Initial Study/Mitigated Negative Declaration
County of San Bernardino Department of Public Works

Santa Ana River Trail (SART) Phase IV, Reach A
City of Redlands and Unincorporated San Bernardino County

Lead Agency

County of San Bernardino Department of Public Works
825 E. Third Street
San Bernardino, CA 92415

Technical assistance provided by:

Lilburn Corporation
1905 Business Center Drive
San Bernardino, CA 92408

January 2020
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SECTION 1 – INTRODUCTION

History

The Santa Ana River corridor extends over approximately 110 miles from the Pacific Ocean inland to the San Bernardino National Forest. Upon completion, the Santa Ana River Trail (SART) would be the “Crest to Coast” regional trail link connecting an area encompassing over four million residents in three counties (Orange, Riverside and San Bernardino). The Trail would provide safe use and enjoyment of open space, environmental education, and a transportation trail system. Portions of the Trail, particularly in Orange County, have been developed over the past 20 years; currently it is possible to travel from the Riverside/Orange County line to Huntington Beach on the SART.

The County of San Bernardino is responsible for the completion of approximately 20 miles of the SART. Development of the trail in San Bernardino County has been divided into four phases with several reaches in each phase to provide for construction as funding becomes available. Phase I and II, extending from the Riverside/San Bernardino county line to approximately 50 feet westerly of La Cadena Drive in the City of Colton and from the terminus of Phase I to Waterman Avenue in the City of San Bernardino respectively have been constructed. It is anticipated that Phase III extending from the Phase II terminus to California Street in the City of Redlands will be constructed in 2020. Phase IV is the last segment of the trail extending from California Street in Redlands to Garnet Street in unincorporated Mentone. For planning and analysis purposes, the Phase IV Section of the SART is divided into four major reaches as follows:

- Reach A – California Street to Orange Street
- Reach B – Orange Street to Judson Street
- Reach C – Judson Street to Opal Avenue
- Reach D – Opal Avenue to Garnet Street

Initials Studies for each for the reaches have been prepared separately as grants and/or other funding sources are identified. Recently, an IS/MND was prepared for Reaches B and C and was circulated for public review beginning October 1, 2018 and ending on October 30, 2018. An Initial Study for Reach D will be prepared in the future. This IS/MND analyses potential environmental impacts associated with construction and operation of SART Phase IV, Reach A.

Project Purpose and Need:

The purpose of the Project is to meet the identified need for a regional non-vehicular trail for the region’s residents. The Project consists of the design and construction of a bicycle trail, which is defined as a shared use path that is physically separated from any street or highway and may be used by pedestrians, bicyclists, skaters, wheelchair users, and joggers. The trail will provide safe contiguous use and enjoyment of open space, environmental education, and an alternative multi-use trail system for transportation. Currently, various segments of the SART have been constructed or approved and Reach A is a portion of Phase IV that extends the trail to its easterly terminus near the foothills of the San Bernardino Mountains.

Ultimately, the Phase IV of the SART will enhance access to recreational opportunities in the region by: (a) providing neighborhood links to green space and natural areas; (b) providing connections with city urban trails that provide safe travel to parks, community recreation facilities, fairgrounds, urban lakes, amphitheaters, historic neighborhoods, and tourist attractions; and (c) providing direct access to San Bernardino National Forest camping and outdoor recreation areas. In conjunction with fulfilling basic
non-motorized transportation purposes, the proposed Project will also meet the needs of individuals with disabilities; specifically, in an area where few trails fulfill the outdoor trail needs of these individuals. All access ramps to the SART will be designed to comply with requirements of the Americans with Disabilities Act (ADA). The SART facilities will incorporate Caltrans Highway Design Manual, Chapter 1000, “Bikeway Planning and Design” to ensure that individuals with disabilities will have both access to and effective use of the SART facilities.

Post-construction activities associated with the trail would include general maintenance including but not limited to: weed abatement, fence and pavement repair including repainting, etc. A Memorandum of Understanding (MOU) between the County of San Bernardino and City of Redlands shall be prepared to address the future maintenance of this extension of the trail and the allocation of responsibilities for the two agencies.

This Initial Study evaluates the County of San Bernardino Regional Parks Department (Regional Parks) and County of San Bernardino Department of Public Works (Public Works) proposed construction of an approximately 3.9-mile linear extension of the Santa Ana River Trail (SART) within the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. The SART is a regional recreational trail; segments of the trail within San Bernardino County have been constructed in various sections (phases). The proposed section of the SART evaluated in this IS/MND is SART Phase IV, Reach A ("proposed Project"); the trail would begin on the west side of California Street and terminate at Orange Street in the City of Redlands. Portions of the alignment would occur on the southern bluffs of the Santa Ana River and are within unincorporated areas of the County. From Pioneer Avenue to Domestic Avenue and from Texas Street east to Orange Avenue the alignment would occur on unpaved roads, and the remaining portions of the alignment would occur on local streets and on other properties within the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. The proposed Project would serve as the connection between the completed Phase III of the trail and the future Phase IV Reaches B and C.

Exhibit 1, Regional Location, shows the location of SART Phase IV, Reach A in the context of the region. Exhibit 2, Project Site and Vicinity, is an aerial photograph showing the extent of the Reach A along the Santa Ana River, streets, and other properties. Exhibit 3 shows the location of all reaches of the SART Phase IV. Exhibit 4 shows the alignment from California Street along the river bluff to just east of the California Street Landfill; Exhibit 5 shows the alignment from eastern edge of the California Street Landfill to Alabama Street; Exhibit 6 shows the alignment along Alabama Street including Option 1 and Option 2; Exhibit 7 shows the alignment from Alabama Street to Pioneer Avenue with a crossing under the I-210 Freeway: Exhibit 8 shows the alignment along Pioneer Street, Tennessee Street and Domestic Avenue; Exhibit 9 shows the alignment along Domestic Avenue to Texas Street; and Exhibit 10 shows the alignment from Texas Street through to Orange Avenue.
Insert Exhibit 1 – Regional Location
Insert Exhibit 2 – Vicinity Map
Insert Exhibit 3
Insert Exhibit 4 – SART Phase IV Reach A Alignment
Insert Exhibit 5
Insert Exhibit 6
Insert Exhibit 7
Insert Exhibit 8
Insert Exhibit 9
Insert Exhibit 10
SECTION 2 – REGULATORY FRAMEWORK

The County of San Bernardino Department of Public Works has identified that the Santa Ana River Trail Phase IV, Reach A Project meets the California Environmental Quality Act (CEQA) Guidelines Section 15378 definition of a Project. CEQA Guidelines Section 15378 defines a Project as the following:

"Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000-21177), this Initial Study has been prepared to determine potentially significant impacts upon the environment resulting from the construction, operation and maintenance of the Santa Ana River Trail Phase IV, Reach A Project (hereinafter referred to as the "Project" or “proposed Project”). In accordance with Section 15063 of the State CEQA Guidelines, this Initial Study is a preliminary analysis prepared by the San Bernardino County Flood Control District (District) as Lead Agency to inform the Lead Agency decision makers, other affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed Project.

Initial Study Organization

This Initial Study is organized as follows:

Introduction: Provides the regulatory context for the review along a brief summary of the CEQA process.

Project Information: Provides fundamental Project information, such as the Project description, Project location and figures.

Lead Agency Determination: Identifies environmental factors potentially affected by the Project and identifies the Lead Agency’s determination based on the initial evaluation.

Mitigated Negative Declaration: Prepared when a determination can be made that no significant environmental effects will occur because revisions to the Project have been made or mitigation measures will be implemented which will reduce all potentially significant impacts to less than significant levels.

Evaluating Environmental Impacts: Provides the parameters the County uses when determining level of impact.

CEQA Checklist: Provides an environmental checklist and accompanying analysis for responding to checklist questions.

References: Includes a list of references and various resources utilized in preparing the analysis.
SECTION 3 – DETAILED PROJECT DESCRIPTION

Project Background
The County of San Bernardino Regional Parks Department (Regional Parks) with the assistance of the County of San Bernardino Department of Public Works (Public Works) proposes to construct an approximately 3.9-mile long section of the Santa Ana River Trail (SART) on the southern bank of the Santa Ana River and local streets in the City of Redlands and unincorporated County areas (Exhibit 1). The SART is a regional recreational trail; segments of the trail within San Bernardino County have been constructed in various sections (phases) with projects named sequentially.

Project Location
The proposed section of the SART is SART Phase IV, Reach A; the trail would begin on the west side of California Street in the City of Redlands and terminate at Orange Street (Exhibit 2).

Project Characteristics
Project construction would begin near the northerly terminus of California Street and continue north for approximately 300 feet where it will connect to the easterly terminus of SART Phase III on the south side of the Santa Ana River and continue east along the river bluff for approximately one-mile to Alabama Street. Along Alabama Street there are two options for the trail alignment; Option 1 would continue south along the westside of Alabama Street to Pioneer Street; Option 2 would cross Alabama Street just south of River Bluff Avenue (at an existing signal) and continue south along the eastside of Alabama Street to Pioneer Street. In both options, the trail transitions from the river bluff to local city streets and continues south toward Pioneer Avenue. At Pioneer Avenue Option 1 would cross at an existing traffic signal at the intersection of Alabama Street and Pioneer Avenue; Option 2 would continue south along the eastside to Pioneer Avenue. In both options, the alignment would continue along the northside of Pioneer Avenue for approximately 0.5 miles then pass underneath State Route 210 (SR-210) and continue east toward Citrus Valley High School. The trail would proceed north along the west high school fence line and continue east to Domestic Avenue (an unpaved road immediately north of the high school fence line). The trail would continue east along Domestic Avenue to Texas Street. From the intersection of Domestic Avenue and Texas Street the trail is proposed to continue north on the west side of Texas Street for approximately one-quarter mile. The alignment will then cross Texas Street and continue east through an abandoned citrus orchard/grove to Israel Beal Park.

The trail segments along the river bluff would consist of a Class I, 10-foot wide asphalt/concrete trail and 2-foot graded shoulder on each side of the asphalt/concrete trail; on the existing right-of-way the existing road surfaces would be widened where possible to accommodate a modified Class I bicycle lane. Under existing conditions portions of Pioneer Avenue does not have curb and gutter; where possible ultimate curb and gutter would be constructed as part of the proposed Project.

Class I is defined by the Caltrans design standards and has specific trail width requirements, shoulder requirements, etc. Existing right-of-way is limited at certain locations of the alignment; therefore, along these portions of the alignment, a modified Class I would be constructed. Specific modifications are not known at this time. However, it is likely that the trail width of 10-feet would be accommodated but other aspects such as the full width requirement for shoulders may not.

In general, construction activities associated with development of the proposed Project would include: earthwork including excavation and grading; construction of embankments and/or retaining walls; construction of storm drains, headwalls, and slope protection; construction of asphalt concrete dike, curb
and gutter; installation of fencing, railing, access gates, trail delineators, and signage; painting of pavement striping and pavement markings; and, construction of appurtenant features.

Equipment staging and borrow/disposal during Project construction may potentially occur at: (1) at various locations within the disturbed vacant lands on the river bluff; (2) on disturbed road shoulders and/or existing street right-of-way on the east side of Alabama Street north of River Bluff Avenue; (3) on the Domestic Avenue right-of-way; and, (4) at Israel Beal Park (see Exhibits 4 through 10 for anticipated construction staging areas).

The area of potential effects (APE) for the Project includes all areas subject to direct effects from construction activities and is mapped with a 25-foot buffer area surrounding the maximum construction impact area, with the exception of where the trail is located within an existing roadway alignment. The APE for the segments of the trail within roadway alignments is mapped as the roadway right-of-way boundary (see Exhibits 4 – 10).

**Project Timing**

Construction is anticipated to begin in 2020 and would take approximately six months to complete.

**Regulatory Requirements, Permits, and Approvals**

Construction of Reach A would require approvals from the City of Redlands to develop the trail on the City’s existing right-of-way and may also require acquisition of right-of-way from private property owners.

Additionally, portions of the proposed trail alignment overlap or are located in close proximity to United States Fish and Wildlife Service (USFWS) designated critical habitat.

**Equipment Staging Areas**

Equipment staging and borrow/disposal during Project construction may potentially occur at: (1) at various locations within the disturbed vacant lands on the river bluff; (2) on disturbed road shoulders and/or existing street right-of-way on the east side of Alabama Street north of River Bluff Avenue; (3) on the Domestic Avenue right-of-way; and, (4) at Israel Beal Park (see Exhibits 4 through 10 for anticipated construction staging areas).

**Operation and Maintenance**

Upper Santa Ana Wash Land Management and Habitat Conservation Plan (Wash Plan)

The SART Phase IV is a covered activity in the Wash Plan. However, because the trail alignment identified in the Wash Plan was conceptual, portions of the presently proposed alignment fall outside of the Wash Plan area. The Wash Plan identifies mitigation measures to off-set the impacts to the five covered species as well as sensitive and general biological resources in this area of San Bernardino County. The Wash Plan has not yet been adopted; however, the relevant measures provided in the Wash Plan are applicable and recommended for the proposed Project in the event the final Wash Plan is not adopted. The construction, operation, and maintenance of local trails is covered by the Wash Plan and is considered a conditionally compatible use; trails are permissible following preparation of a regional Trail Management Plan and its subsequent approval by the Wildlife Agencies. A draft of the Wash Plan Trails Master Plan was published in 2016; the plan would be finalized and approved concurrent with the Wash Plan approvals. Should the Wash Plan be approved prior to construction of the proposed Project; the County would complete a Consistency Determination to obtain coverage for potential impacts to covered species and habitat under the Wash Plan.
A Memorandum of Understanding (MOU) between the County of San Bernardino and City of Redlands shall be prepared to address the future maintenance of this extension of the trail and the allocation of responsibilities for the two agencies to ensure that incidental trash is routinely collected.

**Project Design Features**

The final design of the SART facilities would be completed in accordance with the guidance and requirements of the Caltrans Highway Design Manual, Chapter 1000, “Bikeway Planning and Design.” Existing right-of-way are limited at certain locations of the alignment, and for these portions, a modified Class I bicycle lane is proposed. Additionally, portions of Pioneer Avenue would have ultimate curb and gutter constructed as part of the proposed Project. Construction of the Project would follow Caltrans design standards and specific trail width requirements and shoulder requirements to reduce impacts.

The proposed Project would be reviewed and approved by the City of Redlands to ensure that the final design conforms to applicable policies of Chapter 5 of the General Plan including but not limited to the multi-path policies as related to Pedestrian, Bicycle, and Vehicular Movement (Redlands 2017a). No hazards due to a design features of the trail are anticipated.
SECTION 4 – ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Santa Ana River Trail (SART) Phase IV, Reach A

2. Lead Agency Name: County of San Bernardino Department of Public Works
   Address: 825 East Third Street
   San Bernardino, California 92415-0835

3. Contact Person: Arnold Gerber, Planner II
   Email: Arnold.Gerber@dpw.sbcounty.gov
   Phone: 909-387-7802

4. Project Location:
   General Project Location
   The proposed Project would be located along the southern bank of the Santa Ana River, along local streets and other properties in the City of Redlands and unincorporated San Bernardino County. The proposed 3.9-mile trail would begin on the west side of California Street in the City of Redlands and terminate at Orange Street (Exhibit 2).
   Topographic Quad (USGS 7.5”):
   Redlands
   Topographic Quad Coordinates: 01S, 03W, Section 15, 16, and 17
   Latitude/Longitude
   34°05’17.0” N, Longitude117°13’34.0”W/
   34°05’08.7”N, Longitude: 117°10’59.4”W
   Site Access: Is available from the California Street cul-de-sac. The end use of the trail is for passive recreation, thus vehicular access roads are not proposed.
   
5. Project Sponsor: Department of Public Works
   Name and Address: County of San Bernardino Regional Parks Department
   825 E 3rd Street, San Bernardino, CA 92415

6. General Plan/Zoning Designation: Open Space; Industrial; Agriculture; Planned Residential Development (see Exhibits 5 through 11)

7. Project Description Summary:
   The County of San Bernardino Regional Parks Department (Regional Parks) with the assistance of the County of San Bernardino Department of Public Works (Public Works) proposes to construct an approximately 3.9-mile long section of the Santa Ana River Trail (SART) on the southern bank of the Santa Ana River, within local streets, and on other properties as shown in Exhibit 2. On the westerly end of Reach A, the trail would connect to the Santa Ana Trail Phase III; on the east, the trail would connect to the SART Phase IV Reach B. The SART is a regional recreational trail; segments of the trail within San Bernardino County have been constructed in various sections (phases) with projects named sequentially. Details of the Project are further discussed in Section 3.
8. Environmental/Existing Site Conditions:

The Project area includes the proposed trail alignment consisting of a 3.9-mile linear section of the Santa Ana River Trail (SART) identified as Phase IV Reach A. The proposed trail alignment is within the City of Redlands limits, except for the segment that travels south on Alabama Street and west on Pioneer Avenue, which occurs within unincorporated County area. Portions of the alignment would occur on the southern bluffs of the Santa Ana River. From Pioneer Avenue to Domestic Avenue and from Texas Street east to Orange Avenue the alignment would occur on unpaved roads, and the remaining portions of the alignment would occur on local streets and on other properties within the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. Equipment staging and borrow/disposal during Project construction may potentially occur at: (1) various locations within the disturbed vacant lands on the river bluff; (2) on disturbed road shoulders and/or existing street right-of-way on the east side of Alabama Street north of River Bluff Avenue; (3) on the Domestic Avenue right-of-way; and (4) at Israel Beal Park (see Exhibits 4 through 10 for anticipated construction staging areas).

