

APPENDIX A

Initial Study/Notice of Preparation and Comments

NOTICE OF PUBLIC MEETING

NOTICE IS HEREBY GIVEN that the City of Yucaipa will hold a public scoping meeting for the Robinson Ranch Environmental Impact Report (EIR) on the date and time indicated below. The purpose of the meeting is to receive the comments of all persons who wish to be heard regarding the potential environmental impacts that could result from the proposed project.

DATE / TIME: Thursday, December 13, 2007, at 6:30 P.M.

PLACE: Yucaipa City Hall Hearing Chambers, 34272 Yucaipa Boulevard

APPLICANT: Robinson Properties, LLP

PROPOSAL: The proposed project includes three (3) individual Preliminary Development Plans for a cumulative total of 4,159 multiple-family and single-family dwelling units on 335.8 acres (including 339 very-low income units), 109 acres of commercial uses, 28 acres of business park uses, and 49.2 acres of natural open space; with three (3) corresponding General Plan Amendments for each planning area to adopt the Official Land Use Plan for that area.

LOCATION: The project area includes 522 mostly vacant acres that generally extend westerly 2,000 ft. from Live Oak Canyon Road on the south side of the I-10 Freeway; westerly 3,000 ft from the I-10 Freeway, north of County Line Road, and easterly 3,000 ft. from Oak Glen Road, north of the I-10 Freeway and south of Colorado Street.

ON FILE: Detailed project information, including the Environmental Initial Study, is on file for inspection by the public at the Planning Division office, which is located at Yucaipa City Hall, 34272 Yucaipa Boulevard, Yucaipa, CA.

PLEASE NOTE that if you challenge any decision regarding the above proposal in court, you may be limited to raising only those issues you or someone else raised during public testimony regarding that proposal or in written correspondence delivered to the City at, or prior to, the final public hearings (that are to be held at a later date).

ALL INTERESTED PERSONS are invited to attend said meeting and to provide comments on the potential environmental impacts of the project as outlined above. If there are any further questions, please contact Mr. Jim Morrissey, Contract Planner, at (909) 797-2489, ext. 281, or at jmorrissey@yucaipa.org.

John McMains, Director
Community Development Department

Published: November 29, 2007; Yucaipa News Mirror; 1/8 page display ad

NOTICE OF PREPARATION PUBLIC SCOPING MEETING NOTICE

ROBINSON RANCH PRELIMINARY DEVELOPMENT PLANS AND GENERAL PLAN AMENDMENTS PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR)

DATE: November 19, 2007

TO: Responsible, Trustee, and Other Jurisdictional Agencies and Other Interested Organizations/Individuals

LEAD AGENCY: City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399

In accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines (CCR Title 14, §§15082(a), 15103, and 15375), this Notice of Preparation (NOP) is hereby sent to inform you that the City of Yucaipa is preparing a draft Program EIR to assess the environmental effects of the above-named project. A Program EIR is being prepared for the proposed project, pursuant to CEQA Guidelines §15168, because the project involves three separate Preliminary Development Plans and corresponding General Plan Amendments for Planning Areas under the same ownership that are geographically related (i.e. located within the Freeway Corridor Specific Plan).

As Lead Agency under CEQA, we need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the Program EIR prepared by the City of Yucaipa when considering your permit or other approvals for the project. The City of Yucaipa requests that any potential responsible or trustee agency respond to this NOP in a manner consistent with State CEQA Guidelines Section 15082 (b). If you are responding as an interested organization or individual citizen, we need to know your views as to the environmental information you would like us to address in the Program EIR.

Attachment 1 provides a description of the proposed project and project objectives. A location map identifying the project Planning Areas is provided in Attachment 2. A copy of the Initial Study is included in Attachment 3, which describes the potential environmental effects associated with the project.

Public Scoping Meeting: A public scoping meeting will be held to give the public an opportunity to receive more information on the proposed project, and to provide comments and suggestions on the scope of the Program EIR. Specifically, the public scoping meeting will provide the City with an opportunity to learn about potential concerns and further define the issues, feasible alternatives (including the CEQA-mandated No Project alternative and several Reduced Intensity alternatives), and potential mitigation measures that may warrant in-depth

analysis in the environmental review process. The date, time, and address of this meeting are provided below:

Date: December 13, 2007
Time: 6:30 PM
Place: Yucaipa City Hall
Council Hearing Chambers
34272 Yucaipa Boulevard
Yucaipa, CA 92399

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but **not later than 30 days after receipt of this NOP**. Please send your written responses, including the name of a contact person and phone number, to:

Jim Morrissey, AICP
City of Yucaipa
Community Development Department
34272 Yucaipa Boulevard
Yucaipa, CA 92399
Phone: (909) 797-2489 x281
Fax: (909) 790-9203
Email: jmorrissey@yucaipa.org

Any written or oral comments received at the public scoping meeting will be considered in preparing the Program EIR, along with any written comments received during the 30-day NOP public comment period. All parties that have submitted their names and mailing addresses will be notified of subsequent actions as part of the environmental review process. If you wish to be placed on the mailing list or have any questions about the proposed project or the EIR process, please contact Mr. Jim Morrissey at (909) 797-2489 ext. 281.

Project Title: Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA)

Signature:



Name: John McMains
Title: Director of Community Development
Date: November 19, 2007

Attachments: Project Description
Project Location
Initial Study

ATTACHMENT 1

Description of the Project:

The proposed project, known as “Robinson Ranch” or the “Project,” consists of three (3) individual planning areas (“Planning Areas”), also sometimes called Planned Development (PD) Districts, which are more fully described below. The City of Yucaipa, as the CEQA Lead Agency, will consider adoption of the following separate land use applications for the Project:

- Three (3) Preliminary Development Plans (PDP), one (1) PDP for each Planning Area; and
- Corresponding General Plan Amendments (GPAs) for each Planning Area.

The GPAs will adopt official Land Use Plans for each of the three (3) Planning Areas. These Planning Areas cover the same properties addressed in the Freeway Corridor Specific Plan (FCSP), which has not yet been adopted by the City of Yucaipa. Therefore, if the Project is approved, the Land Use Plans for the PD Districts described in the proposed PDP/GPA applications listed above would replace those shown in the FCSP for these Planning Areas.

Based on County Tax Assessor records, the entire Project consists of approximately 522 acres, with the following general characteristics proposed for the Project: 4,159 multiple and single-family attached and detached dwelling units located on approximately 336 acres, approximately 109 acres of general commercial uses (consisting of 1,213,017 square feet of proposed commercial space), approximately 28 acres of business park uses (consisting of 369,992 square feet of proposed business uses), and approximately 49 acres of natural open space areas (which are incorporated into the three (3) Planning Areas that are more specifically described below).

The Project includes affordable housing components in each of the three (3) Planning Areas. Out of the 4,159 total dwelling units proposed, the PDPs include 339 very low-income housing units. The Project is being processed pursuant to Government Code sections 65589.5 and 65915, which mandate density bonuses for projects that include affordable housing components. The density bonus is included in the Project description for environmental analysis and is included in the gross residential unit counts identified in this Project. The PD General Plan designation permits a gross density of 8 DU/Acre, and the average gross density of the residential components of the Project is 10.8 DU/Acre, after incorporating state mandated density bonus rights. The average net density of the residential components of the Project is 12.4 DU/Acre, with the actual net densities ranging from 20.6 DU/Acre to 5 DU/Acre in the various Planning Areas, after incorporating state mandated density bonus rights.

Development within each Planning Area will be phased. Each separate Planning Area is described below:

- West Oak Center: This Planning Area is generally located on the south side of Interstate-10 (I-10) and west of Live Oak Canyon Road. This Planning Area encompasses approximately 150 acres. It is proposed that this Planning Area will include: 810 dwellings (of which 66 will be affordable to very-low income households) on approximately 60 acres (13.5 DU/Acre) that will be designated RM (Multiple Residential); approximately 47 acres of general commercial uses (consisting of 603,010 square feet of commercial space) that will be designated CG (General Commercial); and approximately 28 acres of business park uses (consisting of 369,992 square feet of business space) that will be designated BP (Business Park). Approximately 15 acres of natural open space has been incorporated into the Planning Area.

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- **Wildwood Ranch:** This Planning Area is located south of I-10 and north of County Line Road. This Planning Area encompasses approximately 268 acres. It is proposed that this Planning Area will include: 2,280 dwelling units (of which 186 will be affordable to very-low income households) on approximately 185 acres (12.3 DU/Acre) that will be designated RM (Multiple Residential); and approximately 57 acres of general commercial uses (consisting of 590,007 square feet of commercial space) that will be designated CG (General Commercial). Approximately 26 acres of natural open space has been incorporated into the Planning Area.
 - **Robinson Ranch North:** This Planning Area is located generally north of I-10, east of Oak Glen Road and south of Colorado Street. This Planning Area includes two (2) separate yet nearly contiguous sites totaling approximately 104 acres that will apply the following specific land use designations to the westerly and easterly areas, as described below:
 - a) The westerly portion, referred to as Oak Ridge Village, is proposed to include: 229 multiple family and 138 single-family attached dwelling units (of which, for these two types of units combined, a total of 30 will be affordable to very-low income households) on approximately 32 acres (11.5 DU/Acre) that will be designated RM (Multiple Residential); and approximately five (5) acres of commercial land uses (consisting of approximately 20,000 square feet of commercial space) that will be designated CG (General Commercial). Approximately two (2) acres of natural open space has been incorporated into this portion of the Planning Area.
 - b) The easterly portion of the site, referred to as Wildwood Center, is proposed to include: 391 multi-family attached dwellings on approximately 19 acres (20.6 DU/Acre) and 271 single-family attached units on approximately 32 acres (8.5 DU/Acre) (of which, for these two types of units combined, a total of 57 will be affordable to very-low income households), as well as 40 single-family detached units on approximately 8 acres (5 DU/Acre) (the total residential acreage for Wildwood Center being approximately 59 acres) that will be designated RM (Multiple Residential). Approximately six (6) acres of natural open space has been incorporated into this portion of the Planning Area.

Project Objectives:

The proposed Project has the following objectives for each Planning Area:

- Create a regional shopping destination that attracts diversified commercial and retail uses, with a focus on providing services, shopping opportunities, and leisure activities to the community.
- Promote the development of local job opportunities.
- Provide a combination of residential, commercial or manufacturing uses in close proximity to one another that utilize a strategic location near regional transportation corridors.
- Provide and promote the development of a variety of housing types to meet projected growth in the City and the region, including housing that will be affordable to lower-income residents and will aid the City in meeting its affordable housing requirements.

ATTACHMENT 2

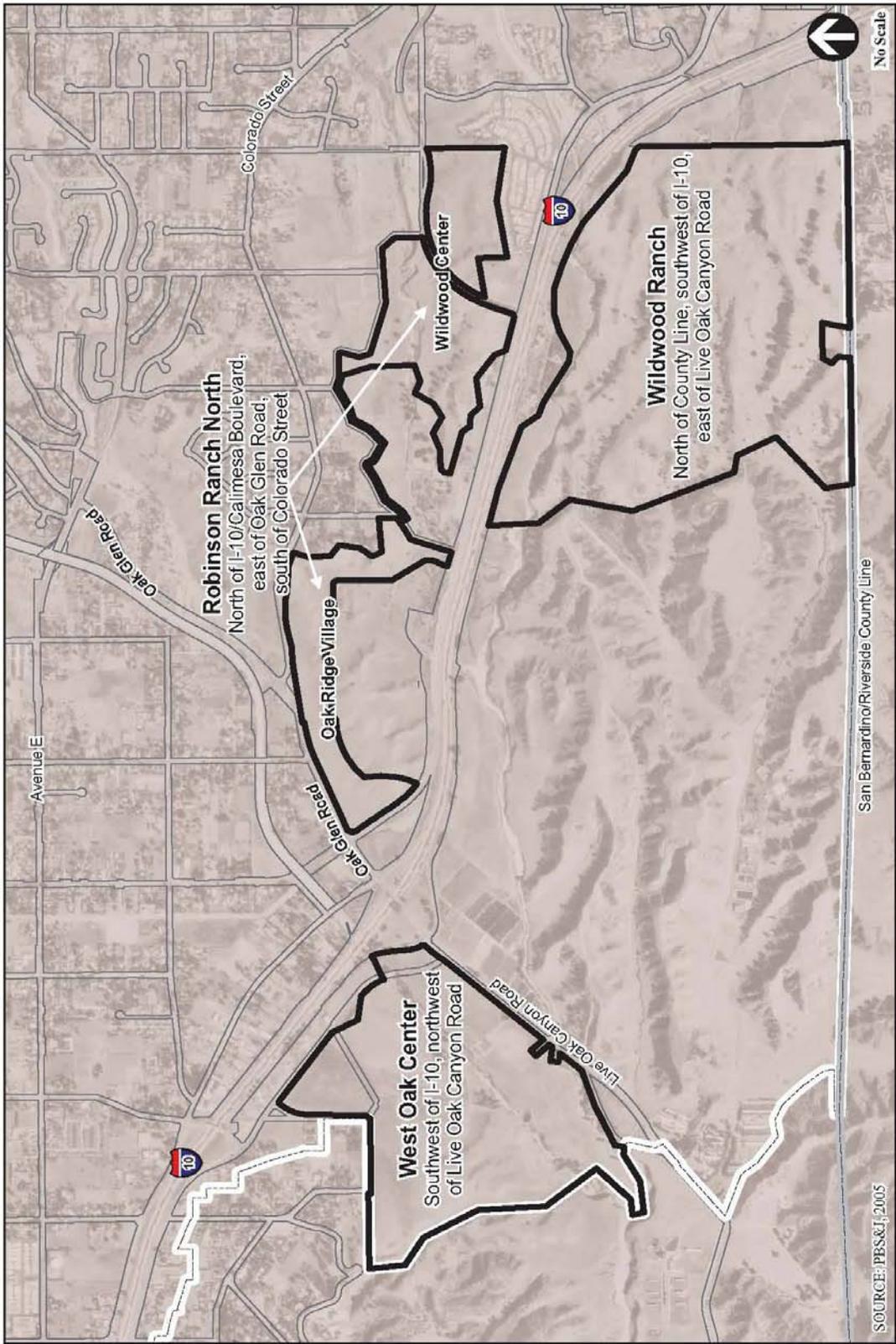


FIGURE 1

VICINITY MAP

ATTACHMENT 3

CITY OF YUCAIPA INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Robinson Ranch (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; 05-203/PDP/GPA)
2. Lead Agency Name and Address: City of Yucaipa, 34272 Yucaipa Boulevard, Yucaipa, CA 92399
3. Contact Person and Phone Number: Jim Morrissey, (909) 797-2489 x 281
4. Project Location: The proposed project represents three (3) specific geographic planning areas located in close proximity to each other. They are as follows:
 - West Oak Center: Located on both sides of Outer Highway 10 S, extending approximately 2,000 feet west of Live Oak Canyon Road.
 - Wildwood Ranch: Located southwest of the Interstate 10 Freeway, extending approximately 4,000 feet west of the intersection of County Line Road and Interstate 10 Freeway, generally north of County Line Road.
 - Robinson Ranch North: This site encompasses two (2) nearly contiguous areas described as follows:

The westerly portion, referred to as Oak Ridge Village, is located north of Calimesa Blvd., south of Colorado Street, and east of Oak Glen Road. The easterly portion, referred to as Wildwood Center, is located north of Calimesa Blvd., east and west of Wildwood Canyon Road, and south of Colorado Street.
5. Project Sponsor's Name and Address: Robinson Ranch Properties, 130 E. Montecito Avenue, #246, Sierra Madre, CA 91024-2434
6. General Plan Designation: Existing: PD (Planned Development)
Proposed: PD (Planned Development)
7. Description of the Project: The proposed project includes the adoption of three (3) Preliminary Development Plans (PDP) that encompasses three (3) individual Planning Areas, and General Plan Amendments to adopt each official Land Use Plan for the subject Planned Development (PD) Districts. The entire project includes approximately 522 acres, with the following general characteristics: 4,159 multiple and single family attached and detached dwelling units on 217.5 acres, 109 acres of general commercial uses, 28 acres of business park uses, and 167.5 acres of improved and natural open space areas incorporated into the various Planning Areas. Each separate geographic area, or proposed Planning Area, is described below.

