

November 2021 | Initial Study EIR Scoping Document

REDLANDS EAST VALLEY HIGH SCHOOL STADIUM PROJECT

Redlands Unified School District

Prepared for:

Redlands Unified School District

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L _{dn}	day-night noise level
L _{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M _w	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

Redlands Unified School District (RUSD or District) intends develop a stadium at Redlands East Valley High School (Redlands East Valley HS) over three phases. The proposed project would include a new track and synthetic grass football field (including scoreboard and competitive-level lighting), bleachers for 3,000 people, new visitor and home ticketing booth, concessions, custodial and restroom buildings, landscaping, and pedestrian and vehicle circulation access and entryway improvements. Redlands East Valley HS is located at 31000 East Colton Avenue in the Mentone community of unincorporated San Bernardino County, California. RUSD will serve as the Lead Agency for the proposed project in accordance with the California Environmental Quality Act (CEQA), Section 15051(c). This Initial Study is a preliminary evaluation of the potential environmental consequences associated with the proposed project. As part of the District's approval process, the proposed project is required to undergo an environmental review pursuant to CEQA. The lead agency uses the Initial Study analysis to determine whether an environmental impact report (EIR) or a negative declaration (ND) is required. If the Initial Study concludes that the project may have a significant effect on the environment, an EIR must be prepared. Otherwise, a ND or mitigated negative declaration (MND) is prepared.

1.1 PROJECT LOCATION

Redlands East Valley HS is located at 31000 East Colton Avenue (Assessor's Parcel Map Numbers 0299-031-30) in the Mentone community of unincorporated San Bernardino County, California (Figure 1, *Regional Location*). The Redlands East Valley High School Stadium project (proposed project) would be developed within the existing school campus. Specifically, the proposed project would disturb approximately 6.95 acres of the western side of the approximately 60.1-acre campus (project site). The proposed project would not impact other areas of the campus.

Regional access to the Redlands East Valley HS campus is provided by State Route (SR) 38 located 0.5 miles north of the project site and Interstate 10 located approximately 3 miles west and south (see Figure 1, *Regional Location*). Redlands East Valley HS is bounded by East Colton Avenue to the north, Opal Avenue to the west, King Street to the east, and agricultural uses to the south (Figure 2, *Local Vicinity* and Figure 3, *Aerial Photograph with Photo Locations*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Development and Use

Redlands East Valley HS campus is approximately 60.1 acres in size. The main eastern portion of the campus is generally configured with classroom buildings and student, staff, and visitor parking lots. The western portion of the campus is configured with athletic fields and amenities, including baseball and softball fields, tennis courts, hard courts, a track and field, restrooms, and an additional student parking lot. The northwest corner, north of the hard courts, also includes a drainage way and above grade utility infrastructure that is fenced off.

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The high school presently provides a total of 951 regular parking stalls and 37 handicapped. East Valley High School was built in the mid-1990s and has a 2020-21 enrollment of 1,892 students in grades ninth through twelfth (CDE 2021). The school operates a “collaboration day” schedule on Monday, which includes six 48 minute periods and regular day schedules Tuesday through Friday, which includes six 55 minute periods. Collaboration day school hours are Monday from 8:30 AM to 2:30 PM, and Regular Day school hours are Tuesday through Friday from 8:30 AM to 3:15 PM. After-school activities may conclude as late as 10:00 PM, including use of sport fields on the west side of the campus. The school also provides optional Period 0 or Period 7 Monday through Friday which occur one hour before and after the school hours.

The proposed project would be located on the western side of the Redlands East Valley HS campus. The project site encompasses existing sport fields, including football field and track and field, restrooms, hardcourts, parking lot, paved walkways, drainage way, utility infrastructure, and grassy areas. The project site is approximately 6.95 acres and is generally flat with a slope that runs along the eastern side of the project site. The football field is natural grass. The football field is surrounded by a clay track. There are eight existing hardtop courts to the west of the track and field, along Opal Avenue (See Figure 4, *Site Photos*).

During the school year, the existing track and field are regularly used by the high school for conducting athletic practices, physical education classes, and a variety of other scholastic-related events. The high school presently has no varsity events happen at complex, and it is used mainly for practice, physical education and lower-level competition. Football games generally occur Thursdays and Fridays from 7 PM to 9:30 PM. Home games occur at different facilities nearby in addition to the existing project site. Soccer home games generally occur Wednesday immediately after school until 6:30 PM for boys teams and Fridays immediately afterschool until 6:30 PM for girls teams, with Junior Varsity (JV) playing before Varsity for both teams. Additionally, track and field events typically occur Thursday after school until 6 PM, and cross country events typically occur on Saturday mornings, starting at 7:30 AM, however track and field and cross country events do not currently occur at the project site. Currently, Redlands East Valley HS hosts around 30 games/events per season, including lower-level sporting events, and 30 games/events are hosted at other facilities. Historically, Redlands East Valley HS averages about 100 to 200 spectators per game and/or event at the existing track and field.

In addition to Redlands East Valley HS uses, outside sporting groups and non-school related events have been individually permitted by RUSD to use the practice field. Currently there is only one non-school related event that uses the stadium, a fundraiser walk, which occurs once per year. Occasional joggers and walkers use the track and field.

1.2.2 Parking and Access

Main vehicular access to the Redlands East Valley HS campus is provided along East Colton Avenue with three access points that lead to the primary parking lots. Two additional access points are located on King Street along the east side of the campus provide access to the primary parking lots, and one additional access point is provided on Opal Avenue that provides access to the surface parking lot onsite. The primary campus parking lot on the northeast portion of the campus along East Colton Avenue, offering 858 spaces. Additional parking is available in a parking lot located on the west side of the Redlands East Valley HS campus on the surface

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parking lot on the project site. The surface parking lot on the project site accessed via Opal Avenue currently includes 78 parking spaces. In total, the currently campus provides 936 parking spaces.

Pedestrian access to the project site includes crosswalks at the intersections along Colton Avenue, and a sidewalk surrounding the perimeter of the campus on the north, east, and west sides. The campus includes internal walkways and paths between buildings throughout the campus and includes a path between the two baseball fields connecting the buildings on campus to the sports fields.

1.2.3 Existing Land Use

Redlands East Valley HS is within an unincorporated area of San Bernardino County. According to the San Bernardino County Zoning District Maps, the project site is designated as “IN” Institutional (San Bernardino 2021). The San Bernardino General Plan Land Use map designation is “PF” Public Facility (San Bernardino 2020)

The proposed project would be developed onsite within the boundaries of the existing Redlands East Valley HS campus, and no new property acquisition would be required to implement the proposed project. The proposed project’s development would not require modification to the project site’s current General Plan and zoning designations.

1.2.4 Surrounding Land Use

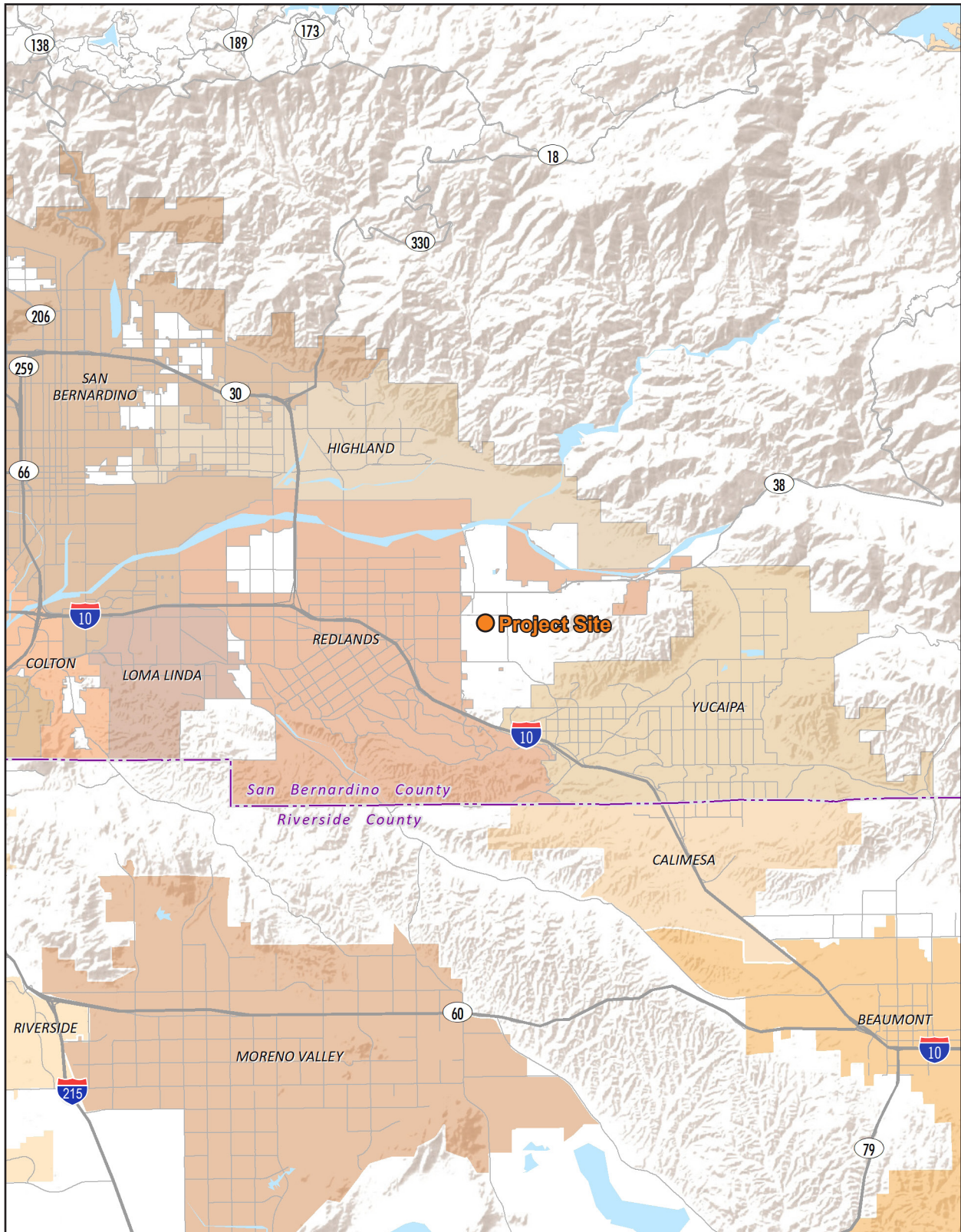
The project site is bordered by East Colton Avenue and an active development site across Colton Avenue to the north. The Redlands East Valley HS baseball fields to the east, a single-family residential dwelling and an agricultural orchard to the south, and Opal Avenue to the west. A single-family and multifamily neighborhood and a paper supply company are to the west of the campus, across Opal Avenue. See Figure 3, *Aerial Photograph with Photo Locations*, and Figure 5, *Surrounding Land Use Photos*.

The properties surrounding the project site are zoned Community Industrial to the north and west, single residential to the northeast, rural living-5 acre minimum to the east and south, rural living-5 acre minimum-agricultural preserve to the southeast, and multiple residential to the west (San Bernardino 2021). The surrounding General Plan Land Use designation include Limited Industrial to the northwest, Low density residential to the north, very low density residential to the east and south, and medium density residential to the west (San Bernardino 2020).