9. Surrounding land uses and setting:

Portions of the proposed Project occur along the southern bluffs of the Santa Ana River; portions from Pioneer Avenue to Domestic Avenue and from Texas Street east to Orange Avenue would occur on unpaved roads, and other portions of the alignment are proposed on local streets and on other properties. Table 1 provides a list of surrounding land uses for each of the segments along Reach A as shown in Exhibits 5 through 10.

<table>
<thead>
<tr>
<th>Portion of Alignment</th>
<th>Corresponding Exhibit</th>
<th>Surrounding Land Uses to the North</th>
<th>Surrounding Land Uses to the South</th>
<th>Surrounding Land Uses to the East</th>
<th>Surrounding Land Uses to the West</th>
</tr>
</thead>
<tbody>
<tr>
<td>California St along river bluff</td>
<td>Exhibit 4</td>
<td>Vacant land/Santa Ana River</td>
<td>California St landfill</td>
<td>California St landfill;</td>
<td>Vacant land, East Valley Corridor multi-use trail</td>
</tr>
<tr>
<td>River bluff to Alabama St</td>
<td>Exhibit 5</td>
<td>Vacant land; Santa Ana River</td>
<td>Wastewater Treatment Plant; vacant land</td>
<td>Vacant land</td>
<td>Vacant land</td>
</tr>
<tr>
<td>Alabama St Options 1 &amp; 2</td>
<td>Exhibit 6</td>
<td>Vacant land</td>
<td>Vacant land</td>
<td>Vacant land</td>
<td>Vacant land; commercial uses</td>
</tr>
<tr>
<td>Alabama St to Pioneer Ave and Undercrossing at I-210 Freeway</td>
<td>Exhibit 7</td>
<td>Vacant land; light industrial – warehouse; I-210 Freeway</td>
<td>Vacant land; light industrial – warehouse; I-210 Freeway</td>
<td>Vacant land</td>
<td>Vacant land</td>
</tr>
<tr>
<td>Pioneer Ave to Tennessee St and Domestic Ave</td>
<td>Exhibit 8</td>
<td>Vacant land; agriculture</td>
<td>Vacant land; Citrus Valley High School</td>
<td>Citrus Valley High School</td>
<td>Vacant land</td>
</tr>
<tr>
<td>Domestic Avenue to Texas St</td>
<td>Exhibit 9</td>
<td>Vacant land; agriculture</td>
<td>Citrus Valley High School</td>
<td>Vacant land</td>
<td>Vacant land; agriculture</td>
</tr>
<tr>
<td>Texas St to Orange St</td>
<td>Exhibit 10</td>
<td>Vacant land; recreational (Gun Range)</td>
<td>Vacant land; single-family residential</td>
<td>Vacant land</td>
<td>Vacant land; single-family residential</td>
</tr>
</tbody>
</table>
As identified in the *City of Redlands Zoning Map*, zoning designations traversed by the trail and/or immediately adjacent to the alignment include: Open Space, Industrial, Agriculture and Planned Residential Development (Redlands 2018). As identified in the *City of Redlands General Plan*, land use designations traversed and/or immediately adjacent to the trail alignment include: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks (Redlands 2017). The City of Redlands Land Use designations along each of the segments are shown on Exhibits 5 through 10.

The portion of the trail alignment that occurs in an unincorporated County area, is identified within the County General Plan as occurring in the East Valley Corridor Specific Plan with designations of East Valley Special Development, and East Valley Regional Industrial.

10. **Other public agencies whose approval is required:**

    **Federal:**
    
    - None

    **State Agencies:**
    
    - None

    **City/County Agencies:**

    City of Redlands, Encroachment Permits

    Upper Santa Ana Wash Land Management and Habitat Conservation Plan (Wash Plan)

    The SART Phase IV is a covered activity in the Wash Plan. However, because the trail alignment identified in the Wash Plan was conceptual, portions of the presently proposed alignment fall outside of the Wash Plan area. The Wash Plan identifies mitigation measures to off-set the impacts to the five covered species as well as sensitive and general biological resources in this area of San Bernardino County. The Wash Plan has not yet been adopted; however, the relevant measures provided in the Wash Plan are applicable and recommended for the proposed Project in the event the final Wash Plan is not adopted. The construction, operation, and maintenance of local trails is covered by the Wash Plan and is considered a conditionally compatible use; trails are permissible following preparation of a regional Trail Management Plan and its subsequent approval by the Wildlife Agencies. A draft of the Wash Plan Trails Master Plan was published in 2016; the plan would be finalized and approved concurrent with the Wash Plan approvals. Should the Wash Plan be approved prior to construction of the proposed Project; the County would complete a Consistency Determination to obtain coverage for potential impacts to covered species and habitat under the Wash Plan.

    **Financing Approval or Participation Agreements:**
    
    - None
11. **Have California Native American tribes traditionally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation?**

   In September 2017, the County of San Bernardino Department of Public Works Environmental Management Division mailed Project notices in accordance with AB 52 to the following tribes: Gabrieleño Band of Mission Indians – Kizh Nation; San Manuel Band of Mission Indians; and, Soboba Band of Luiseño Indians. The San Manuel Band of Mission Indians expressed interest in the Project and requested further consultation. No response was received from the Gabrieleño Band of Mission Indians – Kizh Nation or Soboba Band of Luiseño Indians. Measures as recommended by the consulting Tribe have been incorporated into the Proposed Project in sections V and VXII of this document.

12. **Lead Agency Discretionary Actions:**

   Discretionary actions that may be taken by the Lead Agency include, but are not limited to, the following:

   - Board of Supervisors, certification of environmental documentation
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact requiring mitigation to be reduced to a level that is less than significant as indicated in the checklist on the following pages.

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

LEAD AGENCY DETERMINATION

On the basis of this initial evaluation, the following finding is made:

- The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

- The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Harold Zamora
Signature [Harold Zamora, P.E., Chief]

1/15/2020
Date
1. **AESTHETICS**

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Except as provided in Public Resources Code Section 21099, would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>c) Substantially degrade an existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

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

**Environmental Setting**

The proposed Santa Ana River Trail (SART) identified as Phase IV, Reach A is located along the southern bluffs of the Santa Ana River, on unpaved roads, on local streets and along other properties within the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. Regionally the Project Site is located approximately 60 miles northeast of Los Angeles and 45 miles west of Palm Springs, nestled against the backdrop of the San Bernardino Mountains in San Bernardino County. The City of Redlands is bound by the Santa Ana River, the City of Highland, and the San Bernardino Mountains to the north, Crafton Hills and the City of Yucaipa to the east, the northern boundary of Riverside County to the south, and the cities of Loma Linda and San Bernardino to the west (City of Redlands 2017a).

The California Scenic Highway Program protects and enhances the scenic beauty of California’s highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. The proposed Project is located approximately 1.6 miles north of Interstate 10 (I-10) and 1.0 miles east of State Route 210 (SR-210) which are not designated as state scenic highways by California Scenic Highway Mapping System (Caltrans 2018).

The Project area is characterized by its backdrop mountain scenery with views of the San Bernardino Mountains and the Santa Ana River. As identified in the Land Use Map within the City of Redlands General Plan, land use designations traversed and/or immediately adjacent to the trail alignment include: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks (Redlands 2017a). The County of San Bernardino General Plan identifies...
the Project area as occurring in the East Valley Corridor Specific Plan with designations of East Valley Special Development, and East Valley Regional Industrial.

**Impact Analysis**

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

**No Impact.** The proposed trail alignment is surrounded by scenic views of the Santa Ana River and the foothills of the San Bernardino Mountains to the north. The objective of the proposed Project is to enhance access to recreational opportunities in the region by providing a multi-use trail that will ultimately provide access to the Santa Ana River Wash and scenic views of the San Bernardino Mountains. The trail segments along the river bluff would consist of a Class 1, 10-foot wide asphalt/concrete trail and 2-foot graded shoulder on each side of the asphalt/concrete trail; on the existing right-of-way the existing road surfaces would be widened where possible to accommodate a modified Class I bicycle lane. The above-mentioned Project elements are not anticipated to affect the viewshed or scenic vista of the site and in turn would enhance accessibility for non-motorized vehicles (e.g. bicycles). No impact is anticipated.

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

**No Impact.** The proposed trail alignment is located approximately 1.6 miles north of Interstate 10 (I-10) and crosses under State Route 210 (SR-210), neither of which are designated as state scenic highways by the California Scenic Highway Mapping System (Caltrans 2018). State Highway 330 is the closest eligible State Scenic Highway, 3 miles north of the proposed Project. No impact is anticipated.

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

**No Impact.** The proposed 3.9-mile trail alignment lies along the southern bluffs of the Santa Ana River Wash and within developed urban areas. The proposed Project will ultimately assist in the continuation of the existing SART to the east. As described in the response to I(a) above, the objective of the proposed Project is to provide regional connectivity along the SART, ultimately providing access to scenic vistas of the Santa Ana River Wash and San Bernardino Mountains through the completion of this phase of the SART. These improvements would not substantially degrade the visual character or quality of the surroundings. No impact is anticipated.

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

**No Impact.** The proposed Project does not incorporate lighting. Therefore, no new sources of substantial light or glare, which would adversely affect day or nighttime view in the area, would result from the proposed Project. No impact is anticipated.

**Mitigation Measures:**

None.
Aesthetics Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
2. AGRICULTURE AND FORESTRY RESOURCES

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Conflict with existing zoning for agricultural use or a Williamson Act contract?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Result in the loss of forest land or conversion of forest land to non-forest use?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

**Environmental Setting**

The proposed Project is located along the southern bluffs of the Santa Ana River, on unpaved roads, and on local streets and properties within the City of Redlands, with the exception of the segment going south on Alabama Street and west on Pioneer Avenue which is within unincorporated County area. Portions of the proposed Project traverse properties with a land use designation of Agriculture, in the City of Redlands General Plan, (Redlands 2017a). Prime farmland, mapped by the California Farmland Mapping and Monitoring Program (FMMP), occurs at various locations along the proposed alignment according to
the California Department of California (CDC). Specifically, prime farmland occurs at: (1) the east and west side of Alabama Street between Palmetto Avenue and Pioneer Avenue; (2) existing citrus grove on the west side of Citrus Valley High School; and, (3) the citrus groves on the north side of the unpaved Domestic Avenue west of Texas Street (CDC 2017). Other FMMP designations along the proposed alignment include Urban and Built-Up Land and Grazing Land.

Impact Analysis

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?

Less than Significant. The Project site is located mostly on land that is designated as Open Space and within the existing street right-of-way in the City of Redlands (Redlands 2018). According to the California Farmland Mapping and Monitoring Program (F MMP) Important Farmlands Map for San Bernardino County, the proposed Project would be located within land designated as Urban and Built-Up Land, Prime Farmland, and Grazing Land (CDC 2017). Prime Farmland within the City of Redlands occurs at the existing citrus grove on the west side of Citrus Valley High School and at the citrus groves on the north side of the unpaved Domestic Avenue west of Texas Street. The City of Redlands General Plan Update and Climate Action Plan EIR (Redlands, 2017b) has identified the loss of up to 200 acres of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland designations under the FMMP program as an unavoidable impact. The affected farmland is mainly located where non-contiguous agricultural uses are interspersed with more intensive uses. Policies in the City of Redland’s General Plan provide a framework to ensure the continued existence of agricultural uses for as long as such use is financially feasible.

The area designated as Prime Farmland occurs within the East Valley Corridor Specific Plan occurs along Alabama Street. Proposed street widening to ultimate right-of-way on Alabama Street may require removal of orange trees on the east, and potentially west, side of the street between Palmetto Avenue and Pioneer Avenue (CDC 2019). There are two options for the trail alignment along this street (see Exhibit 6-7); Option 1 would continue south along the westside of Alabama Street to Pioneer Street and cross to the east side of Alabama Street at an existing traffic signal at the intersection of Alabama Street and Pioneer Avenue. In this scenario, the portion of the alignment zoned as Commercial General within the East Valley Corridor Specific Plan would potentially remove orange trees from locations where the right-of-way is not built out to ultimate conditions. Potential re-planting of the trees would occur as feasible elsewhere within the same property. In Option 2, the alignment would cross Alabama Street just south of River Bluff Avenue (at an existing signal) and continue south along the eastside of Alabama Street to Pioneer Avenue. Both options would ultimately continue east and pass underneath State Route 210 (SR-210) to the Citrus Valley High School. In Option 2, a staging area is proposed within the existing paved road right-of-way on the east side of Alabama Street just north of River Bluff Avenue. Staging would occur in front of a Home Depot Distribution Center and no disturbance to the existing landscape is anticipated.

Potentially affected Prime Farmland occurs at three locations: (1) the east and west side of Alabama Street between Palmetto Avenue and Pioneer Avenue; (2) existing citrus grove on the west side of Citrus Valley High School; and, (3) the citrus groves on the north side of the unpaved Domestic Avenue west of Texas Street (CDC 2017). The City of Redlands General Plan (Redlands 2017a) encourages buildout of public outdoor recreational facilities including, the Santa Ana River Trail buildout. The City’s goals encourage actions towards the improvement of bicycle routes throughout the City and for improved trail linkages along the Santa Ana River in order to provide intra-city and regional connections. The County of San Bernardino General Plan also identifies the functionality and convenience of a transportation
system for bicycles, pedestrians, and horses as one of its goals. It promotes the extension, enhancement, and increased connectivity of trail systems throughout the County (Goals CI6 and OS-2). Therefore, the portions of the trail alignment that fall within the prime farmland designation would be enhanced by the proposed Project and would further develop the visions of both the City and County’s General Plans.

Development of the proposed trail alignment may require removal of citrus trees within land designated as Prime Farmland, specifically along the east and west side of Alabama Street, at the citrus grove west of Citrus Valley High School, and on the west side of Texas Street. Citrus trees would be removed from both private property and from the street right-of-way where the right-of-way is not built out to ultimate conditions (portions of Alabama Avenue and Texas Street). Although portions of the alignment, as described above, occur in Prime Farmland, the proposed trail alignment would not convert Prime Farmland into a non-farmland use. Citrus trees removed to allow for construction access would be replaced upon completion of the trail. Therefore, the proposed Project would not directly impact any State of California Farmland Mapping and Monitoring Program designation of Unique Farmland, Farmland of Statewide Importance, Prime Farmland, or Grazing Land by converting to non-agricultural uses. A less than significant impact is anticipated.

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

No Impact. The Project site is located mostly on land that is designated as Open Space and within the existing right-of-way in the City of Redlands (City of Redlands 2018). The SART Phase IV, Reach A alignment is not proposed on or adjacent to property identified under the Williamson Act contract. As such, the proposed Project will not conflict with an established Williamson Act contract (CDC 2017).

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

No Impact. As identified in the City of Redlands General Plan Land Use Map, land use designations traversed and/or immediately adjacent to portions of the trail alignment that occur within the City of Redlands include: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks (Redlands 2017a). Additionally, as identified in the City of Redlands Zoning Map, zoning designations traversed by the trail and/or immediately adjacent to the alignment include: Open Space, Industrial, Agriculture, and Planned Residential Development. (Redlands 2018).

The portion of the trail alignment that occurs in an unincorporated County area is identified within the County General Plan as occurring in the East Valley Corridor Specific Plan with designations of East Valley Special Development, and East Valley Regional Industrial. The Project does not conflict with existing zoning of forest land, timberland, or timberland zone production. Therefore, no impact is anticipated.

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

No Impact. The proposed Project would be located along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties along the existing street right-of-way within the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. The proposed trail alignment would not be located on forest land. The Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is anticipated.
e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**Less than Significant.** The proposed trail alignment would be located along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties along the existing street right-of-way within the City of Redlands (Exhibit 2) and within an unincorporated area of the County within the East Valley Corridor Specific Plan. The proposed trail alignment does not cross lands designated as Farmland or forest land. The proposed Project would not involve other changes that could convert farmland to non-agricultural use or convert forest land to non-forest use. A less than significant impact is anticipated.

**Mitigation Measures:**

None.

**Agriculture and Forestry Services Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
3. AIR QUALITY

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

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

Environmental Setting

The Project site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. To assist local agencies to determine if a Project’s emissions could pose a significant threat to air quality, the SCAQMD has published its Air Quality Rule Book. The air and dust emissions from the implementation of the Project would be temporary, occurring during the excavation and grading activities. These were measured based on the SCAQMD standards and evaluated against the most recent thresholds applicable.

Impact Analysis

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

**Less Than Significant:** Development of the project involves the disturbance of an approximate 3.9-mile alignment for construction of a section of the Santa Ana River Trail (SART). The trail would begin on the west side of California Street in the City of Redlands and terminate at Orange Street. A Class I Bikeway will be developed as a ten-foot wide asphalt trail with an adjacent unpaved two-foot decomposed granite shoulder to accommodate non-motorized modes of transportation and pedestrians. Upon completion of earthmoving activities, no permanent emissions would occur from the proposed SART. Therefore, the project will not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan (AQMD) or any other applicable air quality plans. No significant impacts are anticipated.