- **West Oak Center:** This Planning Area encompasses 150 acres with 810 multiple-family dwellings on 75 acres, designated RM (Multiple Residential); 47 acres of general commercial uses, designated CG (General Commercial), and 28 acres of business park uses, designated BP (Business Park). Approximately 37.5 acres of natural and private/common improved open space, parks, and civic uses have been incorporated into the individual land use districts.
- **Wildwood Ranch:** This Planning Area encompasses 268 acres with 2,280 multiple-family dwelling units on 211 acres, designated RM (Multiple Residential), and 57 acres of general commercial uses, designated CG (General Commercial). Approximately 90 acres of natural and private/common improved open space, parks, and civic uses have been incorporated into the individual land use districts.
- **Robinson Ranch North:** The proposed project area involves two (2) separate, yet nearly contiguous sites totaling 104 acres that will apply the following specific land use designations to the westerly and easterly areas, as described below:
 - a) The westerly portion, referred to as Oak Ridge Village, involves the establishment of 229 multiple family and 138 single family attached dwellings on 34 acres, designated RM (Medium Residential) and five (5) acres of commercial land uses, designated CG (General Commercial). Approximately 14 acres of natural and improved open space have been incorporated into the individual land use districts.
 - b) The easterly portion of the site, referred to as Wildwood Center, involves the establishment of 391 multi-family attached dwellings, 271 single-family attached units, and 40 single-family detached units on 65 acres, designated RM (Medium Residential). Approximately 26 acres of natural and improved open space have been incorporated into the individual land use districts.

8. Surrounding Land Uses and Setting: Each Planning Area has been listed below.

ROBINSON RANCH NORTH

Direction	General Plan Designation	Land Use
Oak Ridge Village (Westerly portion of project site, all portions within the City of Yucaipa)		
North	RL-2.5-AP (Rural Living, 2.5 acre minimum lot size, Agricultural Preserve)	Vacant/unimproved land
South	PD (Planned Development)	Calimesa Blvd. and Interstate 10 Freeway
East	RS-20M (Single Family, 20,000 sq. ft. min. lot size) and PD (Planned Development)	Single family residential
West	CS (Service Commercial)	Single family and commercial
Wildwood Center (Easterly portion of the project site, all portions within the City of Yucaipa)		
North	RS-20M	Vacant/unimproved land, Hoover Egg Ranch facility, and single family residential.
South	RS-72C (Single Family, 7,200 sq. ft. min. lot size) and CG (General Commercial)	Calimesa Blvd., Interstate 10 Freeway, commercial, and mobile home park.
East	RS-20M and RL-2.5 (Rural Living, 2.5 acre min. lot size)	Agricultural related uses and mobile home park.
West	RS-20M and PD	Vacant/unimproved land.

WEST OAK CENTER

Direction	General Plan Designation	Land Use
North	CS (City of Yucaipa) and Resource Preservation (City of Redlands)	Single family residential, commercial, and Interstate 10 Freeway
South	PD (City of Yucaipa)	Vacant/ unimproved and agricultural related
East	PD (City of Yucaipa)	Agricultural related and I-10 Freeway interchange
West	RM-10M (Multiple Residential, 10,000 sq. ft. min. lot size, City of Yucaipa), and Resource Preservation (City of Redlands)	Single family residential and vacant, unimproved land in the City of Redlands

WILDWOOD RANCH

Direction	General Plan Designation	Land Use
North	No designation	Interstate 10 Freeway
South	Residential Low (2-4 DU/AC, City of Calimesa)	Single family residences along the southerly boundary adjacent to the north side of County Line Road
East	No designation	Interstate 10 Freeway
West	PD	Agricultural related uses, waste water treatment facility, and vacant, unimproved land

9. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): Yucaipa Valley Water District, California Department of Fish and Game; Regional Water Quality Control Board; Army Corps of Engineers; S.B. County Flood Control District; Caltrans; and City of Calimesa.

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.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Population/Housing | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

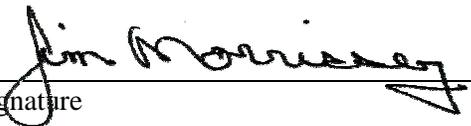
I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

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 “potential 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 in an earlier EIR or **NEGATIVE DEDCLARATION** 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

July 2, 2007

Date

Jim Morrissey

Printed Name

Yucaipa Planning Department

For

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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if 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 (mitigation measures from Section 17, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) 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 analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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1. AESTHETICS. Would the project:

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

The subject area is predominately unimproved. The proposed project would allow for the development of approximately 4,159 multiple and single family attached and detached dwelling units on 217.5 acres, 109 acres of general commercial, and 28 acres of business park. Incorporated into the various land use districts will be natural and improved open space, including trails and parks that total approximately 167.5 acres.

The Yucaipa General Plan EIR identifies the hills and mountains surrounding the community as a scenic natural resource. Although the General Plan does not designate specific scenic areas or view points, the grading necessary to provide for the proposed project, as displayed in the PDP materials provided by the applicant, will significantly change the area’s existing topography from one with a varied contour and undulating natural conditions to one with specific flat building pads, primarily for new development. Existing views of the property will be significantly affected by this proposal.

The General Plan identifies the hillsides in the City as a scenic resource that is to be protected. The General Plan attempts to preserve the hillsides and ridgelines though the Hillside Development policy and objectives that state, in part:

“The City Council of the City of Yucaipa has found that a need exists to control and manage development upon hillsides and ridgelines in order to preserve, protect and maintain significant geologic, aesthetic and environmental values which contribute to the community’s image and character.”

“It is the purpose and intent of this section to accomplish the following objectives.

- Preserve and protect the views to and from hillside areas in order to maintain the identity, impact and environmental quality of the City of Yucaipa.
- Facilitate hillside/ridgeline preservation through appropriate development standards and guidelines for hillside areas. Provide direction and encourage development that is sensitive to the unique characteristics common to hillside properties which include, but are not limited to, slopes, landform, vegetation, habitat and scenic quality.
- Ensure that development in the hillside areas shall be concentrated in those areas with the least environmental impact and shall be designed to fit the existing landform.
- Correlate intensity of development with the steepness of terrain in order to minimize grading, removal of vegetation, land instability and fire hazards.
- On hillsides, provide alternative approaches to conventional flat land development practices by achieving land use patterns and intensities that are consistent with the natural characteristics of hill areas such as slopes, landform, vegetation and scenic quality.” (p. III-3)

As noted above, the proposed project will significantly alter the topography of the affected area and the resulting views of and from the affected hillsides in a manner which seems to be inconsistent with the Regulations of Hillside and/or Ridgeline Developments within the City’s Development Code. As such, a potential significant impact could result due to development of the sites.

It is acknowledged that the proposed PDP(s) plans to intersperse open space areas throughout the development. Policy A of Goal OS-9 provides that “As development occurs in hillside areas, open space will be needed both for aesthetic and practical reasons, such as the reduction of grading impacts and watershed protection.” However, the open space areas identified as part of the land use concept do not alleviate the substantial impact associated with the proposed grading design.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Although a significant amount of grading will occur and significantly transform the existing natural contours, the proposed project is not located along a designated state scenic highway. As such, no notable scenic resources, such as trees or rock outcroppings, will be affected along a designated state scenic highway. Based upon this condition, no further evaluation is necessary.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As noted in number 1a above, the proposed project could create a significant adverse impact upon the visual character of the site. The proposed PDP Land Use Plans identify potential natural or improved open space around the perimeter of each PDP or planning area and some individual land use districts. The use of landscaping within the project design will help to reduce the level of impact on views from the surrounding community, but the permanent change in site conditions will be substantial and remain significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Additional street and night lighting will occur due to additional housing and commercial/business park uses proposed. The amount of lighting necessary in the residential areas will be greater than other typical residential areas for several reasons; The number of new residences will be significant and the potential multiple family style of development will necessitate additional exterior lighting for lighting walkways, entry areas, and parking areas. This will create a significant change from the predominate single family pattern of residential development in the community. The large amount of commercial/business park areas will generate a substantial amount of new lighting in areas that are relatively dark due to their existing locations, primarily south of Interstate 10 Freeway.

2. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The San Bernardino County Important Farmland 2004 Map, prepared by the California Department of Conservation, provides that most of the project area is categorized as "Grazing Land", which is consistent with the Yucaipa General Plan, Exhibit XII-1. A portion of the West Oak Center along Live Oak Canyon Road and Outer Highway South is designated "Farmland of Local Importance". As such, the potential impact upon important farmland is less than significant. Based upon this condition, no further evaluation is necessary.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The subject property is not designated on the City’s General Plan or zoned for agricultural uses. However, the City’s General Plan Land Use Map identifies an area to the north of the westerly portion of Robinson Ranch North, along the east side of Oak Glen Road, as RL-2.5-AP (Rural Living, 2.5 acre minimum lot size, Agricultural Preserve). This property is not used for agricultural purposes and is surrounded to the north, east, and west by residential development. This property has not been farmed in the recent past. Based upon this condition, no further evaluation is necessary.

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As noted above, the property to the north of Robinson Ranch North, along Oak Glen Road, is designated Agricultural Preserve (AP). The area is vacant and unimproved. West Oak Center is located adjacent to an existing agricultural use on Live Oak Canyon Road that is designated as Prime Farmland. The introduction of urban level development and the associated infrastructure improvements needed to support it could significantly affect increase the probability of this Farmland being converted to a non-agricultural use.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The City’s General Plan was adopted prior to 2003 and its land use characteristics were incorporated into the 2003 Air Quality Management Plan (AQMP). Minor modifications were adopted in 2004, but no land use changes ere made. According to the South Coast Air Quality Management District’s Web Information Page the existing 2003 Plan was adopted that placed a greater emphasis on fine particulate matter than previous plans. The latest AQMP delineates 34 stationary and 20 mobile source control measures. The intent of the Air Quality Plan is to continue to reduce emissions in the region through a variety of measures dealing with petroleum operations, combustion sources, fugitive dust, miscellaneous sources and compliance flexibility programs.

The proposed project will establish new land use designations and is contemplated to achieve the following:

- **West Oak Center:** This proposed area encompasses 150 acres with 810 multiple-family dwellings on 75 acres, 47 acres of general commercial uses, and 28 acres of business park uses. Approximately 37.5 acres of natural open space, trails, and parks have also been incorporated into the individual land use districts.
- **Wildwood Ranch:** This proposed area involves 268 acres with 2,280 multiple-family dwelling units on 211 acres and 57 acres of general commercial uses. Approximately 90 acres of natural and improved open space are proposed within the residential and commercial land use districts.
- **Robinson Ranch North:** The proposed planning area involves two (2) separate, yet adjacent sites totaling 104 acres that will apply the following specific land use designations for the westerly and easterly areas as described below:
 - c) The westerly portion, referred to as Oak Ridge Village, involves the establishment of five (5) acres of CG (General Commercial) land use and 34 acres of RM (Medium Residential), with 229 multiple family and 138 single family attached dwellings. Approximately 14 acres of natural and improved open space are proposed within the commercial and residential land use districts.
 - d) The easterly portion of the site involves the establishment of 65 acres of RM (Medium Residential) land uses that include 26 acres of natural and improved open space.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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This number of proposed residences is significantly different than that originally evaluated in the General Plan. Table II-2 of the General Plan specifically identified the potential amount of development for all three (3) Robinson properties as having the following characteristics: 68 acres industrial; 78 acres commercial; 53 acres office; 213 acres of residential at two (2) dwellings per acre, and; 167 acres of residential at one (1) dwelling per acre for a total of 594 units. Each of the residential categories is significantly less than the density and number of residences proposed. In addition, the area covered by this proposed PDP does not include a portion of the property originally contemplated for development.

The result of an increase in the number of residential dwellings and density will significantly affect air quality during the construction and operational phases of the project that were not previously evaluated. For example, in the construction phase, a significant increase in site grading will be necessary to create large flat building pads for multiple-family and smaller lot single-family development. Actual building construction and the time frame of such construction, due to the number of units, will also be substantial. This scenario is significantly different than the lower densities originally analyzed that could utilize the existing land form, thereby resulting in minimal grading and minimal construction activity. During the operational phase of the proposed project, a potential seven-fold increase in housing units and their associated vehicle trips would represent a significant change in air emissions generated by the site. As such, the proposed project could result in a significant affect upon the environment.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

The proposed project site is approximately 522 acres in size. The number of potential dwelling units within the project area would far exceed the number of single family residences (166), apartments (261) or condominiums (297) listed within the SCAQMD screening tables for potentially significant impact, in addition to the amount of commercial development. As such, the potential impact of the project would be significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

See above response to item 3a.

d) Expose sensitive receptors to substantial pollutant concentrations?

The number of new vehicle trips generated by the proposed project will significantly increase traffic congestion and potentially lead to increased intersection delays, even with improvements. The resulting increased vehicle engine idling could generate substantial pollutant concentrations that adversely affect area residents. Portions of the project area are near existing single-family residential uses, which are considered sensitive receptors by the City's General Plan. As additional residences are constructed within each of the Planning Areas, the number of individuals in close proximity to these increased areas of pollution will increase, and be potentially affected by the increased emissions. In addition, construction grading could generate substantial dust or fugitive air emissions. Although various methods are typically employed to reduce fugitive dust emissions, including site watering, the amount of grading would be significant and could result in a potentially significant adverse impact.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project will cause the widening of existing streets and the creation of new streets, requiring the use of asphalt. While the amount of asphalt may be significant, the odor generated by such activity is normally localized and is not expected to cause potentially significant affects. Based upon this condition, no further evaluation is necessary.