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Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

Source: ESRI, 2021

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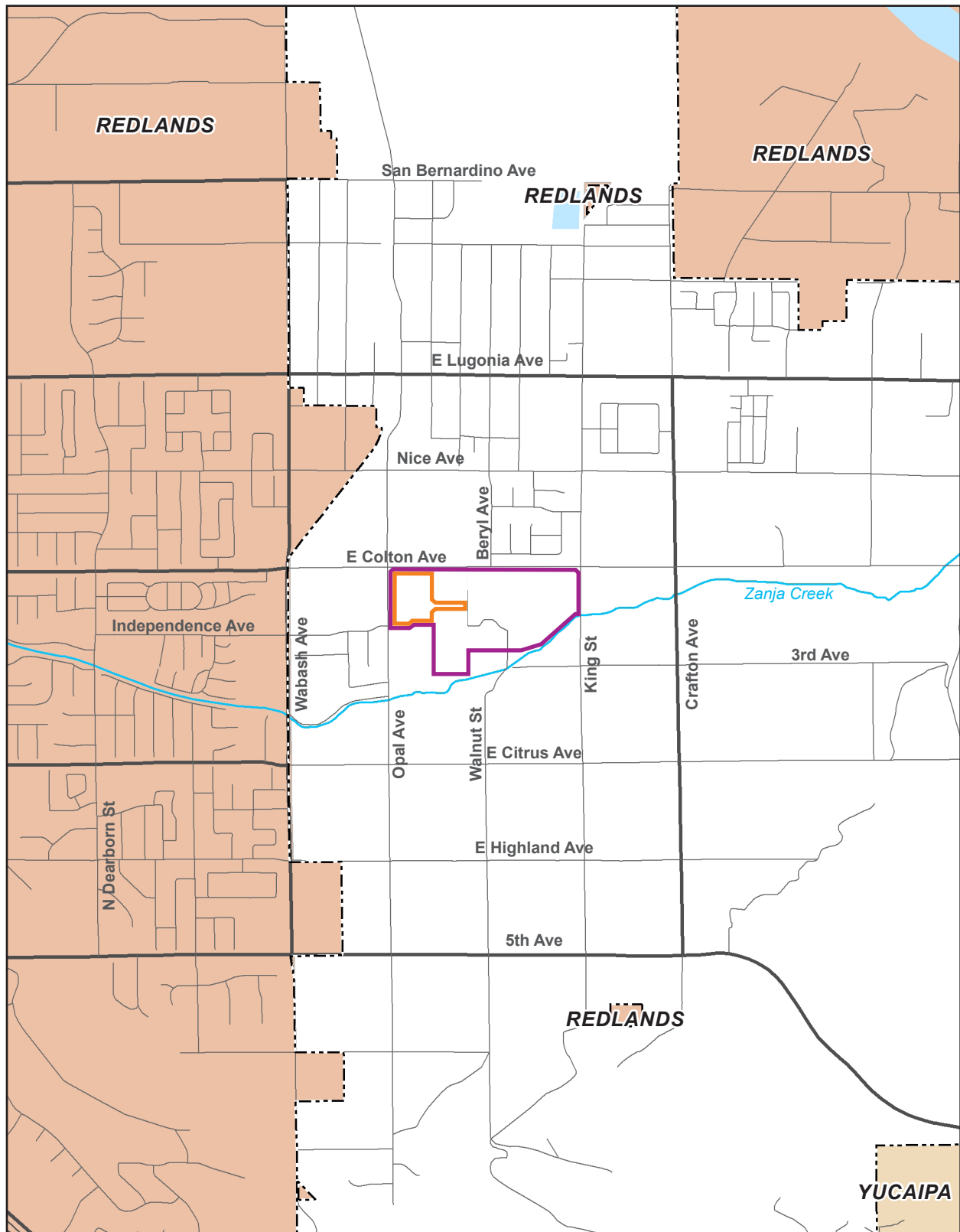


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Figure 2 - Local Vicinity



School Boundary Project Site Boundary

Note: Unincorporated county areas are shown in white.

Source: ESRI, 2021

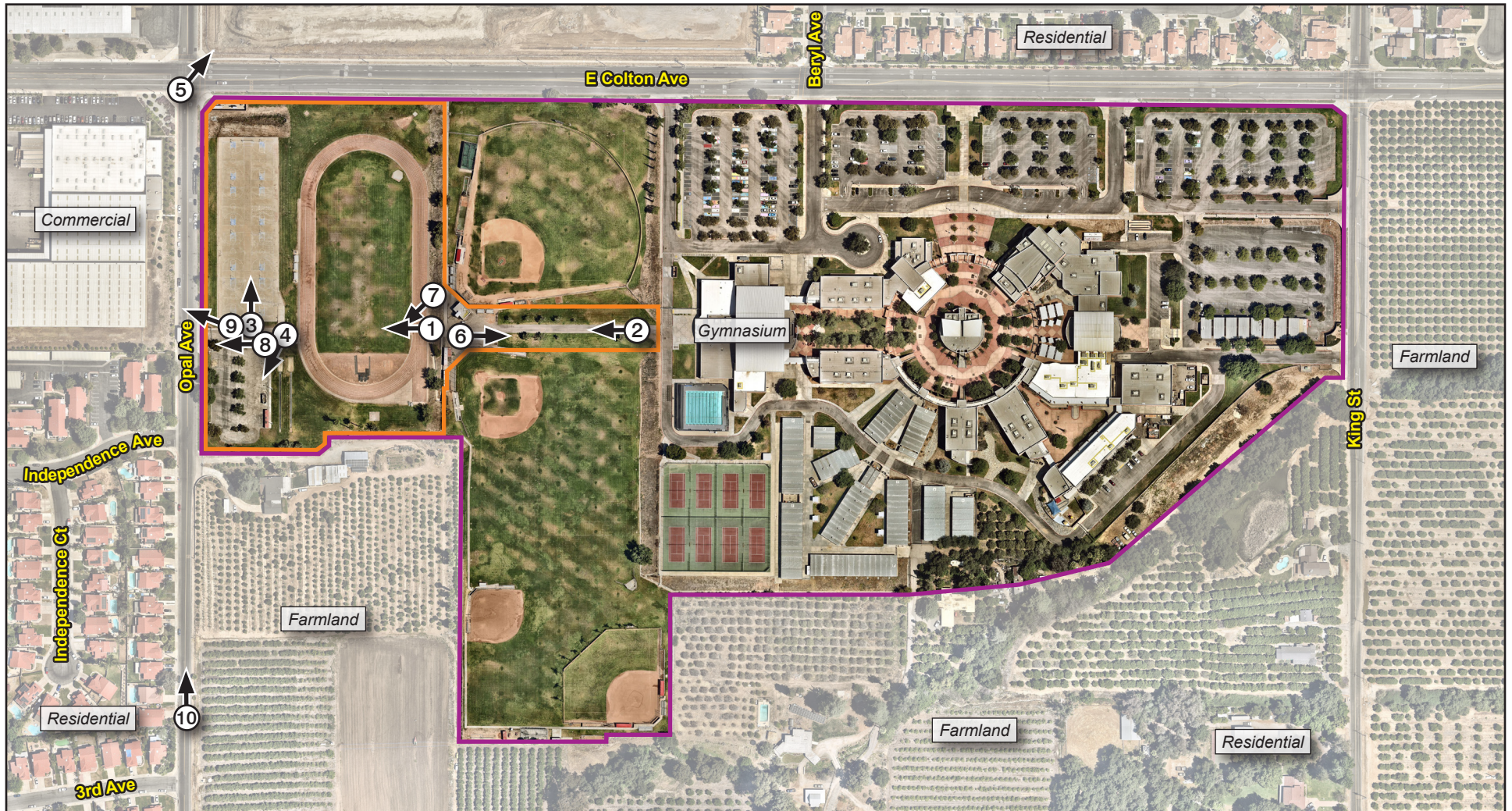
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Figure 3 - Aerial Photograph with Photo Locations



— School Boundary — Project Site Boundary ① Photo Location and Direction (10)

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Source: Nearmap, 2021

1. Introduction

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Figure 4 - Site Photographs



View 1: From the east side of the track and field, looking west at the track and field on the project site.



View 2: From the gymnasium building to the east of the project site, looking west towards the west side of the project site.



View 3: From the south side of the hardtop basketball courts onsite, looking north at the basketball courts and towards the north side of project site.



View 4: From the northeast corner of the existing surface parking lot onsite, looking southeast at the parking lot.

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Figure 5 - Surrounding Land Use Photographs



View 5: From the intersection of Colton Avenue and Opal Avenue, looking northeast at the active construction site north of the project site and the residential neighborhood to the northeast of the project site.



View 6: From the east side of the project site, looking east towards the east side of the Redlands East Valley High School campus.



View 7: From the east side of the track and field, looking southwest towards the residential and agricultural uses to the south of the project site.



View 8: From the existing parking lot on the west side of the project site, looking southwest at the residential uses along Opal Avenue.



View 9: From the existing parking lot on the west side of the project site, looking northwest at the industrial use along Opal Avenue.



View 10: From Opal Avenue, south of the project site, looking north along Opal Avenue at the residential and agricultural uses along Opal Avenue.

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1. Introduction

1.4 PROJECT DESCRIPTION

1.4.1 Proposed Development

The proposed new football stadium and track and field facilities and associated improvements would replace the existing football field and track facilities. Plans include bleacher seating for 3,000 people, lighting, a home ticket booth and restroom/concession building, and visitor ticket booth and restroom/concession building. The proposed project would also include various improvements to landscaping, new chain-link fencing, access and circulation improvements, and emergency access.

The new stadium would allow Redlands East Valley High School to hold home games at its own campus. The high school presently conducts its football home games and track meets at various locations, including Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. The onsite stadium would eliminate the need to bus event participants, e.g., coaches, athletes, and band members, to home games. The new stadium/track and field facility would also serve as a source of school and community pride by providing the high school with a state-of-the-art facility, while at the same time increasing the quality of the high school's athletic curriculum.

1.4.1.1 STADIUM

The proposed project would demolish the existing track and field and regrade and recompact the project site to allow for the proper base and slope for the proposed improvements. Site demolition will also include removal of associated concrete and hard surfaces and five trees along the eastern side of the project site. The proposed project will also relocate the existing metal storage container that currently sits on the southeast corner of the parking lot along Opal Avenue.

The proposed track and field would be sited approximately 45 feet south of Colton Avenue (approximately 48 feet north of the footprint of the existing track and field), which is approximately 49 feet closer to Colton Avenue than the existing track and field. The new field will be synthetic turf for soccer and football. The new track will be synthetic and contain nine lanes. Long and triple jump zone and a new vehicle access gate to the track on the south side of the new track. High jump and discuss zones will be provided on the north side of the track. The sport field and track will be surrounded by a new four-foot-high chain link fence and eight-foot-wide concrete walkway. A new scoreboard with steel and support structure and a 35-foot flagpole will be installed on the north end of the track and walkway. Four new Musco stadium lights¹ will be installed around the track and field, two on the east side at the top of the slope and two on the west side adjacent to the existing hardtop courts. The eastern stadium lights would be 90 feet tall and would be located on either side of the stadium seating facing to the west towards the football/soccer field. The western stadium lights would be 80 feet tall, set 12 feet above grade and would be located behind the stadium seating on either end facing towards

¹ Musco Lighting is a company and brand that designs and manufactures sport field lighting in addition to other lighting solutions (<https://www.musco.com/>).

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the east onto the football/soccer field. Each stadium light pole would include 11 lighting fixtures at the maximum height and two to three fixtures.

The proposed project's development would also involve the installation of bleacher seating and a public address system. The public address system includes six EV. S x 600 High-Output Indoor/Outdoor Speakers. Four speakers would be located at the back of the bleachers on the home side at 42 feet tall two additional speakers would be located at the middle of the visitor side bleachers at 37 feet tall. All size speakers would be positioned in a downward angle. As shown in Figure 6, *Conceptual Stadium Site Plan*, the stadium would include separate bleachers for home and visiting team spectators, providing a combined seating capacity for 3,000 spectators. The 2,000 home team bleachers and a press box would be installed on the east side of the football field, and 1,000 visiting team bleachers would be installed on the west side of the playing field. The proposed bleacher structures would be of aluminum construction and installed on a concrete foundation.

The proposed project would construct a new visitor ticket booth, concessions, custodial and restroom building that would be approximately 1,711 square feet and one story (approximately 14.5 feet above grade); this building will be located on the southwest of the proposed track and field. The proposed project would also construct a new home ticket booth, concessions, custodial, and restroom building that would be approximately 5,417 square feet and two stories high (approximately 16.5 feet relative to upper grade and 28 feet relative to field grade); this building will be located to the southeast of the proposed track and field.

The proposed project would also include other common or associated amenities, such as the security fencing, landscaping and groundcover, walkways, and a subsurface drainage system to manage stormwater drainage throughout the project site.

1.4.1.2 PEDESTRIAN ACCESS, FENCING, AND VEHICULAR PARKING

The proposed project includes pedestrian access and improvements from the west side (visitor side) and the east side (home side). The visitor side includes fencing along the basketball courts and fencing between the parking lot and visitor ticket booth. Pedestrian access from the visitor parking lot through a gate adjacent to the visitor ticket booth and onto concrete pavement. The home side includes fencing between the baseball fields with a gated entrance, and a walking path from the eastern portion of the campus between the baseball fields, lined with trees and gated for access to the stadium. Additional fencing is provided along Colton Avenue from Opal Avenue to the driveway adjacent to the baseball fields. The visitor side of the proposed project would be accessed from Opal Avenue. The existing parking lot would be used as visitor parking. The existing hardtop basketball court would be used for overflow event parking, when necessary, with access via the parking lot on the west side of the project site. The overflow parking can accommodate up to 150 additional vehicles. The overflow parking lot would provide an additional 150 parking stalls.

1.4.1.3 EMERGENCY ACCESS

The proposed project would provide emergency access to the field with a fire access road from the southwest parking lot which would access the field along the south end. Additionally, the walking path from the central school campus and facilities to the fields would be widened to provide direct fire access.

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1.4.2 Use and Scheduling

The proposed project is primarily intended to facilitate interscholastic athletic events and competitions, including football games and track meets. The facility would also be used for athletic team practices, band and color guard practices and occasional classroom activities, rallies, assemblies, and other academic functions. The proposed project would allow the District to host varsity events onsite. As scheduling permits, the proposed project may also accommodate a variety of community-sponsored events in accordance with the Civic Center Act (Education Code Section 38130–38139) and District policy.

