); no natural-gas combustion (e.g., **GHG-PDF-9**); EV charging (e.g., **MM AQ-2**); commute/VMT reduction strategies such as vanpools and rideshare (e.g., **MM TRANS-1** through **MM TRANS-4** and **MM AQ-2**)), amortized construction plus operational emissions are expected to exceed the commonly used SCAQMD screening value of 3,000 $MTCO_2e$/yr for land use projects (draft, not formally adopted). Therefore, project GHG emissions remain significant and unavoidable. *(see Draft and Final PEIR — §§1, 4.7, 11).*

7.1.2 Mitigation Measures

Greenhouse gas emission mitigation measures **MM GHG-1** through **MM GHG-5** (as described in Section 6.5.1 above) were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to greenhouse gas emissions. These GHG mitigation measures are taken from the CAPCOA's Handbook For Analyzing Greenhouse Gas Emissions. The measures as provided include any revisions incorporated in the Final PEIR.

(*see Draft and Final PEIR — §§4.7, 11*).

7.1.3 Findings

Based on substantial evidence in the administrative record, the project would comply with applicable State and City GHG-reduction plans and building energy requirements, as well as incorporate GHG project design features beyond the minimum requirements of CalGreen (**GHG-PDF-1** through **GHG-PDF-9**). The project would further incorporate greenhouse gas emission mitigation measures **MM-GHG-1** through **MM-GHG-5** which will reduce construction emissions, and operational GHG emissions would be reduced through implementation of **MM TRANS-1** through **MM TRANS-4** and **MM AQ-1** and **MM AQ-2.** Despite the adoption of these measures however, there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant and this impact would remain significant and unavoidable after mitigation.

The City finds that implementation of the identified mitigation measures is feasible and will reduce impacts on GHG emissions attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will mitigate, in part, this significant impact to GHG emissions attributable to the project, as identified in the Final PEIR.

However, the City finds that there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific overriding economic, legal, social, technological, and other benefits of the proposed project outweigh this significant and unavoidable impact.

7.1.4 Facts in Support of Findings

The Draft PEIR confirms that the project incorporates numerous design and operational features aligned with State and local GHG reduction goals, including compliance with Title 24 building energy efficiency standards, the CaLGreen Code, and the City of Redlands Climate Action Plan. The project's all-electric building design, on-site renewable energy generation, and sustainable transportation measures contribute to minimizing GHG emissions. Additional conservation and efficiency GHG project design features are proposed beyond the minimum requirements of CalGreen, including GHG-PDF-1 through GHG-PDF-9 (as described in Section 6.5.2 above).

With respect to construction emissions, CAPCOA has developed a method of quantifying GHG reducing measures that may be incorporated into potentially significant projects. These quantifiable construction mitigation measures (MM GHG-1 through MM GHG-5) will reduce potential GHG reductions and will be incorporated into this project. These GHG mitigation measures reduce GHG emissions during construction through the use of alternative fuels and electrified or hybrid

construction equipment, limiting idling times, institution of a heavy-duty offroad vehicle plan, and construction vehicle inventory tracking system.

To further reduce operational GHG emissions, MM TRANS-1 through MM TRANS-4 implement transportation demand management strategies to lower vehicle miles traveled, while MM AQ-1 and MM AQ-2 require the use of low-emission landscaping equipment and the provision of electric vehicle charging infrastructure.

Mitigated GHG emissions from the project are estimated to be 14,306 metric tons per year. This will exceed the SCAQMD significance threshold of 3,000 MTCO2e per year. Since most of these emissions will come from mobile sources, the traffic study provides mitigation measures (MM TRANS-1 through MM TRANS-4) targeted at project employees and commuter vehicle miles travelled (VMT) which can be implemented to reduce GHG emissions in addition to the measures already considered.

Therefore, for GHG Emissions Threshold A, the project's impacts would be significant and unavoidable even with mitigation measures.

(see Draft and Final PEIR — §§ 1, 4.2, 4.7).

7.1.5 Cumulative Impacts

Cumulative impacts related to greenhouse gas (GHG) emissions are inherently global in scope. It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, project specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change.

The project must incorporate GHG reduction measures to be consistent with state and local plans and programs that aim to reduce state and regional GHG emissions, including the City of Redland's Climate Action Plan and 2035 General Plan. The project would also incorporate conservation and efficiency GHG project design features beyond the minimum requirements of CalGreen (GHG-PDF-1 through GHG-PDF-9). The project would incorporate greenhouse gas emission mitigation measures MM-GHG-1 through MM-GHG-5 which will reduce construction emissions. Operational GHG emissions are further reduced through transportation demand management (MM TRANS-1 through MM TRANS-4) and low-emission construction landscaping equipment and electric vehicle charging requirements (MM AQ-1 and MM AQ-2).

Despite these measures, the project's incremental contribution to GHG emissions and their effects on climate change is estimated to be cumulatively considerable. For these reasons, the project's cumulative contribution to global climate change would be significant and unavoidable.

The City finds that implementation of the identified mitigation measures are feasible and will reduce impacts on GHG emissions attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will mitigate, in part, this significant impact to GHG emissions attributable to the project, as identified in the Final PEIR.

However, the City finds that there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant. Therefore, this impact would remain significant and

unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific overriding economic, legal, social, technological, and other benefits of the proposed project outweigh this significant and unavoidable impact.

7.2 Transportation – Vehicle Miles Traveled (VMT)

7.2.1 Significant and Unavoidable Impact – VMT Threshold B (CEQA Guidelines § 15064.3(b))

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

Substantial evidence in the record demonstrates that the project would generate Home-Based-Work VMT per employee that exceeds the City of Redlands VMT significance threshold under CEQA Guidelines §15064.3(b). Although feasible VMT-reduction measures would be implemented (including **MM TRANS-1** through **MM TRANS-4**), these measures would not achieve sufficient VMT reduction to fall below the threshold. Therefore, the impact remains significant and unavoidable. *(see Draft and Final PEIR — §4.12).*

7.2.2 Mitigation Measures

Transportation mitigation measures **MM TRANS-1** through **MM TRANS-4** (as described in Sections 6.1.1 and 6.5.2 above) were included in the Draft PEIR and the Final PEIR, are applicable to the proposed project and would reduce potential project impacts related to transportation. The measures as provided include any revisions incorporated in the Final PEIR.

(*see Draft and Final PEIR — §§4.12, 11*).

7.2.3 Findings

Based on substantial evidence in the administrative record, the project incorporates transportation mitigation measures MM-TRANS-1 through MM-TRANS-4 which will reduce operational VMT impacts. Despite the adoption of these measures, however, there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant, and this impact would remain significant and unavoidable after mitigation.

The City finds that implementation of the identified mitigation measures is feasible and will reduce VMT transportation impacts attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will mitigate, in part, this significant impact to GHG emissions attributable to the project, as identified in the Final PEIR.

However, the City finds that there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific overriding economic, legal, social, technological, and other benefits of the proposed project outweigh this significant and unavoidable impact.

7.2.4 Facts in Support of Findings

The Draft PEIR confirms that the project will incorporate transportation mitigation measures MM-TRANS-1 through MM-TRANS-4 which will reduce operational VMT impacts.