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 Game or U. S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Yucaipa General Plan designates portions of the proposed project area as “Area of Biological Significance” and a portion of the Robinson Ranch North area is also designated “Southern Riparian Forest”, as noted on Exhibit XII-2. Most of these areas are grouped along the major drainage courses, such as Wilson and Wildwood Creeks, which are also identified as a blue line stream on U.S.G.S. Yucaipa Quadrangle Map, 1996.

Policy A, of Goal OS-5 of the Yucaipa General Plan requires, in part, that “All proposed Land Use Map changes and discretionary land use proposals for areas identified on the Biological Resources Map shall be accompanied by a report that identifies all biotic resources located on the site and those on adjacent parcels which could be adversely affected by the proposal...” Therefore, a biological assessment of the property will be necessary to determine existing site conditions and potential options should important habitat be identified. Should important habitat or species be identified and determined to be significant based upon the extent of the species and the viability of the habitat, mitigation measures and/or design modifications will be necessary and could include a variety of actions, including; maintaining the area within natural open space; relocation of the species to another suitable location(s); other actions in consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service.

b) Have a substantially 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 Game or U. S. Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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See response to 4a above.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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See response to 4a above. A portion of the project area is within a designated Floodway, 100-year, and 500-year flood plain, according to the Yucaipa General Plan, Hazards Overlay Districts. Blueline stream drainage courses, as identified on the Yucaipa, CA U.S.G.S. Map, are located within the proposed development area. Due to these conditions, the proposed project could affect wetlands and should be evaluated for potential impacts upon jurisdictional waters and associated physical features.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project area is principally separated by the Interstate 10 Freeway. That portion of the project area south of the Freeway, West Oak Center and Wildwood Ranch, are located adjacent to large tracts of rural, primarily undeveloped land. In addition, these portions are traversed by significant drainage courses that provide safe migration corridors and potential habitat areas. Development of these areas could significantly affect those corridors. However, that portion of the project area north of the Freeway, which encompasses the Robinson Ranch North Planning Area, represents an isolated area that is encircled by the Interstate 10 Freeway and Calimesa Blvd. to the south, Colorado Street to the north, Oak Glen Road to the west, along with existing residential and commercial land uses to the north, east, and west. Due to this condition is it likely that the northerly portion of the project area would not significantly affect migratory corridors.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The City of Yucaipa has regulations on the protection of sensitive native trees, specifically Coast Live Oak Trees. According to information provided by the applicant, a number of Live Oak Trees are located within the project area boundaries. The need to preserve or protect this resource is required. Therefore, further analysis of this issue is necessary and appropriate measures identified.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Habitat Conservation Plan or Natural Conservation Community Plan encompasses the project site. Based upon this condition, no further evaluation is necessary.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The subject area contains lands that have been delineated as having the potential for paleontological/historical sites, based upon Exhibit XII-3 of the Yucaipa General Plan. Policy A, Goal OS-2 of the Yucaipa General Plan requires that cultural resource surveys are to be conducted “for all discretionary land use proposals in areas identified as sensitive.” (p. XII-22). As such, the potential for significant resources to be located within the project area exist and further analysis is necessary to determine whether measures are necessary to avoid or protect any resources.

b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Please refer to number 5a.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Please refer to number 5a.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

It is unknown whether or not human remains are located on the site. In the event that cultural resources are unearthed during construction activities, the City typically requires construction activities to be suspended until the deposits are evaluated by a qualified archaeologist. If human remains of any kind are found during construction activities, all activity must cease immediately and the County Coroner and/or a qualified archaeologist must be notified. Clearance from these authorities must be obtained before work can continue. However, further analysis should be undertaken to determine whether known sites exist, due in part to the varied physical characteristics of the site which could have attracted historic or pre-historic communities.

6. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A portion of the project area, principally the westerly portion of the Robinson Ranch North Planning Area, is located within an Alquist-Priolo Special Studies Zone. A previous investigation was undertaken as part of a prior Draft Program Environmental Impact Report, dated September 22, 1999, which identified the need for a 50 foot setback along the potential fault alignment. Due to the location of this fault and its potential affect upon the proposed project, a significant impact may occur to future development.

(ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Due to the number of faults in the region, the entire City can experience significant ground shaking. A geotechnical or soils report will need to be prepared to address the potential affects of ground shaking upon the proposed project site.

(iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Uniform Building Code (UBC) has identified groundwater within 50 feet of the surface as a potential problem. According to the Yucaipa General Plan ground water can vary within the City from depths lower than 300 feet below surface elevation to as close as 40 feet. Based upon a review of the City's Groundwater Elevations, Exhibit X-3, it is estimated the depth to ground water is between 100 and 200 feet. A Geotechnical report prepared for an area near the Robinson Ranch North project site (Lowe's Yucaipa) indicated the depth to groundwater was estimated to exceed 100 feet. Based upon this condition, no further evaluation is necessary.

(b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Due to the size of the property it will be required to comply with NPDES criteria for erosion control and reducing the run-off of on-site pollutants. NPDES materials, such as a Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) are standard conditions of approval and must be filed with the City of Yucaipa Engineering Division to ensure that the drainage will not result in erosion or that the project will not cause the off-site flow of pollutants. While this is normally adequate to address general development conditions, the need to construct master planned storm drain channels through the project area to ensure the conveyance of storm water flows could adversely affect adjoining downstream properties. As such, this issue should be coordinated with a drainage evaluation to ensure that downstream properties are not adversely affected.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A geotechnical/soils report has not been prepared for the project area. The Yucaipa General Plan Geologic Overlay Districts Map identifies portions of the area as being subject to "Low to Moderate" Landside Susceptibility. Due to the possibility of landside and the amount of grading proposed, including the creation of fill-slopes, development of the property could be subject to a potentially significant adverse impact and further analysis is required.

(d) Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As indicated above, a soils report has not been prepared for the subject property. Expansive soils are a concern due to their potential to adversely affect building foundations. Further evaluation of this issue is required due to the extensive nature of proposed grading and predominately residential nature of the development.

(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project will connect to sewer services that are currently available to the site and will not utilize septic tanks. Based upon this condition, no further evaluation is necessary.

7. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The potential for the use and disposal of hazardous materials on-site exists due to the proposed commercial use of the various sites. The proposed commercial and business park districts allows for a variety of uses, including the establishment of auto repair, limited manufacturing uses, the use of dyes for textiles and apparel, and metal coating. The use of hazardous materials in the residential portion of the project area will be minimal on an individual basis due to the operation of multiple and single family homes. However, due to the substantial nature of the proposed development and the extensive nature of proposed open space areas, a considerable amount of fertilizers and chemicals may be stored within the project area to maintain the common open space areas. Street paving will include the use of asphalt, but in normal conditions, it will not represent a hazard. The potential amount of hazardous materials that could be used in the maintenance and operation of the landscape areas would not exceed normal thresholds for similar areas, and a significant adverse impact would not result.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Please refer to number 7a.

Issues and Supporting Information	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project area does not contain a school. The closest school site to the subject property is Dunlap Elementary School, located approximately 1/2 mile to the north of the westerly half of the Robinson Ranch North project area. However, based on the level of development proposed in all three Planning Areas, construction of at least three elementary schools and one middle school will likely be required. Any new schools, however, will not be subject to hazardous emissions or substances except as permitted subject to all existing safety requirements and standards established by state and federal law.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Information obtained from the applicant indicated that the project site was not listed as a hazardous materials site. However, due to the potential for agricultural related waste or chemicals on the property, further investigation is warranted. Any such hazards that were encountered would be removed in accordance with all applicable public health requirements.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Project site is not within two miles of an airport of any type. Based upon this condition, no further evaluation is necessary.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Project site is not within the vicinity of a private airstrip. Based upon this condition, no further evaluation is necessary.

g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project will involve the improvement of various surrounding roadways, such as Oak Glen Road, Calimesa Boulevard, Live Oak Canyon Road, Outer Higher South, and the establishment of new internal roadways. Emergency access throughout the project area will be required by the City Fire and Public Works Departments. Emergency response plans are event based and no specific roadway(s) has been identified for evacuation purposes. Based upon this condition, no further evaluation is necessary.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The subject area is designated as being part of Fire Safety Review Area (FR) 1 and 2. FR1 is partially defined as being “wildland areas that are marginally developable, areas which are not likely to be developed, and the area of transition between wildlands and areas that are partially developed or are likely to be developed in the future. The area of transition is often characterized by an abrupt slope change.” (85.020215(a)) FR2 is partially defined as having land that “is relatively flat and is either partially or completely developed, or, if it is not developed, is usually suitable for development. Present and future development within Area 2 is exposed to the impacts of wildland fires and other natural hazards primarily due to its proximity to Area 1.” (Section 85.020215(b)) The Southwest San Bernardino County, Natural Hazard Disclosure (Fire) Map, prepared by the State of California, identifies that portion of the project area north of Interstate 10 as “Wildland Area That May Contain Substantial Forest Fire Risks and Hazards” and that portion south of Interstate 10 as “Very High Fire Hazards Severity Zone”. Due to the size of the project area, portions of the project could remain undeveloped for a considerable period of time. In addition, large portions of the project area are adjacent to undeveloped or rural areas in Redlands or the unincorporated area of the County. As such, the potential for fire hazards associated with the existing undisturbed land and newly developed portions could be substantial. Fuel modification zones in which vegetation is reduced can be used to help diminish the potential fire threat. However, due to the substantial geographic size of the project area, varied topographic conditions, potential need to maintain existing biological habitat, and the proximity to other large scale open space areas, the proposed project could result in a significant adverse impact.

8. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Waste water treatment will be provided by Yucaipa Valley Water District. Refer to 16a for further information on waste water treatment. The proposed project will generate a significantly greater amount of waste water than that projected for the property in the General Plan due to the substantial increase in the number of residential dwellings. In addition, the proposed area of disturbance is greater than one (1) acre and, therefore, subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) criteria. The applicant will be required, as a condition of development approval, to prepare a Storm Water Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan (WQMP).

b) Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project will use potable water provided by Yucaipa Valley Water District. According to the District’s Web Site, they currently operate 31 groundwater wells that produce 13,500 gallon of water per minute and can treat up to 1 million gallons per day of surface water. The groundwater basin utilized by the District is currently in an overdraft condition. To address this issue the District is in the process of completing improvements that will allow for the use of State Project Water rather than well water, which can still be used in emergency situations. This action will allow for the replenishment of the groundwater basin. No hazardous materials or other materials are proposed to be injected into groundwater supplies. At present the proposed project could have a substantial adverse affect upon the District’s ability to maintain existing groundwater supplies. Even though the District is in the process of completing improvements to address this issue, the potential exists for a significant affect upon the groundwater basin until the final operation of that system is in place.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

A portion of the project area is located within a Floodway, 100, and 500-year flood plain. Several meandering drainage courses traverse the project area and are designated as blue line streams on the Yucaipa U.S.G.S. Map. Based upon the Conceptual Grading Plans filed by the applicant, the existing drainage courses will either be mass graded and realigned to provide building pads for land around the alignment or substantial grading will occur adjacent to them. Improvements to Wilson and Wildwood Creeks are required as part of the City's adopted Master Plan of Drainage. The proposed project must design the channel consistent with the Master Plan and ensure the methods used to discharge the downstream storm water flows do not adversely affect those properties. If storm water flows are not properly dispersed or slowed to reduce velocities, they could create substantial erosion on adjoining properties. Based upon these factors, the potential exists for the project to cause off-site erosion that would result in a potentially significant impact upon off-site properties.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site?

As noted above, the proposed project will affect an existing blue line drainage course and the current drainage pattern. At present the alignment has a meandering form that will be straightened, thus potentially increasing velocity. As a standard procedure, all runoff associated with a development project is conditioned to maintain the historical drainage pattern and flow rate. A standard method of controlling storm water velocities will be incorporated into the features of major channel design. A drainage study will need to be prepared to properly address this issue.

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

Development is required to install the required storm drain improvements and pay the applicable City development impact fee. However, the extent of the improvements will need to be identified as part of a drainage study, as refer to in number 8d above, to ensure the project flows are designed consistent with the Master Plan of Drainage.

f) Otherwise substantially degrade water quality?

See response to number 8a and d.

g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Portions of the project area are traversed by 100-year flood plains. These flood plains are related to identified drainage courses that are also planned for improvement. Upon the completion of the proposed drainage and site grading improvements, the proposed housing will be removed from the flood plain. Based upon this condition, no further evaluation is necessary.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

See item 8g above.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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This area of the City is not subject to flooding from the failure of a dam or levee. Based upon this condition, no further evaluation is necessary.

j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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This project area is free from the potential of this hazard or related phenomena. Based upon this condition, no further evaluation is necessary.

9. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The three (3) separate Planning Areas have different characteristics relative to the evaluation of this issue. That portion north of the Interstate 10 Freeway is a relatively isolated location due to topography, the surrounding residential and commercial development, and the existing street pattern, including Interstate 10 Freeway. Accessibility through this area is unavailable due to these constraints. Those portions south of the Freeway are located within a rural area and, as such, do not affect notable land uses. While the proposed project would represent a significant development impact upon the area and has been designated Planned Development (PD) to allow for the establishment of development standards due to the unique size and location of the project, its location would not result in dividing an established community. Based upon this condition, no further evaluation is necessary.

b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project is projected to require a number of potential approvals from the Army Corps of Engineers, California Department of Fish and Game, Regional Water Quality Control Board, and U.S. Fish and Wildlife Service due to potential biological habitat areas and drainage courses. Approvals from these agencies would be required to ensure the proposed project will not adversely affect biological and water resources and ensure consistency with adopted regulations. Preparation of biological, archaeological, and drainage studies will be necessary to determine the level of significance and establish applicable mitigation measures. As currently designed, the project would be inconsistent with several General Plan policies regarding Aesthetics, Noise, Open Space, Traffic, and Land Use.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The City of Yucaipa or County of San Bernardino is not within an adopted habitat conservation plan or natural communities conservation plan. Based upon this condition, no further evaluation is necessary.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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10. MINERAL RESOURCES. Would the project:

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

No significant mineral resources are known to exist within the City of Yucaipa. Based upon this condition, no further evaluation is necessary.

- 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?**

The City of Yucaipa General Plan does not identify the existence of locally-important mineral resources. Thus, no locally-important mineral recovery site will be affected by the proposed project. Based upon this condition, no further evaluation is necessary.

11. NOISE. Would the project result in:

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Portions of the project area are adjacent to residential land uses, which are considered noise sensitive land uses in the City General Plan. The amount of construction necessary to grade the site and install necessary infrastructure systems could generate significant noise levels that exceed existing standards. Some of the potential noise levels will be reduced through compliance with existing City regulations that restrict the time allowed for construction activities. However, the extent of potential grading and the close proximity of existing housing and future location of new on-site housing could result in a potentially adverse impact.

- b) **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Grading will occur as part of the proposed project. Although no bedrock is expected that would require the use of unique grading techniques, the amount of grading necessary and the close proximity of earth moving equipment to existing residences could cause substantial ground vibration. In addition, improvement to and the installation of utilities within area streets could also cause notable ground vibration. Subsequent analysis will be necessary to determine the level of potential affect.

- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

The amount of noise increase from the occupancy of proposed housing will probably be greater than other residential areas due to the increased development density proposed. The location of active open space areas has not been identified and could be in close proximity to existing residences. Noise generated by vehicles will also increase due to the significant increase in associated vehicle trips. The combined affect of both actions could result in a substantial permanent increase in noise levels.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) A substantially temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Grading and construction activities will periodically raise noise levels above their current levels. Due to the amount of grading expected and the area's proximity to surrounding residences, the level of noise increase could be substantial and require appropriate mitigation measures once the level of potential affect is determined. The on-going operation of the proposed residences could cause substantial or unusual noise levels, including the number of vehicle trips referenced in number 11c.

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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The subject property is not within an airport land use plan or within two (2) miles of a public use airport. Based upon this condition, no further evaluation is necessary.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The subject property is not within the vicinity of a private airstrip. Based upon this condition, no further evaluation is necessary.

12. POPULATION AND HOUSING. Would the project:

a) Induce substantial 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project is inconsistent with the City's General Plan, based upon the development scenarios identified for the Robinson Ranch PD and displayed in the City's adopted General Plan. Inadequate water and sewer facilities, utilities, and roadways exist near the project area. Substantial upgrades to these and other services will be necessary to meet projected demand, thus inducing substantial population growth.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project area is primarily unimproved with only a few residences. The proposed increase in housing will more than off-set their potential removal. As such, a minimal number of individuals would be affected. Based upon this condition, no further evaluation is necessary.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See response to 12b.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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13. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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?

Yucaipa is currently served by the California Department of Forestry. The project area is generally accessible from existing improved streets that surround the separate project sites. However, the establishment of a significant number of new housing units and commercial/business park uses will require considerable improvements to extend water facilities, in the form of new pipelines and water reservoirs, to the area. In addition, new streets and driveways will be necessary to access the area. These additional improvements will significantly affect fire and medical response times and the number of new businesses and residences will generate additional calls for service. The City of Yucaipa currently requires the payment of a fire facilities development impact fee to off-set the affects of new development upon fire services. However, the potential affects caused by development of the site at this time, such as the ability to provide adequate response times when development is completed, are difficult to assess without further analysis. As such, the proposed project could require new or altered fire and medical services.

b) Police protection?

The San Bernardino County Sheriff's Department currently serves the area in and around the subject property. The site is generally accessible to law enforcement. The proposed project will not require unique police protection services. However, the extent of development proposed and associated calls for service will potentially generate the need for a significant number of new personnel and/or facilities. As such, the proposed project could require new or altered police protection services.

c) Schools?

The Yucaipa Unified School District currently serves the proposed project site. The proposed project will generate a significant number of additional students. To help off-set potential impacts caused by new development the State of California provides various funding mechanisms, along with allowing the payment of local development impact fees at the time building permits are obtained. Normally the State's action mitigates the impact of the additional students the project will bring. However, the location of the proposed project and the extent to which it will occur could require the construction of four (4) new schools. The timing of such construction may not coincide with the need for such facilities, generating overcrowding at existing schools. As such, the proposed project could cause a substantial adverse affect upon school facilities.

d) Parks?

The proposed project will provide some open space areas; however, the specific nature of these improvements has not been identified. Therefore, the extent to which these areas will be available for recreation related activities is unknown. As such, the level of adequacy of existing or new open space/park areas to be constructed as part of the proposed project is unknown. The City of Yucaipa has adopted development impact fees to off-set the potential impact of new users caused by new development. Because the extent to which these proposed open space areas or existing city parks will meet identified demand is unknown, the proposed project could result in a significant impact.

e) Other public facilities?

Yucaipa Valley Water District will provide water and sewer facilities to the project site, respectively. The ability of the District to meet water and waste water demands is unknown without further evaluation. Please refer to section 16 regarding their ability to provide service. Additional utility service facilities, roadways, and drainage facilities will be required. In addition, upgrades to existing facilities or the installation of new improvements could result in a

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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significant impact, such as necessitating road closures for street widening, site grading or excavation, and utility installation.

14. RECREATION.

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

See response to 13d.

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?**

See response to 13d.

15. TRANSPORTATION/TRAFFIC. Would the project:

a) **Cause an increase in the traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**

The City's Transportation Plan, as delineated in the General Plan, was established utilizing the City's Land Use Plan/Map. The system, as designed, has adequate capacity to meet the demand projected in the General Plan. However, the proposed project will substantially increase the number of vehicle trips beyond that projected in the Yucaipa General. This increase could result in a substantially adverse affect upon the area's street system. The City of Yucaipa requires new development to pay appropriate development impact fees in order to off-set the cost of improving the roadway system. The extent to which streets will need to be upgraded to meet increased demands and their relationship to the improvements proposed to be funded by the development impact fee, will need further evaluation as part of a project traffic study.

b) **Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

See response to 15a.

c) **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The project is not located in close proximity to any airports. Based upon this condition, no further evaluation is necessary.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project is located adjacent to a number of existing paved streets. However, due to the magnitude of the project, adjacent roadways will need to be widened and new roadways will need to be constructed. New internal subdivision streets and driveways for individual homes must be designed consistent with the City’s Engineering and Fire Department standards. As part of the traffic analysis, an evaluation of intersection capacities and alignments will be necessary to ensure the proposed design will not create a hazardous condition for motorists. Hazards related to incompatible uses is not a significant concern due to the type of surrounding uses, which include some minor agriculture related uses and single family residences.

e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project site is adjacent to a number of paved roadways. As noted above, existing streets will need to be widened and additional streets will need to be constructed to ensure access to individual lots. These improvements will ensure continued access for emergency vehicles utilizing existing City design standards. However, the distance to or the time involved in providing a adequate emergency response will be affected by the size and location of the project area. While adequate roadways may be available for use, the size of the project area will affect accessibility to the site. As such, emergency access may be adversely affected.

f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project will be conditioned to provide adequate off-street parking consistent with the City’s Development Code for single and multiple family residences and commercial/business park uses. Based upon this condition, no further evaluation is necessary.

g) Conflict with adopted policies or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Due to the proposed project’s proximity/accessibility to the I-10 Freeway, optional measures could be included to provide park and ride facilities, bus turn-a-rounds and other alternative transportation measures. The potential impact of these improvements is unknown.

16. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Yucaipa Valley Water District provides wastewater treatment facilities. The District currently processes approximately 3.0 million of gallons of waste water per day (mgd) and has a plant capacity of 4.5 mgd. At some time in the future this capacity will be expanded. The Yucaipa General Plan projected that 594 dwelling units would occur on the Robinson Ranch properties. However, the proposed project intends to develop 4,159 dwellings. Due to the significant increase in the number of new dwellings planned for the subject property, the amount of additional wastewater treatment necessary to meet demand could be significant and warrant further study to determine whether adequate capacity is available.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Yucaipa Valley Water District will provide water service to the project site. At present, the groundwater basin is in an overdraft condition since the water table has dropped due to drought and continued use. Water lines or water reservoirs are not available to service the project area. The proposed project intends to increase the number of dwelling units seven-fold from that provide for in the General Plan, thereby significantly increasing the demand upon water and wastewater facilities. As such, this change could result in a significant affect upon water and associated wastewater facilities. In addition, due to the number of dwellings proposed a Water Supply Assessment must be prepared to identify the availability of water sources and supply. Based upon this assessment a determination can be made as to the availability of water and the associated potential affect of new facilities, should they be required. Also refer to Section 16a for additional information on wastewater facilities.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The proposed project will result in an incremental increase in the amount of storm water runoff from the property. As noted previously, the proposed project will be required to construct a storm drain system to collect and safely convey storm water flows through the project area and complete a portion of the City's Master Plan of Drainage. The major drainage channels through the project area will generally occur along the existing blueline stream drainage courses. Such improvements have the potential for substantially affecting the environmental resources within that portion of the drainage course and downstream properties.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The proposed project will demand a significant amount of water. As noted above, Yucaipa Valley Water District is undertaking improvements to ensure adequate water is available to meet future demand. However, the amount of water available from State Project Water and available for use by this and other projects occurring within the City is unknown and additional information is required. As such, the proposed project could result in a significant impact upon the District's ability to supply necessary water. Also refer to number 16b for further information.

e) Result in a determination by the wastewater treatment provider which services may serve the project once it is determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Refer to 16a.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

The City's General Plan notes that the San Timoteo County landfill used by the City "has an estimated 10 to 20 more years of capacity at current rates" (IX-3). Additionally, the County of San Bernardino Solid Waste Department is required by the State of California to publish a fifteen (15) year plan each year, describing the necessary implementation of additional landfills. The proposed project will generate significantly more solid waste than previously projected in the General Plan, resulting in a potentially significant affect upon landfill capacity.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Comply with federal, state, and local statues and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project will be served by a City approved waste disposal service. They will be required to comply with all appropriate regulations, including recycling. Based upon this condition, no further evaluation is necessary.

17. MANDATORY FINDINGS OF SIGNIFICANCE.

a) Does the project have the potential to 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, 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As discussed in items 1, 2,3, 4, and 5 above, the project will potentially result in significant impacts to aesthetics, agriculture, air quality, biological, and cultural resources. The project area will be significantly transformed through grading in order to create large building pads. The re-contouring of the land will significantly alter the aesthetic views of the property from surrounding areas, as well as from along the I-10 Freeway, and adjacent agricultural uses could be adversely affected by urban land uses. Air quality in the area could be significantly affected due to the significant increase in grading necessary to provide for the type of development proposed, along with the amount of building construction and associated construction trips and operational vehicle trips. Street intersections may experience increased concentrations of air pollution due to vehicle idling caused by additional vehicle use.

The project area is identified on General Plan Exhibit XII-2, Biological Resources, as having a number of “Areas of Potential Biological Significance” and a “Southern Riparian Forest”. Improvements to the project sites could adversely affect these identified biological resources and riparian habitat. While additional vegetation and landscaping will be provided by the project to enhance its appearance, the configuration of the property will dramatically change and existing habitat could be removed due to the need to complete master planned drainage improvements and mass grading of the area. The project area is also identified as having a “High Sensitivity” for paleontological sites. Due to the location of the project area along various drainage course and rolling hills, extensive grading may also adversely affect potential archaeological resources.

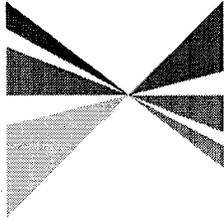
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project includes three (3) separate sites proposed for development that are owned by the applicant. The proposed project could have a significant affect upon the environment due to the number of dwelling units and the associated construction impacts and service needs. The combined affect of the proposed project and other projects in the area will result in a potentially significant cumulative affect upon a variety of city services, utilities, and natural resources. Placement of new facilities must be undertaken in concert with the needs of other projects and could also add to potentially adverse impacts. Although the City and other service agencies have a variety of means to address various development issues, such as the collection of fees and assessments to pay for an expansion in services or facilities, the location of the project sites, along with the physical affect of required improvements could have a potentially significant affect upon the environment.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Portions of the project area are located within an Alquist-Priolo Special Studies Zone, floodway, and 100 and 500-year flood plains. These issues can be addressed through the installation of improvements and proper building setbacks. The proposed project will be constructed consistent with existing City regulations, standards, and processes, and those of other agencies. However, the required improvements to the site could adversely affect surrounding residents through the generation of increased noise levels and air emissions during grading and construction. While noise levels will be partially controlled through the City's regulation of the hours of operation, the amount of noise generated during grading and building activities and the proximity of those actions to existing residents could be significant. Upon completion of development, area roadways could be significantly affected due to the additional vehicle trips and associated increase in noise levels. These occurrences could also affect the newly constructed portion of the proposed project as it is built-out over time.

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October 30, 2008

Mr. Mike Gonzalez, Senior Project Manager
PBS&J / City of Yucaipa
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(760) 603-6010/ mjgonzales@pbsj.com

RE: SCAG Comments on the Notice of Preparation for a Draft Environmental Impact Report for the Robinson Ranch EIR - SCAG No. I20070719 provided December 12, 2007

Dear Mr. Gonzalez,

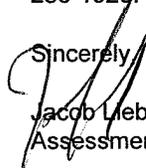
Thank you for inquiring about the status of the policies in SCAG's 2008 Regional Comprehensive Plan. In response to your inquiry, on October 2, 2008, SCAG's CEHD Committee and the Regional Council took action to accept the 2008 Regional Comprehensive Plan (RCP) as an advisory document for local governments in the SCAG region. Because of its advisory nature, the RCP policies in the 2008 RCP will not be used in SCAG's Inter-Governmental Review (IGR) process. The 2008 RCP also supersedes the 1996 Regional Comprehensive Plan & Guide (RCP&G). Therefore, effective October 2, 2008, policies contained within the 1996 RCP&G will no longer be used for IGR review.

However, a consistency analysis should still be provided for policies contained in SCAG's 2008 Regional Transportation Plan (RTP) and Compass Growth Vision (CGV) that may be applicable to your project (included in this letter). SCAG staff has previously reviewed the aforementioned NOP and determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. We recommend the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies and provide supportive analysis as to why it is consistent, not-consistent, or not applicable.

SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

The RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a consistency discussion and supportive analysis in a table format (example attached). We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. **Please provide a minimum of 45 days for SCAG to review the DEIR and associated plans when these documents are available.** If you have any questions regarding the attached comments, please contact Christine Fernandez at (213) 236-1923. Thank you.

Sincerely,


Jacob Lieb, Manager
Assessment, Housing, and EIR Division

DOCS#148877

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
REPORT FOR THE ROBINSON RANCH SPECIFIC EIR PROJECT - SCAG NO. I20070719**

PROJECT DESCRIPTION

The project proposes the development of 4,159 single and multi-family units on 217.5 acres, 1,213,017 square feet of commercial space on 109 acres, 369,962 square feet of business space on 28 acres and 167.5 acres of improved and natural open space. The residential component includes 339 very low income housing units. The project will take place on three connected sites, West Oak Center, Wildwood Ranch, and Robinson Ranch North. The project sites are bisected by the Interstate 10 and Oak Glen and Live Oak Canyon Roads, in the City of Yucaipa.

REGIONAL TRANSPORTATION PLAN

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices.*

Principle 2: Foster livability in all communities.

- GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2** *Promote developments, which provide a mix of uses.*
- GV P2.3** *Promote "people scaled," walkable communities.*
- GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth.*
- GV P3.5 *Encourage civic engagement.*

Principle 4: Promote sustainability for future generations.

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas.*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques.*

CONCLUSION

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. Refer to the attached SCAG List of Mitigation Measures for additional guidance.

When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21018.7, and CEQA Guidelines Section 15097 (g).