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

**Less Than Significant.** The proposed project individually would not exceed any SCAQMD thresholds for criteria pollutants. The County of San Bernardino General Plan EIR concluded that continued development would contribute to pollutant levels in the San Bernardino valley, which already exceed...
State and Federal air quality criteria. Findings on potentially significant impacts of the General Plan indicated that policies contained in the General Plan and mitigation measures in the EIR are expected to reduce emissions associated with future development. However, even after application of these policies and mitigation measures, the General Plan when viewed as a whole project, is expected to generate emissions levels that would exceed the SCAQMD thresholds for criteria pollutants, resulting in a significant unavoidable adverse air quality impact. A Statement of Overriding Considerations for the General Plan EIR was adopted by the County Council.

c) Expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant.** Development of the improvements would require earthmoving, importing and exporting, and other activities such as material handling and compacting. As the area is prepared, sections of the SART will be constructed.

The project’s proposed earthwork activities were screened for emission generation using SCAQMD “Rule Book” guidelines, and SCAQMD Off-Road Mobile Source Emissions Factors (2019). These tables are used to generate emissions estimates for development projects. The criteria pollutants screened for included: reactive organic gases (ROG), nitrous oxides (NO\textsubscript{x}), carbon monoxide (CO), and particulates (PM\textsubscript{10} and PM\textsubscript{2.5}). Two of these, ROG and NO\textsubscript{x}, are ozone precursors.

**Construction Emissions**

Construction earthwork emissions are considered short-term, temporary emissions and are estimated in Tables 2 and 3. The following construction parameters were assumed:

**SART Earthwork Activities, Typical daily equipment:**

- 1 Water Truck operating 2 hours per day
- 1 Loader operating 8 hours per day
- 2 Other Material Handling Equipment operating 8 hours per day

**Import of Material**

- The import of approximately
  - 3,000 CY of Asphalt
  - 600 CY of Concrete
  - 6,000 CY of Decomposed Granite
  - 1,800 CY of Rip Rap
  - 3,500 CY of fill material
- Approximately 20-mile haul distance (roundtrip)
- 1 Loader/Backhoe operating 8 hours per day
- 4 street legal haul trucks operating per hour, 32 trips per day.
- 2 Other Material Handling Equipment operating 8 hours per day
As shown in Tables 2 and 3 project emissions would not exceed SCAQMD thresholds. **Compliance with SCAQMD Rules 402 and 403**

Although the proposed project does not exceed SCAQMD thresholds for construction emissions, the County Public Works Department ("project proponent") is required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for suspended particulates (PM$_{10}$). The project shall comply with, Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACM) for each fugitive dust source; and the AQMP, which identifies Best Available Control Technologies (BACT) for area sources and point sources, respectively. This would include, but not be limited to the following BACMs and BACTs:

1. The project proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.

   I. The project proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.

   II. The project proponent shall ensure that all disturbed areas are treated to prevent erosion.

---

**Table 2**

SART Earthwork Activities
(Pounds per Day)

<table>
<thead>
<tr>
<th>Source</th>
<th>ROG</th>
<th>NO$_x$</th>
<th>CO</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Truck</td>
<td>0.1</td>
<td>0.8</td>
<td>0.7</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Loader</td>
<td>0.6</td>
<td>4.2</td>
<td>3.5</td>
<td>0.2</td>
<td>0.2</td>
</tr>
<tr>
<td>Other Material Handling Equipment</td>
<td>1.0</td>
<td>6.4</td>
<td>5.6</td>
<td>0.6</td>
<td>0.6</td>
</tr>
<tr>
<td><strong>Totals (lbs/day)</strong></td>
<td>1.7</td>
<td>11.4</td>
<td>9.8</td>
<td>0.8</td>
<td>0.8</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td>75</td>
<td>100</td>
<td>555</td>
<td>155</td>
<td>55</td>
</tr>
<tr>
<td>Significant</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

1 SCAQMD Off-Road Mobile Source Emissions Factors (2019)

**Table 3**

Construction Emissions
"Import"
(Pounds per Day)

<table>
<thead>
<tr>
<th>Source</th>
<th>ROG</th>
<th>NO$_x$</th>
<th>CO</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loader$^1$</td>
<td>0.6</td>
<td>4.2</td>
<td>3.5</td>
<td>0.2</td>
<td>0.5</td>
</tr>
<tr>
<td>Other Material Handling Equipment$^1$</td>
<td>1.0</td>
<td>6.4</td>
<td>5.6</td>
<td>0.6</td>
<td>0.6</td>
</tr>
<tr>
<td>Haul Trucks$^2$</td>
<td>0.8</td>
<td>8.9</td>
<td>3.6</td>
<td>0.8</td>
<td>0.8</td>
</tr>
<tr>
<td><strong>Totals (lbs/day)</strong></td>
<td>2.4</td>
<td>19.5</td>
<td>12.7</td>
<td>1.6</td>
<td>1.6</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td>75</td>
<td>100</td>
<td>555</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Significant</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

$^1$ SCAQMD Off-Road Mobile Source Emissions Factors (2019)

$^2$ Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (2019)
III. The project proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

Exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO\textsubscript{X} and PM\textsubscript{10} levels in the area. Although the proposed project would not exceed SCAQMD thresholds during construction, the County will be required to implement the following conditions as required by SCAQMD:

2. To reduce emissions, all equipment used in earthwork must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.

3. The project proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.

4. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.

5. The operator shall comply with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

Routine operational emissions are not anticipated to be significant as the proposed project is a bike trail. The project is consistent with the County General Plan. Therefore, less than significant impact is anticipated.

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Sensitive receptors occur at the eastern end of the proposed trail alignment at Citrus Valley High School via Domestic Avenue and the single-family residential west of Orange Street.

Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term Project-generated emissions of diesel particulate matter (DPM) from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; application of architectural coatings; and other miscellaneous activities. For construction activity, DPM is the primary Toxic Air Contaminant (TAC) of concern. Particulate exhaust emissions from diesel-fueled engines (i.e., DPM) were identified as a TAC by the CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential for all other health impacts (i.e., non-cancer chronic risk, short-term acute risk) and health impacts from other TACs. Accordingly, DPM is the focus of this discussion.

Based on the emission modeling conducted the maximum construction-related emissions of exhaust PM\textsubscript{2.5}, would be 2.4 pounds per day (Table 2 and Table 3) during construction activity (PM\textsubscript{2.5} is considered a surrogate for DPM because more than 90 percent of DPM is less than 1 microgram in diameter and therefore is a subset of particulate matter under 2.5 microns in diameter (i.e., PM\textsubscript{2.5}), according to CARB.
Most PM$_{2.5}$ derives from combustion, such as use of gasoline and diesel fuels by motor vehicles.) Furthermore, even during the most intense month of construction, emissions of DPM would be generated from different locations on the Project site, rather than a single location, because different types of construction activities (e.g., site preparation, grading, paving) would not occur at the same place at the same time.

The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-, 30-, or 9-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the proposed Project. Therefore, considering the relatively low mass of DPM emissions that would be generated during even the most intense season of construction, the relatively short duration of construction activities (less than 6 months) required to develop the site, and the highly dispersive properties of DPM, construction-related TAC emissions would not expose sensitive receptors to substantial amounts of air toxics. Impacts on sensitive receptors from short-term construction activities are anticipated to be less than significant.

**Operational Air Contaminants**

The proposed Project involves the construction of an approximately 3.9-mile-long section of the SART. The proposed Project will not include the provision of new permanent stationary or mobile sources of emissions, and therefore, by its very nature, will not generate quantifiable air toxic emissions from Project operations. The Project is not anticipated to generate any trips. Because the proposed Project would not increase traffic volumes at any intersection to more than 100,000 vehicles per day, there is no likelihood of the Project traffic exceeding CO values. Therefore, the proposed improvement is not anticipated to impact sensitive receptors. Less than significant impact is anticipated.

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

**Less Than Significant:** Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person’s reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. Intensity refers to the strength of the odor.

During construction, the proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, under CEQA, construction odors would result in a less than significant impact related to odor emissions.

SCAQMD CEQA Air Quality Handbook (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The
proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, there would be no operational odor impacts from the proposed Project.

**Mitigation Measures:**

None.

**Air Quality Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
## 4. BIOLOGICAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td></td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td></td>
<td>X</td>
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<tr>
<td>c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
<td></td>
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<td>X</td>
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<tr>
<td>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
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<tr>
<td>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

☑ Check if project is located in the Biological Resources Overlay or Contains habitat for any species listed in the California Natural Diversity Database

### Environmental Setting

A project-specific Focused Biological Assessment (FBA) for the Santa Ana River Trail Phase IV, Reach A was prepared by Natural Resources Assessment, Inc. (NRAI) in January 2019. A second survey was conducted on December 10, 2019 to document any changes in the habitats crossed by the trail since the last survey conducted on October 24, 2018 and determine how those changes might affect trail design and use. Both reports are attached to the Initial Study as Appendix A and Appendix A-1 which should be referred to for more specific detail and exhibits. The findings of the reports are summarized herein.

The proposed Project is located within the Santa Ana River Watershed (Hydrological Unit Code 12-180702030507) along the southern bluffs of the Santa Ana River, local streets, and other properties along the right-of-way throughout the City of Redlands and within an unincorporated area of the County within the East Valley Corridor Specific Plan. The Santa Ana River floodplain is located to the north of
the alignment and consists of largely undeveloped and natural habitat areas. Analysis in the FBA is partially based on the Upper Santa Ana River Wash Plan (“Wash Plan”) which is intended as a comprehensive Habitat Conservation Plan (HCP) to conserve plant communities, species, and associated habitats in the southwestern San Bernardino County. The draft of the HCP was published in January 2018 and is currently out for public review. One of the activities covered by the plan is the Santa Ana River Trail, including Reach A. The HCP has identified mitigation measures to offset the impacts to five covered species as well as sensitive and general biological resources in this area of San Bernardino County. Although a final HCP has not yet been adopted; the relevant measures provided in the HCP are applicable and recommended for the proposed Project in the event the final HCP is not adopted.

Impact Analysis

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

Less Than Significant with Mitigation Incorporated. NRAI conducted a Focused Biological Assessment of the 3.9-mile long segment of the SART Phase IV, Reach A to identify plant communities and assess the presence of suitable habitat for special-status plant and wildlife species. NRAI reviewed plant and wildlife species occurring within the Project vicinity and conducted field surveys and observations of potential habitat for sensitive species. The FBA focused on the proposed trail alignment and its 25-foot buffer area of potential effect (APE).

The FBA literature search identified several sensitive biological resources to have a potential to occur within the proposed Project’s vicinity. Based on subsequent field surveys and an evaluation of the FBA the following plant species have a potential to occur within the proposed trail alignment’s APE: slender-horned spineflower (*Dodecahema leptoceras*) and the Santa Ana River woolly star (*Eriastrum*). The FBA also identified several special status wildlife species to have a potential to occur within the proposed trail alignment. Based on subsequent field surveys and an evaluation by qualified biologists it was determined that the following wildlife species have a potential to occur within the proposed Project’s trail alignment: the San Bernardino kangaroo rat (*Dipodomys merriami parvus*), the California gnatcatcher (*Polioptila californica*), and the burrowing owl (*Athene cunicularia Hypogea*).

Slender-horned Spineflower

The slender-horned spineflower, although a floodplain endemic, is not anticipated within the proposed Project’s vicinity. The proposed SART Phase IV Reach A alignment mostly follows existing dirt roads and runs parallel but outside of the road shoulder along paved streets. The proposed trail alignment enters natural habitats adjacent to the Citrus Valley High School from Pioneer Avenue to Texas Street, and Texas Street to Israel Beal Park. These sections are in ruderal habitat that has been highly disturbed and does not support habitat for the slender-horned spineflower. This species is not expected to be present and will not be impacted by trail construction or use.

Santa Ana River Woolly Star

The Santa Ana River woolly star is a short-lived perennial shrub that only occurs along the Santa Ana River drainage in San Bernardino County. The FBA survey included searching for this species and observed no woolly star plants within the footprint of Reach A. No direct impacts to woolly star are anticipated.
No individuals of slender-horned spineflower or Santa Ana River woolly star were found along the alignment of Reach A, and none are expected to occur. However, indirect impacts to slender-horned spineflower and Santa Ana River woolly star habitat could occur along the California Street to Alabama Street section of Reach A. Implementation of the mitigation measures below will avoid and/or minimize potential indirect impacts to these species to less than significant.

San Bernardino Kangaroo Rat

Suitable habitat for the San Bernardino kangaroo rat (SBKR) was identified at various locations within the Project limits as well as immediately adjacent to the Project limits as summarized below.

California Street to Alabama Street

Suitable habitat occurs in the Santa Ana River along the northern boundary of the construction limits between California Street and Alabama Street. However, the construction limits do not overlap with the suitable habitat. Additionally, there is a topographical separation between the proposed construction area and the suitable habitat. No direct impacts to SBKR are expected from the trail’s proposed alignment between California Street and Alabama Street.

Alabama Street South

Suitable Habitat for SBKR exists on the west and east side of Alabama Street from the river south to the existing commercial buildings along River Bluff Avenue. The suitable habitat is continuous and includes the *Eriogonum fasciculatum* shrubland alliance and open fields on the west side down to the other open fields and orchards south of River Bluff Avenue. This section of the trail alignment is proposed beyond the limits of the existing road shoulders within the fields, there is a potential for direct impact to SBKR.

Citrus Valley High School to East End of Israel Beal Park

SBKR has been recorded within the abandoned orchard on the east side of Texas Street (NRAI 2013). SBKR populations are known along the Santa Ana River and some populations have been found on the river bluffs such as those immediately north of the proposed trail alignment within this reach. The orchards on the perimeter of the high school as well as the abandoned orchards east of Texas Street remain connected to SBKR populations in the Santa Ana River to the north, therefore, SBKR may still either persist in the orchards or continue to repopulate this area and there is a potential for direct impacts to SBKR at these locations.

Critical Habitat

The proposed trail alignment crosses into Critical Habitat at three locations:

- The first Critical Habitat location is in the northern section of the California Street to Alabama Street alignment. It is not clear from the available information if the boundary for the Critical Habitat includes the joint-use across road. Regardless, suitable SBKR habitat is not present on the joint-use access road.

- The second Critical Habitat location is where the alignment follows the joint-use access road down to connect with Alabama Street. The *Eriogonum fasciculatum* Shrubland Alliance in this area is entirely within Critical Habitat. Critical Habitat also extends a short way south on either side of Alabama Street. Suitable habitat for the SBKR is present on the slopes along Alabama Street.
• The third Critical Habitat location includes what is now Israel Beal Park and existing development to the south. However, suitable habitat does not exist within the park.

The Santa Ana River is known to support SBKR populations. Construction of SART Phase IV, Reach A will impact suitable and potentially occupied habitat for the SBKR along Alabama Street, along Pioneer Avenue east of I-210, north from Pioneer Avenue along the Citrus Valley High School fence, west to Texas Street and the abandoned citrus orchards east of Texas Street.

It is recommended that protocol Presence-or-Absence trapping studies be conducted prior to construction to determine whether SBKR occupy these areas of the alignment.

Additionally, it is recommended that the following measures from the HCP be implemented:

• Soil temporarily stockpiled during construction will be fenced to exclude SBKR and stockpiles will be removed within 45 days of the end of construction

• A qualified biologist or biological monitor with SBKR expertise will be present when construction or ground-disturbing activities that could result in take of SBKR occurs, or within 100 meter of SBKR habitat which is classified as low, medium, or high habitat potential for SBKR in the HCP.

Direct impacts to the SBKR and its habitat would be considered significant and would require consultation with the U.S. Fish and Wildlife Service.

Indirect impacts to SBKR habitat could occur along the California Street to Alabama Street section of Reach A. Implementation of mitigation measure BIO-8 and BIO-9 below will avoid and/or minimize potential indirect impacts to SBKR to less than significant.

California Gnatcatcher

The California gnatcatcher is a small songbird that is a year-round resident of sage scrub communities. The historical records for the California gnatcatcher are scarce for the San Bernardino County area. However, the alluvial fan scrub and coastal sage scrub habitats in the Santa Ana River north of the California Street to Alabama Street extension support suitable habitat for the California gnatcatcher. The FBA does not identify suitable habitat for the species within the proposed limits of construction; therefore, there is no direct impact to the species in the form of habitat loss. Construction activity may result in an indirect impact to the species if construction occurs during the nesting season. However, implementation of mitigation measures BIO-5 and BIO-7 below will avoid and/or minimize potential indirect impacts to California gnatcatcher to less than significant.