Project operation is estimated to generate 16,093 trips per day. VMT was estimated using the home-based work method that focuses on commute trips. This is the travel between a person's home and workplace. This method is used because it is consistent with the City's guidelines. Project employment at Master Plan buildout is estimated to be 1,900 employees (Fehr & Peers, 2025, p. 29). The City's threshold for project VMT impacts is per capita VMT greater than 15 percent below the San Bernardino County Baseline VMT. As shown below in Table 4.12-2 of the PEIR, estimated project VMT per employee in 2050 is 22.7, that is, 12 percent higher than the City's threshold.

Therefore, for Transportation Threshold B, the project's impacts would be significant and unavoidable even with mitigation measures.

(see Draft and Final PEIR — §4.12).

7.2.5 Cumulative Impacts

Pursuant to CEQA Guidelines § 15355 defines "cumulative impacts" in part, as

> two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (a) The individual effects may be changes resulting from a single project or a number of separate projects. (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

The key is whether the project significantly adds to an existing or developing significant cumulative problem, often determined by comparing project effects against established thresholds of significance for a given region.

Per Section 4.12.5 of the PEIR, the VMT impact analysis summarized in Section 7.2 above applies to cumulative as well as direct impacts. Thus, despite the application of the transportation mitigation measures (MM TRANS-1 through MM TRANS-4), the project's incremental contribution to VMT is estimated to be cumulatively considerable. For these reasons, the project's cumulative contribution to VMT would be significant and unavoidable.

The City finds that implementation of the identified transportation mitigation measures are feasible and will reduce VMT impacts attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will mitigate, in part, this significant VMT impact attributable to the project, as identified in the Final PEIR.

However, the City finds that there are no feasible mitigation measures that will reduce the impact of the proposed project to less than significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific overriding economic, legal, social, technological, and other benefits of the proposed project outweigh this significant and unavoidable impact.

8.0 FINDINGS REGARDING PROJECT ALTERNATIVES

Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The PEIR considered and analyzed the following four alternatives to the proposed project which would be capable, to varying degrees, of reducing identified impacts:

- Alternative 1 — No Project Alternative
- Alternative 2 — No Project/General Plan Buildout Alternative;
- Alternative 3 — Reduced Intensity Alternative; and
- Alternative 4 — Dispersed Facilities Alternative.

These alternatives-are discussed below and evaluated for their ability to avoid or substantially lessen the impacts of the proposed project identified in the Final PEIR, as well as consideration of their ability to meet the basic objectives of the proposed project as described in the Final PEIR as follows:

1. Provide health care capacity for Kaiser Permanente members in the San Bernardino-Redlands region.

2. Incorporate numerous sustainability features such as vegetated swales, tree-based infiltration, and inert bioswales; high-performance building enclosure systems, external shading, energy efficient and carbon neutral building systems and equipment selections, and solar panels. The buildings will meet or exceed Leadership in Energy and Environmental Design (LEED) Gold certification.

3. Develop the project site in accordance with the Medical Facilities designation in Redlands Business Center Concept Plan No. 1.

4. Phase development over 25 years to keep pace with projected increase in Kaiser Permanente membership in the facility's service area over that period.

The City finds that a good faith effort was made to evaluate all reasonable alternatives to the project that could feasibly obtain the basic objectives of the project, even when the alternatives might impede the attainment of the project objectives or might be more costly. The City also finds that all reasonable alternatives were reviewed, analyzed, and discussed in the review process of the Final PEIR and the ultimate decision on the project.

8.1 Alternative 1: No Project Alternative

8.1.1 Summary of Alternative

Under the No Project Alternative, the project would not be constructed. The existing medical office building would continue operating, and the remainder of the site would remain vacant. No demolition, grading, or construction would occur. Regional patients and staff would continue traveling to other Kaiser Permanente facilities (e.g., Fontana and Ontario).

8.1.2 Reasons for Rejecting Alternative

This alternative would avoid all project impacts, including significant and unavoidable GHG and VMT impacts. However, it would not achieve any of the project objectives. It would not expand regional care capacity, would not develop the project site in accordance with Redlands Business Center Concept No. 1, and would not support long-term development of medical facilities to keep pace with Kaiser Permanente's anticipated membership increase or support long-term regional medical service needs. Additionally, no new employment, public-service benefits, or consistency with planned medical land uses would be provided. Therefore, despite environmental advantages, this alternative would not meet the needs for the project and is inconsistent with core health-care service and policy goals. *(see Draft and Final PEIR — §§5.5, 6.4.2).*

8.1.3 Findings

Under Alternative 1, the No Project alternative, the project would not be approved, and no development would occur. The No Project Alternative would eliminate the project's significant and unavoidable construction transportation impact. The No Project Alternative would have similar impacts as the project for wildfire hazards. Impacts associated with the remaining environmental issues would be less than those of the proposed project. None of the impacts of this alternative would be considerably greater than those of the proposed project.

Accordingly, per CEQA Guidelines § 15126.6, Alternative 1, the No Project alternative, is the environmentally superior alternative (*see Draft and Final PEIR - §§ 1.11.5, 5.1, 5.9*). CEQA Guidelines Section 15126.6(e)(2) states that if the environmentally superior alternative is the "No Project" alternative, the PEIR must also identify an environmentally superior alternative among the other alternatives. Here, that would be Alternative 3, the Reduced Density Alternative, which is addressed below.

However, Alternative 1 would not meet any of the project objectives including the development of a medical center serving Kaiser Permanente members in the San Bernardino-Redlands region. Rather, the site would remain undeveloped land. Pursuant to Public Resources Code Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), the City rejects the Alternative 1, No Project alternative, finding it undesirable due to the following: it fails the proposed project's underlying purpose; and does not meet any of the project objectives..

8.2 Alternative 2: No Project/General Plan Buildout Alternative

8.2.1 Summary of Alternative

Under this alternative, the existing medical office building would remain present and in operation, and the remainder of the site (28.15 acres) would be developed with other uses, that are not necessarily related to the existing development, but are consistent with the current General Plan land use designation for the site, "Commercial Industrial." Uses consistent with this designation include commercial, light industrial, flex commercial space, business parks, auto services, retail, services, manufacturing, and other institutional uses. Under this scenario, development may proceed incrementally under different proponents, potentially resulting in fragmented developmentand reduced functional and environmental performance.

8.2.2 Reasons for Rejecting Alternative

Although this alternative may reduce or change the magnitude of some potential impacts (e.g., air quality, energy use), it would still result in significant and unavoidable Greenhouse Gas Emission and VMT (transportation) impacts and it would not fulfill the project's purpose or core objectives. Alternative 2 would not meet objective 1 because it would not improve regional access to comprehensive health care for Kaiser Permanente members. Alternative 2 would not meet objective 3 because it would not develop the project site in accordance with Redlands Business Center Concept No. 1 land use regulations. Compared with the proposed project, this Alternative would not as effectively support the phased, long-term development of medical facilities to keep pace with Kaiser Permanente's anticipated increase in membership, and would reduce support for long-term regional medical office needs. Additionally, new employment, public-service benefits, or consistency with planned medical land uses are less likely to be provided than under the proposed project. Moreover, this scenario could result in less sustainable development patterns and increased VMT, as well as directly conflict with the existing zoning regulations applicable to the project location. For these reasons, this alternative is considered infeasible and inferior to the proposed project. *(see Draft and Final PEIR — §5.6, 6.4.2).*

8.2.3 Findings

Under Alternative 2, the No Project/General Plan Buildout alternative, the project would not be approved. The existing medical office building remains present and in operation but the balance of the project site (28.15 acres) would be built out in accordance with the existing General Plan land use designation for the site, which is Commercial Industrial.