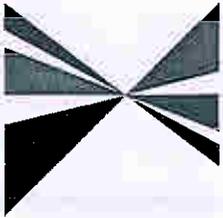
SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: http://www.scag.ca.gov/igr/doc/SCAG_IGRpolicies.DOC

SCAG RTP or CGV Policies		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
RTP G1	<i>Maximize mobility and accessibility for all people and goods in the region.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
RTP G2	<i>Ensure travel safety and reliability for all people and goods in the region.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
RTP G3	<i>Preserve and ensure a sustainable regional transportation system.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.

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San Bernardino County: Gary O'vitt, San Bernardino County - Lawrence Dale, Barstow - Paul Eaton, Montclair - Lee Ann Garcia, Grand Terrace - Tim Jasper, Town of Apple Valley - Larry McCallion, Highland - Deborah Robertson, Rialto - Alan Wapner, Ontario

Ventura County: Linda Parks, Ventura County - Glen Becerra, Simi Valley - Carl Morehouse, San Buenaventura - Toni Young, Port Hueneme

Tribal Government Representative: Andrew Masiel, Sr., Pecharanga Band of Luiseño Indians

Orange County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robin Lowe, Hemet

San Bernardino Associated Governments: Paul Leon

Ventura County Transportation Commission: Keith Millhouse, Moorpark

10/24/07

December 12, 2007

Mr. Jim Morrissey, AICP
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, Ca. 92399



RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Robinson Ranch Plan - SCAG No. I2007719

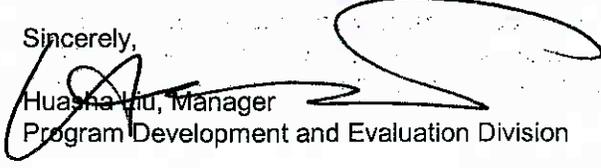
Dear Mr. Morrissey,

Thank you for submitting the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Robinson Ranch Plan - SCAG No. I2007719, to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed the aforementioned NOP and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The project proposes the development of 4,159 residential units, 1,213,017 square feet of commercial space, 369,992 square feet of business space, and 167.5 acres of open space.

CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. We expect the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies and provide supportive analysis as to why it is consistent, not-consistent, or not applicable to these policies. Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) that may be applicable to your project are outlined in the attachment. Also, for ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format (attached). The RCPG, RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. Please provide a minimum of 45 days for SCAG to review the DEIR and associated plans when these documents are available. If you have any questions regarding the attached comments, please contact James R. Tebbetts at (213) 236-1915 or Laverne Jones at (213) 236-1857. Thank you.

Sincerely,

Huashan Liu, Manager
Program Development and Evaluation Division

DOCS# 142379 v1

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
 REPORT FOR THE ROBINSON RANCH PLAN, SCAG NO. I 20070719**

PROJECT DESCRIPTION

The project proposes the development of 4,159 single and multi-family residential units on 217.5 acres, 1,213,017 square feet of commercial space on 109 acres, 369,992 square feet of business space on 28 acres, and 167.5 acres of improved and natural open space. The residential component includes 339 very low income housing units. The project will take place on three disconnected sites, West Oak Center, Wildwood Ranch, and Robinson Ranch North. The project sites are bisected by Interstate 10 and Oak Glen and Live Oak Canyon Roads, in the City of Yucaipa.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the DEIR.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The DEIR should reflect the most current adopted SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. The adopted forecasts for your region, subregion and city are as follows:

Adopted SCAG Regionwide Forecasts

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>
Population	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
Employment	8,729,192	9,198,618	9,659,847	10,100,776	10,527,202

Adopted SANBAG Forecasts

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>
Population	2,059,420	2,229,700	2,397,709	2,558,729	2,713,149
Households	618,782	686,584	756,640	826,669	897,739
Employment	770,877	870,491	972,243	1,074,861	1,178,890

Adopted City of Yucaipa Fontana Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>
Population	49,689	53,361	56,984	60,456	63,786
Households	17,659	19,638	21,686	23,738	25,824
Employment	10,130	11,290	12,468	13,657	14,862

1. The 2004 RTP growth forecast at the regional, county and subregional level was adopted by RC in April, 2004. City totals are the sum of small area data and should be used for advisory purposes only.

The Draft 2008 RTP Baseline Growth Forecast (built upon subregion/local jurisdiction input) was released on November 1, 2007 by the Community, Economic and Human Development Committee (CEHD) along with the Draft 2008 RTP and RCPG for public review and comment. You may wish to review these forecasts to determine compatibility with the any Project Forecasts. The following 2035 forecasts are

provided for your reference. The forecasts for the intervening years (2010, 2015, 2020, 2025, and 2030) will be included in the 2008 RTP Baseline Growth Forecast.

2035 Forecasts ¹	Population	Households	Employees
City of Yucaipa	63,358	24,033	18,006
County of San Bernardino	3,134,000	973,000	1,255,000
SCAG	24,056,000	7,710,000	10,287,000

1. Source: Draft 2008 RTP Baseline Growth Forecast
(http://scag.ca.gov/forecast/downloads/RTP_baseline_forecasts_1001.xls)

- 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- 3.04 *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*
- 3.05 *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.06 *Support public education efforts regarding the costs of various alternative types of growth and development.*
- 3.07 *Support subregional policies that recognize agriculture as an industry, support the economic viability of agricultural activities, preserve agricultural land, and provide compensation for property owners holding lands in greenbelt areas.*
- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.*
- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the # of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*
- 3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*
- 3.15 *Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.*
- 3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*
- 3.17 *Support and encourage settlement patterns, which contain a range of urban densities.*
- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*
- 3.19 *SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.26 *Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.*
- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

AIR QUALITY CHAPTER

The Air Quality Chapter core actions related to the proposed project include:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulation can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

OPEN SPACE AND CONSERVATION CHAPTER (OSCC)

The OSCC goals related to the proposed project includes the following.

- 9.1 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*
- 9.2 *Increase the accessibility to open space lands for outdoor recreation*
- 9.3 *Promote self-sustaining regional recreation resources and facilities.*
- 9.4 *Maintain open space for adequate protection to lives and properties against natural and manmade hazards.*
- 9.5 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.*
- 9.6 *Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.*
- 9.7 *Maintain adequate viable resource production lands, particularly lands devoted to commercial agriculture and mining operations.*
- 9.8 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter goals related to the proposed project include:

- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

REGIONAL TRANSPORTATION PLAN

The 2004 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals

- RTP G1 Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2 Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3 Preserve and ensure a sustainable regional transportation system.*
- RTP G4 Maximize the productivity of our transportation system.*
- RTP G6 Encourage land use and growth patterns that complement our transportation investments.*

Regional Transportation Plan Policies

- RTP P1 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*

GROWTH VISIONING

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place

to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents

- GV P1.1 Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2 Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3 Encourage transit-oriented development.*
- GV P1.4 Promote a variety of travel choices*

Principle 2: Foster livability in all communities

- GV P2.1 Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 Promote developments, which provide a mix of uses.*
- GV P2.3 Promote "people scaled," walkable communities.*
- GV P2.4 Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people

- GV P3.1 Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 Support educational opportunities that promote balanced growth.*
- GV P3.3 Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 Encourage civic engagement.*

Principle 4: Promote sustainability for future generations

- GV P4.1 Preserve rural, agricultural, recreational and environmentally sensitive areas.*
- GV P4.2 Focus development in urban centers and existing cities.*
- GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 Utilize "green" development techniques*

CONCLUSION

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

Suggested Side by Side Format - Comparison Table of SCAG Policies

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggest format is as follows:

SCAG RCPG (RTP and/or CGV) Policies		
Growth Management Chapter		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
3.01	<i>The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.02	<i>In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.03	<i>The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.

City of Redlands



January 7, 2008

John McMains, Director
Jim Morrissey, Project Planner
Community Development Department
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399

RECEIVED

JAN 07 2008

City of Yucaipa
PLANNING DIVISION

Re: Robinson Properties, LLP Projects - Case Nos. 04-174/PDP/GPA; 04-175/PDP/GPA; 05-203/PDP/GPA

Dear Mr. McMains & Mr. Morrissey:

This letter is in response to the Notice of Preparation (NOP) received on the three (3) Robinson Ranch Projects (the "Project") listed above. Staff is providing comments pursuant to Section 15082(b) of the California Environmental Quality Act Guidelines. Based on our review of the Initial Study Checklist that accompanied the NOP, the following comments are provided as to the scope and content that should be evaluated in the Program Environmental Impact Report (EIR).

These comments supplement the City of Redlands' previous response on this project detailed in a letter dated July 17, 2007 (attached). Further, the City of Redlands would like to go on record to express opposition to the current design and density of the Robinson Ranch Project, especially the West Oak Center (Case No. 04-174-/PDP/GPA) which is adjacent to the City of Redlands, and which raises very serious concerns and conflicts with the adopted General Plan for Redlands. The Redlands General Plan designation for land abutting this project to the west is Resource Preservation and is zoned A-1 Agricultural District (5-acre minimum lot size). This General Plan land use designation provides for a maximum development density of one (1) dwelling unit per acre with a slope density formula that reduces density further based on steepness of slope. Typical projects found to be consistent with the City's General Plan often have gross densities of one dwelling unit per two and a half (2½) acres or less if the site has only limited land less than 15% slope. This General Plan designation was adopted as a result of a voter initiative in 1997 and can only be modified subject to another vote of the residents. We would recommend

"Preserving the Past, Protecting the Future"

P.O. BOX 3005

• REDLANDS, CA 92373



Redlands

that the project be revised to be consistent with the density prescribed by this land use designation in order to be compatible with the City of Redlands General Plan. This lower density is reflective of the fact that there is only a limited amount of public infrastructure and the residents are strongly supportive of keeping the Live Oak Canyon area in a very rural/agricultural setting.

Staff believes that the Initial Study Checklist adequately identifies the Project's significant environmental issues that the Program EIR should evaluate in detail. Particular attention should be considered in the EIR as follows:

Traffic

The Robinson Ranch Project will have serious local and regional traffic impacts on this area due not only to the high residential development densities (11.5 to 13.5 DU/Acre) but also due to the proposed 1,213,017 square feet of commercial uses, and 369,992 square feet of business park uses. Collectively, these land uses will significantly impact local streets, the Live Oak Canyon Road Interchange and the Interstate 10 Freeway, as well with potentially severe regional consequences. To that end, it is critical that a comprehensive regional traffic study in accordance with the standards outlined in the County of San Bernardino's Congestion Management Program be undertaken that will evaluate, recommend solutions for, and identify unmitigable impacts that will result from the development of this project. We are particularly concerned about developing local streets that will parallel the freeway and encourage local and regional traffic to look for alternatives to the overly congested freeway which would include local streets that extend through rural and residential areas of Redlands.

Except for those lands immediately fronting on Live Oak Canyon Road, the proposed 810 residential dwellings on 60 acres (13.5 du/acre) in the West Oak Center component, adjacent to the City of Redlands, would appear to gain access through local residential streets in Redlands. One of the standards adopted in the 1997 voter initiative was that new development cannot increase traffic on local residential streets if it would increase traffic on those streets to over 500 ADT. For example, 17th Street is already at 500 ADT and any additional traffic on that street would be contrary to City standards and result in an inconsistency with the City of Redlands General Plan. While we do not have a current traffic count on 16th Street, it is obvious that any development in this area will adversely impact 16th Street as well. Given the above, the West Oak Center should be revised to a density consistent with the Redlands General Plan for this area.

The City is very concerned that any development in the Project area will have adverse consequences to Live Oak Canyon Road as it passes through the City of Redlands, as well as San Timoteo Canyon Road. While these roads are shown as Minor Arterial Roads on the Redlands General Plan, it was not projected to handle the volume of traffic that would be generated by this Project. Currently, these roads are already impacted by traffic from Moreno Valley. If the proposed development density is to occur, it would be critical for the Project to assist in paying for upgrades and improvements to Live Oak Canyon and San Timoteo Canyon Roads that would be necessary to accommodate the anticipated traffic.

Aesthetics

As stated in the Initial Study Checklist, the project is inconsistent with the City of Yucaipa's Hillside Ordinance and will require substantial grading that will significantly alter the natural slopes and undulating hills that are a characteristic viewshed as you enter Yucaipa from the west along the Interstate 10 Freeway. The EIR should identify and evaluate project alternatives that would preserve these significant geologic features and avoid the transformation of a substantial scenic resource into dense urbanized uses.

Agriculture Resources

The West Oak Center component is adjacent to a large City of Redlands Agricultural Preserve. This area is shown to contain lands designated in the Farmland Mapping and Monitoring Program by the Department of Conservation as either "Prime Agricultural Lands", "Agricultural Lands of Local Importance", or "Grazing Land". The project would have a significant and an unavoidable impact on these lands by increasing the probability of this agricultural area to being converted to urbanized uses. The EIR should identify project alternatives that preserve this area as open space and a rural environment in order to be compatible and consistent with this Agricultural Preserve in the City of Redlands.

Air Quality

The Robinson Ranch Project is inconsistent with the 2003 Air Quality Management Plan (AQMP) for this region. The project proposes development that substantially exceeds the assumptions made in the AQMP for buildout in the City of Yucaipa. The purpose of the AQMP is to establish a comprehensive program that will lead to compliance by all levels of government with the federal and state air quality planning regulations. This project will have severe and unavoidable long term and short term air quality impacts due to the substantial increase in housing units and commercial development and their associated vehicle trips, as well as the construction activities.

Biologic Resources

The project covers an area that includes blue line drainage courses which contain numerous wildlife corridors that, if urbanized, will have a significant adverse impact on safe migration of sensitive biological species. Live Oak Canyon and San Timoteo Canyon each contain remnants of past natural communities of regional importance. The Badlands while peripheral to the project area, is ecologically linked with Live Oak Canyon and San Timoteo Canyon, sharing some of the same vegetative associations and wildlife. Thus, the project will have significant and unavoidable regional impacts on biological resources. Project alternative should be identified that preserve West Oak Center and Wildwood Ranch areas in a rural environment.

Climate

With the issuance of Governor Schwarzenegger's Executive Order S-3-05 and the passage of AB 32, the Global Warming Solutions Act of 2006, it is now official state policy that global climate change poses a threat to California's resources and the public. In the face of such official state action, Lead Agencies under CEQA are under growing pressure to analyze the greenhouse gas (GHG) emissions of projects and any resulting impacts to global climate change. In April, 2007, the State Attorney General's Office joined three environmental organizations in suing the County of San Bernardino under CEQA, alleging that the County had not adequately evaluated the GCG impacts of its approved general plan update. Thus, given the substantial development density of the Robinson Ranch Project, the EIR should evaluate a significance determination to cumulative impacts on whether the project implements all feasible and applicable GHG emission reduction strategies.

Cultural Resources

The West Oak Center component is adjacent to a large Rural Historic and Prehistoric Archeological District in the City of Redlands according to the Archeological Resource Sensitivity Map in the EIR/MEA for the General Plan. It is highly probable that this area extends easterly into the West Oak Center component. Potential impacts to Cultural Resources should be evaluated and measures taken to avoid and protect any uncovered resources.