The District anticipates the scheduling of approximately 60 events/games per year that require the use of the stadium's public address and/or field lighting systems, five of which would have the potential to be full capacity. All of the 60 events/games that would be held at the project site are existing events. Thirty of these events/games currently exist onsite and thirty events/games would be relocated from other facilities; no new events would occur on the project site. The most heavily attended stadium events would be football games. An additional number of games, likely no more than two, would be scheduled depending on the team's playoff status. Homecoming, games between local school rivals, and possible playoff games could result in maximum-capacity crowds. Occasional special events, such as rallies, may also result in capacity-sized crowds. As such, approximately five capacity events are anticipated per year which would have the potential to reach crowds of over 2,000 spectators.

The District anticipates the scheduling of approximately three home football games per year each for varsity and Freshman teams. High school football season generally extends from the end of August through the middle of November, depending on team playoff status. Varsity games would generally be scheduled on Thursday and Friday evenings between the hours of 7:00 PM and 9:30 PM. Freshman games would be scheduled immediately following the end of the school day on Thursday or Friday afternoons. The stadium's field lights would be in operation for approximately four hours during any single evening, with lights being turned off by 10:30 PM. Football practice sessions at the stadium would occur on a regular basis and may, when necessary, utilize the stadium's lighting system, with lights being shut off before 9:00 PM.

Track season takes place during the late winter and spring months. The District anticipates the scheduling of approximately three home track meets during the average school year. Track and field meets would generally be conducted on Thursday after school until 6 PM, and cross county competitions would be held on Saturdays, starting at approximately 7:30 AM. Track and field meets are usually held during daylight hours, and generally do not require the use of stadium lights. However, there is a possibility that some meets may require use of the lighting system. Lights would be turned off prior to 10:30 PM.

Soccer takes place during the late winter and spring months. Home games generally occur Wednesday immediately after school until 6:30 pm for boys teams and Fridays immediately after school until 6:30 for girls teams, with JV playing before Varsity for both teams. Each team (Girls JV, Girls V, Boys JV, and Boys V) have 5 home games per year, for a total of 20 home games typically occurring with JV and Varsity games occurring consecutively. Soccer Games at the stadium may, when necessary, utilize the stadium's lighting system, with lights being shut off before 9:00 PM.

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Other school uses may include band and color guard practices and competitions, classroom activities, and possibly rallies and assemblies, most of which would be conducted during daylight hours. The high school's band would use the stadium and lighting system one or two nights a week during football season for practice. Band practice would conclude by approximately 9:00 PM. It is anticipated that daily physical education classes would not normally utilize the stadium facility. Additionally, some summer events may occur at the project site, and would be shown in the school's event schedule.

In addition to scholastic-related uses, the proposed project may also accommodate a variety of community-sponsored events and activities, potentially including youth soccer practices and youth football. Stadium use by community organizations would be subject to approval by the District and the Civic Center Act. Community events would generally be scheduled on weekends and would conclude by 10:00 PM. Currently, one community-sponsored event (a fundraiser walk) uses the facilities, which occurs one time per year.

1.4.3 Project Phasing

The proposed project would be constructed in three phases, with construction activities anticipated to begin in April 2022 and completed in June 2026. Figures 7 to 9 for site plans for each phase.

1.4.3.1 PHASE 1

Phase 1 of the proposed project includes installing artificial turf sport field, installation of 9-lane synthetic track and track and field spaces, four Musco stadium lights, and public address system. This would include installation of the scoreboard and flag pole, trenching and installation of underground utilities, construction of concrete walking path around the track, installing stadium fencing, parking lot restriping, and relocation of the metal storage container on the southeastern corner of the parking lot. Following the completion of this phase, the project site would host home track and field events, and varsity soccer for boys and girls teams, without bleachers. Refer to Figure 7, *Phase 1 Site Plans*.

1.4.3.2 PHASE 2

Phase 2 would include the installation of a 1,000-person bleacher on the visitor team side and a 2,000-person bleacher on the home team side. Phase 2 would include construction of the new visitor concessions/restroom/ticket booth building and pedestrian entry improvements, as well as emergency access improvements such as access gate, roadway, and fire hydrant. This phase also includes new chain-link fencing, trees, irrigation, and turf surrounding the stadium and basketball courts, landscape improvements and fencing around the baseball fields and the walking path to the stadium, and several new concrete pavement areas. Following completion of phase 2, full use of stadium for football games and other events would occur. Refer to Figure 2, *Phase 2 Site Plans*.

1.4.3.3 PHASE 3

During Phase 3, the construction of the home concession/restroom buildings and entry improvements would occur. The new home concession/restroom building would include a ticket booth, concessions, custodial space, and restrooms. Additionally, new masonry and landscaping would occur between the access point near the

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baseball fields to the home concession building. This phase also includes upgrades to the walking path on the home side to allow fire access and staircase to the stadium for direct fire access. Refer to Figure 3, *Phase 3 Site Plans*.

1.5 DISCRETIONARY APPROVALS

The Redlands Unified School District is the Lead Agency under CEQA and has the approval authority over the proposed project. Discretionary actions for the proposed project would include: (1) certification of the environmental document and (2) approval of the proposed project.

1.6 OTHER AGENCY ACTION REQUESTED

The Redlands Unified School District is the Lead Agency under CEQA and has the approval authority over the proposed project. The District would require approval and/or coordination from the following agencies to implement the proposed project.

State Agencies

The District will seek approval of the proposed project from the Division of the State Architect (DSA). Since the project will not receive state funding, CDE and DTSC approvals are not required.

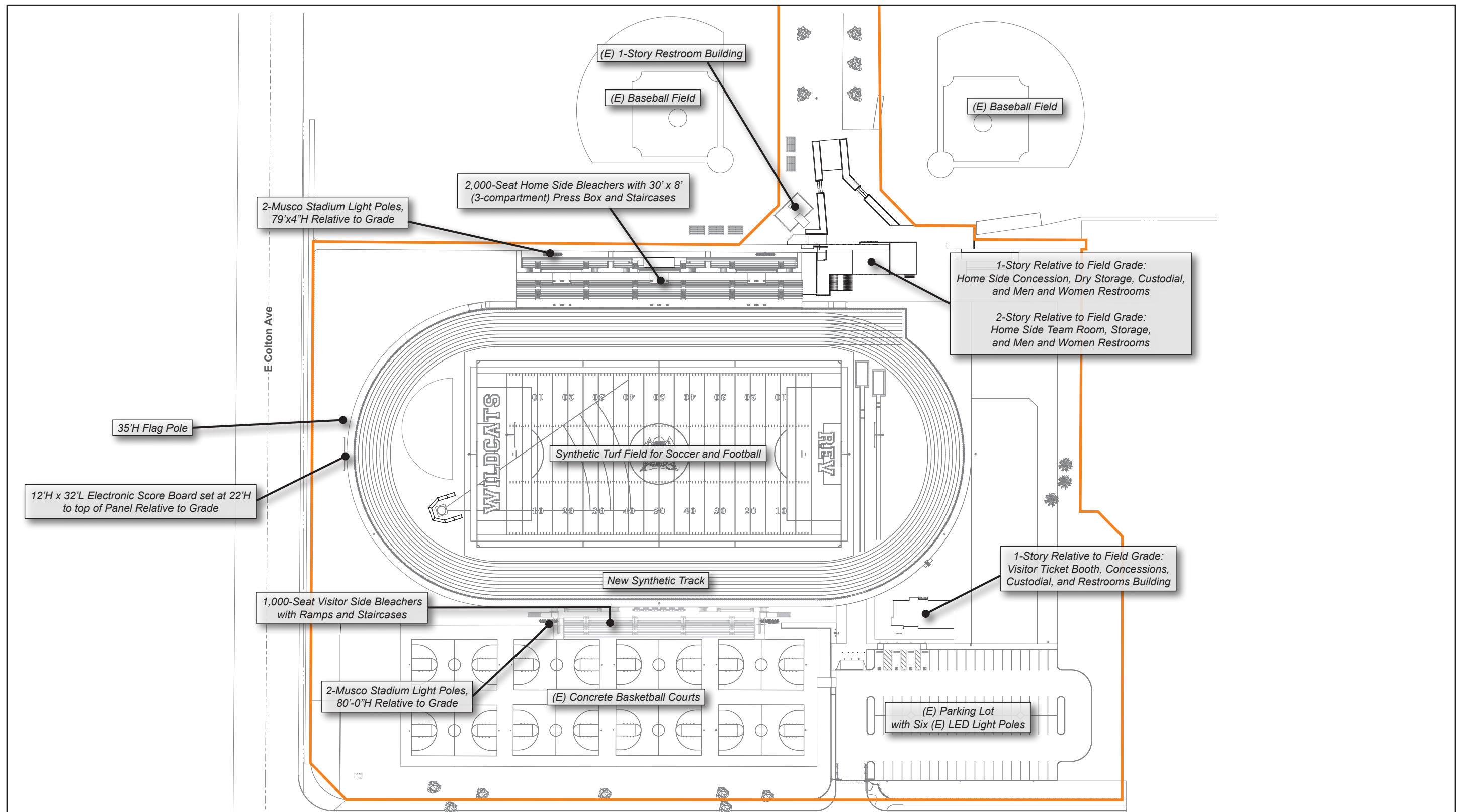
Local Agencies

The District would require approval of the addition of a new fire hydrant from San Bernardino County Fire Department.

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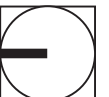
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Figure 6 - Site Plan



Project Site Boundary

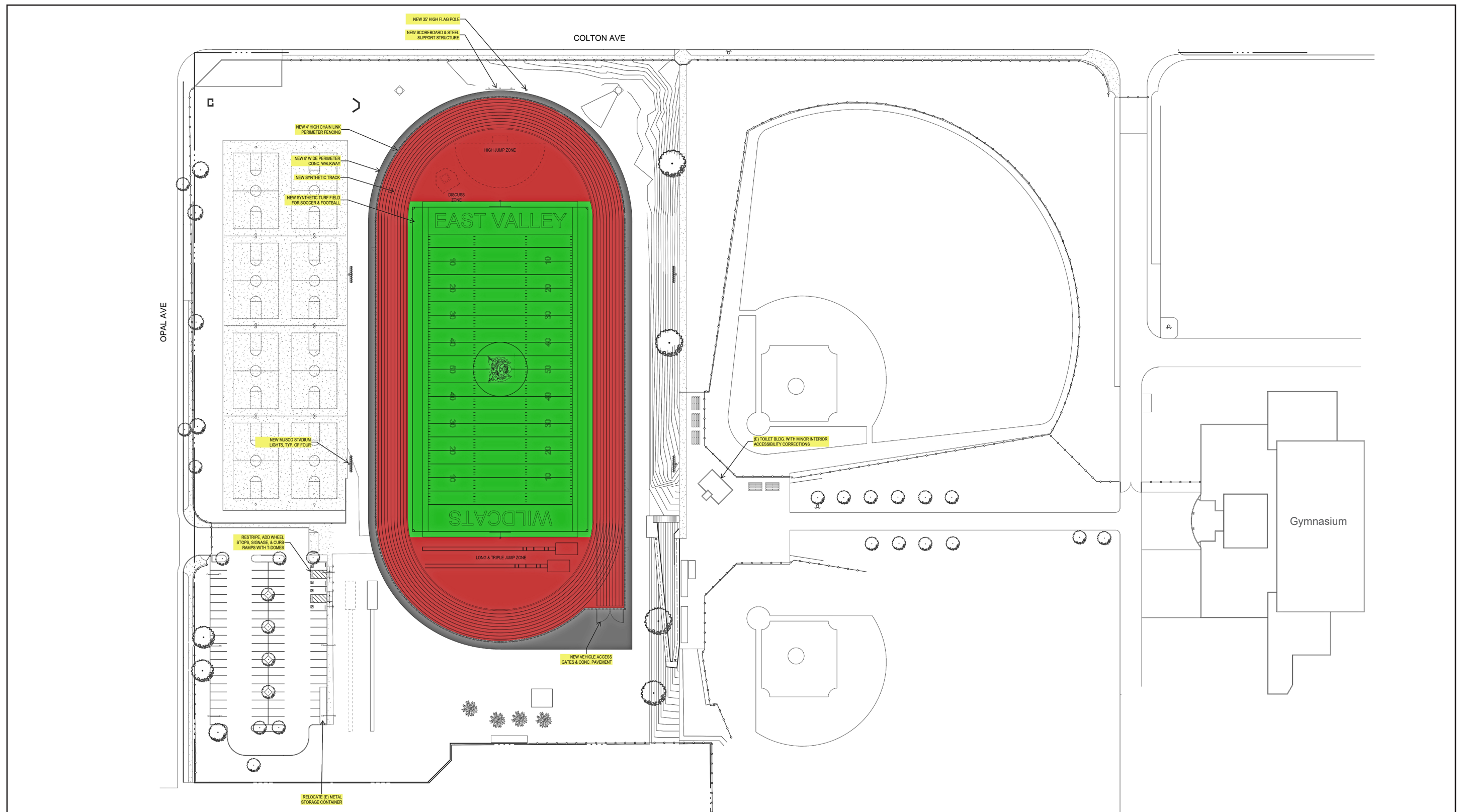
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Scale (Feet)