While Alternative 2 is anticipated to reduce certain environmental impacts, it would not avoid any of the proposed project's significant and unavoidable impacts. The remaining environmental effects would be generally similar to or greater than those of the proposed project.

Alternative 2 would not satisfy Project Objectives 1 and 3 and only partially meet Project Objectives 2 and 4. Overall, the No Project/General Plan Buildout Alternative would not meet the project's objectives of providing health care capacity for Kaiser Permanente members in the San Bernardino-Redlands region.

Pursuant to Public Resources Code Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), the City rejects the Alternative 2, the No Project/General Plan Buildout alternative, finding it undesirable due to the following: it fails the proposed project's underlying purpose; only partially meets two of the four project objectives; would not avoid the project's significant and unavoidable impacts; and, because specific economic, legal, social, technological, or other considerations make the alternative infeasible.

8.3 Alternative 3: Reduced Intensity Alternative

8.3.1 Summary of Alternative

This alternative would reduce the intensity of the proposed project by omitting phases 3 and 4 from the project, constructing a smaller medical center, including a reduced-bed hospital and fewer outpatient services, along with a downsized parking structure. Trip generation, energy consumption, grading, and operational emissions would be lower than those associated with the proposed project.

Some regional health-care benefits would still occur; however, the reduced scale would limit care accessibility and long-term service delivery capacity.

8.3.2 Reasons for Rejecting Alternative

The Reduced Intensity Alternative would lessen several impacts (including air quality, energy use, and operational emissions) and would reduce, but not avoid, the significant and unavoidable GHG and VMT (transportation) impacts. However, it would only partially achieve the project objectives. Compared with the proposed project, the Reduced Intensity Alternative would limit the project's ability to meet Kaiser Permanente's projected regional health-care demand; reduce operational efficiencies gained through the co-location of health-care services; reduce support for the long-term development of medical facilities to keep pace with Kaiser Permanente's anticipated membership increase; and reduce support for long-term regional medical service needs. Additionally, new employment and public-service benefits would be decreased in comparison to the proposed project.

For these reasons, although environmentally advantageous in some areas, the Reduced Intensity Alternative is not preferred because it would not adequately fulfill critical health-care service needs for the region. *(see Draft and Final PEIR — §§5.7, 6.4.2).*

8.3.3 Findings

Under Alternative 3, the Reduced Intensity alternative, phases 3 and 4 of the project would not be implemented.

While Alternative 3 is anticipated to reduce some environmental impacts, it would not avoid any of the proposed project's significant and unavoidable impacts. The remaining environmental effects would be generally similar to or greater than those of the proposed project.

Alternative 3 would only partially meet Project Objectives 1, 3 and 4. Overall, the Reduced Intensity Alternative would only partially meet project's objectives of providing health care capacity for Kaiser Permanente members in the San Bernardino-Redlands region.

Per CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "No Project" alternative (Alternative 1 above), the PEIR must also identify an environmentally superior alternative among the other alternatives. Here, that would be Alternative 3 (*see Draft and Final PEIR - §§ 1.11.5, 5.1, 5.9*).

Nevertheless, pursuant to Public Resources Code Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), the City rejects the Alternative 3, the Reduced Intensity alternative, finding it undesirable due to the following: it only partially meets three of the four project objectives and only partially satisfies the proposed project's underlying purpose; would not avoid the project's significant and unavoidable impacts; and, because specific economic, legal, social, technological, or other considerations make the alternative infeasible.

8.4 Alternative 4: Dispersed Facilities Alternative

8.4.1 Summary of Alternative

Under this alternative, medical services would be distributed across multiple smaller facilities located throughout the region, rather than co-located on a single, integrated campus. While each

facility would serve specific functions (e.g., outpatient care, diagnostics, or urgent care), no centralized, consolidated medical center would be built under this Alternative.

8.4.2 Reasons for Rejecting Alternative

This alternative would avoid site-specific impacts at the Redlands location, but would still result in significant and unavoidable Greenhouse Gas Emission and VMT (transportation) impacts. The decentralized approach would not develop the project site in accordance with Redlands Business Center Concept No. 1. Compared with the proposed project, this Alternative would limit the project's ability to develop adequatemedical facilities to serve Kaiser Permanente's anticipated membership increase. Further, this Alternative would compromise staff coordination, reduce operational efficiency and service integration, and likely impede the timely implementation of modern healthcare facilities to address regional needs. This alternative would also be less consistent with the City's General Plan land use and medical zoning designations.

Therefore, in addition to failing to fully satisfy the project objectives, this alternative is not preferred due to logistical, environmental, and policy alignment shortcomings. *(see Draft and Final PEIR — §§5.8, 6.4.2).*

8.4.3 Findings

Under Alternative 4, the Dispersed Facilities alternative, the project would develop approximately six small medical office facilities in the San Bernardino–Redlands region (the general service area for the proposed project).

While Alternative 4 is anticipated to reduce certain environmental impacts, including those relatd to VMT, it would not avoid any of the proposed project's significant and unavoidable impacts. The remaining environmental effects would be generally similar to or greater than those of the proposed project.

Alternative 4 would not satisfy Project Objective 3 and only partially meet Project Objective 4.

Pursuant to Public Resources Code Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), the City rejects the Alternative 4, the Dispersed Facilities alternative, finding it undesirable due to the following: of the four project objectives, it fails to satisfy Project Objective 3 and only partially meets Project Objective 4; would not avoid the project's significant and unavoidable impacts; and, because specific economic, legal, social, technological, or other considerations make the alternative infeasible.

9.0 GENERAL CEQA FINDINGS

As expressed more fully herein, the City certifies that the Final PEIR, dated January 2026, has been completed in compliance with CEQA and the CEQA Guidelines, that the PEIR was presented to the City, and that the City reviewed and considered the information contained therein before approving the proposed project, and that the EIR reflects the independent judgment and analysis of the City agency. (CEQA Guidelines § 15090.)

Any findings made by the City shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes findings by the City, whether or not any particular sentence or clause includes a statement to that effect. The City intends that these findings be considered as an integrated whole and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the City with respect to any particular subject matter of the Final PEIR, shall be deemed to be made if it appears in any portion of these findings.

9.1 Procedural Compliance With California Environmental Quality Act

The City published a Draft PEIR on November 18, 2025. A Final PEIR was completed in January of 2026 in compliance with CEQA requirements. The Final PEIR has been prepared in accordance with CEQA and the CEQA Guidelines. As authorized in State CEQA Guidelines Section 15084(d)(2), the City retained a consultant to assist with the preparation of the environmental documents. City staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The key milestones associated with the preparation of the PEIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the PEIR and to solicit comments on the results of the environmental analysis presented in the Draft PEIR.

9.1.1 Environmental Review Process

In conformance with CEQA, the State CEQA Guidelines, and the County CEQA Guidelines, the City conducted an extensive environmental review of the proposed project.

The environmental review process for the project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft PEIR, through a Notice of Preparation (NOP) process. The NOP was circulated for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, owners, local addresses, and other interested parties from January 22, 2025 through February 21, 2025. A public scoping meeting for the project was held at 4:30 p.m. on February 12, 2025. As part of the public distribution process for the Initial Study for the proposed project, Native American tribal contacts were sent a copy of the NOP and a CD with the Initial Study and Initial Study appendices. The NOP was Appendix A3 in the Draft PEIR and the public comments received on the Initial Study were included as Appendix A1 in the Draft PEIR.