Hazards

The project proposes to locate 4,159 multiple- and single-family residential units within a wildland interface and high fire hazard area. As such, fire hazards and loss of property due to the introduction of urban uses into an undisturbed wildland area would pose a

significant adverse impact. Due to the substantial size of the project area south of the Interstate 10 Freeway, the varied topographical features, the need to preserve valued habitat and wildlife corridors, and the proximity to other large open space areas, the project alternatives should consider maintaining this area in a rural environment.

Hydrology and Water Quality

Yucaipa Creek, Wilson Creek and Wildwood Creek appear to dissect the project area. The project may have adverse impacts to water quality and biological resources due to the introduction of urbanized uses within this sensitive wildland area. The adverse effects from runoff of urban pollutants, such as oils, fuels, minerals from roadway surface treatments, heavy metals and cleaning agents into the watershed will have devastating impacts. The project will also significantly alter drainage patterns of the site and potentially cause irreversible damage to sensitive biological resources and habitat areas.

Noise

Operational impacts from the generation of tens of thousands of daily vehicle trips will significantly alter ambient noise and affect sensitive receptors in the area. Portions of the business park and commercial areas of the West Oak Center component are adjacent to the City of Redlands and are either near or adjacent to residential and agricultural uses, and should contain a substantial buffer to minimize adverse impacts to these sensitive receptors.

Population and Housing

The Robinson Ranch Project is growth inducing and proposes a development plan that far exceeds the City of Yucaipa's General Plan for this area. Presently, there are inadequate water and sewer facilities, utilities, and roadways in this area. The project will require substantial upgrades in public infrastructure and other municipal services to meet the projected demand, and thereby increases the probability of inducing substantial population growth to the surrounding areas outside the Project.

Public Services

The project will generate a substantial increase in calls for service by police and fire personnel. The West Oak Center adjacent to Redlands will adversely impact the City of Redlands police and fire service due to mutual aid agreements. Redlands does not have the capacity to incur the increase in service demands that will be generated by the Project. As a result, response times will be significantly affected due to the substantial development density and the remote location of the Project.

Project Alternatives

Under Section 15126.6 of the CEQA Guidelines, an EIR is required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. The EIR should consider a project alternative in the West Oak Center and Wildwood Ranch areas that maintain the rural environment and where nonresidential uses are located north of the Interstate 10 Freeway in the Robinson Ranch North component of the project.

Thank you for the opportunity to respond to the NOP for this project. The City of Redlands is requesting that all notices connected with this project be sent to the Community Development Department, as well as a copy of the Notice of Availability / Draft Environmental Impact Report and the Response To Comments. If you have any questions regarding our comments, I can be reached at (909) 798-7562.

Sincerely,



Robert D. Dalquest, AICP
Assistant Community Development Director

cc: Mayor and City Council
N. Enrique Martinez, City Manager
Dan McHugh, City Attorney

City of Redlands



July 17, 2007

John McMains, Director
Jim Morrissey, Contract Planner
Community Development Department
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399

Re: Robinson Properties, LLP Projects - 04-174/PDP/GPA; 04-175/PDP/GPA; 05-203/PDP/GPA

Dear Mr. McMains & Mr. Morrissey:

This letter is in response to the notices received regarding the three (3) Robinson Properties, LLP Projects. The City of Redlands staff has reviewed the land use plans and would like to offer some initial comments for your consideration and information at this time.

The City of Redlands is concerned with the densities proposed by these project, especially 04-174-/PDP/GPA, which is adjacent to the City of Redlands Limit Line, and raises some serious concerns and conflicts with the adopted General Plan for Redlands. The current City of Redlands General Plan designation for land abutting this project to the west is Resource Preservation. This land use designation provides for a maximum development density of one (1) dwelling unit per acre with a slope density formula that reduces density even further based on slope. Typical projects found to be consistent with the City's General Plan often have gross densities of one dwelling unit per two (2) acres or less if the site has only limited land less than 15% slope. This General Plan designation was adopted as a result of a voter initiative in 1997 and can only be modified subject to another vote of the people. We would encourage the project to be consistent with the density prescribed by this land use designation to be more compatible with the City of Redlands General Plan. This lower density is reflective of the fact that there is only a limited amount of infrastructure in the area and the residents are strongly supportive of keeping the area rural.

As an example of local resident concerns, the City of Redlands recently approved a planned residential development in Live Oak Canyon near the western edge of the proposed project. This project was consistent with the General Plan, however, involved a

zone change from A-1, Agricultural District (5 acre parcels) to R-R, Rural Residential District (1 acre parcel minimum). That project was subjected to a referendum action and the approval was overturned by the voters. The citizens of Redlands feel very strongly that Live Oak Canyon should be maintained in a very rural/agricultural setting. A more recent project was approved with a maximum density of one dwelling unit per 2.5 acres. There was opposition to that project as well, however, no action was taken as of this date to overturn that approval.

Specific Comments

1. Except for those lands immediately fronting on Live Oak Canyon Road, the proposed residential density of 10.8 dwelling units per acre adjacent to the City of Redlands would appear to gain access through local residential streets in the City of Redlands. One of the standards adopted in the 1997 voter initiative was that new development cannot increase traffic on local residential streets if it would increase traffic on those streets to over 500 ADT. 17th Street is already at 500 ADT and any additional traffic on that street would be contrary to that standard and result in an inconsistency with the City of Redlands General Plan. While we do not have a current traffic count on 16th Street, it is obvious that any development in this area will adversely impact 16th Street as well. Given the above, this area should be reevaluated and a much lower density that would be consistent with that in the City of Redlands should be considered.
2. The proposed Land Use Plan will have serious traffic impacts on the area due not only to the high residential development densities but also the proposed commercial and business park land uses in this area. These land uses will significantly impact local streets, the Live Oak Canyon Road interchange and the Interstate 10 Freeway as well with potentially severe regional consequences. To that end, it is critical that a comprehensive traffic study be undertaken that will evaluate, recommend solutions for and identify unmitigable impacts that will result from the development that would be allowed from this Project. We are particularly concerned about developing local streets that will parallel the freeway and encourage local and regional traffic to look for alternatives to the overly congested freeway that include local streets that extend through rural and residential areas of Redlands.
3. The City of Redlands is very concerned that any development in the Project area will have adverse consequences to Live Oak Canyon Road as it passes through the City of Redlands as well as San Timoteo Canyon Road. While these roads are shown as Minor Arterial Roads on our General Plan, they did not assume that level of

development projected by these projects. In addition, the level of development anticipated in the canyon areas of the City of Redlands is very rural as described above. If the development shown is to occur, it would be critical for that development to assist in paying for the upgrades and improvements to Live Oak Canyon and San Timoteo Canyon Roads that would be necessary to accommodate the anticipated traffic. Again, a regional traffic study would be critical to determining the level of impact and extent of mitigation required.

4. The proposed density and intensity of the land use plans of all three projects are not consistent with the proposed Freeway Corridor Specific Plan that the City of Yucaipa is currently preparing.
5. Portions of the Business Park and Commercial areas of 04-174/PDP/GPA are adjacent to the City of Redlands and are either near or adjacent to residential and agricultural uses and must contain a substantial buffer to minimize adverse impacts to these uses.
6. Yucaipa Creek and Wilson Creek appear to dissect the project area. The project may have adverse impacts to Water Quality and biological issues.
7. The project collectively would allow the potential for over 4,200 dwelling units, and over 1.1 million square feet of commercial development and would also have a significant impact on air quality, ambient noise, public services, public infrastructure, utilities and service systems, aesthetics, open space and trails, and agricultural resources.

I hope the above information will be of use to you in proceeding with this proposal. The City of Redlands is requesting that all notices connected with this project be sent to the Community Development Department, as well as, all environmental information and documents to include but not be limited to: Notice of Preparation, Initial Study Checklist (if prepared), Draft Environmental Impact Report, Notice of Availability, and Final Environmental Impact Report. Thank you for the opportunity to respond to this project, we look forward to working with you. If you have any questions regarding our comments, I can be reached at (909) 798-7562.

Sincerely,



Robert Dalquest, AICP
Assistant Community Development Director

cc: Jeff Shaw, Community Development Director

RAMONA BAND OF CAHUILLA

56310 Highway 371, Suite B
Post Office Box 391670
Anza, California 92539



Tel: (951) 763-4105
Fax: (951) 763-4325
E-mail: admin@ramonatribe.com

December 27, 2007

"A SOVEREIGN NATION"

Jim Morrissey, AICP
City of Yucaipa
Community Development Department
34272 Yucaipa Blvd.
Yucaipa, CA 92399
(909)790-9203 fax

Re: Robinson Ranch

Dear Mr. Morrissey:

The Ramona Band of Cahuilla Indians received a notice regarding the above proposed project.

While the proposed project is not within the Reservation boundaries, the project site lies within the traditional territory of the Cahuilla People, and the Ramona Band of Cahuilla Indians is concerned about the protection of unique and irreplaceable cultural resources, such as Cahuilla village and burial sites, and archaeological items that may be displaced by work associated with any project within the aboriginal homelands of the Cahuilla people.

The Ramona Band of Cahuilla Indians is also concerned about the proper and lawful treatment of any cultural or ceremonial items, Native American human remains, or sacred items which may be discovered during planning and/or construction of the project.

At this time, the Ramona Band of Cahuilla Indians can not provide any information regarding cultural resources within the proposed project area. However, the Ramona Band of Cahuilla Indians requests a copy of the cultural resources report for the proposed project and reserves the right to review the cultural resource report for the proposed project and provide comments regarding any concerns we may have. Please forward a copy of the cultural resources report to the address listed above.

The Ramona Band of Cahuilla Indians looks forward to working with the City of Yucaipa, on a government-to-government basis to protect the invaluable resources of the Cahuilla people.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gomez, Jr.", is written over a faint, circular stamp or watermark.

John A. Gomez, Jr.
Cultural Resources
Ramona Band of Cahuilla Indians



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
 STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
 GOVERNOR

RECEIVED
 CYNTHIA BRYANT
 DIRECTOR

Notice of Preparation

November 26, 2007

DEC 03 2007

City of Yucaipa
PLANNING DIVISION

To: Reviewing Agencies

Re: Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA
 SCH# 2007111104

Attached for your review and comment is the Notice of Preparation (NOP) for the Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jim Morrissey
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
 Project Analyst, State Clearinghouse

Attachments
 cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007111104
Project Title Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No.
Lead Agency 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA
 Yucaipa, City of

Type NOP Notice of Preparation
Description The proposed project, known as "Robinson Ranch" or the "Project," consists of three (3) individual planning areas ("planning areas"), also sometimes called Planned Development (PD) Districts. The entire project consists of approximately 522 acres, with the following general characteristics proposed for the project: 4,159 multiple and single-family attached and detached dwelling units located on approximately 336 acres, approximately 109 acres of general commercial uses (consisting of 1,213,017 square feet of proposed commercial space), approximately 28 acres of business park uses (consisting of 369,992 square feet of proposed business uses), and approximately 49 acres of natural open space areas (which are incorporated into the three (3) Planning Areas.

Lead Agency Contact

Name Jim Morrissey
Agency City of Yucaipa
Phone (909) 797-2489 x281 **Fax**
email jmorrissey@yucaipa.org
Address 34272 Yucaipa Boulevard
City Yucaipa **State** CA **Zip** 92399

Project Location

County San Bernardino
City
Region

Cross Streets

Parcel No.

Township

Range

Section

Base

Proximity to:

Highways

Airports

Railways

Waterways

Schools

Land Use Existing: PD (Planned Development)
 Proposed: PD (Planned Development)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Biological Resources; Archaeologic-Historic; Geologic/Seismic; Toxic/Hazardous; Water Quality; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Traffic/Circulation; Other Issues

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 6; Native American Heritage Commission; California Highway Patrol; Caltrans, District 8; Integrated Waste Management Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 8; Department of Housing and Community Development

Date Received 11/26/2007 **Start of Review** 11/26/2007 **End of Review** 12/26/2007

Resources Agency

Fish & Game Region 2
Jeff Drongesen

Fish & Game Region 3
Robert Floerke

Fish & Game Region 4
Julie Vance

Fish & Game Region 5
Don Chadwick

Fish & Game Region 6
Gabrina Gatchel

Fish & Game Region 6 I/M
Gabrina Gatchel

Dept. of Fish & Game M
George Isaac

Marine Region

Other Departments

Food & Agriculture
Steve Shaffer

Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Robert Steppy

Environmental Services Section

Dept. of Health Services
Veronica Malloy

Dept. of Health/Drinking Water

Independent Commissions/Boards

Delta Protection Commission
Debbie Eddy

Office of Emergency Services
Dennis Castrillo

Governor's Office of Planning & Research
State Clearinghouse

Native American Heritage
Comm.
Debbie Treadway

Public Utilities Commission
Ken Lewis

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jean Sarno

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

Caltrans - Division of Aeronautics
Sandy Hesnard

Caltrans - Planning
Terri Pencovic

California Highway Patrol
Shirley Kelly

Office of Special Projects

Housing & Community Development
Lisa Nichols

Housing Policy Division

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Jeff Pulverman

Caltrans, District 4
Tim Sable

Caltrans, District 5
David Murray

Caltrans, District 6
Marc Blmbaum

Caltrans, District 7
Cheryl J. Powell

Caltrans, District 8
Dan Kopulsky

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Mario Orso

Caltrans, District 12
Bob Joseph

Cal EPA

Air Resources Board

Airport Projects
Jlrm Lerner

Transportation Projects
Ravi Ramalingam

Industrial Projects
Mike Tollstrup

California Integrated Waste Management Board
Sue O'Leary

State Water Resources Control Board
Regional Programs Unit

Division of Financial Assistance

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit

Division of Water Quality

State Water Resources Control Board
Steven Herrera

Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation

RWQCB 1
Cathleen Hudson

RWQCB 2
Environmental Document Coordinator

RWQCB 3
San Francisco Bay Region (2)

RWQCB 4
Central Coast Region (3)

RWQCB 5
Teresa Rodgers

RWQCB 5S
Los Angeles Region (4)

RWQCB 5F
Central Valley Region (5)

RWQCB 5R
Central Valley Region (5)

RWQCB 6
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)

RWQCB 6
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson

RWQCB 2
Environmental Document Coordinator

RWQCB 3
San Francisco Bay Region (2)

RWQCB 4
Central Coast Region (3)

RWQCB 5
Teresa Rodgers

RWQCB 5S
Los Angeles Region (4)

RWQCB 5F
Central Valley Region (5)

RWQCB 5R
Central Valley Region (5)

RWQCB 6
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)

RWQCB 6
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

December 26, 2007

Mr. Jim Morrissey, AICP
Community Development Department
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, California 92399
jmorrissey@yucaipa.org

NOTICE OF PREPARATION OF A ENVIRONMENTAL IMPACT REPORT FOR THE ROBINSON RANCH PRELIMINARY DEVELOPMENT PLANS AND GENERAL PLAN AMENDMENTS (CASE NO. 04-174/PDP/GPA; 04-175/PDP/GPA; AND 05-203/PDP/GPA) PROJECT, YUCAIPA, SAN BERNARDINO COUNTY, 92399. (SCH#2007111104)

Dear Mr. Morrissey:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of an Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "The proposed project, known as "Robinson Ranch" or the "Project", consists of three (3) individual planning areas ("planning areas"), also sometimes called planned Development (PD) Districts. The entire project consists of approximately 522 acres, with the following general characteristics proposed for the project: 4,159 multiple and single-family attached and detached dwelling units located on approximately 336 acres, approximately 109 acres of general commercial uses (consisting of 1,213,017 square feet of proposed commercial space), approximately 28 acres of business park uses (consisting of 369,992 square feet of proposed business uses), and approximately 49 acres of natural open space areas which are incorporated into the three (3) planning Areas, West Oak Center, Wildwood Ranch, Robinson Ranch North." DTSC has the following comments; please address if applicable.