Burrowing Owl

The burrowing owl (Athene cunicularia hypogea) is a resident species in lowland areas of Southern California that prefers large flat open areas for nesting and hunting. This species lives in burrows constructed by other ground-dwelling species in grassy or sparse shrubby habitat and are also known for taking over other types of burrows, including manmade objects, such as pipes. This species forages low over the ground surface for insect prey, and seldom flies very high in the air. As a result of coastal development, the burrowing owl is declining in coastal habitats. The California Department of Fish and Wildlife (CDFW) has designated the burrowing owl as a California Species of Special Concern (CSC). These species are so designated because “declining population levels, limited ranges and/or continuing threats have made them vulnerable to extinction.” (California Department of Fish and Wildlife 2018).
The California Street to Alabama Street section has suitable habitat on either side of the proposed trail alignment, mostly along the river bluff. There is no suitable habitat immediately within the Project's construction limits. The portion of the proposed trail alignment from Pioneer Avenue parallel to but outside the fence around the Citrus Valley High School and then east to Texas Street also provides suitable habitat for burrowing owls. No burrowing owls were observed, and no burrows were found adjacent to this section during the field surveys. However, there may be animals nesting outside the alignment in either of these two sections that could be indirectly affected by construction. Most of the available habitat is of low quality, but these areas are located close to the Santa Ana River and open space areas where the burrowing owls may move into in the future. Implementation of mitigation measures BIO-5 and BIO-7 below, will avoid and/or minimize potential indirect impacts to burrowing owl to less than significant.

Overall impacts to sensitive biological resources are primarily concerned with the loss of habitat. Most of Reach A is in close proximity to habitats, but because it follows an existing dirt road/trail or otherwise disturbed surface, construction of the trail is not expected to have a significant direct impact on sensitive resources. No direct impacts are expected to occur to sensitive plant communities, habitats or species.

However, indirect impacts to sensitive resources, including one or more of the five species covered in the HCP, may occur as a result of construction activities. Best Management Practices (BMPs) and avoidance and minimization measures as recommended in the FBA and listed below shall be incorporated into the Project.

Implementation of mitigation measures BIO-1 to Bio-17 below would minimize potential impacts to habitat and wildlife, including potentially occurring special status species, to a less than significant level.

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

**Less than Significant.** Construction activities and expected earthwork would include cut and fill for trail grading and retaining wall construction. Although the majority of the proposed trail alignment overlies existing road or flood control right-of-way and mostly disturbed areas, it is anticipated that construction would require the removal and/or relocation of various trees, shrubs, bushes, and grasses.

The potential vegetation types identified within the SART Phase IV, Reach A alignment include: Hirschfeldia Herbaceous Semi-Natural Alliance, Agricultural Orchards (Citrus) with a ruderal understory beneath the trees, and Developed/Disturbed barren areas that do not support plant communities. At the time of the survey, farmed areas were observed to have no vegetation cover and were dominated by weeds such as red brome, slender wild oats (Avena barbata), and Russian thistle. Shrubs and tree species were mostly absent in this community because these areas tend to be subject to high disturbance levels. Types of disturbance include crop production, grading, disking for fire control, and legal and illegal uses such as off-roading and dumping of material.

During the December 10, 2019 survey, NRAI found only one change in the environment since the October 24, 2018 survey. The change included a reduction in the area of Hirschfeldia Semi-Natural Alliance habitat (located west of Alabama Street south to Palmetto Avenue). The southern three-fourths of the Hirschfeldia Semi-Natural Alliance habitat appeared graded and was undergoing development at the time of the survey. The northern one-fourth appeared abandoned and still retained Hirschfeldia Semi-Natural Alliance habitat. If the northern quarter of Hirschfeldia Semi-Natural Alliance habitat remains unused, then over time it could become marginally suitable habitat for the burrowing owl. As concluded in the December 16, 2019 Letter Report, since Project construction limits do not include this habitat, any...
impacts to the burrowing owl would be indirect. No new mitigation measures, beyond the initial mitigation measures provided in the January 2019 FRA, would be recommended.

Reach A begins at the terminus of California Street and continues along a dirt access road which extends to the bank/levee of the Santa Ana River and turns east along the existing California Street landfill. This section of the proposed trail alignment travels along the joint-use access dirt road on the levee of the river past the Redlands Wastewater Treatment Facility to Alabama Street. There is no native habitat directly along this section of Reach A until just before reaching Alabama Street, where the alignment passes through a stand of the *Eriogonum fasciculatum* Shrubland Alliance.

The SART Phase IV, Reach A then travels on Alabama Street south to Pioneer Avenue and then easterly and under Interstate 210 (I-210). The proposed trail alignment then continues north from Pioneer Avenue and connects with Domestic Avenue at the northwest corner of Citrus Valley High School which then turns east on Domestic Avenue to Texas Street. The vegetation alliance along this section is a mix of ruderal (weedy), agricultural, orchard, and developed/disturbed vegetation.

The proposed trail alignment then travels north on the west side of Texas Street for approximately one-quarter mile. Vegetation along this section includes orchard on the west and ruderal and developed/disturbed on the east. Reach A then turns east, crossing Texas Street and continues east through ruderal habitat and an abandoned citrus orchard. The undergrowth in the former citrus orchard is dominated by weedy species such as slender wild oats, red brome, short-pod mustard and London rocket (*Sisymbrium irio*). There are also stumps of former citrus trees and isolated individuals of eucalyptus and Mexican elderberry (*Sambucus nigra*). East of the abandoned orchard an approximately 500-foot segment of the proposed trail alignment, which connects to Israel Beal Park, has been constructed by a private party and is within a developed/disturbed vegetation type, entirely landscaped and devoid of native habitat.

The impacts to general biological resources include the loss of ruderal and upland habitats. These impacts are minimal and are not considered to be significant. No impact to riparian habitat or other sensitive natural communities were identified in the FBA. Therefore, less than significant impacts are anticipated to occur.

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

**No Impact.** The Santa Ana River is under the jurisdiction of the Army Corps of Engineers (ACOE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW). During the FBA field survey, a small channel on the east side of Texas Street was identified as potentially under the jurisdiction of the ACOE and RWQCB. Subsequent to the FBA field survey, staff from the Environmental Management Division of the County coordinated a site visit with regulatory staff from the ACOE to evaluate jurisdiction. It was determined that the channel consists of a roadside drainage ditch and is not subject to a ACOE permit as defined in 40 CFR 230.3. The channel does not have relatively permanent water flows; it is constructed wholly in uplands for the purpose of draining upland sheet flow; it does not connect a natural drainage feature upstream to a downstream tributary; and, it does not intersect the groundwater table. Furthermore, vegetation in the drainage is limited to herbaceous species in the *Hirschfeldia Herbaceous* Semi-Natural Alliance. The drainage is also considered non-jurisdictional to the SWRCB under Section 401 of the Clean Water Act.
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

**Less Than Significant with Mitigation Incorporated.** A wildlife movement corridor is defined as an area which joins two or more larger areas of similar wildlife habitat; a wildlife corridor between such habitat blocks functions to allow for genetic exchange between populations. Movement corridors allow for dispersal of young, expanded foraging opportunities, and allow for animals to flee in the event of a fire or other large-scale disturbance. Viable connections between habitat areas effectively expand the usable areas for wildlife that use the habitats and corridors. The major regional blocks of habitat in the region of the proposed Project include the San Gabriel Mountains, the San Bernardino Mountains, the Chino Hills, the Prado Basin, the Jurupa Hills, the San Timoteo Badlands, and the Crafton Hills. The upper Santa Ana River floodplain between Redlands, Highland and San Bernardino is also a major block of habitat. Wildlife movement connections between these features are generally limited by urbanization. Restrictions are minimized where these habitat blocks are closer to each other.

In general, residential and commercial development is present throughout the proposed trail alignment and the Santa Ana River is located north of the proposed trail alignment. The segment of the trail along Pioneer Avenue is surrounded by agricultural and vacant fields with existing bicycle lanes. Agriculture, vacant fields, and the Citrus Valley High School exist along Domestic Avenue and urban developments and abandoned agricultural fields occur on the east and west sides of Texas Street. Urban developments are generally not conducive to wildlife travel between natural areas because of vehicular traffic, human presence, and the presence of noise and light. The vacant parcels of land may provide limited restricted movement but are typically not utilized by wildlife due to lack of protective cover and proximity to development.

The proposed Project would result in development of the trail along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties along the right-of-way within the City of Redlands and unincorporated County areas. The trail segments along the river bluff would consist of a Class 1, 10-foot wide asphalt/concrete trail and 2-foot graded shoulder on each side of the asphalt/concrete trail; on the existing right-of-way the existing road surfaces would be widened where possible to accommodate a modified Class I bicycle lane. Implementation of the Project would not result in a substantial physical change to the existing environment that would impact regional wildlife corridors or the non-specific movement patterns of wildlife adapted to urban environments. No significant loss to raptors and migratory birds or their habitats are expected, and therefore no mitigation is required. However, construction activity may indirectly affect nesting birds, especially in areas of native habitat.

Implementation of Mitigation Measure BIO-5 to BIO-7 below would minimize potential impacts to an established native resident or to migratory wildlife corridors, to a less than significant level.

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

**Less Than Significant.** Shrub and tree species are mostly absent in the Project area which tends to be subject to high disturbance levels. Types of disturbance include crop production, grading, disking for fire control, and legal and illegal uses such as off-roading and dumping of material. However, portions of the trail alignment traverse land uses designated as agricultural and construction of the trail may require the removal of citrus trees located within the existing street’s right-of-way. Trees that occur within the public domain are protected and managed pursuant to City Municipal Code Chapter 12.52. According to City Municipal Code Section 12.52.090, it shall be the policy of the City to protect and maintain mature and
healthy public trees. Special consideration shall be afforded public, landmark, native and specimen trees. A landmark tree is defined as a public tree designated as a historic resource under Chapter 2.62 of the City Municipal Code as a tree of historic or cultural significance and of importance to the community due to any of the following factors: 1) it is one of the largest or oldest public trees of the species located in the city; 2) it has historical significance due to an association with a historic building, site, street, person or event; or 3) it is a significant outstanding feature of a neighborhood. The policy also protects all public trees that meet the definition of native or specimen trees which are defined as any public tree, identified by a certified arborist as native to the local area, with a trunk more than eight inches in diameter at a height of four and one-half feet \((4\frac{1}{2})\) above natural grade that is identified on a list of native trees approved by the City Council.

In these instances, appropriate permits as outlined in the City of Redlands’ Municipal Code Section 12.52 would be obtained to remove/relocate public trees to an area subject to less disturbance. If it is determined during the City’s Plan Review of the final design that removal of a protected tree pursuant to City Municipal Code Chapter 12.52 will occur, permits and approvals would be required from the City as part of the project approval process. Compliance with the determinations of the plan review will ensure that the Project would not conflict with local policies protecting trees within the City.

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

Less Than Significant with Mitigation Incorporated. The Upper Santa Ana River Wash Plan (ICF 2018) is intended as a comprehensive Habitat Conservation Plan (HCP) that will conserve plant communities, species and associated habitats in southwestern San Bernardino County. It covers approximately 4,892 acres and identified five covered species requiring specific protection. The draft was published in January 2018 and has not yet been finalized. The SART Phase IV, Reach A is a covered activity in the HCP and even though the HCP has not yet been adopted, the relevant measures provided in the HCP are included in the mitigation measures below. Once finalized the SART Phase IV, Reach A will comply with applicable conservation measures and would minimize conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, to a less than significant level.

Mitigation Measures

- **BIO-1** Prior to construction of the Project, the Project Proponent shall install and maintain barriers such as boulders, fences, and gates along work area and trail boundaries to help prevent unauthorized activities, including dumping and off-road vehicle use.

- **BIO-2** Prior to construction, the Project Proponent shall delineate the limits of construction via marking or temporary fencing. The delineation shall be maintained as necessary until construction of the trail is completed.

- **BIO-3** Throughout construction of the Project, construction personnel shall limit their activities, vehicles, equipment, and construction materials to the designated work area and equipment staging areas.

- **BIO-5** All workers will receive environmental awareness training. The training will be developed in consultation with a qualified biologist and consist of an onsite or training center presentation for which supporting materials will be provided. Training will provide information about the special-status species potentially occurring on site and an explanation of the purpose and function of the avoidance and minimization measures and the possible penalties for not adhering to them.
If construction takes place during the California gnatcatcher breeding season, burrowing owl nesting period, during nesting bird season (February 1 through August 31), or whether significant loss to raptors and migratory birds or their habitats is expected, a general nesting bird survey will be required. The protocol requires the following:

- Construction scheduled to occur between February 1 and August 31 will require a qualified biologist conduct a breeding bird survey no more than three days prior to the start of construction to determine if nesting is occurring.
- “Construction” includes selection of staging areas, demolition, tree, trash and debris removal, placement of equipment and machinery on to the site preparatory to grading, and any other Project-related activity that increases noise and human activity on the Project site beyond existing levels. Emergency measures are exempt from this definition.
- If occupied nests are found, they shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (a) the adult birds have not begun egg-laying and incubation; or (b) the juveniles from the occupied nests are capable of independent survival.
- If the biologist is not able to verify one of the above conditions, then no disturbance shall occur within a distance specified by the qualified biologist for each nest or nesting site. The qualified biologist will determine the appropriate distance in consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.

Protocol SBKR presence-or-absence studies will be conducted prior to construction to determine whether SBKR occupy suitable habitat along the alignment. If the studies are positive the County will consult with the U.S. Fish and Wildlife Service. Construction will not proceed until the appropriate authorization from U.S Fish and Wildlife Service is received.

A qualified biologist or biological monitor with SBKR expertise will be present when construction or ground-disturbing activities that could result in take of SBKR occurs, or within 100 meters of SBKR habitat which is classified as low, medium or high habitat potential for SBKR in the HCP.

Equipment (e.g., passenger vehicles, trucks, and heavy equipment) will be cleaned prior to entering the worksite and between worksites to prevent the importation and spread of exotic plant species.

Ingress and egress of construction equipment and personnel will be confined to designated access points. Cross-country travel by vehicles and equipment will be prohibited.

No open trenches or holes will be left overnight without covering, fencing, or providing escape ramps with a minimum 3:1 slope. If trenches are not covered, they will be inspected for trapped wildlife by a qualified biologist or biological monitor prior to the start of work activities each day the trenches or holes remain uncovered. Animals found will be captured and moved to the nearest safe location outside the construction area.

Soil temporarily stockpiled during construction will be fenced to exclude SBKR and stockpiles will be removed within 45 days of the end of construction.
BIO-13 Dust will be controlled. If water trucks are to be used, pooling of water will be avoided to minimize the potential of attracting opportunistic predators.

BIO-14 Adequate fire suppression capability will be maintained in active construction areas including having a water tender on site in active construction areas during periods of high fire danger.

BIO-15 No firearms or pets will be allowed at the work areas. Firearms carried by authorized security and law enforcement personnel are exempt.

BIO-16 Litter control measures will be implemented during construction and post-construction. Trash and food items will be contained in closed containers and removed daily to reduce the attractiveness of the area to opportunistic predators.

**Biological Resources Impact Conclusions:**

With implementation of the above listed measures, less than significant impacts are anticipated.
5. CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</td>
<td></td>
<td>X</td>
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<tr>
<td>c) Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td></td>
<td>X</td>
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(Check if project is located in the Cultural overlays or cite results of cultural resource review)

Environmental Setting

Potential impacts to cultural resources are identified in the Phase I Cultural Resources Investigation and Assessment (CRIA) of Impacts on Cultural Resources Identified within the Proposed Santa Ana River Trail, Phase IV, Reach A, California Street to Orange Street, Redlands, San Bernardino County, California prepared by McKenna et al. (McKenna 2018) for the 3.9-mile-long alignment. The cultural study included an archaeological records search, Native American consultation, historic background research, paleontological overview, and a field survey. The report is available for review at the Department of Public Works and findings of the report are summarized herein.

Impact Analysis

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

Less Than Significant. As reported in the cultural resources investigation, historic period resources were identified in and around the trail alignment. However, the resources were found to be previously impacted by earlier improvements and/or previously evaluated and found to be ineligible for listing on any of the registers (federal, state, regional, or local). Previous studies have identified over 100 historic period sites within one-mile of the Project area. Most of the historic structures were identified near the Norton Air Force Base (less than a mile northwest of the Project site) and along Lugonia Avenue (less than a mile south of Pioneer Street alignment). Of the resources, two were identified as significant to the Project alignment; the Lugonia School Monument and the San Bernardino County Museum. However, neither will be impacted by the proposed Project.

McKenna et al. identified the following roadways as significant to the Project alignment:

- California Street
- Texas Street
- Olive Avenue
- Nevada Street
- Orange Street
- Palmetto Avenue
- Alabama Street
- Pioneer Avenue
- Domestic Avenue

With the exception of Domestic Avenue each of the road alignments listed have been widened and paved or substantially altered through modern improvements and no longer resemble their original designs or materials.

The open areas surrounding Citrus Valley High School, specifically the fields west and north of the school, along Domestic Avenue have evidence of early orchards, which continue to be harvested. The survey of
the area around the school confirmed a dirt road extension of Domestic Avenue and sewer caps indicating the presence of disturbed soils and buried pipelines. A few irrigation remnants were found on the western boundary of the school and to the north, however, these structural remains have been previously assessed and determined to be insignificant. The proposed trail alignment would occur outside of any potential historic listing.

The open field to the east of Texas Street also yielded evidence of an early irrigation system, an abandoned orchard, and the remnants of large, old eucalyptus trees along the river bluff. This property has been previously recorded as Site 36-007052; the site was evaluated, and it was concluded that site avoidance or protection are not necessary (McKenna 2018). Furthermore, the off-road area connecting Texas Street to Israel Beal Park is subject to significant dumping of modern refuse, homeless encampments, and other surface disturbances. Despite the disturbances, no significant artifacts or features have been uncovered.