Consistent with the requirements of § 15087 of the CEQA Guidelines, the Draft PEIR was submitted to the State Clearinghouse, Office of Planning and Research for distribution to state agencies and was circulated for a 45-day public review commencing on November 18, 2025, and ending on January 5, 2026. A Notice of Availability of the Draft PEIR was emailed to those interested parties who requested notice. A press release describing the PEIR and public review thereof was published in the Redlands Daily Facts newspaper on November 18, 2025. The Draft PEIR was made available for review on City

of Redlands website (available here: https://www.cityofredlands.org/post/environmental-documents) and at the City's Development Services Department at 35 Cajon Street, Suite 20, Redlands, CA 92373, A.K. Smiley Public Library at 125 W. Vine Street, Redlands, CA 92373, and at the County's Clerk of the Board Office located at 385 N. Arrowhead Avenue, #2, San Bernardino, CA 92415. Following the Draft PEIR public comment period, this Final PEIR has been prepared and includes responses to the comments raised regarding the Draft PEIR.

9.2 Environmental Mitigation Monitoring Program

Based on the entire record before the City and having considered the unavoidable significant impacts of the project, the City hereby determines and finds that all feasible mitigation within the responsibility and jurisdiction of the City has been adopted to reduce or avoid the potentially significant impacts identified in the Final PEIR, and that no additional feasible mitigation is available to further reduce significant impacts. The feasible mitigation measures are discussed in **Sections 6 and 7**, and are set forth in the MMRP attached hereto (**Attachment A**).

Section 21081.6 of the Public Resources Code requires the City to adopt a monitoring or compliance program regarding the changes in the project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP for the proposed project, which is attached hereto (**Attachment A**) and made a part of these Findings, is hereby adopted by the City in satisfaction of Section 21081.6 of the Public Resources Code and in fulfillment of the CEQA mitigation monitoring requirements as:

- The MMRP is designed to ensure compliance with the changes in the project and mitigation measures imposed on the project during project implementation; and

- Measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements, or other measures.

9.3 CEQA Guidelines Section 15091 and 15092 Findings

Based on the findings herein and the information contained in the administrative record, the City has made one or more of the following findings with respect to each of the significant effects of the project:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid significant effects on the environment.

2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make the mitigation measures or alternatives identified in the Final PEIR infeasible.

Based on the findings herein and the information contained in the administrative record, and as conditioned by the foregoing:

1. All significant effects on the environment due to the project have been eliminated or substantially lessened where feasible.

2. Any remaining significant effects that have been found to be unavoidable are acceptable due to the overriding considerations set forth in **Section 10** herein.

9.4 City of Redland's Independent Judgment

The Final PEIR for the proposed project reflects the City's independent analysis and judgment. The City has exercised independent judgment in accordance with Public Resources Code 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the PEIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final PEIR, as well as any and all other information in the record, the City hereby makes these findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

9.5 Reliance on Record

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, contained in the administrative record relating to the project.

9.5.1 Record of Proceedings

In accordance with PRC Section 21167.6(e) and for purposes of CEQA and these Findings, the record of proceedings for the City's decision on the project includes the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the City in conjunction with the proposed project.
- The Final PEIR for the proposed project and all appendices thereto.
- The Draft PEIR and all appendices thereto.
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All written and verbal public testimony presented during a noticed public hearing for the proposed project.
- The Mitigation Monitoring and Reporting Program (MMRP).
- All documents, including but not limited to EIRs, reports, studies, memoranda, maps, staff reports, or other planning documents or materials cited and/or referenced in the Draft PEIR and Final EIR, or otherwise relied upon with respect to the City's action on the project;

- All documents submitted by other public agencies or members of the public in connection with the project, up through the close of the final public hearing;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the project;
- Any documentary or other evidence submitted at such information sessions, public meetings, and public hearings;
- All findings and resolutions adopted by the City in connection with the proposed project, and all documents cited and/or referenced therein, including comments received after the close of the comment period and responses thereto.
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings in addition to those above.
- Any other written materials relevant to the City's compliance with CEQA or its decision on the merits of the project, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the project, or included in the City's non-privileged retained files for the EIR or project;
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).
- The Notice of Determination.

The City intends that only those documents relating to the project and its compliance with CEQA and prepared, owned, used, or retained by the City and listed above shall comprise the administrative record for the project. Only that evidence was presented to, considered by, and ultimately before the City prior to reviewing and reaching its decision on the EIR and project.

9.5.2 Custodian and Location of Records

The documents and other materials that constitute the administrative record for the City's actions related to the project are at the City of Redlands Development Services Department main office at 35 Cajon Street, Suite 20, Redlands, CA. Development Services Department is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Development Services Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

9.6 Recirculation Not Required

CEQA Guidelines Section 15088.5 provides the criteria that a lead agency is to consider when deciding whether it is required to recirculate an EIR. Recirculation is required when "significant new information" is added to the EIR after public notice of the availability of the Draft EIR is given, but before certification. (CEQA Guidelines, §15088.5(a).)

In relevant part, CEQA Guidelines Section 15088.5(a) describes "significant new information," as

> …information added to an EIR … that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.
>
> "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> > (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
> >
> > (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
> >
> > (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
> >
> > (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043).

(CEQA Guidelines, §15088.5(a)(1)-(3).).

Recirculation is not required where "the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." (CEQA Guidelines, §15088.5(b).). Recirculation also is not required simply because new information is added to the EIR. New information is routinely added given CEQA's public/agency comment and response process and CEQA's post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies. In brief, recirculation is "intended to be an exception rather than the general rule" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132.).

Given this context, the City finds that recirculation of the Draft PEIR prior to certification is not required. In addition to providing responses to comments, the Final PEIR includes revisions to expand upon information presented in the Draft PEIR; explains or enhances the evidentiary basis for the Draft PEIR's findings; updates information; and makes clarifications, amplifications, updates, or helpful revisions to the Draft PEIR. The Final PEIR's revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final PEIR demonstrates that the project will not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft PEIR. The changes reflected in the Final PEIR also do not indicate that meaningful public review of the Draft PEIR was precluded in the first instance. Accordingly, recirculation of the PEIR is not required as revisions to the PEIR are not significant as defined in Section 15088.5 of the State CEQA Guidelines.

9.7 Certification Of The Final Program Environmental Impact Report

In accordance with CEQA and the CEQA Guidelines, having received, reviewed, and considered the PEIR for the Kaiser Permanente Redlands Medical Center project (SCH 2025010666), as well as other information in the record of proceedings on this matter, the City of Redlands, as the Lead Agency certifies and adopts the Findings of Fact (Findings) and Statement of Overriding Considerations contained herein as part of its certification of the Final PEIR for the project. The Findings and Statements of Overriding Considerations set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the project.

The City hereby makes findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15043 (*Authority to Approve Projects Despite Significant Effects*), 15090 (*Certification of the Final EIR*) and 15091 (*Findings*) and hereby certifies that:

(1) the final PEIR has been completed in compliance with CEQA;

(2) the final PEIR was presented to the City Council of the City of Redlands as the decision making body of the lead agency and that the City Council reviewed and considered the information contained in the final PEIR prior to approving the project; and

(3) as noted in **Section 9**, the final EIR reflects the lead agency's independent judgment and analysis.

The City further certifies that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the Final PEIR. Specifically, and as further described herein, the Final PEIR for the proposed project identified potentially significant effects that could result from the project's implementation. However, the City finds that the inclusion of certain mitigation measures as part of the project approval will reduce most, but not all, of those effects to less than significant levels. Those impacts that are not reduced to less than significant levels are identified and overridden due to specific project benefits described in the Statement of Overriding Considerations (**Section 10**).