- 1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.
- 2) Your document in Section 7, Hazard and Hazardous Materials, c) and d) the checklist boxes are not marked and are left blank. The EIR should identify the known or potentially contaminated sites within the proposed Project area. For all

identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
 - Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information.
- 4) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency

that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table.

- 5) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports should be included in the EIR.
- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.
- 7) If buildings, other structures, or associated uses; asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- 8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the

California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

- 11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.
- 12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.
- 13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 14) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
- 15) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- 16) Your document states: "However, due to the potential for agricultural related waste or chemicals on the property, further investigation is warranted. Any such hazards that were encountered would be removed in accordance with all applicable public health requirements." If the site was used for agricultural, cattle ranching or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- 17) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields,

Mr. Jim Morrissey, AICP
December 26, 2007
Page 5

or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

- 18) In future CEQA documents please provide complete contact information, including contact person information, title, contact fax and e-mail address, and agency web address which contains the project information. Also, if the project title changes, please provide historical project title(s).

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, preferably at email: thom@dtsc.ca.gov. Her office number is (714) 484-5477 and fax at (714) 484-5438.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
gmoskat@dtsc.ca.gov

CEQA#1967



California Regional Water Quality Control Board Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

December 24, 2007

Jim Morrissey
City of Yucaipa Community Development Dept.
34272 Yucaipa Boulevard
Yucaipa, CA 92399

RECEIVED
DEC 28 2007
City of Yucaipa
PLANNING DIVISION

NOTICE OF PREPARATION FOR DRAFT ENVIRONMENTAL IMPACT REPORT, ROBINSON RANCH RESIDENTIAL PROJECT, CITY OF YUCAIPA, SCH# 2007111104

Dear Mr. Morrissey:

Staff of the Regional Water Quality Control Board, Santa Ana Region (RWQCB), have reviewed the City of Yucaipa's Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the proposed Robinson Ranch residential project (project).

The project would comprise approximately 522 acres divided among three separate planning areas adjacent to Interstate 10 (I-10), including floodplains adjacent to I-10 in Live Oak Canyon along Yucaipa Creek /Live Oak Canyon Creek. Three Preliminary Development Plans would be generated, although the NOP map and text indicate what may be considered to be four planning areas. A total of 4,159 multiple and single-family dwellings would be distributed among 336 of the 522 acres, as well as general commercial use on 109 acres, business park use on 28 acres, and natural open space use on 49 acres.

We believe that the DEIR should incorporate the following comments to assure that water quality standards of surface and groundwater of the project area are protected. Water quality standards, that is, water quality objectives and beneficial uses specified for various water bodies in the Santa Ana Region, are contained in the Water Quality Control Plan for the Santa Ana River Basin (Region 8 Basin Plan).

1. Project construction and post-construction flows are expected to directly and indirectly impact numerous drainages (and their beneficial uses) that are tributary to Yucaipa Creek¹. The intermittent beneficial uses of Yucaipa Creek and its tributaries listed in the Region 8 Basin Plan are Municipal Supply (MUN), Groundwater Recharge (GWR), Water Contact Recreation (REC1), Non-Contact Water Recreation (REC2), Warm Freshwater Habitat (WARM), and Wildlife Habitat (WILD). The Region 8 Basin Plan specifies the following water quality objectives for Yucaipa Creek: 290 mg/l for total dissolved solids, 175 mg/l for hardness, 60 mg/l for both sodium and chloride, 6 mg/l for total inorganic nitrogen, 45 mg/l for sulfate, and 15 mg/l for chemical oxygen demand. The above-

¹ The U.S. Geological Survey "Yucaipa, California" quadrangle map shows Oak Glen Creek as being tributary to Yucaipa Ck.; unnamed tributaries to Yucaipa Ck. shown on the quad. map include what are locally known as Wilson Creek, Wildwood Creek, and Live Oak Canyon Creek,

Mr. Jim Morrissey

referenced water quality standards could be degraded by the cumulative runoff from the impervious surfaces, including roads and structures, to be constructed in all planning areas. If not properly managed, development-related changes in runoff flow rates and velocities could lead to further undesirable hydromodification of channels downstream from the project site. The NOP apparently recognizes this. The DEIR should report and evaluate the findings of the proposed drainage study, and identify appropriate mitigation to address water quality concerns and hydrology issues. The DEIR should also consider the extent to which the proposed project can control or reverse existing hydrologic conditions of concern that may continue to cause hydromodification/channel modification, instream or riparian-related vegetative loss, or streambank erosion on the project site.

The DEIR must include an alternatives analysis for other versions of the project; the NOP mentioned that the DEIR would include "Reduced Intensity Alternatives." The alternatives analysis should select an "environmentally superior alternative" that provides the maximum avoidance of water-quality and riparian-habitat issues, is easily sewerable, and which results in the lowest potential to cause or contribute to violations of water quality standards.

The DEIR should discuss the cumulative, growth inducing impacts that this project has the potential to contribute to, and identify appropriate mitigation strategies and the agencies responsible for implementing them. In general, lower density (or clustered, high density) residential development projects result in more effective control over discharges of non-point source pollutants, lower pollutant loadings on receiving waters, and better protection of water quality standards. We favor alternatives that incorporate the principles of Low-Impact Development (LID), including the opportunities for stormwater retention and infiltration, preserving open space, and reducing development footprints. LID makes use of project-level features to manage urban runoff quantity and quality, while conserving water. LID is among the Ahwahnee Water Principles for Resource Efficient Land Use (attachment), adopted in 2005 by the Local Government Commission to incorporate management of stormwater and other non-point source runoff from compact urban developments into general plans. These "community" and "implementation" principles are intended to reverse the trend of increasingly paved and constructed areas that alter the rate and volumes of surface water runoff and groundwater recharge (see www.lgc.org). SWRCB management has expressed support of the Ahwahnee principles and LID as useful to address its major goals and objectives.

2. Pg. 10 of the NOP identifies Southern Riparian Forest in the northern planning areas, and overall, it suggests potential conflict with City General Plan management goals for areas of biotic significance in drainage courses where Southern Riparian Forest is found. Impacts to Southern Riparian Forest habitat that support the Basin Plan's WILD beneficial use may cause a violation of water quality standards. The violation of water quality standards is a significant impact under CEQA. Therefore, impacts that affect resources supporting the WILD beneficial use should be avoided, minimized, and/or mitigated in a manner that is acceptable to relevant Responsible Agencies. Every reasonable effort must be made to avoid impacts to waters of the United States and the state (surface waters or tributaries thereto, as well as ephemeral drainages). Impacts to waters of the U.S. and state that are unavoidable must be minimized. For example, the

DEIR should favor project features that protect the WILD beneficial use of natural drainage courses, including riparian wildlife corridors, by minimizing the number of subsurface utility crossings through the drainage(s), and specifying that all road crossings over drainages take the form of bridges or arched, open-bottomed culverts so as to provide movement corridors to terrestrial wildlife. The California Department of Fish and Game may require a Streambed Alteration Permit for the project.

3. Where impacts to waters of the United States and the state are unavoidable, mitigation must replace the full function and value of the beneficial uses that existed prior to impact. This project appears to result in excavation of ("dredging"), and placement of fill into waters of the United States. Therefore, the DEIR should report whether this project falls within the jurisdiction of the United States Army Corps of Engineers and requires their issuance of a Clean Water Act Section 404 permit. If so, the DEIR should direct the applicant to promptly apply to the Regional Board for the requisite Section 401 Water Quality Certification (Certification) that construction and operation of the project will not adversely affect water quality standards. Since both Section 404 permits and Certification may require mitigation, the applicant should engage in early consultation with USACOE and Regional Board staff to identify likely impacts to water quality and appropriate mitigation for identified impacts, so that these mitigation obligations can be included in the DEIR.

Information concerning Section 401 Certification can be found at the Regional Board's website, www.swrcb.ca.gov/rwqcb8/html/401.html. Where the USACOE finds that a water body does not fall under their jurisdiction, the Regional Board may still determine that waste discharge requirements are necessary for protection of waters of the state.

Board staff encourages mitigation through localized mitigation banking that targets protection, enhancement, and restoration of wetlands and waterways and associated riparian habitat.

4. Best Management Practices (BMP) utilized on projects receiving a Certification must meet Best Available Technology (BAT) standards that may go beyond BMPs typically needed to comply with: 1) the State Water Resources Control Board's Water Quality Order No. 99-08-DWQ, "General Permit for Storm Water Discharges Associated with Construction Activity"² and, 2) the San Bernardino County Stormwater Program's Model Water Quality Management Plan (WQMP) Guidance³, a requirement of Regional Water Quality Control Board Order No. R8-2002-0012 (NPDES Permit No. CAS618036), Waste Discharge Requirements for San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region Area-Wide Urban Storm Water Runoff, also known as the San Bernardino County municipal separate storm sewer system, or "San Bernardino County MS4" permit. The DEIR should reflect that the project must conform to the Water Quality Management Plan (WQMP) guidance of the San Bernardino County Stormwater Program by implementing a variety of structural and non-structural BMPs controlling pollutants from both point and non-point sources.

² <http://www.swrcb.ca.gov/stormwtr/construction.html>

³ <http://www.waterboards.ca.gov/santaana/sbpermit/WQMPGuide60905.pdf>

December 24, 2007

- 4 -

Mr. Jim Morrissey

If you have any questions, please call Glenn Robertson at (951) 782-3259, or me at (951) 782-3234.

Sincerely,

Glenn Robertson, for

Mark G. Adelson, Chief
Regional Planning Programs Section

Attachment: Ahwahnee Principles (2 pages)

cc w/attach: State Clearinghouse
U.S. Army Corps of Engineers, Los Angeles – Jason Lambert
U.S. Fish and Wildlife Service, Carlsbad – Doreen Stadlander
California Department of Fish and Game, Ontario – Robin Maloney-Rames
Yucaipa Valley Water District – Joe Zoba

X:Groberts on Magnolia/Data/CEQA/CEQA Responses/ DEIR – City of Yucaipa – Robinson Ranch.doc

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
www.nahc.ca.gov
 ds_nahc@pacbell.net



RECEIVED

November 28, 2007

DEC 03 2007

Mr. Jim Morrissey, AICP

CITY OF YUCAIPA COMMUNITY DEVELOPMENT DEPARTMENT

City of Yucaipa
PLANNING DIVISION

34272 Yucaipa Boulevard
 Yucaipa, CA 92399

Re: SCH# 2007111104: CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for the Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA and 05-203/PDP/GPA); City of Yudaipa; San Bernardino County, California

Dear Mr. Morrissey:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state agency designated for the protection of California's Native American cultural resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE),' and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the 'Information Center' nearest you is available from the State Office of Historic Preservation in Sacramento (916/653-7278). The record search will determine:
 - If a part or the entire (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
 - * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have information on cultural resources in or near the APE. Please provide us site identification as follows: USGS 7.5-minute quadrangle citation with name, township, range and section. This will assist us with the SLF.
 - Also, we recommend that you contact the Native American contacts on the attached list to get their input on the effect of potential project (e.g. APE) impact. In many cases a culturally-affiliated Native American tribe or person will be the only source of information about the existence of a cultural resource.
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

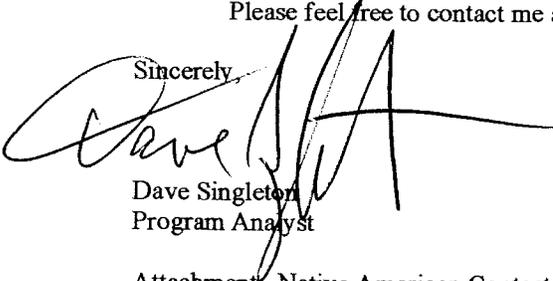
√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigations plans.

- CEQA Guidelines §15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the Initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American groups, identified by the NAHE, to ensure the appropriate and dignified treatment of Native American human remains and any associated grave goods.
- Health and Safety Code §7050.5, Public Resources Code §5097.98 and CEQA Guidelines §15064.5(d) mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in CEQA Guidelines §15370 when significant cultural resources are discovered during the course of project planning or execution.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", written over a horizontal line.

Dave Singleton
Program Analyst

Attachment: Native American Contact List

Cc: State Clearinghouse

**Native American Contacts
San Bernardino County
November 28, 2007**

Cahuilla Band of Indians
Anthony Madrigal, Jr., Interim-Chairperson
P.O. Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
(951) 763-2631

(951) 763-2632 Fax

Ramona Band of Mission Indians
Joseph Hamilton, vice chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105

(951) 763-4325 Fax

San Manuel Band of Mission Indians
Henry Duro, Chairperson
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Morongo Band of Mission Indians
Britt W. Wilson, Cultural Resources-Project Manager
49750 Seminole Drive Cahuilla
Cabazon , CA 92230 Serrano
britt_wilson@morongo.org
(951) 755-5206
(951) 755-5200/323-0822-cell
(951) 922-8146 Fax

San Manuel Band of Mission Indians
Ann Brierty, Environmental Department
101 Pure Water Lane Serrano
Highland , CA 92346
abrierty@sanmanuel-nsn.gov
(909) 863-5899 EXT-4321

(909) 862-5152 Fax

Serrano Nation of Indians
Goldie Walker
6588 Valaria Drive Serrano
Highland , CA 92346
(909) 862-9883

Cahuilla Band of Indians
Maurice Chacon, Cultural Resources
P.O. Box 391760 Cahuilla
Anza , CA 92539
cbandodian@aol.com
(951) 763-2631

(951) 763-2632 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007111104; CEQA Notice of Preparation (NOP) Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA and 05-203/PDP/GPA and draft Environmental Impact Report (DEIR); City of Yucaipa; San Bernardino County, California.