1. Introduction

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Figure 7 - Phase 1 Site Plans



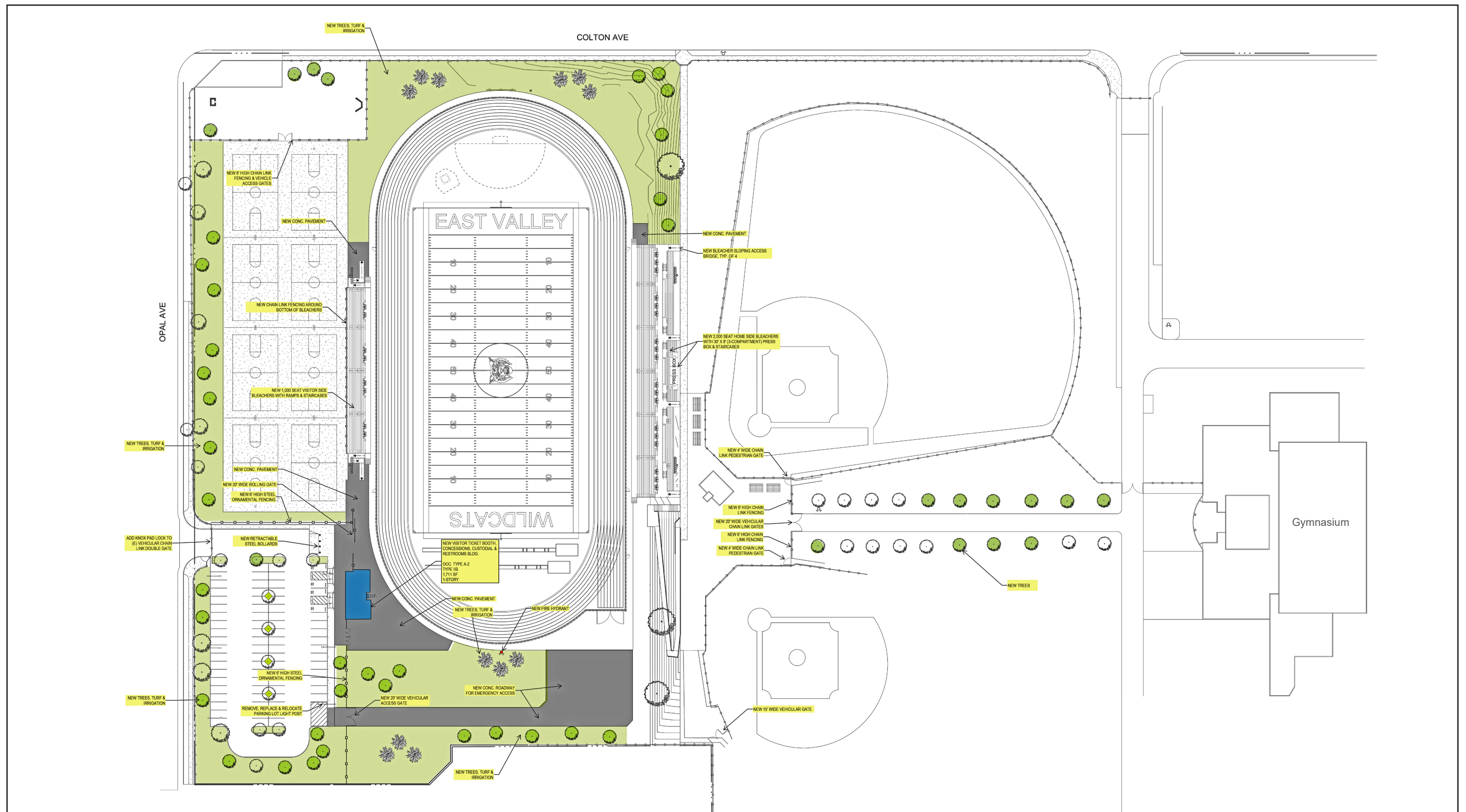
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1. Introduction

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Figure 8 - Phase 2 Site Plans

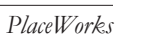


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1. Introduction

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1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Redlands East Valley High School Stadium Project
2. **Lead Agency Name and Address:**
Redlands Unified School District
20 W. Lugonia Avenue
Redlands, CA 92374
3. **Contact Person and Phone Number:**
Ken S. Morse, Coordinator, Operations & Facilities Planning
(909) 748-6730
4. **Project Location:** The project site is located at 31000 East Colton Avenue (Assessor's Parcel Map Numbers 0299-031-30) in the Mentone community of unincorporated San Bernardino County, California
5. **Project Sponsor's Name and Address:**
Redlands Unified School District
20 W. Lugonia Avenue
Redlands, CA 92374
6. **General Plan Designation:** The project site is designated as "PF" Public Facility in the San Bernardino General Plan Land Use map.
7. **Zoning:** The project site is designated as "IN" Institutional in the San Bernardino County Zoning District Maps.
8. **Description of Project:** Redlands Unified School District intends to redevelop the stadium at Redlands East Valley High School over three phases. The proposed project would include a new track and synthetic grass football field (including scoreboard and Musco field lights), bleachers for 3,000 people, new visitor and home ticketing booth, concessions, custodial and restroom buildings, landscaping, and pedestrian and vehicle circulation access and entryway improvements.
9. **Surrounding Land Uses and Setting:** The project site is bordered by East Colton Avenue and an active development site across Colton Avenue to the north. The Redlands East Valley HS baseball fields to the east, a single-family residential dwelling and an agricultural orchard to the south, and Opal Avenue to the west. A single-family and multifamily neighborhood and a paper supply company are to the west of the campus, across Opal Avenue. The properties surrounding the project site are zones Community Industrial to the north and west, single residential to the northeast, rural living-5 acre minimum to the east and south, rural living-5 acre minimum- agricultural preserve to the southeast, and multiple residential to the west.

2. Environmental Checklist

The surrounding General Plan Land Use designation include Limited Industrial to the northwest, Low density residential to the north, very low density residential to the east and south, and medium density residential to the west.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

State Agencies

- Division of the State Architect (DSA)

Local Agencies

- Mentone community of unincorporated San Bernardino County
- San Bernardino County Fire Department

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The proposed project would comply with tribal consultation requirements pursuant to Assembly Bill 52 (AB 52). One California Native American tribe, the San Manuel Band of Mission Indians is on the RUSD's notification list pursuant to AB 52. The District provided a notification letter to this tribe on November 9, 2021 and as of the time of publication of this Initial Study, no response has been received.

2. Environmental Checklist

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

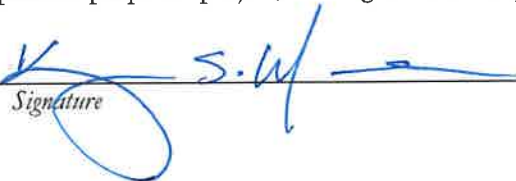
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

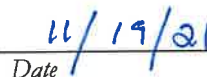
☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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


Signature


Date

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063I(3)(D). In this case, a brief discussion should identify the following:
 - a) **Earlier Analyses Used.** Identify and state where they are available for review.
 - b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

2. Environmental Checklist

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
- the significance criteria or threshold, if any, used to evaluate each question; and
 - the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
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?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	X			
IV. BIOLOGICAL RESOURCES. Would the project:				
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?				X
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?				X
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?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X			
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
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 waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X			
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
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?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	X			
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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 a substantial erosion or siltation on- or off-site;	X			
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	X			
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	X			
iv) impede or redirect flood flows?	X			
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X
XIII. NOISE. Would the project result in:				
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?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			
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?			X	
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) 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?	X			
Police protection?	X			
Schools?				X
Parks?				X
Other public facilities?			X	
XVI. RECREATION.				
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?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	X			
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	X			
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
d) Result in inadequate emergency access?	X			
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	X			
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	X			
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
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?				X
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?				X
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
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.)	X			
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	X			

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

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

Less Than Significant Impact. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape feature (e.g., a mountain range, lake, or coastline) or of a significant historic or architectural feature (e.g., views of a historic structure). Although the project site is located in a developed urban area and is not part of a scenic vista, views around the project site include the San Bernardino Mountains in the distance.

The proposed project would develop a stadium at the project site that would include bleachers, new visitor and home ticketing booths, concessions, custodial and restroom buildings, a new scoreboard with steel and support structure, a 35-foot flagpole on the north end of the track, and four new stadium lights around the track and field. As described in section 1.4.1, *Project Development*, the eastern stadium lights would be 90 feet tall and would be located on either side of the stadium and the western stadium lights would be 80 feet tall, set 12 feet above grade, and would be located behind the stadium seating on either end. These proposed lighting features and building at the project site would be consistent with the overall existing character and features of the campus and would not result in substantial adverse changes to the project site. Additionally, from its location, proposed project amenities would primarily be visible to those visiting the project site and the adjacent roadways, residences and businesses. The proposed project, including the light poles, would not substantially interfere with views of the San Bernardino Mountains. Thus, the proposed project would not result in a substantial adverse effect to scenic vistas from the project site, when compared to existing conditions. Therefore, impacts would be less than significant. This issue will not be reviewed further in the EIR.

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 project would involve the development of new athletic facilities on the campus of an existing high school. The nearest officially designated state scenic highway is a portion of State Route 38 (SR-38) beginning at Post Mile (PM) 31 and ending at PM 46.7, located approximately 19 miles northeast of the project site. Additionally, the nearest eligible scenic highway is located approximately 0.5-mile north of the project site, on SR-38, beginning at PM S0.372 and ending at PM 49.5 (Caltrans 2021). The project site is not located near a scenic highway and no damage to any scenic resources within a state scenic highway would result from project development. This issue will not be reviewed further in the EIR.

3. Environmental Analysis

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

Potentially Significant Impact. The proposed project would involve the construction of a new athletic stadium on the campus of an existing high school in an area presently developed with athletic facilities. Project development would not change the visual character of the site in this regard. The proposed project's development would not involve extensive grading or substantial changes in site elevation, and the project site does not contain habitat nor other significant natural features that could be considered a visual resource. The proposed project would include the installation of bleacher structures and stadium lighting. The stadium lighting would range from 80 to 90 feet in height. Installation of these features would be readily visible from the areas surrounding the project site, and particularly those nearby residences to the north and east of the site. This issue will be further discussed in the EIR.

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

Potentially Significant Impact. The proposed project would include elevated field lighting to allow for the scheduling of nighttime games and activities. Use of high-intensity elevated lighting does have the potential to result in substantial changes to nighttime light levels at neighboring residences. Lighting and glare impacts resulting from the proposed project will be addressed further in the EIR.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The proposed project would be developed on the campus of an established high school. The project site is identified as Urban Built-Up Land and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2021a). The project site is adjacent to a residential development and agricultural fields, but they are not designated as unique farmland, prime farmland, or farmland of statewide importance. Operation of the proposed project would be limited to the project site, and the proposed project would not physically impact nor alter the use of the existing agricultural fields. Further,

3. Environmental Analysis

the project site's developed state, current use as a school campus, and relatively small acreage preclude its use for significant large-scale agricultural uses. No significant impacts to any farmland resources would result from the development of the proposed project. This issue will not be reviewed further in the EIR.

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

No Impact. According to the San Bernardino County Zoning District Maps, the project site is designated as "IN" Institutional (San Bernardino 2021); additionally, the San Bernardino General Plan Land Use map designation is "PF" Public Facility (San Bernardino 2020). The proposed project site is not zoned for agricultural use and is not bound by a Williamson Act contract. While there are agricultural uses to the south of the project site, development and operation of the proposed project would occur within the boundaries of the project and would not conflict with neighboring agricultural uses. Development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. This issue will not be reviewed further in the EIR.

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. The project site is currently zoned "IN" Institutional and has a General Plan land use designation of "PF" Public Facility. The project site is on the Redlands East Valley HS campus and currently developed with a track and field, surface parking lot, hardtop basketball courts, walkways and supporting structures. No forested land nor timberland exist onsite. Further, the proposed project site is not zoned for forest land or timberland. Therefore, development of the proposed project would not conflict with existing zoning for forestland or timberland. This issue will not be reviewed further in the EIR.

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

No Impact. The proposed project site is located on the campus of an existing high school within an urbanized area, and no significant forest land uses are present onsite nor in the immediate vicinity. Development of the proposed project would not require any changes to the existing environment that could result in the conversion of forest land to non-forest use. No impacts would occur as a result of the proposed project. This issue will not be reviewed further in the EIR.

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?