10.0 ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines sections 15126.2, 15093(a) and (b), the City is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable" (CEQA Guidelines, §15093 (a)).

CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final PEIR or elsewhere in the administrative record (CEQA Guidelines, §15093(b)).

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency's economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan, and provision of construction jobs. *See Towards Responsibility in Planning v. City Council* (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; *Markley v. City Council* (1982) 131 Cal App.3d 656.

Pursuant to State CEQA Guidelines § 15093, the City of Redlands, as Lead Agency, has reviewed and considered the information contained in the Draft and Final Program Environmental Impact Reports (collectively, "PEIR") for the Kaiser Permanente Redlands Medical Center project, as well as the entire administrative record. In accordance with the requirements of CEQA and the CEQA Guidelines, the City finds and determines that:

> (1) all significant environmental effects of the proposed Project have been substantially lessened where feasible;
>
> (2) the proposed Project will result in certain significant adverse environmental effects that cannot be avoided or reduced to a less-than-significant level even with incorporation of all feasible mitigation measures; and
>
> (3) there are no other feasible mitigation measures or feasible Project alternatives that will further mitigate, avoid, or reduce the remaining significant environmental effects to a less-than-significant level.

As documented in the PEIR, the City finds that the project would result in the following significant and unavoidable environmental impacts, even after implementation of all feasible mitigation measures:

- Greenhouse Gas (GHG) Emissions (*see PEIR Section 4.7*)
- Transportation — Vehicle Miles Traveled (VMT) (*see PEIR Section 4.12*)

Even with mitigation (**MM TRANS-1** through **MM TRANS-4** and all applicable GHG reduction measures) no additional feasible mitigation or alternatives have been identified that would avoid or further reduce the significant and unavoidable impacts associated with GHG emissions and VMT

while still achieving the project objectives. The Final PEIR provides detailed information regarding these impacts (*see* **Section 7**, *Environmental Effects That Remain Significant And Unavoidable After Mitigation*, of this document).

The City further finds that these remaining significant and unavoidable environmental effects are outweighed and are found to be acceptable due to specific overriding economic, legal, social, technological, or other considerable benefits based upon the facts set forth herein, the PEIR, and the record, including as follows:

1. The project is necessary to provide sufficient health care capacity for Kaiser Permanente members in the San Bernardino-Redlands region.

    a. Specifically, the project will result in improved regional healthcare access and increase regional capacity for advanced inpatient and outpatient services for Kaiser Permanente members within the San Bernardino–Redlands service area. The project reduces travel distances and improves response times for urgent and specialty healthcare services.

    b. The project will also improve patient outcomes and operational efficiency. Co-location of medical services increases coordination of care, reduces delays in treatment, and enhances patient health outcomes over time. The project's phased development approach facilitates healthcare service capacity expansion to keep pace with projected regional increases in Kaiser Permanente membership.

2. The project will incorporate numerous sustainability features such as vegetated swales, tree-based infiltration, and inert bioswales; high-performance building enclosure systems, external shading, energy efficient and carbon neutral building systems and equipment selections, and solar panels. The buildings will meet or exceed Leadership in Energy and Environmental Design (LEED) Gold certification.

    a. The project will promote long-term sustainability and resource efficiency via the incorporation of numerous sustainability features, including conservation and efficiency project design features (GHG-PDF-1 through GHG-PDF-9), high-performance building enclosure systems, external shading, energy efficient and carbon neutral building systems and equipment selections, solar panels, and water-efficient infrastructure, contributing to statewide and local climate and sustainability goals. New buildings will meet or exceed LEED Gold certification.

    b. Further, the project design will enhance seismic safety and code compliance. The new facilities will incorporate a soils and geology project design feature (PDF-GEO-1) and comply with current seismic standards for hospitals and essential medical services, replacing reliance on older facilities.

3. The project will develop the project site in accordance with the Medical Facilities designation in Redlands Business Center Concept Plan No. 1.

    a. Consistent with this plan, development of the project site will have economic and employment benefits. Construction and operation of the medical center would generate substantial local employment, provide long-term skilled medical and support jobs, and stimulate secondary economic growth in the region.

4. The project will phase development over 25 years to keep pace with projected increase in Kaiser Permanente membership in the facility's service area over that period.

    a. The project will provide support for regional planning and smart growth. The project's development consolidates high-quality medical services within an existing urbanized area, consistent with the City of Redlands General Plan, The East Valley Corridor Specific Plan, Redlands Business Center Concept Plan No. 1., and other City land use policies and infrastructure investment strategies designed to reduce sprawl and promote compact regional growth.

In accordance with State CEQA Guidelines §§ 15043 (*Authority to Approve Projects Despite Significant Effects*), 15091 (*Findings*), and 15093, (*Statement of Overriding Considerations*), and balancing the specific economic, legal, social, technological, and other considerable benefits associated with the project, the City finds that the project's remaining significant and unavoidable impacts are acceptable due to the factors described above. Therefore, the City of Redlands hereby adopts this Statement of Overriding Considerations as part of its approval of the Kaiser Permanente Redlands Medical Center project.

ATTACHMENT A

FINAL MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

4.0 FINAL MITIGATION MONITORING AND REPORTING PROGRAM

The Final Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with § 21081.6 of the Public Resources Code and § 15097 of the CEQA Guidelines, which requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a MND or an EIR. The MMRP ensures implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified through the use of monitoring and reporting. Monitoring is generally an ongoing or periodic process of project oversight; reporting generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

It is the intent of the MMRP to: (1) provide a framework for document implementation of the required mitigation; (2) identify monitoring/reporting responsibility; (3) provide a record of the monitoring/reporting; and (4) ensure compliance with those mitigation measures (MMs) that are within the responsibility of the City and/or Applicant to implement.

This MMRP includes specific project design features (PDFs) and best management practices (BMPs) referenced in the PEIR that will be implemented with the project's construction and operation. The specific PDFs and BMPs are presented in **Table 4.0-1** below.

The required MMs are presented in **Table 4.0-2** below. Environmental topics for which mitigation is required are listed in Table 4.0-2 under their corresponding impact category. This table also lists impacts, mitigation measures adopted by the City of Redlands in connection with approval of the proposed project, level of significance after mitigation, responsible and monitoring parties, and the project phase in which the measures are to be implemented.

Table 4.0-1
PROJECT DESIGN FEATURES (PDFs) AND BEST MANAGEMENT PRACTICES (BMPs)

Issue Area	Project Design Features (PDFs) and Best Management Practices (BMPs)
4.5 Geology and Soils	
Threshold F: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**PDF-GEO-1** The project would implement all geotechnical recommendations for the development of the site, including earthwork, seismic design, retaining walls, shoring, and foundation design as specified in the Geotechnical Investigation Report prepared for the Medical Office Building 2 (MOB 2) project at the Kaiser Redlands site located at 1301 California Street in Redlands. Prepared by Twining, dated March 31, 2023; provided in Appendix D7 of this PEIR.
4.7 Greenhouse Gas Emissions	
Energy Conservation and Efficiency	**GHG-PDF-1** Project design will provide energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent, based on the 2022 Building Energy Efficiency Standards requirements
	GHG-PDF-2 Use of natural heating and cooling features.
	GHG-PDF-3 Use of improved insulation.
	GHG-PDF-4 Installation of PV panels.
	GHG-PDF-5 Use of efficient and durable roofing materials and exterior finishes.