The results of the cultural resource investigation indicate that although the Project area has yielded historic period resources, the resources have been found to be insignificant and ineligible for recognition as historic resources (McKenna 2018). Therefore, a less than significant impact is anticipated.

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

**Less Than Significant.** The Project area has surface deposits composed of soil and younger Quaternary alluvium derived predominantly as alluvial fan deposits from the Crafton Hills and the San Bernardino Mountains to the east via the Santa Ana River. To adequately address the potential resources in the Project area, McKenna et al. completed a standard archaeological record search through the California State University, Fullerton, South Central Coastal Information Center on October 8, 2018.

In some cases, the research exceeded the one-mile radius to incorporate studies likely to yield additional data pertaining the area along the Santa Ana River. As a result of this research, McKenna et al. documented a minimum of 107 cultural resources studies in the immediate area of the proposed SART Phase IV, Reach A alignment. Previous surveys have amply addressed much of the proposed alignment. Of the 107 reported cultural resources, only two of the identified resources were found to be cross-referenced as a California Point of Historical Interest including the Lugonia School Monument and the San Bernardino County Museum. The Lugonia School Monument is located approximately 1.2 miles southwest of the eastern trail terminus and the San Bernardino County Museum is located approximately 1.4 miles south of the western trail terminus.

Additionally, three of the previously recorded cultural resources were determined to be of consequence to the proposed Project alignment. The first site is a historic refuse scatter on the west side of Orange Street north of the alignment recorded in 1987. The site was likely destroyed by the Gun Range and is not anticipated to be further impacted by the proposed trail alignment. The second site is a ranching complex that included a residence, barn, irrigation feature, and groves recorded in 1991. This site was relatively large and included structural improvements along Pioneer Avenue east of the Citrus Valley High School. The remainder of the property is covered in groves and remnants of eucalyptus wind rows. None of the structural locations are anticipated to be impacted by the proposed trail alignment. The third site consists of irrigation system remnants on the south side of Pioneer Avenue west of the State Route 210 alignment recorded in 2007. None of the features associated with this site are anticipated to be impacted by the proposed trail development.
Given the nature of the proposed SART Phase IV, Reach A alignment, much of the alignment consists of highly impacted areas with little to no native soils available for investigations. However, the alignment does not involve areas likely to be associated with standing structures and therefore, resources are more likely to be peripheral to the proposed alignment. However, implementation of Mitigation Measure CUL-1 below would minimize impacts to potential archaeological resources incidental finds to a less than significant level.

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

**Less Than Significant with Mitigation Incorporated.** No known human remains are present on the Project site. If human remains are inadvertently uncovered during Project activities, adherence to Mitigation Measure CUL-2 would reduce impacts to less than significant.

**Mitigation Measures:**

- **CUL-1**  
  In the event that previously unidentified resources are uncovered as a result of the trail development, a qualified archaeologist shall be on-call and available to inspect and assess the find in accordance with CEQA criteria. If deemed appropriate, archaeological monitoring shall be incorporated into the overall mitigation program.

- **CUL-2**  
  If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within 60-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the Project.

**Cultural Resources Impact Conclusions:**

With implementation of the above listed measures, less than significant impacts are anticipated.
### 6. ENERGY

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

#### Environmental Setting

Portions of the alignment would occur along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and on other properties within the existing right-of-way in the City of Redlands and unincorporated area of the County. The proposed Project traverse properties with the following land use designations: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks.

#### Impact Analysis

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

**Less than significant.** Consumption of energy resources for the proposed Project is limited to fuel for construction equipment. Once the trail is operational, demand for energy resources is anticipated to be minimal for patrolling and maintenance of the facility. Use of the trail for recreational purposes would not generate demand for energy resources. A less than significant impact is anticipated.

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

**Less than significant.** The Sustainable Community Element of the City of Redlands General Plan and the Renewable Energy and Conservation Element of the County of San Bernardino General plan outline goals promoting sustainable energy sources and energy efficient technologies. The proposed project is the construction and operation of a multi-use trail; operation of the trail consist of passive use for recreation and does not generate a demand for energy resources. Consumption of energy resources would be limited to fuel during construction and for patrolling/maintenance of the trail post-construction. The proposed Project does not conflict with or obstruct plans for renewable energy or energy efficiency because it does not preclude goals of the City and County related to renewable energy. Additionally, the project does not generate a significant demand for energy resources; therefore, it does not conflict with energy efficiency goals. A less than significant impact is anticipated.

#### Mitigation Measures:

None.

#### Energy Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
7. GEOLOGY AND SOILS

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury death involving:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>ii. Strong seismic ground shaking?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>iii. Seismic-related ground failure, including liquefaction?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>iv. Landslides?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(Check if project is located in the Geologic Hazards ☐ or Paleontologic Resources ☐ Overlay District):

**Environmental Setting**

According to the *City of Redlands General Plan Update and Climate Action Plan EIR*, the Project area occurs within the San Bernardino Valley just south of the San Bernardino Mountains. Geologically, the area is located north of the Peninsular Range geomorphic province, which is characterized by northwest trending mountains and valleys of granite and older metamorphic rocks. The topography in the area generally slopes downward to the southwest (Redlands 2017b). Phase IV, Reach A of the SART is located near the northern City of Redlands boundary along the bluffs of the Santa Ana River and along local streets and within the existing right-of-way in the City of Redlands; with a portion of the trail occurring within an unincorporated area of the County within the East Valley Corridor Specific Plan.

**Impact Analysis**

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

ii. **Strong seismic ground shaking?**

iii. **Seismic related ground failure, including liquefaction?**

iv. **Landslides?**

**Less Than Significant.** The Project area lies southwest of the San Andreas Fault zone and southwest of the San Jacinto fault zone. The Crafton Hills fault zone also traverses sections of Redlands, Crafton, and Mentone. The San Andreas Fault zone is predicted to have the capacity to produce an earthquake with a maximum moment magnitude of 7.5. The San Jacinto fault is predicted to have the capacity to produce an earthquake with a maximum moment magnitude 6.7 (Redlands 2017b). The Project site is subject to ground shaking and potential impacts related to ground shaking. As shown in Figures 7-5 Faults of the City's General Plan, the proposed trail alignment does not traverse through any Alquist-Priolo fault zones or zones with identified landslide susceptibility. However, because portions of the trail along the river bluffs are located within high liquefaction susceptibility, the proposed trail alignment may be subject to risk related to ground shaking. However, such risk is not expected to be substantially adverse because trail use would be transitory and does not include residential or other structures that would encourage large densities of users to gather. Therefore, a less than significant impact is anticipated.

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

**Less Than Significant.** Construction activities associated with development of the proposed Project would include: earthwork including excavation and grading; construction of embankments and/or retaining walls; construction of storm drains, headwalls, and slope protection; construction of asphalt concrete dike, curb and gutter; installation of fencing, railing, access gates, trail delineators, and signage; painting of pavement striping and pavement markings; and, construction of appurtenant features.

The area of potential effects (APE) for the Project includes all areas subject to direct effects from construction activities and is mapped with a 25-foot buffer area surrounding the maximum construction impact area, with the exception of where the trail is located within an existing roadway alignment. The APE for the segments of the trail within roadway alignments is mapped as the roadway right-of-way boundary (see Exhibits 4 – 10).

A Water Quality Management Plan (WQMP) and a Storm Water Pollution Prevention Plan (SWPPP) will be prepared for the proposed Santa Ana River Trail Phase IV, Reach A once the Project moves to final design stages. These reports will include Best Management Practices (BMP) to reduce the potential of fugitive dust and soil erosion (refer to Section III Air Quality). Compliance with the BMPs, as well as other applicable water quality standards and requirements (refer to Section IX, Hydrology and Water Quality) will reduce impacts from erosion associated with construction activities. Therefore, a less than significant impact is anticipated.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?**
Less Than Significant. The *City of Redlands General Plan* identifies the Santa Ana River bluff as an area of high liquefaction susceptibility (Redlands 2017a). The proposed trail alignment adjacent to the Santa Ana River wash would consist of a 10-foot wide asphalt/concrete trail and would include a 2-foot wide graded shoulder on either side of the proposed trail alignment; specifically, from California Street to Alabama Street and along Texas Street to Orange Street. Development of the trail would require minimal earthwork and ground disturbance. It is not expected that development of the trail would result in instability of the river bluff. Therefore, a less than significant impact is anticipated.

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

Less Than Significant. Three different soil series occur on or in the immediate vicinity of the proposed trail alignment and include: Hanford, Pssaments and Fluvents, and Tujunga. A soil series is a group of soils with similar profiles. These profiles include major horizons with similar thickness, arrangement, and other important characteristics. Each of the soil series recorded are natural soil types, but there is the potential for presence of fill material derived from other sources within the many developed portions of the Project area, as well as potential mixing of soil types along the surface horizons due to ground disturbance.

The drainage classes of the soil series recorded within the Project area are well drained to excessively drained, meaning that they are not generally very wet. Water is removed from the soil readily to rapidly and internal free water occurrence is rare. Each of the recorded soil types are alluvium derived from granite or a sandy alluvium. Cobbles and coarse stones are common within the soils occurring within the Project area. Each of the soil types contain moderate to rapid permeability with variable runoff potential.

Expansive soils are clay-rich soils that expand when wet and shrink when they dry out. The Hanford, Pssaments and Fluvents, and Tujunga soils that occur within the Project area are well drained to excessively drained and are derived from granite or sandy alluvium not clay. The soils do not exhibit the characteristic of expansive soils; therefore, a less than significant impact is anticipated.

*e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The proposed Project is the development of the Santa Ana River Trail Phase IV, Reach A and does not include septic tanks or alternative wastewater disposal systems. Therefore, no impact is anticipated.

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

Less than Significant with Mitigation Incorporated. McKenna et al. completed a paleontological overview for the SART Phase IV, Reach A alignment. It was concluded that the Project area consists of younger Quaternary alluvium originating from the San Bernardino Mountains via the Santa Ana River. Alluvial deposits of this type are not typically conducive to yield fossil specimens. However, fossil specimens have been recovered in similar settings at depths that may be as shallow as 9-10 feet. McKenna et al. found no evidence of fossil specimens. However, implementation of Mitigation Measure GEO-1 below would minimize potential impacts to paleontological resources incidental finds to a less than significant level.
**Mitigation Measure:**

GEO-1 Should the Project require relatively deep excavations, generally in areas with disturbance exceeding nine (9) feet below the present surface, where older alluvium deposits are possible; a paleontological monitor shall be present and have authority to recover, analyze, and curate any specimens of paleontological significance. The paleontological monitoring program shall be conducted in a manner consistent with the protocols of the San Bernardino County Museum.

**Geology and Soils Impact Conclusions:**

With implementation of the above listed measure, less than significant impacts are anticipated.
8. **GREENHOUSE GAS EMISSIONS**

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**Background**

The County of San Bernardino has adopted a screening threshold of significance of 3,000 MTCO$_2$e per year for GHG emissions (Greenhouse Gas Emissions Development Review Processes County of San Bernardino March 2015). Therefore, a screening threshold of 3,000 MTCO$_2$e per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the County of San Bernardino and numerous cities in the South Coast Air Basin and is consistent with the South Coast Air Quality Management District (SCAQMD) staff’s proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD’s *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (SCAQMD 2008).

**Impact Analysis**

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

**Less Than Significant:** Per CEQA guidelines, new project emissions are treated as standard emissions, and air quality impacts are evaluated for significance on an air basin or even at a neighborhood level. Greenhouse gas emissions are treated differently as the perspective is global, not local. Therefore, emissions for certain types of projects may not necessarily be considered new emissions if the project is primarily population driven. Many gases make up the group of pollutants that are believed to contribute to global climate change. However the three gases that are currently evaluated include Carbon dioxide (CO$_2$), Methane (CH$_4$) and Nitrous oxide (N$_2$O). GHGs emissions were evaluated using SCAQMD’s Off-Road Mobile Source Emissions Factors (2019) and California Climate Action Registry General Reporting Protocol, 2009; Table A9-8-C SCAQMD Handbook; Climate Leaders EPA, Section 3, Table 3. Model results for GHG emissions related to the proposed Project are shown in Table 4.

As shown in Table 4, the Proposed Project's emissions would not exceed the threshold of significance. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
Table 4
Construction Emissions
Greenhouse Gases

<table>
<thead>
<tr>
<th>Task</th>
<th>CO₂₁</th>
<th>CH₄¹</th>
<th>N₂O²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Haul Trucks</td>
<td>2,691.8</td>
<td>0.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Loader</td>
<td>872</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Water Truck</td>
<td>246</td>
<td>0.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Other Material Handling Equipment</td>
<td>1,968</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Total (lbs per day)</td>
<td>5,777.8</td>
<td>0.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Total Per Year (lbs)*</td>
<td>577,780</td>
<td>20</td>
<td>0.0</td>
</tr>
<tr>
<td>MTCO₂e</td>
<td>262.1</td>
<td>0.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Total MTCO₂e</td>
<td>262.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Threshold</td>
<td>3,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Significant</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¹ Off-Road Mobile Source Emissions Factors (2019);
Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (2019)
² California Climate Action Registry General Reporting Protocol, 2009;
Table A9-8-C SCAQMD Handbook; Climate Leaders EPA, Section 3, Table 3.
* Construction duration: 100 work days

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

Less Than Significant: The proposed project is the construction and operation of a multi-use trail. No operational emissions are anticipated. The City of Redlands and the County of San Bernardino have adopted a Climate Action Plan and a Greenhouse Gas Emissions Reduction Plan, respectively. The plans and how they pertain is discussed below:

City of Redlands Climate Action Plan (CAP)

The Redlands Community Sustainability Plan (2011) is a strategic planning document that identifies sources of GHG emissions within the City’s boundaries, presents current and future emissions estimates, identifies a GHG reduction target for future years, and presents strategic programs, policies, and projects to reduce emissions from the energy, transportation, land use, water use, and waste sectors. The GHG-reduction strategies in the CAP build on inventory results and key opportunities prioritized by City staff and members of the public. The CAP strategies consist of strategies that identify the steps the City will take to support reductions in GHG emissions. The City will achieve these reductions in GHG emissions through a mix of voluntary programs and new strategic standards. All standards presented in the CAP respond to the needs of development, avoiding unnecessary regulation, streamlining new development, and achieving more efficient use of resources.

Construction of the proposed Project would last approximately six months and construction-related GHG emissions would cease upon completion. The proposed Project would not include the provision of new permanent stationary or mobile sources of emissions, and therefore, by its very nature, would not generate quantifiable GHG emissions from Project operations. Thus, the Project is consistent with the GHG inventory and forecast in the Redlands CAP since it would not contribute to the generation of GHG emissions beyond that considered in the CAP. Furthermore, the trail would promote the use of alternative transportation, including walking and cycling, which would, in turn, reduce GHG emissions due to the reduced reliance on automobiles, a primary source of GHG emissions. More
importantly, the Project directly implements CAP Goal LU3 and Policy LU3.3, which seeks to encourage non-motorized transportation and specifically complete the SART. The Project is consistent with the City’s CAP as it would not conflict with the CAP GHG inventory or forecast and serves to directly implement CAP Goals and Policies. No impact would occur.

**County of San Bernardino Greenhouse Gas Emissions Reduction Plan**

The County of San Bernardino GHG Reduction Plan (2011) establishes a GHG emissions reduction target for the year 2020 that is 15 percent below year 2007 emission levels. The GHG Plan is consistent with AB 32 and sets the County on a path to achieve a more substantial long-term reduction in the post-2020 period. Achieving this level of emissions would ensure that the contribution to GHG emissions from activities covered by the GHG Reduction Plan would not be cumulatively considerable. All new development under the jurisdiction of the County is required to quantify a project’s GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance.

The County GHG Reduction Plan identifies a review standard of 3,000 metric tons of CO₂e per year to identify and mitigate project emissions. Projects estimated to generate less than 3,000 metric tons of CO₂e per year are considered less than significant. For projects exceeding 3,000 metric tons of CO₂e per year, the developer may use the GHG Reduction Plan Screening Tables in the GHG Reduction Plan as a tool to assist with calculating GHG reduction measures and the determination of a significance finding. Projects that garner 100 or more points on the Screening Tables are considered less than significant. (The point system was devised to ensure project compliance with the reduction measures in the GHG Plan such that the GHG emissions from new development, when considered together with those from existing development, would allow the County to meet its year 2020 target and support longer-term reductions in GHG emissions beyond year 2020.)

As shown in Table 4, the total amount of proposed GHG emissions would total 262 metric tons of CO₂e per year, which does not exceed the County’s 3,000 metric tons of CO₂e per year screening threshold. Therefore, the Project does not conflict with the San Bernardino Greenhouse Gas Emissions Reduction Plan. No impact would occur.

**Mitigation Measures:**

None.

**Greenhouse Gas Emissions Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
9. HAZARDS AND HAZARDOUS MATERIALS

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

**Environmental Setting**

Portions of the alignment would occur along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and on other properties within the existing right-of-way in the City of Redlands; a portion of the alignment occurs within an unincorporated area of the County within the East Valley Corridor Specific Plan. The proposed Project traverse properties with the following land use designations: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks.