No Impact. The project site is located on the campus of an existing high school within an urbanized area, and no significant agricultural uses or forest land uses are present onsite nor in the immediate vicinity. Development of the proposed project would not require any changes to the existing environment that could result in the conversion of farmland to nonagricultural uses or forest land to non-forest use. No significant impacts would occur as a result of the proposed project. This issue will not be reviewed further in the EIR.

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3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

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

Potentially Significant Impact. Construction and operation of a new 3,000-seat stadium would generate criteria air pollutants that have the potential to increase the severity of the nonattainment designation of the South Coast Air Basin (SoCAB) or exceed the assumptions of the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). Potential impacts associated with consistency with the AQMP will be analyzed in the EIR.

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

Potentially Significant Impact. The SoCAB is designated nonattainment for ozone (O₃) and fine particulate matter (PM_{2.5}) under the California and National AAQS, nonattainment for particulate matter (PM₁₀) under the California AAQS, and nonattainment for lead (Pb) under the National AAQS (CARB 2018). Project-related construction or operational phases of the proposed project have the potential to exceed the SCAQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Any project that produces a significant project-level regional air quality impact in a nonattainment area adds to the cumulative impact. Due to the extent of the SoCAB area and the number of cumulative project emissions, a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds (SCAQMD 1993). Therefore, air quality impacts of the proposed project will be examined further in the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Air pollutant emissions associated with the proposed project would occur over the short term from construction activities, and over the long term from project-generated vehicle trips and stationary sources. During construction activities, off-road equipment exhaust and fugitive dust have the potential to elevate concentrations of air pollutants at onsite and offsite sensitive receptors. Air pollutant emissions generated by the proposed project will be evaluated against SCAQMD's localized significance thresholds (LST). During operation, on-road emissions from vehicles traveling to and from the project site have the potential to generate elevated concentrations of carbon monoxide (CO) at congested intersections. Localized impacts from project-related construction and operational activities will be examined further in the EIR.

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

Potentially Significant Impact. Air pollutant emissions would occur over the short term for site preparation and construction activities, and over the long term associated with project-related vehicle trips generated during

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operation. The EIR will evaluate the increase in air pollutant emissions generated by construction and operation of the proposed project against SCAQMD's regional significance thresholds. Mitigation measures will be recommended, if applicable, to minimize the proposed project's contribution to air pollutant emissions in the SoCAB.

3.4 BIOLOGICAL RESOURCES

Would the project:

- 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?**

No Impact. The proposed project would be implemented on the campus of an existing high school, in an area currently developed with school-related facilities. The project site does not contain, or provide habitat for, any sensitive or special status species. Further, San Bernardino's Biotic Resources map identifies no areas of valued habitat at the site (San Bernardino 2012). According to this map, the closest critical habitat for a threatened and endangered species designated by the USFWS, is the San Bernardino kangaroo rat; additionally the three nearest habitats to the project site of species of special concern include the burrowing owl, California gnatcatcher, the, and the Santa Ana River Woolly Star. However, all habitats located are approximately 1.5 miles from the project site.

The proposed project would not result in direct or indirect impacts on any candidate, sensitive, or special status species or the elimination or modification of any natural habitat, which may provide habitat for any sensitive or special status species. Impacts relating to the removal of ornamental trees and vegetation would not constitute a constraint on the site's development and would be less than significant. This issue will not be reviewed further in the EIR.

- 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?**

No Impact. The proposed project would be developed on the campus of an existing high school, which does not contain any riparian habitat (USFWS 2021). Further, according to San Bernardino's Biotic Resources map, the project site does not have sensitive natural community on the project site (San Bernardino 2012).

Project development would not impact riparian habitat or other sensitive natural communities identified in local, regional, or national plans, regulations, or policies. Construction of the proposed project would be confined to within the developed the project site. No additional areas of property would be acquired and no impacts to offsite areas of habitat would occur. This issue will not be reviewed further in the EIR.

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- 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. According to the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI), the project site is developed and does not contain any wetland resources or other natural habitat. The proposed project would not have an adverse effect on federally protected wetlands (USFWS 2021). The project site is located approximately 0.2 mile north of an identified creek located south of the campus; however, the proposed project would be constructed and operated within the project site and would not affect this wetland. No impacts to state or federally protected wetlands would result from project implementation. This issue will not be reviewed further in the EIR.

- 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?**

No Impact. Development of the proposed project would occur on the campus of an existing high school. The project site is currently development and does not contain habitat that is used as a migratory wildlife corridor nor a wildlife nursery. Construction and operation of the proposed project is limited to the project site. No impacts to wildlife movement nor wildlife nursery sites would occur as a result of the proposed project's construction and operation. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. The proposed project would be implemented within the boundaries of an existing high school campus, which does not contain a significant number of trees. However, a number of ornamental landscape trees are planted around the perimeter area of the proposed track and field location and within the existing parking lot. While impacts to the school's existing landscape would be avoided to the extent feasible, approximately five onsite trees would require removal to accommodate the proposed project, these tree species include *Pinus coulteri* (Coulter Pine) and *Acacia melanoxylon* (Blackwood Acacia). These species are not protected species.

The proposed project's development would not conflict with any applicable policies or ordinances protecting biological resources, including Goal NR-5 from the General Plan's Natural Resources Element that supports an interconnected landscape of open spaces and habitat areas that promotes biodiversity and healthy ecosystems. No significant impacts would occur as a result of the project's development and no mitigation measures are required. This issue will not be reviewed further in the EIR.

- 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?**

No Impact. The project site is not located within the boundaries of a Habitat Conservation Plan (HCP) nor a Natural Community Conservation Plan (NCCP). Further, the project would be developed on the campus of

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an existing high school within a developed urban area, and as discussed under checklist question 3.4(a), the project site does not contain sensitive habitat. Therefore, no impact would result from the development of the proposed project. This issue will not be reviewed further in the EIR.

3.5 CULTURAL RESOURCES

Would the project:

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

According to the California Historical Landmarks database, California Register of Historical Resources, and National Register of Historic Resources Places, no listed or known archeological resources within are on the project site (OHP 2021; NPS 2021). Construction would be confined to the project site, which is located on the west side of the Redlands East Valley High School campus. The areas of the school campus proposed for development are presently developed with athletic fields and amenities, including baseball and softball fields, tennis courts, hard courts, a track and field, restrooms, and an additional student parking lot. Redlands East Valley High School began construction in 1995, and opened on September 9, 1997 (Redlands East Valley High School 2021); thus, all existing development on the project site post-dates 1995 and therefore has no historical significance. The proposed project does not involve the demolition or modification of any potentially historic structures, and no facilities eligible for historic preservation would be impacted by the project’s development.

Based on this review of the project site, no significant historical resources would be impacted by project development. Additionally, no important or historically significant persons or events are known to be associated with the project site. No impact to historic resources would result from project construction and operation. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. The proposed project would require ground-disturbing activities and the construction of new buildings.

In the unlikely event that archaeological resources are discovered during excavation or grading, work would cease in the area of the find and a qualified archaeologist would be contacted. A qualified archaeologist will evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2. Consistent with regulatory requirements, personnel of the proposed project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Impacts would be less than significant. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. Given the project site was previously disturbed, it is unlikely to support conditions conducive to the discovery of human remains. However, there is a remote possibility that human remains could be encountered during excavation and grading activities associated with for the proposed project.

If human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall halt and remain halted. The county coroner shall investigate the circumstances, manner, and cause of any death and recommend the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of being notified of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC), who will contact the “most likely descendant.” The most likely descendant shall receive access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

While unlikely, any accidental discovery of human remains during project construction and operation would be required to comply with all applicable laws and regulations establishing the proper handling of human remains. Compliance with these laws and regulations would ensure that proposed project would result in a less than significant impact. This issue will not be examined further in the EIR.

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3.6 ENERGY

Would the project:

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

Potentially Significant Impact. Following is a discussion of the potential impacts related to the consumption of energy sources resulting from the construction and operational phases of development that would be accommodated by the proposed project.

Construction

Construction of the proposed project would require energy use to power the construction equipment. The energy use would vary during different phases of construction. Construction equipment would potentially include gas or diesel-powered machinery and/or vehicles. Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. Impacts related to energy use during construction would be addressed further in the EIR, and applicable mitigation measures would be identified.

Operation

The proposed project involves the construction of field lighting on the existing field and would result in an increase in energy consumption upon completion. The project site is currently developed with institutional uses. The existing facilities onsite consumes electricity for various needs, including but not limited to operation of electrical systems; lighting; and use of on-site equipment and appliances. Compliance with existing energy standards would minimize the environment impact of energy during operation. However, operation of the proposed project would have the potential to increase energy consumption that could significantly impact the environment. The EIR will evaluate the potential for the project to generate a substantial increase in energy use, and mitigation measures will be incorporated as needed.

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

Potentially Significant Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of energy include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60

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percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target. A project found to be consistent with the adopted implementation of state and local plans is presumed to have less than significant energy consumption impacts. Energy consumption will be addressed and reviewed in the EIR to determine the significance of potential impacts.

3.7 GEOLOGY AND SOILS

Would the project:

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

No Impact. According to the DOC, no known faults or fault traces pass through the project site (DOC 2015). In addition, the project site is not located within an Alquist-Priolo Earthquake Fault Zone (San Bernardino 2020). The nearest Alquist-Priolo Earthquake Fault Zone is the Crafton Hills Fault, located about 2.6 miles southeast of the project site (DOC 2021b). The proposed project would not have substantial adverse effects involving Alquist-Priolo Fault Zones and surface rupture. No impacts would occur. This issue will not be reviewed further in the EIR.

ii) Strong seismic ground shaking?

Less Than Significant Impact. There are a number of faults in the southern California area that are considered active and can produce earthquakes that can cause ground shaking at the project site. All proposed structures would be constructed in accordance with applicable building codes and standards. The most recent building standard adopted by the legislature and used throughout the state is the 2019 version of the California Building Code (CBC) (Title 24, Part 2, California Code of Regulations). These codes provide minimum standards to protect property and the public welfare and safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. Additionally, the CBC requires the preparation of project-specific geotechnical/engineering reports by a Certified Engineering Geologist and/or Geotechnical Engineer prior to construction of the proposed structures. The proposed project would be required to comply with the recommendations contained in these reports. Any structures

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built for this proposed project would adhere to the most recent version of the CBC. Impacts would be less than significant. This issue will not be reviewed further in the EIR.

iii) Seismic-related ground failure, including liquefaction?

No Impact. According to San Bernardino County's Geological Hazards Maps, the project site is not located within a Zone of Suspected Liquefaction Susceptibility or a generalized liquefaction susceptibility area (San Bernardino 2021). In general, liquefaction is a phenomenon that occurs where there is a loss of strength or stiffness in the soils that can result in the settlement of buildings, ground failure, or other hazards. The main factors contributing to this phenomenon are 1) cohesionless, granular soils having relatively low densities; 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high ground shaking. The project site is not located within an area susceptible to liquefaction (DOC 2021c). As such, no liquefaction impacts would occur. This issue will not be reviewed further in the EIR.

iv) Landslides?

No Impact. According to San Bernardino County's Geological Hazards Maps, the project site is not located within a generalized landslide susceptibility area (San Bernardino 2021). Based on a review of the DOC's Landslide Information Maps and the United States Geological Survey (USGS) 7.5-minute Topographic Series, Redlands, California Quadrangle Map (DOC 2015, USGS 2018), the project site has a gentle gradient to the west. There are no large or steep slopes on or near the site. The lack of significant slopes on or near the project site indicates that there is not a significant hazard from slope instability, landslides, or debris flows at the project site. Based on the lack of significant slopes on or adjacent to the site, landslides are not expected at the project site. No impacts would occur. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. Precipitation, water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds so slowly as to be imperceptible, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion within an urban area can cause damage by undermining structures, blocking storm sewers, and depositing silt, sand, or mud in roads and tunnels. Eroded materials may eventually be deposited into local waters, where the carried silt can remain suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Construction and operation of the proposed project may result in small amounts of soil erosion. However, the construction and operation of the proposed project would be required to comply with all applicable water quality regulations and standards and incorporate best management practices to reduce erosion. The proposed project would comply with the County General Plan's Hazards Element Policy HZ-1.8, which requires new development in medium-high or high wind erosion hazard areas to minimize the effects of wind-blown soil through building and site design features such as fencing, surface treatment or pavement, attenuation or wind barriers, architectural features, building materials, and drought resistant landscaping (San Bernardino 2020).

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Additionally, the project site is relatively level and contains no unusual geographic features. The proposed project would not result in exposing any soil at the project site for prolonged periods of time. Soils may be exposed during project construction, but that exposure would be temporary and would not result in substantial soil erosion.

Compliance with applicable regulations would ensure that the proposed project would in a less than significant impact to soil erosion and loss of top soil. This issue will not be reviewed further in the EIR.

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

No Impact. Hazards arising from liquefaction and landslides would have no impact, as discussed above in sections a(iii) and a(iv).