Issue Area	Project Design Features (PDFs) and Best Management Practices (BMPs)
	GHG-PDF-6 Use of efficient interior finishes.
Water Conservation	**GHG-PDF-7** Water-efficient plumbing fixtures (17 to 31 percent of GHG emissions associated with non-residential indoor water use).
Solid Waste Conservation	**GHG-PDF-8** Use of recycled foundation materials.
Other	**GHG-PDF-9** No combustion of natural gas (100 percent reduction in emissions from natural gas use).
4.10 Noise	
Threshold 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?	**BMP NOISE-1** Noise Study for Phase 3. A new noise study shall be conducted after completion of Phase 2 construction and prior to the start of Phase 3 construction to determine potential noise impacts of Phase 3 construction activities. The information in this study will be used in support of the Lead Agency's approval of Phase 3 and potential preparation of a Noise Mitigation Plan for Phase 3 construction if necessary.

Table 4.0-2
FINAL MITIGATION MONITORING AND REPORTING PROGRAM

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
4.2 Air Quality				
Threshold A: 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?	**MM AQ-1** Replace Gas Powered Landscape Equipment with Zero-Emission Landscape Equipment (listed at A-1 in the aforementioned CAPCOA Handbook, and LL-1 in CalEEMod).	Less than Significant	Project Applicant/City of Redlands	During Project Operation
	MM AQ-2 Provide Electric Vehicle Charging Infrastructure (listed as T-14 in CalEEMod).	Less than Significant	Project Applicant/City of Redlands	Include in Building Plans; and During Project Construction
	MM TRANS-1 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a commute trip reduction program consisting of information sharing and marketing to promote and educate employees about their travel choices to the project site beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	Less than Significant	Project Applicant/City of Redlands	During Project Operation
	MM TRANS-2 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a ridesharing program for employees with similar commutes with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions. Existing programs including IE	Less than Significant	Project Applicant/City of Redlands	During Project Operation

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	Commuter can be leveraged for this measure.			
	MM TRANS-3 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.	Less than Significant	Project Applicant/City of Redlands	Include in Building Plans; and During Project Construction
	MM TRANS-4 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions. It was assumed that up to 2% of employees would participate in the vanpool program.	Less than Significant	Project Applicant/City of Redlands	During Project Operation
4.3 Biological Resources				
Threshold A: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a	**MM BIO-1: Crotch's Bumble Bee Surveys** To ensure the proposed project does not result in direct or indirect impacts to the Crotch's bumble bee, focused presence/absence surveys shall be conducted based on the CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species Guidelines (June 6th, 2023), (CDFW, 2023). Focused surveys shall be	Less than Significant	Qualified biologist/Applicant/City of Redlands	Before beginning of ground disturbance; three surveys shall be conducted with

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	started during the colony active period and when floral resources are present for the species by a qualified entomologist. Specifically, three surveys shall be conducted with at least two weeks between surveys from April to June. All regions within the project site where suitable floral resources are present shall be surveyed by walking meandering transects at least one hour after sunrise and/or at least two hours before sunset (ideally between 9am and 1pm) on warm sunny days with winds below eight miles per hour. Focused surveys shall be conducted for a minimum of one person-hour of searching per three acres of suitable habitat. Bumble bees shall be captured with a net from blooms, avoiding destruction of the flower when possible. Each bee shall be carefully transferred into a sterile vial and moved to a cooler with only one bee per vial to avoid disease spread. The bee shall be kept in the vial for no more than 10 minutes in ambient temperature before being placed in a cooler as they have a tendency to over-heat (the amount of time will be decreased on hotter days). The vial shall be placed in a cooler at a temperature above 25 degrees Fahrenheit, as lower temperatures could freeze and kill the bee. The results of the focused surveys shall be summarized in a letter report including graphics and recommendations. At a minimum, the survey letter report shall provide the following: 1. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. 2. Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species			at least two weeks between surveys from April to June.

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	searched. 3. Map(s) showing the location of nests/colonies; and, 4. A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). If the species is detected onsite, the CDFW shall be contacted to determine appropriate conservation measures to prevent direct/indirect impacts to the species, or acquisition of an Incidental Take Permit (ITP). To initiate the ITP process, the applicant or representative shall contact the appropriate CDFW Regional Office and submit a completed ITP application.			
	MM BIO-2: Focused and Preconstruction Burrowing Owl Surveys To ensure the proposed project does not result in direct or indirect impacts to the burrowing owl, focused surveys shall be conducted in accordance with the March 7, 2012, Staff Report on Burrowing Owl Mitigation (CDFG, 2012) which recommends both a breeding and non-breeding season survey. Specifically, a total of four surveys shall be conducted by a qualified avian biologist during the breeding season: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three surveys, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Non-breeding season surveys shall include four surveys	Less than Significant	Qualified biologist/Applicant/City of Redlands	A total of four surveys shall be conducted by a qualified avian biologist during the breeding season: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three surveys, at least three weeks apart, between April 15 and July 15, with at least one visit

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	spread out evenly from July 15 to February 15. A report of the findings prepared by a qualified biologist shall be submitted to the City of Redlands prior to any permit or approval for ground disturbing activities. Regardless of the findings of the focused surveys, a burrowing owl preconstruction survey shall be conducted no less than 14 days prior to the initiation of ground-disturbing activities to ensure protection for this species including a survey conducted with 24 hours of start of work. The preconstruction surveys shall be conducted in compliance with CDFW guidelines (CDFG, 2012). A report of the findings prepared by a qualified biologist shall be submitted to the City of Redlands prior to any permit or approval for ground disturbing activities. If burrowing owls are not detected onsite, the proposed project may proceed. However, if project initiation is delayed more than 14 days, updated preconstruction surveys may be required. If burrowing owls are detected onsite during the focused or preconstruction surveys, a burrowing owl monitoring and/or relocation plan shall be developed and approved by the City of Redlands, CDFW and USFWS prior to any permit or approval for ground disturbing activities. At a minimum, the plan shall include the following: 1. Burrowing owl status, distribution and habitat utilization within and adjacent to the project site. 2. Conservation objectives and goals developed in cooperation with CDFW and USFWS. 3. Results of burrowing owl monitoring activities. a. 350-foot minimum protective (no work) zone shall be designated around each of the occupied burrow sites and delineated by orange silt			after June 15. Non-breeding season surveys shall include four surveys spread out evenly from July 15 to February 15. Regardless of the findings of the focused surveys, a burrowing owl preconstruction survey shall be conducted no less than 14 days prior to the initiation of ground-disturbing activities to ensure protection for this species including a survey conducted with 24 hours of start of work.