The City of Redlands adopted a *Hazard Mitigation Plan* (HMP) in 2015 to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. The purpose of the HMP is to establish a plan for reducing and/or eliminating risks associated with flooding, earthquake, wildfire, hazardous material, and drought hazards within the City. The HMP identifies mitigation goals, objectives, and projects to reduce risk; the recommendations and goals of the HMP are incorporated into the City’s General Plan and referenced below.
Impact Analysis

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

Less than Significant. The construction phase of the proposed Project may include the transport of gasoline and diesel fuel to the Project site as well as the on-site storage of said products for the sole purpose of fueling construction equipment. All transport, handling, use and disposal of substances such as petroleum products, solvents, and paints related to the maintenance of the trail would comply with all Federal, State, and local laws regulating the management and use of hazardous materials. The potential impacts associated with the routine transport, use, or disposal of hazardous materials would be minimal occurring only during the short-term construction period and periodic maintenance activities. Therefore, a less than significant impact is anticipated.

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

Less Than Significant. Construction and maintenance would involve short-term use of petroleum-based fuels, lubricants, pesticides and other potentially hazardous materials. Use of these materials would occur only during the short-term construction period and during maintenance and is not considered a significant hazard to the public. Therefore, a less than significant impact is anticipated.

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

Less Than Significant. Citrus Valley High School is located adjacent to a portion of the SART Phase IV, Reach A alignment; Clement Middle School is located approximately 0.8 mile southeast of the terminus at Orange Street. Construction activities would involve short-term use of petroleum-based fuels, lubricants, and other similar materials. As described in response b above, all transport, handling, use and disposal of substances such as petroleum products and solvents would be required to comply with all Federal, State, and local laws regulating the management and use of hazardous materials. Post-construction activities would include regular inspections and maintenance and would be completed as necessary. Similar to the construction phase, handling of potentially hazardous materials as needed for trail maintenance would comply with all Federal, State, and local laws regulating the management and use of hazardous materials. Therefore, a less than significant impacts is anticipated.

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

No Impact. A review of the California State Water Resources Control Board (SWRCB) GeoTracker website indicates that no listed hazardous material sites are located on or immediately adjacent to the proposed trail alignment (SWRCB 2018). GeoTracker is a data management system for hazardous material sites and identifies sites that require cleanup (e.g. Department of Toxic Substance Control, Leaking Underground Storage Tanks (USTs), Department of Defense, and Site Cleanup Programs) as well as permitted facilities that could impact groundwater (i.e., irrigated lands, oil and gas production, operating USTs, and land disposal sites) and meets Government Code Section 65962.5 (Cortese List) requirements. No hazardous material sites are known to occur within the limits of disturbance for construction of the proposed trail alignment. Therefore, a less than significant impact is anticipated.
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant. The proposed trail alignment between California Street and Alabama Street is proposed on the southern bluffs of the Santa Ana River, the San Bernardino International Airport runways are located approximately 0.5-mile to the north on the north side of the river (Exhibits 4-5). As identified in the City of Redlands General Plan, the proposed trail alignment does not overlap airport compatibility zones for the Redlands’s Municipal Airport (Redlands 2017a). However, the proposed Project, is within the County of San Bernardino’s Airport Safety Review Area 3 (AR3) as shown in the San Bernardino County Land Use Plan Hazard’s Overlay Map FH31B. AR3 zones are classified as areas outside a 65 Ldn noise contour and/or areas within one-mile of the outer boundaries of the airport ownership. The County of San Bernardino’s 2007 General Plan Table S-5, Land Use Compatibility in Aviation Safety Areas, categorizes neighborhood parks, extensive natural recreations, and all other land uses within the categories of “Clearly Acceptable” and “Normally Acceptable” with a no limit maximum gross density within the AR3 safety area. Use of the trail will be transitory; users would move in and out of the airport’s vicinity without staying at any given location for a prolonged time. Therefore, a less than significant impact is anticipated.

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

No Impact. The proposed Project is a 3.9-mile linear extension of the SART, specifically Phase IV Reach A. Portions of the alignment would occur along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and on other properties within the existing right-of-way in the City of Redlands and unincorporated County. The proposed Project traverse properties with the following land use designations: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks (Redlands 2017a). The Proposed Project is a pedestrian/bicycle trail. The trail is proposed on existing undeveloped areas and within the rights-of-way of existing local streets. The developed trail would not conflict with access and/or circulation of emergency vehicles in response to an emergency and/or evacuation. Therefore, post-construction activities associated with the trail would not conflict with access and/or circulation of emergency vehicles in response to an emergency and/or evacuation. No impact is anticipated.

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

Less Than Significant. A majority of the proposed trail alignment occurs along a Moderate Threat fire zone interspersed by High Threat fire zones, as identified in the City’s General Plan; no adjacent wildlands are identified within the unincorporated County area. Per the City of Redlands Hazard Mitigation Plan (HMP) and City policies, Redlands implements an on-going Weed Abatement Program to manage weeds and brush and provide defensible space in areas prone to fire due to vegetation. Additionally, the County of San Bernardino actively establishes fire hazard abatement programs year-round throughout unincorporated areas and within cities and fire districts per San Bernardino County Code Section 23.0301-23.0319. Construction and post-construction activities of the trail would not result in significant increase in risk related to wildland fires. Therefore, a less than significant impact is anticipated.
Mitigation Measure:

None.

Hazards and Hazardous Materials Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
### 10. HYDROLOGY AND WATER QUALITY

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>i. Result in substantial erosion or siltation on – or off-site;</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on – or off-site;</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>iii. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

#### Environmental Setting

A portion of the proposed trail alignment is located along the southern Santa Ana River bluffs. The Santa Ana River watershed is approximately 3,000 square miles and all drainage features within the Project area ultimately drain to the Santa Ana River. A Water Quality Management Plan (WQMP) and a Storm Water Pollution Prevention Plan (SWPPP) will be prepared for the proposed Santa Ana River Trail Phase IV, Reach A once the Project moves to final design stages. The findings in this section are based off a recent field visit, a subsequent literature review and the Focused Biological Assessment prepared by Natural Resources Assessment, Inc. The topography for the proposed 3.9-mile trail alignment was found to be relatively flat.

#### Impact Analysis

a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

**Less Than Significant.** Construction of the proposed Project would be subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State’s General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes
the disturbance of one acre or more. The Regional Water Quality Control Board (RWQCB) has issued an area-wide NPDES Storm Water Permit for the County of San Bernardino, the San Bernardino County Flood Control District, and the incorporated cities of San Bernardino County.

Prior to the issuance of permits, the County shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the Department of Public Work’s National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (General Permit No. CAS000003) to eliminate potential sedimentation effects off-site. The General Construction permit requires recipients to reduce or eliminate non-stormwater discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges or stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants into stormwater discharges from the construction site during and after construction. The SWPPP is based on the principles of (BMPs) to control and abate pollutants. The SWPPP must include BMPs to prevent Project-related pollutants from impacting surface waters. BMPs may include or require the following:

- The Project Proponent shall avoid applying materials during periods of rainfall and protect freshly applied materials from runoff until dry.
- All waste to be disposed of in accordance with local, state and federal regulations. The Project Proponent shall contract with a local waste hauler or ensure that waste containers are emptied weekly. Waste containers cannot be washed out on-site.
- All equipment and vehicles to be serviced off-site.

Best Management Practices within the SWPPP will minimize any potential for sedimentation resulting from the discharge of untreated stormwater from the Project entering the Santa Ana River during construction.

In addition to complying with NPDES requirements, the County also requires the preparation of a Water Quality Management Plan (WQMP) which will be prepared once the final design stages are approved. However, construction of the proposed SART Phase IV, Reach A are not anticipated to violate waste discharge requirements (WDRs) because the Project does not include any commercial or industrial components that would require issuance of WDRs. Water quality in the Santa Ana River would not be compromised because the proposed trail alignment is intended to be used for passive recreational use. The WQMP would include Best Management Practices (BMPs) that would recommend general maintenance along the trail, including periodic inspections, cleanup of trash, fence, and asphalt repair. A Memorandum of Understanding (MOU) between the County of San Bernardino and City of Redlands shall be prepared to address the future maintenance of this extension of the trail and the allocation of responsibilities for the two agencies to ensure that incidental trash is routinely collected.

The proposed trail alignment would be utilized for passive recreational uses and would not allow non-motorized transportation. Due to its nature, it’s expected to have a minimal adverse effect on stormwater quality associated with both construction and post-construction use of the trail. Therefore, a less than significant impact is anticipated.

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

**Less Than Significant.** According to the RWQCB Region 8 Basin Plan map, the proposed SART Phase IV, Reach A alignment occurs within the Bunker Hill- B groundwater management zone. Groundwater...
near the Santa Ana River is anticipated to be shallower due to groundwater recharge from the river. The 3.9-mile trail alignment is proposed on undeveloped lands on the southern bluffs of the Santa Ana River and the remaining segments of the alignment are proposed along unpaved roads, local streets, and other properties along the existing right-of-way. The proposed trail alignment would not include landscaping or post-construction water usage and thereby result in a decrease of groundwater supplies. There are no recharge basins underlying this segment of the trail and the Proposed Project does not include the construction of groundwater recharge basins. Therefore, it is not anticipated that the proposed Project would affect the existing condition of the groundwater basin, result in a significant net addition of impervious areas to the overall watershed or have any adverse effects on aquifer recharge. Less than significant impact is anticipated.

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

I. Result in substantial erosion or siltation on – or off-site;
II. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;
III. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or

Less Than Significant. The proposed trail alignment would be located along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and properties along the existing street right-of-way within the City of Redlands and unincorporated County. All drainage features within the Project area drain to the Santa Ana River. The proposed Project includes a 3.9-mile combination of Class I 10-foot wide asphalt/concrete trail with a widened 2-foot graded shoulder, modified Class I bicycle lane along the existing right-of-way, and ultimate curb and gutter construction where possible; (i.e., portions of Pioneer Avenue). Portions of the trail alignment would occur along the southern bluffs of the Santa Ana River and would not preclude or significantly alter the existing drainage pattern of the area. Recommended BMPs from the WQMP and the SWPPP would be implemented during construction and post-construction activities (i.e., maintenance) to avoid and minimize potential erosion to surrounding areas. Existing drainage systems currently discharging into the Santa Ana River would not be impacted by implementation of the proposed trail alignment.

The proposed trail alignment would be constructed entirely outside of the Santa Ana River flood plain and would not cross any other streams or drainages. Development of the proposed Project would not impact the existing drainage pattern of the area and would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or off-site.

Development of the Project would result in a minimal increase of impervious area and would not significantly change the natural composition of the surrounding environments which are mostly impervious surfaces. As a result, the Project would not create or contribute additional runoff water which would exceed the capacity of the existing water drainage system. Therefore, a less than significant impact is anticipated.

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

No Impact. The proposed Project is located outside of the 100-year flood hazard area and does not include structures that would impede or redirect flood flows. Reach A of the Phase IV SART is located within a 500-year Floodplain (Zone X) as defined in Figure 7-3 Flood Hazards (Redlands 2017a). A 500-
year flood zone corresponds to an annual exceedance probability (AEP) of 0.2 percent (or a 1 in 500 chance) of occurring in a given year. This portion of the SART is located approximately 70 miles inland from the ocean. Therefore, the proposed Project would not be affected by severe storms or earthquake-related water hazards such as a seiche or tsunami. No impact is anticipated.

**Mitigation Measures:**

None.

**Hydrology and Water Quality Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
11. LAND USE AND PLANNING

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Physically divide an established community?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Environmental Setting**

The proposed SART Phase IV, Reach A trail alignment would begin on the west side of California Street in the City of Redlands and terminate at Orange Street. The westerly and easterly limits are proposed on the southern bluffs of the Santa Ana River, the remaining alignment is proposed on unpaved roads, local streets, and other properties along existing right-of-way within the City of Redlands and unincorporated County. As identified in the General Plan, existing land uses traversed by the trail and/or immediately adjacent to the alignment include: Open Space, Industrial, Agriculture, and Planned Residential Development (Redlands 2017a).

**Impact Analysis**

a) *Physically divide an established community?*

**No Impact.** The purpose of the proposed Project is to develop a non-motorized transportation system that provides safe and contiguous use and enjoyment of open space and environmental education. The trail alignment is consistent with current and proposed bicycle trail alignments identified within the *City of Redlands Bicycle Master Plan* (Redlands 2015). The trail alignment would traverse unincorporated County land along Alabama Street; the alignment at this location is consistent with the County’s East Valley Plan Trail System. According to the County of San Bernardino General Plan non-motorized transportation systems fulfill an increasingly important role as recreational amenities and would not take away from the intended Regional Industrial development. Development of the proposed trail alignment would ultimately provide a bikeway connection to the existing City of Redlands East Valley Corridor Trail.

The East Valley Corridor Trail is part of the City of Redlands “Emerald Necklace.” The Emerald Necklace is a series of existing and proposed green open space and park areas encircling the city, joined together by roads and trail systems. The Emerald Necklace route consist of an approximately 45-mile circuit around the city and is accessible by motorists and bicycles and links a number of Redlands’ parks, trails, and open space areas including the San Timoteo Canyon, Live Oak Canyon, the Crafton groves, the Sports Parks, the Santa Ana River Wash, the Santa Ana River bluffs, Israel Beal Park, the East Valley Corridor Multi-Purpose Trail, and Heritage Park (Redlands 2017a). Access to the East Valley Corridor Trail is available from the California Street cul-de-sac, the same cul-de-sac will provide access to the SART trail and may serve as a connection between the two trail systems.

The purpose and concept of the trail are consistent with the vision of the *Redlands Bicycle Master Plan* and with the multi-path policies of the General Plan as related to Pedestrian, Bicycle, and Vehicular Movement (Redlands 2017a) and with the County’s East Valley Plan Trail System. The proposed trail alignment would further extend the SART to the San Bernardino Mountain foothills and would not divide an established community. Therefore, no impact is anticipated.
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The proposed SART Phase IV, Reach A is consistent with the City of Redlands Bicycle Master Plan and is consistent with the multi-path policies of the General Plan as related to Pedestrian, Bicycle, and Vehicular Movement as well as Community Cohesion (Redlands 2017a). Therefore, no impact is anticipated.

Mitigation Measures:

None.

Land Use and Planning Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
12. MINERAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Environmental Setting

The Santa Ana River is located north of the Project area and contains high quality construction aggregates that have been mined since the 1920s (Redlands 2017a). Currently, mining in the Santa Ana River is occurring in both the cities of Redlands and Highland. New areas are currently being proposed for mining along the City of Redland’s northern planning boundary. Mining activities within the Santa Ana River are covered activities within the proposed Upper Santa Ana Wash Land Management and Habitat Conservation Plan (Wash Plan HCP); a Record of Decision has not been issued and a timeline for implementation of the Upper Santa Ana Wash Land Management and Habitat Conservation Plan is not definitively known.

Impact Analysis

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

No Impact. The proposed trail alignment is entirely within an MRZ-2 zone. The MRZ-2 designation indicates that significant Portland Cement Concrete (PCC-Grade) aggregate resources are present in the area. Accordingly, the proposed trail alignment occurs within overlays for “Regionally Significant PCC-grade Aggregate Resources” along Texas Street and within “Designated Areas Lost to Land Uses Incompatible with Mining since 1987” along Israel Beal Park, as designated by the State Mining and Geology Board (Redlands 2017b). However, the proposed trail alignment is located along the Santa Ana River bluffs, on local streets and other properties and within the right-of-way - not within the floodplain where mining typically occurs. Development of the trail would not conflict with the established mining areas in the Santa Ana River wash or with proposed mining land use boundaries as identified in the HCP. Therefore, implementation of the proposed Project would not result in the loss of availability of known aggregate resources of value to the region or the State. No impact is anticipated.

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

No Impact. As discussed in section XI(a) above the proposed Project would not conflict with identified mineral resource recovery sites as identified in the City of Redlands long term planning documents. Therefore, no impact is anticipated.
Mitigation Measures:

None.

Mineral Resources Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
13. NOISE

<table>
<thead>
<tr>
<th>Would the project result in:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Generation of excessive groundborne vibration of groundborne noise levels?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**Environmental Setting**

Construction of the trail will be required to adhere to the City of Redland’s Development Code, which allows for construction noise between the hours of 7:00 am to 6:00 pm on weekdays and Saturdays and to the County of San Bernardino Development Code, which allows for construction noise between 7:00 am to 7:00 pm, with the exceptions of Sundays and Federal Holidays.

The proposed trail alignment occurs along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties within the existing right-of-way in the City of Redlands and unincorporated County. The potential sensitive receptors within the proposed Project area include the Citrus Valley High School and the residences near Israel Beal Park; both occurring on the eastern end of the proposed trail alignment.

**Noise Fundamentals:** Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include the average hourly noise level (in L<sub>eq</sub>) and the average daily noise levels (in L<sub>dn/ CNEL</sub>).

Noise can be generated by many sources including: mobile sources, such as automobiles, trucks, and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Mobile transportation sources, such as highways, and hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3.0 A-weighted decibels (dBA) per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance from the source. Noise generated by stationary sources typically attenuates at a rate of approximately 6.0 to 7.5 dBA per doubling of distance from the source (EPA 1971).