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. As discussed above, the project site is not located within a Zone of Suspected Liquefaction Susceptibility or a generalized liquefaction susceptibility area (San Bernardino 2021). Therefore, the proposed project would not expose people or the project site to adverse effects associated with lateral spreading. No impacts would occur.

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. The project site is located within the Upper Santa Ana Valley – San Bernardino basin (California Department of Water Resources 2019). However, the proposed project would not increase withdrawal of groundwater and project implementation would not pose substantial hazards to people or structures due to ground subsidence. Therefore, no impacts would occur.

Collapsible Soils. Collapsible soils consist of loose, dry, low-density materials that are weakly cemented and that thus can collapse or be compressed with the addition of water or weight. Collapsible soils include young fine-grained alluvial materials, wind-deposited soils, and soils with salts. The project site is unlikely to have collapsible soils, as much of the Valley Region is covered with either alluvial or wind-blown soils (San Bernardino 2020). Therefore, no impacts would occur.

No impacts related to lateral spreading, subsidence, or collapsible soils would occur. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. Expansive soils swell when they become wet and shrink when they dry out, resulting in the potential for cracked building foundations and, in some cases, structural distress of the buildings themselves. The project site is located within the Valley Region of San Bernardino County, which is unlikely to have expansive soil (San Bernardino 2019). Standard grading technologies and compliance with current grading requirements in accordance with the seismic requirements of the California Building Code (CBC), CCR Title

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24, and DSA seismic safety would reduce impacts from expansive soils to a less than significant level. This issue will not be reviewed further in the EIR.

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 waste water?

No Impact. Development of the proposed project would not require the installation of a septic tank or alternative wastewater disposal system. The proposed project would utilize the local sewer system. Therefore, no impacts would result from septic tank or other onsite wastewater disposal systems. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. The Valley Region of San Bernardino County, in which the project site is located, is characterized by a broad valley floor deposit of Younger Alluvium (Q), which is likely underlain by Older Alluvium (Qoa) and Pleistocene-Pliocene Nonmarine Sediments (QPc), such the San Timoteo Formation. The Younger Alluvium (Q) across the valley floor is too young to preserve fossil resources in the upper layers, but the deeper layers and underlying sediments have high paleontological sensitivity, as do the Miocene Marine Sediments (M) (San Bernardino 2020).

The proposed project would require ground-disturbing activities. Therefore, the potential exists that construction of the proposed project and earthwork activities may unearth unknown paleontological resources. In the unlikely event that paleontological resources are discovered during earthwork activities, the proposed project would be required to comply with regulatory requirements in California Public Resources Code Section 21083.2, which requires the lead agency to make reasonable efforts to permit any or all resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, (1) Planning construction to avoid archaeological sites, (2) Deeding archaeological sites into permanent conservation easements, and (3) Capping or covering archaeological sites with a layer of soil before building on the sites. Additionally, the proposed project would comply with the County General Plan's Resource Conservation Element Goal CR-2 and Policy CR-2.3, to protect and preserve paleontological resources for their cultural importance to local communities as well as their research and educational potential (San Bernardino 2020).

Therefore, through compliance with PRC Section 21083.2, the proposed project's potential for disturbing unknown paleontological or a unique geological resource would be less than significant. This issue will not be examined further in the EIR.

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3.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

Potentially Significant Impact. Construction and operation of a new 3,000 seat stadium would generate greenhouse gas (GHG) emissions. The EIR will discuss potential climate change impacts from GHG emissions generated by construction and operation of the proposed project. Mitigation measures will be recommended, as applicable, to minimize the proposed project's contribution to GHG emissions.

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

Potentially Significant Impact. The California Air Resources Board (CARB) adopted the Scoping Plan in conformance with Assembly Bill 32. In addition, SB 375, the Sustainable Communities and Climate Protection Act of 2008, was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016) identifies the per capita GHG reduction goals for the SCAG region. SCAG recently released the 2020-2045 RTP/SCS (Draft Connect SoCal Plan) which replaced the 2016-2040 RTP/SCS. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SCAG's RTP/SCS. Construction of the proposed project could have the potential to conflict with GHG reduction strategies and goals of CARB's Scoping Plan and SCAG's 2020 RTP/SCS. The EIR will discuss consistency of the proposed project with the GHG reduction strategies of the Scoping Plan. Mitigation measures will be recommended, as applicable, to minimize the proposed project's contribution to GHG emissions.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

No Impact. The proposed project would involve the development and operation of a new athletic stadium on the campus of an existing high school. Significant amounts of hazardous materials would not be transported, used, or disposed of in conjunction with the proposed project. Maintenance of the new facility would likely require the use of cleaners, solvents, paints, and other janitorial products that are potentially hazardous. However, these materials would be utilized in relatively small quantities and would be stored in compliance with established state and federal requirements. These materials would be used in accordance with normal operational safety practices, as employed at other school facilities within the District. No significant impacts would occur. This issue will not be reviewed further in the EIR.

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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 Impact. The proposed project does not have the potential to release hazardous materials into the environment during either the construction or long-term operation of the proposed facilities.

Construction

The project site does not appear on any regulatory agency database including, but not limited to GeoTracker and EnviroStor (DTSC 2019; State Water Resources Board 2019). Construction activities of the proposed project could result in the exposure of construction personnel and the public to unidentified hazardous substances in the construction debris and soil. There are no hazardous material sites located within 0.5-mile of the project site (State Water Resources Board 2019).

Exposure to unanticipated hazardous substances could also occur from previously unidentified soil contamination caused by migrating contaminants originating at nearby listed sites. Exposure to hazardous materials during construction activities could occur as a result of any of the following:

- Direct dermal contact with hazardous materials
- Incidental ingestion of hazardous materials (usually due to improper hygiene, when workers fail to wash their hands before eating, drinking, or smoking)
- Inhalation of airborne dust released from dried hazardous materials

California Division of Occupational Safety and Health (Cal/OSHA) regulates worker safety with respect to the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces the hazard communication program regulations, which include provisions for identifying and labeling hazardous materials, describing the hazards of chemicals, and documenting employee training programs.

Compliance with existing regulations would ensure that construction workers and the general public are not exposed to any unusual or excessive risks related to hazardous materials during construction activities. Project construction would be required to follow all state and federal regulations, which would ensure that construction-related impacts would not occur. Therefore, impacts associated with the exposure of construction workers and the public to hazardous materials during construction activities for the proposed project would be less than significant.

Operational

It is not anticipated that operation of the proposed project would create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Hazardous materials that could be stored within the project site would consist of common chemicals used for maintenance and cleaning, similar to existing conditions. Development of the proposed project would include the use and storage of common hazardous materials such

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as paints, solvents, and cleaning products for maintenance of the home and visitor buildings, concession stands, and restrooms.

The products used for common maintenance would be similar to those currently used on the Redlands East Valley HS campus and would be stored and used consistent with manufacturers specifications and existing RUSD guidelines. The volumes and use of these hazardous materials would be very limited, and the transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. The potential for the proposed project's operation to result in a release, accidental or otherwise, of any hazardous materials into the environment is considered less than significant. This issue will not be reviewed further in the EIR.

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 Impact. The proposed project site is on the existing Redlands East Valley HS campus. The next closest school to the project site is Franklin Elementary School located 2.9 miles to the west. As discussed above under Responses 3.9(a) and 3.9(b), the use of hazardous materials and substances during the operation of the proposed project is generally minimal and in small quantities. Currently, limited quantities of hazardous materials are used at Redlands East Valley HS, including the project site, for maintenance and repair activities, landscaping, cleaning, and educational purposes, such as science labs. All hazardous materials and substances at the proposed project site would be subject to federal, state, and local health and safety requirements—e.g., Resource Conservation and Recovery Act; California Hazardous Waste Control Law; and principles prescribed by the California Department of Health Services, Centers for Disease Control and Prevention, and National Institutes of Health—and the proposed project would be under the regulatory oversight of agencies such as the San Bernardino County Environmental Health Division, Department of Toxic Substance Control, and the Regional Water Quality Control Board. The proposed project would result in a less than significant impact with regard to the emission or handling of hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school. This issue will not be reviewed further in the EIR.

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. Government Code section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. As discussed above in 3.9(b), the project site is not listed on a regulatory data base for hazardous material sites and is not within 0.5 miles of a hazardous material site (Waterboards 2021; DTSC 2021). Additionally, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any unusual or excessive risks related to hazardous materials during construction activities. Project construction would be required to follow all state

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and federal regulations, which would ensure that construction-related impacts would not occur. Therefore, the proposed project would not be located on a site which is included on a list of hazardous materials sites and would not create a hazardous risk to the public or the environment. This topic will not be reviewed further in the EIR.

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

No Impact. Redlands Municipal Airport is approximately 1.3 nautical miles (1.5 statutory miles) north of the project site. California Education Code Section 17215 requires approval by the Department of Transportation, Aeronautics Program for the acquisition or lease of land by a school district for a new school site within two nautical miles of an airport. However, as the proposed project would make improvements at an existing site and would not acquire or lease any land or create a new school site, approval from the Department of Transportation, Aeronautics Program is not required. The proposed project would comply with Education Code Section 17215, and all other applicable regulations and requirements.

The proposed project would install seating for up to 3,000 spectators at the project site. It would therefore increase the use of the project site, although full-capacity events would be fewer than 5 times a year. The Redlands Municipal Airport would not pose a significant hazard, as the project site is not aligned with the runway and is not beneath flight paths for airplanes arriving at or departing from the airport. No significant impacts related to nearby airports would occur. This issue will not be analyzed further in the EIR.

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

No Impact. The proposed project would not conflict with any adopted emergency response or evacuation plans. The site's surrounding roadways would continue to provide emergency access through the project area and to surrounding properties during the project's construction. In the event that a temporary closure of any street is required, the project's contractor would be required to provide the County of San Bernardino with a construction schedule and plans for the closure of the street and to ensure that the placement of construction materials and equipment does not obstruct a detour route. The project's contractor would be required to comply with all county and/or San Bernardino County Fire Department recommendations, as applicable, for reducing impacts to emergency response or evacuation plans.

Onsite emergency response would be facilitated through the use of the school's driveways, parking lot, and paved areas, which would provide emergency vehicle access to the stadium. The District would be required to obtain local fire authority approval of the project site plan, including emergency access routes, prior to initialization of any construction activities. Mandatory compliance with existing rules and regulations would ensure that no significant impacts would occur. This issue will not be reviewed further in the EIR.

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

Less Than Significant Impact. The project site is not adjacent to wildland and would not be immediately exposed to wildland fires. The project site is in a developed area and is surrounded by developed land uses. The maps of Very High Fire Hazard Severity Zones in southwest San Bernardino County indicate that the project site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) for a State or Federal Responsibility Area or Local Responsibility Area (LRA)(CAL FIRE 2008). The proposed project is therefore not expected to expose people or structures to risks related to wildland fires. Furthermore, the proposed project would comply with all applicable fire safety regulations, including the San Bernardino County Uniform Fire Code. Impacts related to wildland fires would be less than significant. This issue will not be discussed further in the EIR.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Potentially Significant Impact. Pursuant to Section 402 of the Clean Water Act, the US Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control stormwater discharges. In California, the State Water Quality Control Board (SWQCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates pollutant discharges, including those generated from construction activities. Because the project site is larger than one acre, the proposed project's construction and operation would be subject to the NPDES program. Water quality and discharge requirements will be reviewed in the EIR.

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 Impact. The City of Redlands is the school's water service provider. The city provides potable water to more than 75,000 residents in Redlands, Mentone, parts of Crafton Hills and San Timoteo Canyon, and a small parts of unincorporated San Bernardino County. Redlands receives its water from the following sources (Redlands 2021a):

- Mill Creek Watershed: Water from the Mill Creek watershed is treated at the Henry Tate (Tate) Water Treatment Plant (WTP) located on Highway 38 east of Mentone.
- Santa Ana River Watershed: Water from the Santa Ana River watershed is treated at the Hinckley WTP located north of Mentone.
- Local Groundwater: Local groundwater is pumped from wells in Redlands, Mentone, and Yucaipa.

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- California State Water Project (SWP) Water: When required, SWP water is treated at the Hinckley WTP and Tate WTP.

Redlands East Valley High School, including the project site, does not contain any wells or direct groundwater connections. The proposed project would not increase student enrollment at Redlands East Valley High School. While the stadium's operation would result in increased volumes of potable water consumed at the project site during events and games, the proposed project would operate on an established schedule. The scheduling of events with the potential to attract large groups of spectators will be minimal. It is estimated that the proposed project would host up to five games or events that have the potential to meet the maximum spectators. Although water would be consumed in conjunction with landscape and facility maintenance on a regular basis, these volumes would be substantially less than generated during an event. The proposed project's use of an artificial turf playfield would further reduce the volume of water used for maintenance because regular watering of the field would not be required. Since the proposed project would not increase student enrollment, Redlands East Valley High School's use of the proposed project for physical education uses and team practices, among other scholastic activities, would not result in a substantial increase in water consumption because these activities are currently being conducted at the school and would take place either with or without the proposed project.