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	fencing. The installation of the fencing shall be monitored by a qualified biologist to ensure owls are not directly or indirectly impacted as a result of fence installation. The monitoring biologist will also be responsible for directing where the fencing shall be installed. b. A qualified monitoring biologist shall monitor the owls weekly during the non-breeding season to determine if the 350-foot protective zone is adequate for their protection. The weekly monitoring events will also provide critical information regarding the status of the species onsite for purposes of developing a relocation plan. c. A qualified monitoring biologist shall conduct an initial environmental briefing with any contractors which will be working onsite. The briefing shall include a discussion of burrowing owl natural history, identification of burrowing owl non-breeding season protection zones, and summary of penalties for directly and/or indirectly impacting the species. d. A qualified monitoring biologist shall be authorized to stop all work activities in the event potential direct and/or indirect impacts to burrowing owl may occur as a result of proposed staging activities. e. Monthly updates on the monitoring efforts including recommendations, as warranted, shall be submitted to the City of Redlands, CDFW and USFWS.			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	4. Passive and/or active relocation activities. 5. Burrowing owl management activities for active relocation sites. Based on the candidacy or listing status of the species at the time of surveys, if detected, acquisition of an Incidental Take Permit may also be required.			
	MM BIO-3: Pre-Construction Breeding Bird Survey To maintain compliance with the MBTA and California Fish and Game Code §§ 3503, 3503.5, and 3513, and to avoid impacts or take of migratory non-game breeding birds and other native birds, their nests, young, and eggs, the following measures shall be implemented. Site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (generally September 15 to February 15 for songbirds; September 1 to January 14 for raptors, although the nesting season may be extended due to weather and drought conditions). If site preparation activities are proposed during the nesting/breeding season, the project proponent shall retain a qualified avian biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the project to determine if active nests of species protected by the MBTA or the California Fish and Game Codes are present in the construction zone. The nest surveys shall include the project site where project activities have the potential to cause nest failure. The survey results shall be provided to the City of Redlands for review and approval. The project applicant shall	Less than Significant	Qualified biologist/Applicant/City of Redlands	Prior to the issuance of grading permits for the project. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of project activities.

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	adhere to the following: 1. The project applicant shall retain a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures. 2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the property; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate. If no nesting birds are observed during the survey, site preparation and construction activities may begin. However, if active nests (including nesting raptors) are located, then avoidance or minimization measures shall be undertaken in consultation with the City of Redlands, CDFW and USFW, as warranted. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The biologist shall monitor the nest at the onset of project activities and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Birds or their active nests will not be disturbed, captured, handled or moved. Active nests cannot be removed or disturbed; however, nests can be removed or disturbed if determined inactive by a qualified biologist. If listed bird species are observed within a project site during the preconstruction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and to determine if additional mitigation is necessary. Project activities may begin within the area only when concurrence is received from the appropriate resource agency. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City of Redlands			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	for review and approval prior to initiation of construction activities.			
	MM BIO-4: Preconstruction Bat Survey Prior to implementation of project activities, a qualified bat biologist shall be retained to determine whether potential roosting sites for yellow bats may be affected. For large ornamental trees and palms suitable for bat roosting/nursery, exit counts and acoustic surveys shall be performed prior to initial ground disturbance, vegetation or structure removal to determine whether the project site and a 300-foot buffer supports a nursery or roost. This work will occur between late -spring and late summer and/or in the fall (generally mid-March through late October). If the results of the bat survey find a total of a single roosting individual of a special status bat species or 25 or more individuals of a non-special status bat species with potential to be present in the project site, a Bat Management Plan shall be developed by a qualified bat biologist to ensure mortality to bats does not occur. For each location confirmed to be occupied by bats, the Bat Management Plan must provide details both in text and graphically where exclusion devices/and or staged tree/palm removal will need to occur, the timing for exclusion work and the timeline and methodology needed to exclude the bats. The plan will need to be reviewed and approved by the City of Redlands and CDFW prior to disturbance of the roosts. The Bat Management Plan shall include: 1. Bat status, distribution and habitat information within and adjacent to the project site. 2. Results of the bat surveys.	Less than Significant	Qualified biologist/Applicant/City of Redlands	Prior to implementation of project activities

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	3. Project-specific measures for noise attenuation devices, acoustic and visual monitoring during high-vibration and sound activities (such as saw cutting, jackhammering, and pile driving), visual disturbance buffers, and the installation of bat exclusion devices to safely and humanely evict bats outside of the maternity season, in the event they are needed. 4. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not re enter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). 5. If roosts cannot be avoided or it is determined that construction activities may cause roost abandonment, such activities may not commence until permanent, elevated bat houses have been installed outside of, but near the construction area. Placement and height will be determined by a qualified wildlife biologist, but the height of bat house will be at least 15 feet. Bat houses will be multi-chambered and be purchased or constructed in accordance with CDFW standards. The number of bat houses required will be dependent upon the size and number of colonies found, but at least one bat house will be installed for each pair of bats (if occurring individually), or of sufficient number to accommodate each colony of bats to be relocated.			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	6. Consultation with the California Department of Fish and Wildlife would occur to finalize preparation of the Bat Management Plan for inclusion in other permits that are required from the CDFW, such as a Lake or Streambed Alteration Agreement (LSAA) under Section 1600-1616 of the Fish and Game Code. Each LSAA usually contains a section titled Measures to Protect Fish and Wildlife Resources, for which this plan would be incorporated. 7. A description of incidental monitoring and reporting that will take place during construction. 8. Details for post-construction monitoring. 9. Note that the Bat Management Plan is triggered only if the project requires high-vibration and sound activities causing shaking or vibration, generally resulting from saw cutting, jackhammering, pile driving, or similar activities (within 150 feet of a bat colony).			
	MM BIO-5: Jurisdictional Delineation and Permitting Prior to approval of grading permits and initiation of project activities, a qualified biologist shall conduct a formal jurisdictional delineation on the project site to determine the presence/absence of jurisdictional resources, extent of jurisdictional areas, and impacts to resources regulated by the USACE, RWQCB, and CDFW. The delineation shall be conducted using the current USACE methods and definition of "waters of the U.S." (most current as of this writing is March 2025 notice and data sheets) and the methods and wetland definitions specified in the *California State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (Procedures) (SWRCB, 2019) to delineate	Less than Significant	Qualified biologist/Applicant/City of Redlands	Prior to approval of grading permits and initiation of project activities

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	waters of the state. Upon completion of the jurisdictional delineation survey, a jurisdictional delineation report shall be prepared according to the *Minimum Standards for Acceptance of Aquatic Resources Delineation Reports for the USACE, Los Angeles Regulatory District* (USACE-LA, 2017). This report shall be submitted to City of Redlands for review and approval. If jurisdictional areas are present on the project site, the project applicant shall obtain a Clean Water Act Section 404 permit, California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement from CDFW and a CWA 401 or WDR permit issued by the RWQCB (Santa Ana RWQCB-Region 8) pursuant to the California Water Code § 13260, as warranted. If required, these permits shall be obtained prior to issuance of a grading permit. Construction activities (including but not limited to fencing, staging, and clearing) will not commence unless all requirements of the USACE, CDFW, RWQCB have been met and the RWQCB has issued a WDR permit, letter of permission, or other project-specific approval. All conditions of these permits shall be adhered to during project development.			
4.4 Cultural Resources				
Threshold A: Would the Project cause a substantial adverse change in the significance of a historical resource	**MM CUL-1** The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology to conduct monitoring of subsurface ground disturbance during construction activities. The archaeologist shall also take the opportunity to	Less than Significant	Qualified archaeologist; project applicant; and City of Redlands	Before beginning of ground-disturbing work; and during site clearance

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
pursuant to § 15064.5? And **Threshold B:** Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	re-survey the parcel's ground surface as the vegetation is cleared for construction work. If unanticipated cultural resource discoveries are made the archaeologist will be afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist will recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-L) form and filed with the Eastern Information Center.			
	MM CUL-2 If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in a 50-foot radius and notify the project proponent and the City of Redlands. A Secretary of the Interior qualified archaeologist (Principal Archaeologist) shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The Principal Archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place. The Principal Archaeologist, depending on the type and extent of the finds, may prepare an Archaeological Resources Treatment Plan (ARTP) to guide future monitoring, the recovery of cultural resources, analysis and reporting of the finds, and curation of the finds. The ARTP shall be submitted to the City and the project proponent for approval. The ARTP shall include the following:	Less than Significant	Qualified archaeologist; project applicant; and City of Redlands	During construction activities