Sound levels can be reduced by placing barriers between the noise source and the receiver. In general, barriers contribute to decreasing noise levels only when the structure breaks the “line of sight” between the source and the receiver. Buildings, concrete walls, and berms can all act as effective noise barriers.
Wooden fences or broad areas of dense foliage can also reduce noise but are less effective than solid barriers.

**Vibration:** Ground vibration can be measured several ways to quantify the amplitude of vibration produced. This can be through peak particle velocity or root mean square velocity. These velocity measurements measure maximum particle at one point or the average of the squared amplitude of the signal, respectively. Vibration impacts on people can be described as the level of annoyance and can vary depending on an individual’s sensitivity. Generally, low-level vibrations may cause window rattling but do not pose any threats to the integrity of buildings or structures.

**Impact Analysis**

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

**Less Than Significant.**

**Construction Impacts**

Construction noise associated with the proposed Project would be temporary and would vary depending on the nature of the activities being performed. Project-related noise would primarily be associated with the operation of off-road equipment for on-site construction activities as well as construction vehicle traffic on nearby roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., demolition, grading, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could affect residences in the vicinity of the construction site. The nearest sensitive receptors to the Project site are the residences located approximately 500 feet from the proposed trail alignment on the easternmost end of the trail and the Citrus Valley High School located approximately 400 feet from the proposed trail alignment. Construction activities would move throughout the proposed alignment and would not be concentrated for extended periods of time at a single location during the estimated 100-workday overall construction schedule.

Noise levels associated with individual construction equipment, provided by the Federal Highway Administration (FHWA), in the Construction Noise Handbook are summarized in Table 5.
As depicted in Table 5, noise levels generated by specific types of construction equipment typically range from approximately 70.0 dBA $L_{eq}$ to 82.0 dBA $L_{eq}$ at 50 feet. During construction, exterior noise levels could affect the existing sensitive receptors identified as occurring approximately 400 and 500 feet from the proposed trail alignment.

Per Section 8.06.120 of the City of Redlands Municipal Code, noise sources associated with new construction, remodeling, rehabilitation or grading of any property is exempt from noise standards, provided such activities take place between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or Federal Holidays. Additionally, per Section 87.0901 of the County of San Bernardino Municipal Code, exempt noise and vibration sources include temporary construction, repair, or demolition activities and shall occur between 7:00 am and 7:00 pm on weekdays and Saturdays, except for Sundays and Federal Holidays. All motorized equipment used in such activity shall be equipped with functioning mufflers in adherence with the municipal code.

Operational Impacts

The proposed Project involves the construction of an approximately 3.9-mile portion of the SART. While it is anticipated that the Project would require intermittent maintenance, such maintenance would be minimal requiring a negligible amount of traffic trips on an annual basis. People using the trail for recreational activities (e.g., walking, running, cycling) would be the main source of noise in the Project vicinity. Noise generated by people using the trail will likely be fleeting and transitory in nature, so nearby sensitive receptors are not anticipated to notice a significant change in noise levels. Therefore, a less than significant impact is anticipated.

b) Generation of excessive groundborne vibration of groundborne noise levels?
Less Than Significant. Project construction would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Ground vibration caused by temporary construction or demolition is not regulated by the City. For comparative purposes, this impact discussion utilizes Caltrans's (2002) recommended standard of 0.2 inches per second (in/sec) peak particle velocity (PPV) with respect to the prevention of structural damage for normal buildings. Table 6 displays vibration levels for typical construction equipment.

### Table 6
Representative Vibration Source Levels for Construction Equipment

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Peak Particle Velocity at 25 Feet (inches per second)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Bulldozer</td>
<td>0.089</td>
</tr>
<tr>
<td>Caisson Drilling</td>
<td>0.089</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td>0.076</td>
</tr>
<tr>
<td>Jackhammer</td>
<td>0.035</td>
</tr>
<tr>
<td>Small Bulldozer/Tractor</td>
<td>0.003</td>
</tr>
</tbody>
</table>

Source: Caltrans 2013

The nearest existing structures to any construction activity area are located approximately 400 feet away (Citrus Valley High School). Based on the vibration levels presented in Table 6, ground vibration generated by heavy-duty equipment at the nearest structure would not be anticipated to exceed approximately 0.089 in/sec PPV. Therefore, the use of virtually any type of construction equipment would most likely not result in a ground borne vibration velocity level above 0.2 in/sec and predicted vibration levels at the nearest structure would not exceed recommended criteria. Additionally, this would be a temporary impact and would cease upon completion of the project construction.

Post-construction activities associated with the Project would not result in any ground borne vibration. Therefore, a less than significant impact is anticipated.

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?

Less Than Significant. There are no private airstrips located within the vicinity of the Project site. The nearest airport to the Project site is the San Bernardino International Airport, located approximately 0.6 miles north of the proposed trail alignment between California Street and Alabama Street (Exhibit 4-5). Significant noise at the San Bernardino International Airport is dependent on the aircraft type and primarily generated by takeoffs, landings, aircraft storage hangars, aircraft maintenance hangars, and aircraft rescue and on-site firefighting services. Aircrafts at this airport include single and multi-engine airplanes, jet airplanes, helicopters, gliders, and ultralight aircrafts. Noise from the aircraft generates a relatively minor contribution to the overall noise environment. Aircraft-related noise would not exceed 65 dBA CNEL outside the boundary of the San Bernardino International Airport (ALP 2010).

The City of Redlands General Plan includes a land use compatibility table that provides the City with a tool to gauge the compatibility of new land uses relative to existing noise levels. This table identifies
normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses, including open space land uses such as those proposed by the Project. In the case that the noise levels identified at a proposed Project site fall within levels considered normally acceptable, the proposed Project is considered compatible with the existing noise environment. An acceptable existing noise level for locating park uses is noise levels up to 72.5 dBA CNEL (Redlands 2017a). Since aircraft-related noise would not exceed 65 dBA CNEL outside the boundary of the San Bernardino International Airport, the existing noise level is below 72.5 dBA. Therefore, the Project is not anticipated to expose people using the trail to excessive noise level from airport operations; a less than significant impact is anticipated.

**Mitigation Measures:**

None.

**Noise Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
14. **POPULATION AND HOUSING**

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

**Environmental Setting**

The proposed Project is a 3.9-mile linear section of the SART. Portions of the alignment would occur along the southern bluffs of the Santa Ana River, on unpaved roads, local streets and on other properties within the existing right-of-way in the City of Redlands and/or unincorporated County area. The City of Redlands is located at the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles northeast of Los Angeles and 45 miles west of Palm Springs. Redlands is a mid-sized city with a population of 68,049 persons as of 2016. As of 2016, 30,200 housing units were inventoried within the City of Redlands planning area (Redlands 2017a).

**Impact Analysis**

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

**No Impact.** The proposed Project is the construction and operation of a non-motorized pedestrian/bicycle trail that is to connect to proposed SART Phase III on California Street and proposed SART Phase IV Reach B on Orange Street. The project is consistent with the *City of Redlands General Plan* and the *City of Redlands Bicycle Master Plan*. Implementation of the proposed Project does not include the construction of new residential uses or significant employment opportunities that would induce population growth. Therefore, no impact is anticipated.

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

**No Impact.** The proposed Project is the construction and operation of a non-motorized pedestrian/bicycle trail. The proposed alignment is consistent with bicycle trail alignments identified within the *City of Redlands Bicycle Master Plan*. Implementation of the proposed Project would not displace people or any existing housing necessitating the construction of replacement housing. Therefore, no impact is anticipated.

**Mitigation Measures:**

None.
Population and Housing Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
15. PUBLIC SERVICES

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>i. Fire protection?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ii. Police protection?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>iii. Schools?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>iv. Recreation/Parks?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>v. Other public facilities?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Environmental Setting

Public safety services within the City of Redlands are provided by the Redlands Police Department and by the Redlands Fire Department. The San Bernardino County Sheriff’s Department provides law enforcement services in collaboration with the City of Redlands for the unincorporated areas within the Project area. Fire protection services are also provided from collaboration between various agencies within the San Bernardino County.

The Redlands Unified School District serves Redlands and the surrounding communities of Mentone and Crafton as well as Loma Linda and the eastern portion of Highland.

The City of Redlands currently has 424.2 acres of recreational land; including parks, trails, and open space systems and has proposed to develop approximately 314 more acres of recreational lands by 2035 (Redland, 2017a). The City of Redlands General Plan has included the Santa Ana River Trail as part of its proposed future development through Redlands and Mentone and ultimately to the San Bernardino National Forest. Additionally, the County of San Bernardino is responsible for the completion of approximately 20 miles of the SART. Development of the trail in San Bernardino County has been divided into four phases with several reaches in each phase to provide for construction as funding becomes available. Phase I and II have been constructed and extend from the Riverside/San Bernardino county line to approximately 50 feet westerly of La Cadena Drive in the City of Colton and from the terminus of Phase I to Waterman Avenue in the City of San Bernardino. It is anticipated that Phase III extending from the Phase II terminus to California Street in the City of Redlands will be constructed in 2020. Phase IV is the last segment of the trail extending from California Street in Redlands to Garnet Street in unincorporated Mentone. This IS/MND analyses potential environmental impacts associated with construction and post-construction use of SART Phase IV, Reach A which is proposed to extend from California Street to Orange Street.
Impact Analysis

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, Police protection, Schools, Recreation/Parks, Other public facilities?

Less Than Significant. Public safety services within the City of Redlands are provided by the Redlands Police Department and Redlands Fire Department. The proposed trail alignment occurs along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties within the City of Redlands and within an unincorporated area of the County. The Santa Ana River Phase IV, Reach A alignment is entirely within a moderate fire threat area. The nearest fire station to the Project site is Fire Station 263 located on the south side of Orange Street, approximately 0.7 miles south of the proposed trail alignment.

According to the City of Redlands General Plan the Police Department service ratio is 1.1 officers per 1,000 residents; the average response time in 2015 was reported to be 6.5 minutes. While there is no industry standard for response time to emergency calls, the City identified a desirable goal of 4.5 minutes (Redlands 2017a). The Redlands Police Department is located on W. Park Avenue approximately 1.5 miles south of the Project site.

The proposed trail alignment would be operated for recreational purposes and would be open to the public during daylight hours for hiking and cycling. The City of Redlands nor the County anticipates the need for new or expanded police or fire protection services specifically for the surveillance of the proposed SART Phase IV, Reach A extension. While occasional demand for emergency response may result from operation of the trail, such demand is not expected to substantially alter existing service ratios or response times.

The SART Phase IV, Reach A trail alignment is within the Redlands Unified School District (RUSD) which provides services for nearly 21,000 students. However, the proposed Project would not result in an increase in the population of the area or a demand of RUSD services.

Post-construction activities associated with the trail include general maintenance that would include but not be limited to: weed abatement, fence and pavement repair including repainting, etc. A Memorandum of Understanding (MOU) between the County of San Bernardino and City of Redlands will be prepared to address the future maintenance of this extension of the trail and the allocation of responsibilities for the two agencies.

Implementation of the proposed Project would not result in a demand for additional housing or increase the population of the area. Therefore, the proposed Project is not expected to result in substantial adverse physical impacts associated with public services within the City of Redlands or within the unincorporated County area. The Project would not result in the need for new or physically altered public facilities. Therefore, a less than significant impact is anticipated.

Mitigation Measures:

None.
Public Services Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
16. RECREATION

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Environmental Setting

The City of Redlands General Plan provides for a system of trails serving recreational and emergency access needs to accommodate walking, jogging, bicycling, and equestrian use. Existing and proposed future trails are identified in the 2015 City of Redlands Bicycle Master Plan which is used as the primary source for planning and implementing bikeway improvements in Redlands. The proposed trail alignment for the SART Phase IV, Reach A is consistent with future trails as identified in the City of Redlands Bicycle Master Plan.

The Final Environmental Impact Report for the County of San Bernardino’s General Plan (San Bernardino 2007) supports the establishment of “urban open space areas” and seeks to develop or retain these areas through cooperation with local cities. Where possible, these areas shall be located along or near regional trail routes. The proposed Santa Ana River Trail Phase IV, Reach A is consistent with these plans. The proposed Project meets the goals of the City of Redlands and those of the County of San Bernardino.

Impact Analysis

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

Less Than Significant. The proposed Project would result in the extension of an existing recreational facility consistent with the circulation policies of the City of Redlands General Plan and with the City of Redlands Bicycle Master Plan. The trail would ultimately link Israel Beal Park on Orange Street to the East Valley Corridor multi-use trail on California Street. Long-term use of the trail includes regular inspections and maintenance/repairs as needed. A MOU between the County of San Bernardino and City of Redlands will be prepared to address the future maintenance of this extension of the trail and the allocation of responsibilities for the two agencies. Implementation of the Project is not anticipated to result in substantial physical deterioration of the facility itself or of the City parks and is anticipated to result in a beneficial impact to regional recreational opportunities. Therefore, less than significant impacts are anticipated.

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

Less Than Significant. The proposed Project is the development of a recreational pedestrian and bicycle trail and is anticipated to result in a beneficial impact to regional recreational opportunities. Less than significant impacts are anticipated.
Mitigation Measures:

None.

Recreation Impact Conclusions:

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
17. TRANSPORTATION

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>d) Result in inadequate emergency access?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

Environmental Setting

As stated in the City or Redlands General Plan, the City is proactively improving the active transportation network by providing more bicycle lanes and bicycle lockers, replacing and installing new sidewalk facilities, and improving the existing transit network. The General Plan seeks to further such efforts by incorporating policies that promote the development of a comprehensive network of on- and off-roadway bike routes. The City’s Bicycle Master Plan is the primary resource for planning and implementing the City’s bikeway improvements.

Impact Analysis

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact. The proposed SART IV, Reach A alignment is consistent with the multi-path policies in the City of Redlands General Plan as related to Pedestrian, Bicycle, and Vehicular Movement (Redlands 2017a). Additionally, the proposed trail alignment is within planned routes as identified in the City of Redland’s Bicycle Route Master Plan (Redlands, 2015). No impact is anticipated.

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

Less Than Significant. During construction of the trail, temporary impacts to traffic at various locations along the trail route may occur as a result of trucks transporting asphalt, cement, decomposed granite, etc. These impacts are anticipated to be short-term in nature and would result in a less than significant impact.

Post-construction use of the trail for recreational hiking and biking is not anticipated to significantly increase the existing traffic load on adjacent roadways. The proposed Project consists of a Class 1 trail physically separated from vehicular traffic. Therefore, traffic on the trail would not conflict with vehicular traffic or with the levels of service.
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

**Less Than Significant.** The final design of the SART facilities would be completed in accordance with the guidance and requirements of the Caltrans Highway Design Manual, Chapter 1000, “Bikeway Planning and Design.” Existing right-of-way are limited at certain locations of the alignment; therefore, along these portions, a modified Class I bicycle lane is proposed. Additionally, portions of Pioneer Avenue would have ultimate curb and gutter constructed as part of the proposed Project. Construction of the Project would follow Caltrans design standards and specific trail width requirements and shoulder requirements.

The proposed Project would be reviewed and approved by the City of Redlands to ensure that the final design conforms to applicable policies of Chapter 5 of the General Plan including but not limited to the multi-path policies as related to Pedestrian, Bicycle, and Vehicular Movement (Redlands 2017a). No hazards due to a design features of the trail are anticipated. Therefore, a less than significant impact is anticipated.

d) Result in inadequate emergency access?

**No Impact.** The proposed trail alignment is located along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and other properties within the City of Redlands and unincorporated County areas. Post construction use of the trail would not conflict with access for emergency vehicles and/or emergency services. No impact is anticipated.

**Mitigation Measures:**

None.

**Transportation Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
18. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, lace, 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:

<table>
<thead>
<tr>
<th>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, lace, 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:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Listed or eligible for listing in California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</td>
</tr>
<tr>
<td>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
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</tbody>
</table>

Environmental Setting

Assembly Bill (AB) 52 signed on September 25, 2014 and effective on July 1, 2015 established a formal consultation process for California Native American tribes as part of CEQA. AB 52 requires that CEQA Lead Agencies, such as the County of San Bernardino, provide California Native American tribes with notice of projects under CEQA consideration by a Lead Agency; the Lead Agency is required to provide notice only to those Tribes that previously requested to be notified by the Lead Agency.

In September 2017, the County of San Bernardino Department of Public Works Environmental Management Division mailed Project notices in accordance with AB 52 to the following tribes: Gabrieleño Band of Mission Indians – Kizh Nation; San Manuel Band of Mission Indians; and, Soboba Band of Luiseno Indians. The San Manuel Band of Mission Indians expressed interest in the Project and requested further consultation. No response was received from the Gabrieleño Band of Mission Indians – Kizh Nation or Soboba Band of Luiseno Indians. Measures as recommended by the consulting tribes have been incorporated into the proposed Project in section V and XVIII of this Initial Study.