Currently, Redlands East Valley HS conducts its home games at Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. Without the proposed project, Redlands East Valley HS would continue to play games at these alternate locations. The development of the proposed project would not involve the siting of a new land use, but rather a relocation of an existing use and modernization of the current facilities onsite. Therefore, increases in water consumption resulting from the proposed project would be nominal, and would not result in a need to increase pumping of groundwater resources.

The District would coordinate with the city of Redlands as appropriate. No significant impacts to the local groundwater resources would result from project development. This issue will not be discussed in the EIR.

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 a substantial erosion or siltation on- or off-site?

Potentially Significant Impact. While no direct impacts to any stream or river are proposed by the proposed project, the project site's existing drainage patterns could change as a result of project development. Drainage plans will be analyzed in the EIR. Requirements of the NPDES permit, as they apply to the site, will also be examined in the EIR. Mitigation measures will be recommended, as necessary, to ensure that any potential impacts from erosion or siltation are less than significant.

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- ii) **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

Potentially Significant Impact. While no direct impacts to any stream or the river are proposed by the project, the site's existing drainage patterns could change as a result of project construction. Drainage plans will be analyzed in the EIR. Mitigation measures will be recommended, as appropriate.

- iii) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Potentially Significant Impact. Project development would result in the conversion of presently natural turf field and grassy areas to impermeable surfaces through the placement of structural foundations and pavement, thereby reducing the current rate of absorption and increasing the volume of surface water runoff experienced at the site. The potential for the proposed project to create or contribute runoff water that would impact stormwater drainage systems, and applicable drainage discharge requirements, will be reviewed in the EIR.

- iv) **Impede or redirect flood flows?**

Potentially Significant Impact. According to the Federal Emergency Management Agency (FEMA), the project site lies within an area identified as "Zone X: Area with reduced flood risk due to a levee". The project site does not lie within the 100-year flood plain (FEMA 2021). This topic will be further evaluated in the EIR.

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

No Impact. A seiche is an oscillating surface wave in a restricted or enclosed body of water generated by ground motion, usually during an earthquake. Seiches may cause inundation if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Seven Oaks Dam is approximately four miles northeast of the project site. However, in the event of overtopping as a result of a seiche, the dam spillway for Seven Oaks Dam would divert any overflow from the reservoir into the adjacent drainage subbasins located to the north, away from Redlands East Valley High School and the project site (DSOD 2021). As there are no other large bodies of water on, or topographically upgradient in the immediate vicinity of, the project site, a seiche is not considered to be a potential hazard for the site.

Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor topography upon approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. Due to the distance of the site from the Pacific Ocean, there is no potential for tsunamis to impact the site.

Mudflows are events in which a mass of saturated soil flows downhill as a very thick liquid. Based on flat surface of the project site and surrounding area, the project site is not susceptible to mudflows.

This topic will not be reviewed further in the EIR.

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

Less Than Significant Impact. The quality of surface and groundwater is affected by land uses in the watershed and the composition of subsurface geologic materials. Water quality in surface and groundwater bodies is regulated by the State Water Resources Control Board and RWQCB. The project site is located within the Upper Santa Ana Valley – San Bernardino basin (California Department of Water Resources 2019). However, the proposed project would be in compliance with existing laws and regulations, including the Santa Ana River Basin Plan (State Water Resources Control Board 2019) and the Upper Santa Ana Watershed Integrated Regional Water Management Plan (San Bernardino Valley Water Conservation District 2015), which would ensure that it would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and would result in a less than significant impact.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The proposed project would replace existing athletic facilities on an existing school campus with a new stadium that would include a new track and synthetic grass football field (including scoreboard and field lights), bleachers for 3,000 people, and new visitor and home ticketing booth, concessions, custodial and restroom buildings. The proposed project also includes a new fire lane along the southern side of the project site, pedestrian walkway improvements, and landscaping. Construction and operation of the proposed project would be limited to the project site and campus. Development of the proposed project would not change the existing land use nor zoning designation on the project site. The proposed project would not create any new land use barriers or otherwise divide or disrupt the physical arrangement of any communities. Development of the proposed project would not result in the division of an established community and no impacts would occur. The issue will not be further reviewed in the EIR.

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 project site is designated as Institutional (IN) by the San Bernardino County Zoning District Maps and has a General Plan land use designation of Public Facility (PF). The proposed project would include a new track and synthetic grass football field (including scoreboard and field lights), bleachers for 3,000 people, new visitor and home ticketing booth, concessions, custodial and restroom buildings, landscaping, and pedestrian and vehicle circulation access and entryway improvements. The proposed project would be developed within the boundaries of the Redlands East Valley HS campus. As the project site currently contains a track and athletic field, the proposed project would not change the use of the site. Project development would not require modification to the site's current General Plan land use and zoning designations. Development of the proposed project would not conflict with any applicable land use plans, policies or regulations. The issue will not be further reviewed in the EIR.

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3.12 MINERAL RESOURCES

Would the project:

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

No Impact. Due to its large washes and stream channels, Mentone contains regionally significant construction aggregate and mineral resources. The primary minerals found in Mentone are decorative rocks, sand, and gravel. A relatively large portion of Mentone, including the project site is classified as Mineral Resource Zone 2 (MRZ-2) (San Bernardino 2019). The MRZ-2 designation is defined by the California Geological Survey as an area where significant mineral deposits are likely to occur. MRZ-2 areas also indicate the existence of a construction aggregate deposit that meets certain state criteria for value and marketability based solely on geologic factors.

While the project site is within an MRZ-2 zone, the project site is developed with school use and is located on the Redlands East Valley HS campus. The project site is not currently used for the mining, and the proposed project would not remove any mines nor interfere with mineral extraction activities. The proposed project does not change the land use of the project site, as the project site would remain part of the Redlands East Valley High School campus and would continue to be used for athletics and school activities. Therefore, development of the proposed project would not 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. This issue will not be reviewed further in the EIR.

- 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. Designation of a site as a mineral resource recovery site is a process limited to the identification of significant mineral resources within existing MRZ-2s only. MRZ-2s are areas where the available geologic information indicates that there are significant mineral deposits. As mentioned above, the project site is located within an MRZ-2 designation (San Bernardino 2019). However, the project site is a part of the Redlands East Valley HS and is developed with and used for athletics and events. The project site is not used for mineral extraction, and the proposed project would not remove nor interfere with mineral extraction activities. Therefore, development of the proposed project would not result in the loss or availability of a locally important mineral resource recovery site. This issue will not be reviewed further in the EIR.

3.13 NOISE

Would the project result in:

- 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?**

Potentially Significant Impact. Noise that exceeds adopted thresholds may be generated during construction and operation of the proposed project. Specific during operation, noise generated during a full capacity stadium

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event at the proposed project has the potential to generate excessive noise levels that exceed the standards adopted by the District. The EIR will address potential noise impacts associated with operation of the stadium, and if necessary, mitigation measures will be identified.

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

Potentially Significant Impact. The nearest offsite vibration-sensitive land uses are on the west side of Opal Avenue, approximately 50 feet west of the proposed project at its nearest point. Operation of the proposed stadium would not generate substantial levels of vibration. Construction activities have the potential to generate strong levels of vibration. The EIR will evaluate the potential for vibration generated by project-related construction activities to impact the residents to the west and disrupt classroom activities.

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 Impact. The project site is located within 1.3 miles (1.5 miles) of the Redlands Municipal Airport. According to the Redlands Municipal Airport Land Use Compatibility Plan (Redlands 2015), the project site is outside of the 60 dBA and 65 dBA CNEL noise contour. Consequently, the proposed project would not expose staff or students to excessive noise levels from aircraft overflights. A less than significant would occur, and this issue will not be discussed further in the EIR.

3.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The proposed stadium would be constructed on the campus of an existing high school in an area currently developed with the school's athletic field and track, and no changes in land use would occur. Because the proposed project is intended to serve an existing need, the proposed project would not increase in Redlands East Valley High School's enrollment capacity and would not contribute to new students. The proposed project would not create a significant number of new employment opportunities that could result in a greater demand for local housing. Moreover, major infrastructure is already in place and the extension of roads or other major infrastructure systems would not be required. Therefore, project development would not induce substantial population growth in the area, either directly or indirectly. This issue will not be reviewed further in the EIR.

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

No Impact. No housing units exist onsite. As such, the proposed project would not displace any housing units. No impact would occur. This issue will not be reviewed further in the EIR.

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3.15 PUBLIC SERVICES

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:

a) Fire protection?

Potentially Significant Impact. Fire protection services are provided to the project site by the San Bernardino County Fire Department. The jurisdictional fire station for the project site is Mentone-Station 9, approximately 0.75-mile northeast of the project site. Through a mutual aid agreement, other stations may also respond to calls from the project site, including stations operated by the City of Redlands Fire Department. The proposed project would not increase student enrollment. However, the proposed project would increase the use of the project site, which may increase the need for fire protection services at the project site. Currently, certain Redlands East Valley HS sport games are held at Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. Fire protection for Redlands High School, and Citrus Valley High School is provided by the City of Redlands Fire Department; fire protection for Beaumont High School is provided by the Riverside County Fire Department; and fire protection for the Yucaipa Community Park is provided by the City of Yucaipa Fire Department. The proposed project would relocate these games and events to the project site. This issue will be discussed further in the EIR.

b) Police protection?

Potentially Significant Impact. Police protection services are provided to the project site by the San Bernardino County Sheriff's Department. The jurisdictional sheriff station for the project site is the Yucaipa Station, approximately 5 miles southeast of the project site. The proposed project would not increase student enrollment. However, the proposed project would increase the use of the project site, which may increase the need for police protection services at the project site. Currently, certain Redlands East Valley HS games are held at Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. Police protection for Redlands High School, and Citrus Valley High School is provided by the City of Redlands Police Department; police protection for Beaumont High School is provided by the City of Beaumont Police Department; and police protection for the Yucaipa Community Park is provided by the San Bernardino Sheriff's Department. The proposed project would relocate these games and events to the project site. This issue will be discussed further in the EIR.

c) Schools?

No Impact. The proposed project involves the development of an athletic stadium and facilities on the campus of an existing high school. Typically, the demand for schools is created by new housing development or activities that generate additional population. The proposed project would not generate increase student enrollment. Therefore, the proposed project would not impact schools. This issue will not be reviewed further in the EIR.

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d) Parks?

No Impact. Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. The proposed project would serve an existing student population and would not induce population growth or housing in the area. The proposed project would not increase the use of existing parks or recreational facilities, or the need for new parks or recreational facilities.

Moreover, the proposed project would be made available for community-sponsored events after school hours in accordance with the Civic Center Act (Education Code Sections 38130–38139) and District policy, thereby providing improved recreational opportunities to the community and reducing impacts on neighborhood parks. No impacts to parks would result from the proposed project. This issue will not be reviewed further in the EIR.

e) Other public facilities?

Less Than Significant Impact. The proposed project would be served by existing infrastructure, including public roads. Due to the size and general nature of the proposed project, impacts to public facilities are not anticipated to be significant. The District would be responsible for required utility connections and any applicable improvements necessary to accommodate the project. Development of the proposed project would not require new or altered governmental services for the maintenance of roadways or other public facilities. Additionally, the area surrounding the project site is served by the San Bernardino County’s Mentone Senior Center and Library branch, located at 1331 Opal Avenue. The proposed project would be designed to serve the existing and future student population at the project site. No new population would be generated by the proposed uses; therefore, no increased demand on other public facilities is anticipated. No significant impacts would occur. This issue will not be reviewed further in the EIR.

3.16 RECREATION

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

No Impact. Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. The proposed new stadium would serve an existing student population and would not increase student enrollment. Therefore, the proposed project would not cause population growth. Since the proposed project would not induce growth, no substantial increases in the use of any existing parks would occur. Further, the proposed project would not increase the use of any recreational facilities.

Moreover, the proposed athletic stadium would be made available for organized community-sponsored events after school hours in accordance with the Civic Center Act (Education Code Sections 38130–38139) and District policy, thereby providing improved recreational opportunities to the community and reducing impacts on existing recreation facilities. No significant impacts to parks would occur. This issue will not be reviewed further in the EIR.

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

No Impact. As discussed under 3.16(a), the demand for recreational facilities is created by the development of new housing and/or actions that generate additional population. The proposed project would serve an existing student population and would not increase student enrollment. Therefore, the proposed project would not cause population growth. Since the proposed project would not induce growth, no increases in the use of any existing recreational facilities would occur. The proposed project would not require the construction or expansion of recreational facilities. No impact would occur. This issue will not be reviewed further in the EIR.

3.17 TRANSPORTATION

Would the project:

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

Potentially Significant Impact. The proposed project will provide nighttime lighting and permanent bleachers on-site, allowing for increased use of the project site.