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	1. Results of the Cultural Resources Inventory: archaeological resources and their condition and threats on the project site. 2. Impact assessment. 3. Mitigation strategies, which may include: a. Potential avoidance measures. b. Data recovery steps such as excavation and analysis of an archaeological site to collect information before it is destroyed. c. Conservation measures such as cleaning, conserving, studying, cataloging, and storing recovered archaeological materials and associated records. 4. Procedures for archaeological monitoring during construction to record exposed resources. 5. Protocols for unanticipated discoveries: what construction workers should do if they find cultural resources unexpectedly, including ceasing work and contacting a qualified archaeologist. 6. Consultation with relevant groups, such as Native American tribes, historians, and regulatory agencies, to determine the value of resources and appropriate treatment measures. 7. Documenting and reporting format and procedures.			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
Threshold C: Would the Project disturb human remains, including those interred outside of dedicated cemeteries?	**MM CUL-3** If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery, and the San Bernardino County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLDS (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).	Less than Significant	Qualified archaeologist; project applicant; and City of Redlands	During excavations associated with this project
4.5 Geology and Soils				
	MM-GEO-1 A qualified paleontologist, approved by the City of Redlands and the Western Science Center, must be retained prior to excavation and grading activities at the project site. 1. Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of	Less than Significant	Qualified paleontologist/project applicant; City of Redlands	Prior to excavation and grading activities at the project site; and during excavation and grading activities

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and include monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final paleontological survey report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project Paleontologist and requirements of the PRIMP. At a minimum, the PRIMP shall include the following: 1. Project and location 2. Regulatory setting 3. Geology of the site 4. Paleontological resources and survey results 5. Paleontological sensitivity of the site 6. Paleontological resources mitigation and monitoring measures such as: a. Coordination with construction personnel and training b. Details of training and materials c. Frequency and location of inspections d. When and how grading/excavation			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	activities will be diverted e. Procedures of fossil recovery, removal, treatment, transport, and deposition facility f. Recording, documentation, and reporting procedures 2. Before the mitigation program begins, the paleontologist or monitor must coordinate with the appropriate construction contractor personnel to provide information regarding the requirements of the City or Redlands, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on the procedures to follow in the event that fossil remains, and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site. 3. The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the project site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and will depend on the depth of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist must temporarily divert or redirect the grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The authority of the paleontologist to temporarily halt construction in part of the project site must be included in the project grading and construction plans. A copy of the			

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	report of the paleontological survey is submitted to the Western Science Center. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.			
4.7 Greenhouse Gas Emissions				
Threshold A: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**MM GHG-1** Using alternative fuels for construction equipment (0 to 22 percent). **MM GHG-2** Using electric or hybrid construction equipment (2.5 to 80 percent of GHG emissions from equipment that is electric or hybrid if used 100 percent of the time). **MM GHG-3** Limiting construction equipment idling beyond regulation requirements (varies with the amount of project idling occurring and the amount reduced). **MM GHG-4** Instituting a heavy-duty offroad vehicle plan (range of effectiveness is not applicable because it only ensures compliances with other mitigation measures). At a minimum, the heavy-duty offroad vehicle plan shall include the following: 1. Fleet reporting and labeling: diesel-fueled vehicles operating in California, with engines 25 horsepower or greater, must be reported to CARB through the online DOORS system and labeled appropriately.	Significant and Unavoidable	Project applicant and project construction contractor	Include in project building plans; and during project construction

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	2. Emission reduction strategies: how you will meet emission reduction requirements by: a. Retiring/Replacing Vehicles: Phase out older, dirtier engines by replacing them with new, cleaner ones or equipment that meets the latest emission standards. b. Engine repowering: plan/schedule to replace older off-road diesel engines with newer, cleaner ones. c. Verified Diesel Emission Control Strategies (VDECS): Install verified diesel emission control strategies (e.g., exhaust retrofits) on existing engines. 3. Fuel acquisition: fleets must begin (2024) using renewable diesel (R99 or R100). 4. Idling restrictions: limit idling to five minutes and apply a written idling policy. **5.** Fleet average goals: fleet average emission level standards/balancing emissions from vehicles. **MM GHG-5** Implementing a construction vehicle inventory tracking system (range of effectiveness does not reduce GHG emissions in and of itself; it only ensures compliance with other mitigation measures).			
4.12 Transportation				
Threshold B: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**MM TRANS-1** Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a commute trip reduction program consisting of information sharing and marketing to promote and educate employees about their travel choices to the project site beyond driving such as carpooling, taking transit, walking, and biking,	Significant and Unavoidable	Project applicant/City of Redlands	Prior to issuance of a certificate of occupancy for each phase of the project

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	thereby reducing VMT and GHG emissions.			
	MM TRANS-2 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement a ridesharing program for employees with similar commutes with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions. Existing programs including IE Commuter can be leveraged for this measure.	Significant and Unavoidable	Project applicant/City of Redlands	Prior to issuance of a certificate of occupancy for each phase of the project
	MM TRANS-3 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.	Significant and Unavoidable	Project applicant/City of Redlands	Prior to issuance of a certificate of occupancy for each phase of the project
	MM TRANS-4 Prior to issuance of a certificate of occupancy for each phase of the project, the project proponent will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions. It was assumed that up to 2% of employees	Significant and Unavoidable	Project applicant/City of Redlands	Prior to issuance of a certificate of occupancy for each phase of the project

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	would participate in the vanpool program.			
4.13 Tribal Cultural Resources				
Threshold 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	**MM-TCR-1**: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities 1. The project applicant shall retain a Native American Monitor(s) from one or more Consulting Tribe(s), including Gabrieleño Band of Mission Indians – Kizh Nation. Monitors from more than one tribe may coordinate and utilize a rotating schedule at their discretion. The monitor(s) shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. 2. A copy of the executed monitoring agreement with each monitoring Consulting Tribe(s), including Gabrieleño Band of Mission Indians – Kizh Nation, shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. 3. The monitor(s), including Gabrieleño Band of Mission Indians – Kizh Nation, will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction	Less than Significant	Native American Monitor/Project Applicant/City of Redlands	Prior to Commencement of Ground-Disturbing Activities; and during ground-disturbing activities

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
resources as defined in Public Resources Code § 5020.1(k); or . 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 Resource Code § 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.	activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe, including Gabrieleño Band of Mission Indians – Kizh Nation. 4. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Consulting Tribe(s) , including Gabrieleño Band of Mission Indians – Kizh Nation, from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Consulting Tribe(s) , including Gabrieleño Band of Mission Indians – Kizh Nation, to the project applicant and lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.			
	MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) 1. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e.	Less than Significant	Native American Monitor/Project Applicant/City of Redlands	Prior to Commencement of Ground-Disturbing Activities; and during ground-disturbing

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/ Monitoring Party	Implementation Stage
	not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Consulting Tribe(s), including Gabrieleño Band of Mission Indians – Kizh Nation, monitor(s) and/or archaeologist(s).			activities
	MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects 1. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. 2. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. 3. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). 4. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. **5.** Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	Less than Significant	Native American Monitor/Project Applicant/City of Redlands	Prior to Commencement of Ground-Disturbing Activities; and during ground-disturbing activities