Impact Analysis

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

Less Than Significant. The Project specific Phase I Cultural Resources Investigation and Assessment completed by McKenna et al. in November 2018 (McKenna 2018) resulted in negative findings for prehistoric or Native American resources due to extensive and subsequent disturbances for borrow pits, removal of orchards, and general use of the area. McKenna et al. researched the history of the Project area through the County Assessor’s Office, County Archives, and aerial photographs made available through the County Surveyor’s Office. Historic maps were reviewed, along with the various listings for the National Register of Historic Places and California Register of Historical Resources.
b) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?**

**Less than Significant Impact with Mitigation Incorporated.** Refer to discussion in Section XVII (a) above.

In September 2017, the County of San Bernardino Department of Public Works Environmental Management Division mailed Project notices in accordance with AB 52 to the following tribes: Gabrieleño Band of Mission Indians – Kizh Nation; San Manuel Band of Mission Indians; and, Soboba Band of Luiseño Indians. The San Manuel Band of Mission Indians expressed interest in the Project and requested further consultation. No response was received from the Gabrieleño Band of Mission Indians – Kizh Nation or Soboba Band of Luiseño Indians.

The Archeological Resource Assessment was provided to San Manuel Band of Mission Indians as part of the AB 52 consultation. The Tribe provided their comments on the report on January 18, 2019. Incidental fined measures as recommended by the Tribe have been incorporated into this Initial Study.

**Mitigation Measures:**

**TCR-1** In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work in other portions of the project, outside of the buffered area, may continue during this assessment period. Additionally, consulting tribes (San Manuel Band of Mission Indians) will be contacted if any such find occurs and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. The archaeologist shall complete and isolate/site record for the find and submit this document to the applicant and the Lead Agency for dissemination of the consulting Tribes.

**TCR-2** If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to consulting tribes (San Manuel Band of Mission Indians) for review and comment. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any cultural materials encountered during the project.

**Tribal Cultural Resources Conclusions:**

With implementation of the above listed measures, less than significant impacts are anticipated, and consulting tribes agreed to close consultation under AB52.
19. UTILITIES AND SERVICE SYSTEMS

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

Environmental Setting

The City of Redlands Municipal Utilities and Engineering Department is responsible for providing infrastructure and related public services, including water production and distribution, wastewater collection and treatment, engineering review and inspections of development proposals, public infrastructure improvements, and development/construction of new facilities within the City’s water and sewer service areas. The proposed Project lies entirely within the service areas of the department. The City operates two surface water treatment plants; water distribution infrastructure includes 15 wells, 37 booster pumps, 18 reservoirs, and 400 miles of transmission and distribution lines. The City also operates a wastewater treatment plant. The wastewater treatment plant is located on the south side of the Santa Ana River, at the north end of California Street adjacent to this section of the SART. It is a secondary plant which disposes solids off-site and includes basins for effluent to percolate into the underlying aquifer after treatment. The sewer collection system includes one lift station and approximately 230 miles of pipelines.

The City’s stormwater drainage system serves an area of approximately 37 square miles; the system is composed of a combination reinforced concrete pipe and corrugated metal pipe, box culverts, covered rubble rock and concrete channels, and concrete and natural drains. Stormwater runoff flows by gravity into the San Bernardino County Flood Control District’s Mission Channel, Morrey Arroyo Creek, and San Timoteo Canyon, and discharge into in the Santa Ana River.

Solid waste collection services are provided by the City’s Quality of Life Department to customers within the City limits. Solid waste is disposed of at either the City’s California Street Landfill (adjacent to this reach of the SART) or at the San Timoteo Sanitary Landfill operated by County of San Bernardino.
Impact Analysis

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

No Impact. The proposed Project does not include development of public facilities such as public restrooms and would not require construction of any new water service, sewer collection or wastewater treatment facilities. In addition, the trail would not require the construction or relocation of any new electric power, natural gas or telecommunication facilities. No impact is anticipated.

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

No Impact. The proposed Project is the development and use of the SART Phase IV Reach A. Post-construction use of the trail would not require irrigation or place a demand on potable water resources which would result on a need for new or expanded entitlements. Therefore, no impact is anticipated.

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

No Impact. The proposed Project does not include development of public facilities such as public restrooms. The Project would not have an end use that would place a demand on wastewater treatment capacity. Therefore, no impact is anticipated.

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

No Impact. Construction of the proposed Project would require minimal grubbing and earthwork. It is expected that solid waste generated by construction activities would be disposed of at either the California Street Landfill or at the San Timoteo Sanitary Landfill. The California Street Landfill encompasses 115 acres and has a design capacity of 11.4 million cubic yards; its maximum permitted capacity is 10 million cubic yards. As of 2017 the landfill had a remaining capacity of 6,800,000 cubic yards (Redlands 2017b). The San Timoteo Sanitary Landfill encompasses 366 acres (114 acres permitted for disposal) and has a permitted capacity of 20,400,000 cubic yards. As of 2017 the reported remaining capacity was 11,402,000 cubic yards (CalRecycle 2018). Post-construction use of the trail would be limited to transitory use by pedestrians/bicyclists for recreation. In general, post-construction activities of the trail are not refuse generating. Therefore, no new demand on the waste disposal capacity is expected. No impact is anticipated.

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

Less Than Significant. All solid waste generated during Project construction would be disposed of by the contractor at an approved site. The contractor is required to comply with federal, State, and local statues and regulations regarding solid waste. Therefore, less than significant impact is anticipated.
Mitigation Measures

None.

Utilities and Service Systems Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
## 20. WILDFIRE

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

The City of Redlands adopted a *Hazard Mitigation Plan* (HMP) in 2015 to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. The purpose of the HMP is to establish a plan for reducing and/or eliminating risks associated with flooding, earthquake, wildfire, hazardous material, and drought hazards within the City. The HMP identifies mitigation goals, objectives, and projects to reduce risk; the recommendations and goals of the HMP are incorporated into the City’s General Plan and referenced below.

### Impact Analysis

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The proposed Project is a 3.9-mile linear extension of the SART, specifically Phase IV Reach A. Portions of the alignment would occur along the southern bluffs of the Santa Ana River, on unpaved roads, local streets, and on other properties within the existing right-of-way in the City of Redlands and unincorporated County. The proposed Project traverse properties with the following land use designations: Agriculture, Public Institutional, Open Space, East Valley (EV) Special Development, (EV) Regional Industrial, (EV) Commercial General, Commercial/Industrial, Public/Institutional, Low and Very Low Density Residential, and Parks (Redlands 2017a). The Proposed Project is a pedestrian/bicycle trail. The trail is proposed on existing undeveloped areas and within the rights-of-way of existing local streets. The developed trail would not conflict with access and/or circulation of emergency vehicles in response to an emergency and/or evacuation. Therefore, post-construction activities associated with the trail would not conflict with access and/or circulation of emergency vehicles in response to an emergency and/or evacuation. No impact is anticipated.
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**Less than Significant.** A majority of the proposed trail alignment occurs along a Moderate Threat fire zone interspersed by High Threat fire zones, as identified in the City’s General Plan; no adjacent wildlands are identified within the unincorporated County area. Per the *City of Redlands Hazard Mitigation Plan* (HMP) and City policies, Redlands implements an on-going Weed Abatement Program to manage weeds and brush and provide defensible space in areas prone to fire due to vegetation. Additionally, the County of San Bernardino actively establishes fire hazard abatement programs year-round throughout unincorporated areas and within cities and fire districts per San Bernardino County Code Section 23.0301-23.

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

**Less than Significant.** The proposed Project is the construction and operation of a multi-use trail consistent with the goals of the City of Redlands Bicycle Master Plan, City of Redlands Pedestrian, Bicycle, and Vehicular Movement General Plan Goals, and with the County of San Bernardino trail system policies in the East Valley Area Plan. The end use of the trail is for passive recreation, therefore, infrastructure such as vehicular access roads and utilities are not proposed. As described in section XX(b) above, the proposed alignment traverses moderate and high fire threat zones. However, both the City and County implement fire mitigation policies. Therefore, the proposed Project is not expected to significantly exacerbate fire risks or result in temporary or ongoing impacts to the environment.

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

**Less than Significant.** Reach A of the Phase IV SART is located within a 500-year Floodplain (Zone X) as defined in Figure 7-3 Flood Hazards (Redlands 2017a). A 500-year flood zone corresponds to an annual exceedance probability (AEP) of 0.2 percent (or a 1 in 500 chance) of occurring in a given year. As shown in Figure 7-5: Faults, of the City’s General Plan, the proposed trail alignment does not traverse zones with identified landslide susceptibility; therefore, in the event of a fire, it is not expected that slope instability would be experienced.

**Mitigation Measures:**

None.

**Wildfire Impact Conclusions:**

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
21. MANDATORY FINDINGS OF SIGNIFICANCE

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<td>Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</td>
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<td>Does the project have impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</td>
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<td>Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
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a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant. A Project specific Focused Biological Assessment (FBA) for the Santa Ana River Trail Phase IV, Reach A was prepared by Natural Resources Assessment, Inc. (NRAI, January 2019). The findings of the report are summarized in this Initial Study; all direct, indirect, and cumulative impacts as identified in the report were reduced to a less than significant impact with implementation of Mitigation Measures BIO-1 to BIO-17. Impacts to potentially occurring rare or endangered plant or animal species and their habitats have been reduced to a less than significant impact with implementation of mitigation measures. Development of the proposed Project would not cause fish or wildlife populations to drop below self-sustaining levels or restrict the movement/distribution of a rare or endangered species.

Potential impacts to cultural resources are identified in the Phase I Cultural Resources Investigation and Assessment (CRIA) of Impacts on Cultural Resources Identified within the Proposed Santa Ana River Trail, Phase IV, Reach A, California Street to Orange Street, Redlands, San Bernardino County, California prepared by McKenna et al. (McKenna 2018) for the 3.9-mile-long alignment. The cultural study included a cultural resources records search, Sacred Lands File search, field survey, and California Register of Historical Resources (CRHR) evaluation. A Paleontological Identification Report of the Project area was completed as well. The findings of the two reports are summarized in this Initial Study. All direct, indirect, and cumulative impacts as identified in the technical study were reduced to a less than significant impact with implementation of Mitigation Measures CUL-1, CUL-2, GEO-1 and TCR-1 and TCR-2. Adherence to the mitigation measures would ensure that important examples of the major periods of California history or prehistory are not eliminated as a result of the proposed Project.
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant. The proposed Project does not have impacts that are individually limited, but cumulatively considerable. The SART has been included in local and regional plans and evaluated in their respective Environmental Impact Report for cumulative impacts. Additionally, the evaluation contained in this document determined that potential impacts to the environment can be reduced to a less than significant level with implementation of the identified mitigation measures. Based on data provided in this document, including the type of project proposed and its location, it is concluded that implementation of the proposed Project will not result in impacts that are either individually or cumulatively considerable or significant when viewed in relation to past, present or probable future projects.

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

Less Than Significant. The proposed Project will not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly, as there are no such impacts identified within this analysis or in the project specific technical analyses or available data from other agencies.

Only minor temporary increases in air emissions and noise will be created by implementation of the proposed Project. These potential impacts have been thoroughly evaluated and have been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse effects upon the region, the local community or its inhabitants.
SECTION 5 – SUMMARY OF MITIGATION MEASURES

The following mitigation measures were identified to reduce impacts to less than significant:

**BIO-1** Prior to construction of the Project, the Project Proponent shall install and maintain barriers such as boulders, fences, and gates along work area and trail boundaries to help prevent unauthorized activities, including dumping and off-road vehicle use.

**BIO-2** Prior to construction, the Project Proponent shall delineate the limits of construction via marking or temporary fencing. The delineation shall be maintained as necessary until construction of the trail is completed.

**BIO-3** Throughout construction of the Project, construction personnel shall limit their activities, vehicles, equipment, and construction materials to the designated work area and equipment staging areas.

**BIO-4** Throughout construction of the Project, the Project Proponent shall implement seasonal avoidance and minimization measures adopted as advised in the Upper Santa Ana River Wash Plan for nesting birds.

**BIO-5** All workers will receive environmental awareness training. The training will be developed in consultation with a qualified biologist and consist of an onsite or training center presentation for which supporting materials will be provided. Training will provide information about the special-status species potentially occurring on site and an explanation of the purpose and function of the avoidance and minimization measures and the possible penalties for not adhering to them.

**BIO-6** If construction takes place during the California gnatcatcher breeding season, burrowing owl nesting period, during nesting bird season (February 1 through August 31), or whether significant loss to raptors and migratory birds or their habitats is expected, a general nesting bird survey will be required. The protocol requires the following:

- Construction scheduled to occur between February 1 and August 31 will require a qualified biologist conduct a breeding bird survey no more than three days prior to the start of construction to determine if nesting is occurring.

- "Construction" includes selection of staging areas, demolition, tree, trash and debris removal, placement of equipment and machinery on to the site preparatory to grading, and any other Project-related activity that increases noise and human activity on the Project site beyond existing levels. Emergency measures are exempt from this definition.

- If occupied nests are found, they shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (a) the adult birds have not begun egg-laying and incubation; or (b) the juveniles from the occupied nests are capable of independent survival.

- If the biologist is not able to verify one of the above conditions, then no disturbance shall occur within a distance specified by the qualified biologist for each nest or nesting site. The qualified biologist will determine the appropriate distance in consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.
Protocol SBKR presence-or-absence studies will be conducted prior to construction to determine whether SBKR occupy suitable habitat along the alignment. If the studies are positive the County will consult with the U.S. Fish and Wildlife Service. Construction will not proceed until the appropriate authorization from U.S Fish and Wildlife Service is received.

A qualified biologist or biological monitor with SBKR expertise will be present when construction or ground-disturbing activities that could result in take of SBKR occurs, or within 100 meters of SBKR habitat which is classified as low, medium or high habitat potential for SBKR in the HCP.

Equipment (e.g., passenger vehicles, trucks, and heavy equipment) will be cleaned prior to entering the worksite and between worksites to prevent the importation and spread of exotic plant species.

Ingress and egress of construction equipment and personnel will be confined to designated access points. Cross-country travel by vehicles and equipment will be prohibited.

No open trenches or holes will be left overnight without covering, fencing, or providing escape ramps with a minimum 3:1 slope. If trenches are not covered, they will be inspected for trapped wildlife by a qualified biologist or biological monitor prior to the start of work activities each day the trenches or holes remain uncovered. Animals found will be captured and moved to the nearest safe location outside the construction area.

Soil temporarily stockpiled during construction will be fenced to exclude SBKR and stockpiles will be removed within 45 days of the end of construction.

Dust will be controlled. If water trucks are to be used, pooling of water will be avoided to minimize the potential of attracting opportunistic predators.

Adequate fire suppression capability will be maintained in active construction areas including having a water tender on site in active construction areas during periods of high fire danger.

No firearms or pets will be allowed at the work areas. Firearms carried by authorized security and law enforcement personnel are exempt.

Litter control measures will be implemented during construction and post-construction. Trash and food items will be contained in closed containers and removed daily to reduce the attractiveness of the area to opportunistic predators.

In the event that previously unidentified resources are uncovered as a result of the trail development, a qualified archaeologist shall be on-call and available to inspect and assess the find in accordance with CEQA criteria. If deemed appropriate, archaeological monitoring shall be incorporated into the overall mitigation program.

If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within 60-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the Project.
GEOLOGY AND SOILS

GEO-1 Should the Project require relatively deep excavations, generally in areas with disturbance exceeding 9 feet below the present surface, where older alluvium deposits are possible; a paleontological monitor should be present and have authority to recover, analyze, and curate any specimens of paleontological significance. The paleontological monitoring program should be conducted in a manner consistent with the protocols of the San Bernardino County Museum.

TRIBAL CULTURAL RESOURCES

TCR-1 In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, consulting tribes (San Manuel Band of Mission Indians) will be contacted if any such find occurs and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. The archaeologist shall complete and isolate/site record for the find and submit this document to the applicant and the Lead Agency for dissemination of the consulting Tribes.

TCR-2 If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to consulting tribes (San Manuel Band of Mission Indians, Soboba Band of Mission Indians and Morongo Band of Mission Indians) for review and comment. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians, Soboba Band of Mission Indians and Morongo Band of Mission Indians on the disposition and treatment of any cultural materials encountered during the project.
SECTION 6 - REFERENCES

[Caltrans] California Department of Transportation


2002 *Transportation Related Earthborne Vibrations.*

[CalRecycle] California Department of Resources Recycling and Recovery


CAPCOA (California Air Pollution Control Officers Association)


CARB (California Air Resources Board)


[CDC] California Department of Conservation

2019 Important Farmlands Map for San Bernardino County


City of Redlands


2008 Redlands Municipal Airport – Airport Master Plan

EPA (US Environmental Protection Agency)

1971 *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances.*

FHWA (Federal Highway Administration)


McKenna et al.

2018 Phase I Cultural Resources Investigation and Assessment of Impacts on Cultural Resources Identified within the Proposed Santa Ana River Trail, Phase IV, Reach A [NRAI] Natural Resource Assessment, Inc.

2019 Focused Biological Assessment Santa Ana River Trail Phase IV, Reach A

2019 Updated Focused Biological Assessment Santa Ana River Trail Phase IV, Reach A

San Bernardino, County of

2007 Final Environmental Impact Report related to the 2007 General Plan


(SBIAA) San Bernardino International Airport Authority


SCAQMD (South Coast Air Quality Management District)


1993 *CEQA Air Quality Handbook.*

2008 *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]).

2008 Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans
San Bernardino Valley Water Conservation District