As such, the proposed project would have the potential to conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Thus, this topic will be evaluated further in the EIR.

- b) **Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

Potentially Significant Impact. On September 27, 2013, SB 743 was signed into law, which started a process that fundamentally changed transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). As part of the updated CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code section 21099(b)(1)). On January 20, 2016, the Governor’s Office of Planning and Research (OPR) released revisions to its proposed CEQA guidelines for the implementation of SB 743. Final review and rulemaking for the new guidelines were completed on December 28, 2018, when the California Natural Resource Agency certified and adopted the CEQA Guidelines update package, including guidelines section implementing SB 743. Vehicle miles traveled (VMT) is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length ($VMT = \text{daily trips} \times \text{average trip length}$). The proposed project would have the potential to increase vehicle trips associated with the project site. The proposed project’s vehicle miles traveled will be explored in the EIR. Mitigation measures will be incorporated as appropriate.

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

Potentially Significant Impact. The proposed project would be designed to minimize any design-related hazards such as sharp curves and dangerous intersections. The District would work with San Bernardino County to achieve safe pedestrian and vehicular access to the project site. The EIR will analyze the potential impacts of design features.

- d) **Result in inadequate emergency access?**

Potentially Significant Impact. Access and circulation features for the project site need to accommodate emergency ingress and egress by fire trucks, police units, and ambulance vehicles. The District would be required to obtain local fire authority approval of the project site plan, including emergency access routes, prior to initialization of any construction activities. Emergency site access will be reviewed in the EIR, and mitigation measures will be incorporated as appropriate.

3.18 TRIBAL CULTURAL RESOURCES

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

Potentially Significant Impact. As of July 1, 2015, Public Resources Code Sections 21080.1, 21080.3.1, and 21080.3.2 require public agencies to consult with California Native American tribes recognized by the Native American Heritage Commission for the purpose of mitigating impacts to tribal cultural resources. This law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions.

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. The proposed project would comply with tribal consultation requirements pursuant to Assembly Bill 52 (AB 52). One California Native American tribe, the San Manuel Band of Mission Indians, is on the RUSD's notification list pursuant to AB 52. The District provided a notification letter to this tribe on November 9, 2021 and as of the time of publication of this Initial Study, no response has been received.

The proposed project would involve the construction of a new sport field, track, field light fixtures, bleachers, and other stadium building facilities. The project site is currently developed and operates with

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similar sport uses. The project site is not 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) (OHP 2021; NPS 2021). As the project site has been previously disturbed and currently supports similar sports and academic uses, it is not anticipated that unknown tribal cultural resources are present on-site. Nevertheless, the potential for tribal cultural resources to exist onsite and the results of the Assembly Bill 52 tribal consultation will be further discussed in the EIR.

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

Potentially Significant Impact. As discussed under section 5.18(a), the proposed project would involve construction of a new sport field, track, field light fixtures, bleachers, and other stadium building facilities. The project site is currently developed and operates with similar sport uses. The project site is not 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) (OHP 2021). As the property has been previously disturbed and currently supports similar sports field uses, it is not anticipated that unknown tribal cultural resources are present on-site. Nevertheless, the potential for tribal cultural resources to exist onsite and the results of the Assembly Bill 52 tribal consultation will be further discussed in the EIR.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less than Significant Impact. The proposed project would serve an existing need and would not increase student enrollment at Redlands East Valley HS. On a temporary basis, the proposed project can generate up to 3,000 spectators onsite in addition to the players/hosts and staff. A discussion for each utility is provided below.

Water and Wastewater

The proposed project would not require or result in the construction or expansion of any new/potable water or sewage/wastewater treatment facilities. Water and wastewater service to the project site is provided by the City of Redlands, which provides water and wastewater service to both the City of Redlands and the unincorporated community of Mentone, among other communities.

While the City of Redlands has standard water consumption and wastewater generation rates for common land uses, it does not have standard consumption and generation rates for a stadium use. Based on a seating capacity of 3,000 spectators, the stadium has the potential to result in the consumption of approximately 13,200 gallons of potable water per day during a capacity event, and the generation of 12,000 gallons of wastewater per day

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if all events operated at capacity.² As discussed in Section 1.4, *Project Description*, it is anticipated that there would be up to five full capacity events per year.

The City of Redlands provides an average of 27 million gallons of water per day, with a maximum of 50 million gallons of water per day in the summer (Redlands 2021a). When operating at capacity, an event that would happen infrequently, the proposed project would result in an increase of less than 0.01 percent over the daily average water consumption. Wastewater generated from the project site would be treated at the City of Redlands Wastewater Treatment Plant, which currently processes about 6 million gallons per day and has the capacity to treat 9.5 million gallons of wastewater a day (Redlands 2021b). As discussed above, the proposed project has generate approximately 12,000 gallons of wastewater per day during full-capacity events which is well within the 3.5 million gallons wastewater treatment capacity remaining. Therefore, the proposed project would not result in a significant increase in water consumption or wastewater generation.

While the proposed project's operation would result in increased volumes of potable water consumed and wastewater generated, the proposed project would operate on a limited schedule. Maximum capacity events are expected to occur only approximately five times per year. Further proposed project would replace the natural grass sport field with a synthetic field that does not require watering. Water and wastewater associated with landscape and facility maintenance on a regular basis would be less than generated during a full capacity event.

Finally, Redlands East Valley High School currently conducts certain games and events at Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. Without the proposed project, the high school would continue to conduct these events at Beaumont High School, Yucaipa Community Park, Citrus Valley High School, and Redlands High School. Therefore, the development of the proposed project would result in the relocation of an existing events. Thus, the proposed project is not expected to significantly change the net volumes of water treated at the local treatment facilities.

The proposed project would not require the relocation or construction of new or expanded water and wastewater treatment. A less than significant impact would occur. This issue will not be discussed in the EIR.

Stormwater Infrastructure

The project site is in a developed area of the current campus which contains an existing stormwater collection and conveyance system. The proposed project would include a subsurface drainage system to manage stormwater drainage throughout the project site. The new field will be synthetic turf for soccer and football, which would further reduce the volume of water used for maintenance because regular watering of the field would not be required.

Development of the proposed project would result in a minimal increase in the amount of impervious coverage on other portions of the site where the stadium facilities and light fixtures are proposed. As part of the

² Generation rate for a school stadium is 4 gallons/day/seat (City of Los Angeles, L.A. CEQA Thresholds Guide, 2006). Consumption rate is assumed to be 4.4 gallons/day/seat, 110 percent of generation rate.

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proposed project, stormwater drainage plans would comply with regulatory requirements. Compliance with the existing regulatory requirements would ensure that the capacity of the existing storm drainage infrastructure serving the project site would not be diminished, and impacts of the proposed project to the storm drain system would be less than significant. This issue will not be discussed in the EIR.

Electricity Infrastructure

The new lighting associated with the proposed project would connect to the existing electric power system. All utility connections to the proposed project would be required to comply with applicable federal, state, and local regulations related to electrical power. As such, the proposed project would not require the relocation or construction of new or expanded electricity infrastructure. A less than significant impact would occur. This issue will not be discussed in the EIR.

Natural Gas and Telecommunications

The proposed project does not involve or require any changes to the natural gas or telecommunication system. Therefore, relocation and expansion of existing facilities and construction of new facilities would not be required. Impacts would be less than significant. This issue will not be discussed in the EIR.

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

Less Than Significant Impact. As discussed under section 3.20(a) above, the proposed project would increase water demand by a minor amount at the project site. The proposed project includes new restroom, ticket and concession booths, facility would operate on a limited schedule and these facilities would be used up to 60 times a year and only five events have the potential to reach a crowd of 3,000 spectators. The proposed project would not increase student enrollment. The campus's water supply would adequately supply the new facilities water needed during normal, dry and multiple dry years, and therefore would have a less than significant impact to water supply.

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?

Less Than Significant Impact. As discussed above, the proposed project has the potential to generate 12,000 gallons of wastewater per day during a full-capacity event. Wastewater generated from the project site would be treated at the City of Redlands Wastewater Treatment Plant, which currently processes about 6 million gallons per day and has the ability to treat 9.5 million gallons of wastewater a day (Redlands, 2021b). While the proposed project's operation would result in increased volumes of wastewater generated full-capacity events are anticipated to occur only approximately five times per year. As such, the estimate of 12,000 gallons per day is conservative and would be well within the available capacity of the City of Redlands Wastewater Treatment Plant.

Additionally, the proposed project would serve an existing need and would not result in an increase in student population at the school. Redlands East Valley High School's use of the proposed project for physical education

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uses and team practices would not result in a substantial increase in wastewater generation because these activities are currently being conducted at the school and would take place either with or without the proposed project's development. The proposed project would have adequate capacity to serve the proposed project's anticipated demand in addition to the project site's existing commitments. A less than significant impact would occur as a result of proposed project. This issue will not be discussed in the EIR.

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

Less Than Significant Impact. The proposed project would be served by the San Timoteo Sanitary Landfill, the closest landfill to the project site, approximately six miles southwest of the project site. The landfill has a permitted maximum disposal of 2,000 tons per day and has an estimated remaining capacity of approximately 12 million cubic yards (CalRecycle 2021).

Stadium operation is expected to result in an increased volume of solid waste generated at the project site. However, the proposed project is intended to serve an existing need, and no increase in student population would occur. The proposed project would generate up to 60 games/events onsite, five of which would have the potential to be full capacity. Of these 60 games/events onsite, all are existing and being relocated from other facilities to the project site; no new events are anticipated to occur on the project site. Therefore, the net increase in solid waste to the San Timoteo Sanitary Landfill or other area landfills resulting from the proposed project would be marginal. As the San Timoteo Sanitary Landfill has a remaining capacity of approximately 12 million cubic yards, it would not be significantly affected by slight increases in solid waste that may occur as a result of the proposed project. A less than significant impact to solid waste reduction goals would occur. This issue will not be discussed further in the EIR.

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

Less Than Significant Impact. All local governments, including the County of San Bernardino, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. The District currently complies with federal, state, and local statutes and regulations related to solid waste, and would continue this practice. CALGreen section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. A less than significant impact would result from the proposed project. This issue will not be discussed in the EIR.

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3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones (VHFHSZ), would the project:

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

No Impact. The project site is located within a local responsibility area (LRA) and is not located in state responsibility area and is not within nor near a designated VHFHSZ (CalFire 2021). Additionally, the project site is not within a Fire Safety Overlay District (San Bernardino 2010). A Fire Safety Overlay corresponds to distinct geographic areas and the associated wildland fire hazard, and is created to provide greater public safety in areas prone to wildland brush fires, by establishing additional development standards for these areas (San Bernardino 2014). Since the project site is a previously developed campus and it is not located within a VHFHSZ, no significant impacts would result from the proposed project. This issue will not be discussed in the EIR.

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?

No Impact. The project site is located in a LRA and is not located in or near a designated VHFHSZ (CalFire 2021). Since the project site is a previously developed campus and it is not located within a VHFHSZ, no significant impacts would result from the proposed project. This issue will not be discussed in the EIR.

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?

No Impact. The project site is located in a LRA and is not located in or near a designated VHFHSZ (CalFire 2021). Since the project site is a previously developed campus and it is not located within a VHFHSZ, no significant impacts would result from the proposed project. This issue will not be discussed in the EIR.

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?

No Impact. The project site is located in a LRA and is not located in or near a designated VHFHSZ (CalFire 2021). Since the project site is a previously developed campus and it is not located within a VHFHSZ, no significant impacts would result from the proposed project. This issue will not be discussed in the EIR.

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3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. As discussed in Section 3.4, *Biological Resources*, the proposed Project would neither degrade the quality of the environment nor substantially impact any sensitive habitat or species. The proposed project site is in an urban and fully developed area and would not have an impact on the habitat or population level of fish or wildlife species; threaten a plant or animal community; or impact the range of a rare or endangered plant or animal. Because the property was already developed and the surrounding area is highly urbanized, the redevelopment of the project site would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Impacts would be less than significant.

As discussed under Section 3.5, *Cultural Resources*, the proposed Project would not significantly impact historic, archaeological, paleontological resources, and human remains. Because the property is not historic and was already developed and the surrounding area is highly urbanized, the redevelopment of the project site would not impact examples of California history or prehistory. The proposed Project does not have the potential to substantially degrade the quality of the environment. Impacts would be less than significant. These topics will not be further analyzed in the EIR.

- 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.)

Potentially Significant Impact. As identified in this initial study, the proposed project has the potential to result in significant impacts involving aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, noise, tribal cultural resources, and transportation. The EIR will analyze these topics in greater detail to determine whether the proposed project would generate any cumulatively considerable impacts.

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

Potentially Significant Impact. As identified in this initial study, the proposed project has the potential to result in significant impacts involving aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, noise, tribal cultural resources, and transportation. These impacts could potentially have an adverse effect on humans. Further analysis of these issues is required as part of the environmental review process and will be included in the EIR.

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