HILLCREST MOBILE ESTATES

33600 Calimesa Boulevard
Yucaipa, California 92399
(909)795-4112

RECEIVED

DEC 20 2007

City of Yucaipa
PLANNING DIVISION

Yucaipa City Council
Jim Morrissey, Contract Planner
34272 Yucaipa Boulevard
Yucaipa, California 92399

Re: Robinson Properties, LLP

Case Numbers: 04-174/pdp/gpa; 04-175/pdp/gpa; 05-203/pdp/gpa

Comment Letter

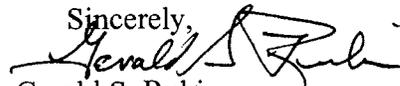
Dear Mr. Morrissey,

I am writing you in regards to the above-referenced case numbers and attendant proposals, with respect to the environmental impact their implementation would have on the surrounding area and the city. As you may know, our mobile home park is adjacent to the subject properties, and would therefore be directly affected by these projects. Therefore, in support of, and in addition to the comments offered at the city council meeting of December 13, 2007, of which I was in attendance, I would like to take this opportunity to provide additional commentary regarding the proposed zoning and construction.

1. Density: There is no need to have the affordable housing include such a high ratio for the residential density. My property, and the homes thereon, constitute affordable housing, and is only at half the proposed density.
2. Water: Water is not available for the proposed number of residents. The cost of supplying potable water would be an extreme hardship upon the city. The additional water usage, I fear, would lower the water table in the area, as well as influence the available water in our park, where we have a providing well.
3. Pollution: Topographically, our hillside is such that it does not provide for economic development of property adjacent to us.
4. Freeway: The proposals identify significant residential projects abutting the freeway. Placing residential units that close to a freeway will create an environment of excessive noise and smog pollution to those residents.
5. Drainage: The plans do not provide for adequate drainage systems. The present plans would not necessarily include significant drainage through and around our property.

6. Streets; One plan provides for a freeway turnoff at Wildwood Road, while the others do not. The plans fail to address the additional streets necessary to accommodate the projects, and the attendant streetlights, congestion, and traffic.
7. Prices: The projects' plans appear disingenuous, in that the development of the property for its proposed uses are inconsistent with the surrounding areas, and the limitations of the environment. It would appear that the request for zoning is aimed at attaining higher values for the properties' sale, and not for its actual development.

If you have any questions regarding the foregoing comments, please contact me at your convenience.

Sincerely,

Gerald S. Rubin

RICHARD EVANS

From: "RICHARD EVANS" <richmars2@verizon.net>
To: <jmorrissett@yucaipa.org>; <jmcmains@yucaipa.org>
Cc: "Richard Evans" <richmars2@verizon.net>
Sent: Wednesday, December 19, 2007 2:40 PM
Subject: Opposition to ROBINSON RANCH PROJECTS

RECEIVED

DEC 19 2007

Dear Sirs,

I was in attendance at the public meeting on December 13, 2007 at the Yucaipa City Hall chambers at 6:30 p.m. concerning the proposals that the Robinson Ranch group is putting forth. The one thing that stood out the most in that meeting was that everyone who spoke were unanimous in their opposition to ALL the proposed projects.

City of Yucaipa
PLANNING DIVISION

As a matter of public record, I, Richard Evans, am in agreement with all of the opposition that has come forth! Most of my feelings echo the same concerns that have already been stated in that public meeting.

Years ago I was the citizen who circulated petitions concerning the reclassification of the zone that now has the project of Wildwood Canyon Country Estates built upon it. Those sites are R1-20,000 square foot sites, and are an asset to the city of Yucaipa. You should know that if the developer of that project could do it, the Robinson family can do the same for their projects. It is insulting to the current population when you bring projects to the city that propose almost 11 units per acre, when most of your adjoining neighbors have already built at 2 units per acre! In the days of my efforts, I was surprised at the unanimous support to reclassify my zone to minimum half acre sites. In those days it took approx. 400 signatures from my zone's concerned occupants.

What is manifested most is the repetitive GREED of the Robison family with these absurd multiple proposals that offend and continue to violate the current population in and around the areas that will be negatively impacted.

The proposals of thousands of multi-family units and very low income units needs to be removed from this current proposals, as well as any future proposals.

The key points to my oppositions are:

- 1) Unit density 4 times to high
- 2) Infrastructure is not there, or even close.
- 3) Freeway system has not been upgraded to accommodate projects
- 4) Existing water wells and overall supply will suffer and not support project.
- 5) Noise standards will become intolerable with increased population
- 6) Natural ecosystem will suffer
- 7) Drainage will negatively impact many areas downstream
- 8) Police, Fire, and Crime control are non-existent
- 9) Multi-family and very low income should be excluded from these projects, and placed in other areas of the city that currently support all phases of living.

12/19/2007

- 10) Current sewer facilities will be stressed beyond their limits
- 11) I-10 Fwy corridor will suffer in every way
- 12) Natural hillsides will become a complete thing of the past
- 13) Living in the country type lifestyle will vaporize
- 14) Very low income units and multi-family units are proposed to be placed right next to existing homes valued for as much as \$1,000,000.

My personal opposition comes to you in this order, Wildwood Center, Oak Ridge North, Wildwood Ranch, and West Oak Center. I should say though that I don't see much difference in any of these projects

I have reviewed all 3 binders on file with the City of Yucaipa related to the Environmental Impact Report and strongly suggest that these projects be rejected by the city, and again if necessary, by the voters of Yucaipa. Let the Robinisons pick up the tab.

Thanks for your time,

Richard L. Evans
12891 8TH ST.
Yucaipa, Ca. 92399

11050 Bryant St., #8
Yucaipa, CA 92399
December 14, 2006

City Planning Division
Yucaipa City Hall
34272 Yucaipa Blvd.
Yucaipa, CA 92399

RECEIVED

DEC 18 2007

City of Yucaipa
PLANNING DIVISION

Dear Planning Division:

Please, **PLEASE**, listen to the cries of the people who live here, and love it. You must not approve the gross development of more than 4000 residences, and the commercial facilities that would go along with it.

It is so difficult to protect any vacant land, but it is what Yucaipa is still all about. We **need** the hills, and the fields, and not the congestion of traffic, and the total change of atmosphere, in what we feel is OUR Yucaipa. Don't destroy it, and the Robinson Ranch (HA, that's a laugh, call it Robinson Slum---NO RANCH is left.), would be the worst possible place to live, in or near. Please consider what that enormous development would do, and how many would try to move away from Yucaipa if it is approved as presented. Oh, that is not "development" it is **destruction**.

We agree with every person who has said, **NO**.

Sincerely,



Eleanor and Ralph Meyering

11971 Douglas Street
Yucaipa, California, 92399

December 14, 2007

To: The members of the Planning Commission:

Regarding: The Robinson Properties, LLP proposal to build 4,159 new dwelling units in addition to 109 acres of commercial and 28 acres of business park construction in Yucaipa, totaling 522 acres.

Most, if not all of us chose to move here, chose to call this place our home because of the beautiful land and our proximity to the wild spaces and animals and flora for which other communities can now only envy us. Even the Indians that once crossed this land chose this very place to call their home. We do not have to wonder why. The flora and fauna and diversity of this land in *their* time were plentiful.

However, a project of this magnitude will obliterate what remains of the existing natural landscape in the proposed area, to say nothing of the water and road systems it will overburden. Our community already supports and has expansion plans to add plenty thousands of additional units in this area, based in part on the work achieved by the Freeway Corridor Development Committee, of which I was a member.

You, as members of the City Planning Commission, have already reviewed and City Council approved *Plan A* from that ad hoc committee. I feel strongly that the density of this new iteration will upset the balance of the already approved plan, which included some preservation of the natural hillside and the restoration of trails that were designed to allow hikers and horsemen alike to pass peacefully through the area.

I hope you will agree with me that the dwindling natural resources in our city should be protected wherever possible. I ask you to remember that once *lost* to us, these resources can not be retrieved or returned. Supporting a project of this size will have significant negative impacts on our remaining natural resources. I ask you to stand up for and protect what still remains. It is still in our power – in **your** power – to do so.

It is time to start preserving our natural land and other resources. Please say no to the Robinson's newest request for approval of a project that will frame the entrance to our city. Instead, task them to offer you a plan that preserves more of this precious place that is *our* Yucaipa.

Thank you,

KT Gates-Waldrup

Member, Trail and Open Space Committee and proud citizen of Yucaipa

Robert Cutshaw 31665 Highview Drive
PO Box 1171
Redlands, Ca. 92373

December 14, 2007

Yucaipa City Hall
Attn: Jim Morrissy
34272 Yucaipa Blvd
Yucaipa, Ca.

RECEIVED

DEC 18 2007

City of Yucaipa
PLANNING DEPARTMENT

Dear Sirs;

I recently learned of the intent of some outside business people proposing the development of the Robinson Ranch Project and attended the meeting in the Yucaipa City Council chambers on Dec 13th. I reside in Redlands, very close to what would be the West Oak Center portion of the proposed project. We have lived here since 1962.

My family is decidedly opposed to this project for reasons that follow:

1. The increase in traffic would progress to an even more unmanageable state. One can hardly get on the local freeway without sitting in stop and go traffic. Live Oak and Oak Glen Road are already a disaster, especially at commuting times.
2. The crime factor would rise dramatically considering the 339 low income housing units they propose. I didn't even hear anything at the meeting about the other very low income units reported in the papers previously. Must I point out our neighboring community of Moreno Valley?
3. The ascetics of the area would simply be eliminated. What we don't want are thousands more tile roofs and salmon colored paint schemes, exhibiting no distinctive styling to distinguish one from another, with maybe six feet between them. What a wonderful glorious view that would give me. We have already removed almost all of the natural beauty of Southern California. These greedy people wish to take yet another chunk.
4. The twenty acres spelled out for commercial would not only be used for residents of this project but would also bring in extra confusion and traffic from other areas and the freeway.
5. Water is already at a premium all throughout the southland. Where do they propose to get the extra resources. I already am getting gouged an extra \$20 per billing cycle for the addition of the new 2 million gallon water tank to be erected by Western Heights Water Co. I get to pay this extra fee for the benefit of further residents. This hardly seems fair. The long time home owners are always the ones that pay the penalty.
6. The Quality of Life would be even more lessened. My wife and I used to flitter all over to enjoying the fruits of Southern California living. Now we hesitate to

December 14, 2007

Page 2

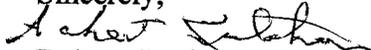
venture out of Redlands, and then only on surface streets because of the tremendous traffic problems. Some quality of life!

As ex-major of Redlands Bill Cunningham said "This project is completely out of scale". I couldn't agree more. A project of this magnitude belongs more towards downtown Yucaipa, not in the still rural areas. I am sure if this proceeds other large scale projects would be in the pipeline and soon we would look just like Temecula.

I cannot believe the greed of these land developers. They care nothing about the former residents of Yucaipa and Redlands, only in the bottom dollar for them and that is to make as much money as possible, expending as little as needed. This happens far too often these days. These developers don't even put up single level homes anymore. There is so much more money to be made off of two story units, twice the money for half the acreage. Even more lucrative profits can be made by erecting unsightly apartments or townhouses or whatever they choose to call them. After these bandits spoil the lands they retire to a nice secluded resort area to leave us with the result of their greed.

Again, my family is very opposed to this project.

Sincerely,



Robert Cutshaw

December 13, 2007

Jim Morrisey
City of Yucaipa
34272 Yucaipa Blvd.
Yucaipa, CA 92399

Re: Robinson Ranch Proposal

Dear Mr. Morrisey,

The Robinsons are long-time residents of Yucaipa who own extremely valuable land. They have been here before Yucaipa was a city, through the incorporation process, and through the Measure O process. Then the Robinsons and many other property owners took part in the I-10 Corridor Specific Plan process which took many months. At the conclusion of the I-10 Corridor process, the Robinson property was given various designations that would allow for thoughtful build-out without endangering various environmental concerns and would still provide them with a sizeable income.

This Robinson's new plan not only causes untold concerns for traffic and pollution with at least 30,000 to 36,000 additional car trips per day as well visual pollution with the numerous multi-story buildings to house the 16 or more units per acre. This project has the potential to bring in an additional 14,000+ people, bringing our population almost to the projected build-out, and excluding the rest of the projected population for the I-10 Corridor.. And the low-income housing – totally away from the city center. We'll also have total impaction at our schools with at least another 5,000 children in our schools. Where are the school sites on the Specific Plan to teach this many children? Also impacted will be our flood control channels with at least hundreds of additional residential roofs, patios, driveways, streets, parking lots and other impermeables at the industrial and commercial areas possibly contributing to flooding. What are the Robinsons thinking?!

The Robinson Plan is a slap in the face for many people, residents and city staff alike, who spent so many months involved in the I-10 Corridor Specific Plan process. This project only speaks of unmitigated, unforgiveable greed at everyone else's expense. We can only hope the Planning Commission and City Council members will remember Measure O, all the letters against this new plan, and all the voices which were raised tonight and give a resounding "no" to this or any other plan which doesn't fall within the realm of the I-10 Corridor Specific Plan.

Thank you.



Anne C. and Ray Birge
34328 Yucaipa Blvd, Suite E-302,
Yucaipa, CA 92399-2474

December 13, 2007

City of Yucaipa
34272 Yucaipa Blvd
Yucaipa, CA 92399

Ref: Robinson Property LLP - Public Scoping Meeting Dec. 13, 2007

Attn: Planning Division

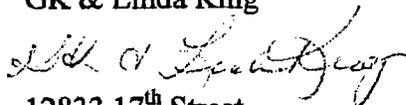
We wish to express our opposition to the Robinson LLP project. It will be very destructive and detrimental to the environment of the entire area. To those of us who live in the area adjacent to this project, we will certainly have to bear the burden of all the negative effects it will bring.

Our neighborhood is rural with single family homes on large parcels. We have already been impacted greatly by heavy traffic due to the expansive growth in the area in recent years. To allow the beautiful open spaces of the Robinson property to be developed with a project of dense multi-family dwellings and huge volume commercial buildings is not consistent with our area. This massive project will bring traffic congestion, crime, devaluation of our property values, as well as many other problems associated with a project of this type, size and density. It most assuredly will greatly effect the infrastructure of the area and the services that need to be provided. How will all of this be managed and not be passed on to existing property owners? Once a project of this enormity is in place, the environmental burden to all is forever.

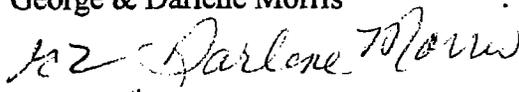
To impose a project of this magnitude upon our community, as well as to those of us living in such close proximity to it is irresponsible. The community and individual homeowners should not have to bear the consequences of poor decisions with respect to this massive unsightly proposed project.

Thank you for your time regarding our comments.

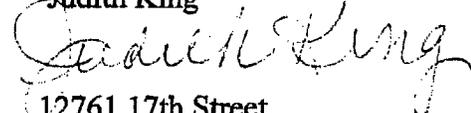
GK & Linda King


12833 17th Street
Redlands, CA 92373

George & Darlene Morris


12835 17th Street
Redlands, CA 92373

Judith King


12761 17th Street
Redlands, CA 92373

Citizens of Redlands for Redlands
PO Box 7799
Redlands, CA 92375

City of Yucaipa
Planning Division
34272 Yucaipa Blvd.
Yucaipa, CA 92399

Re: Proposed Development of Robinson Ranch

December 13, 2007

Dear Sir or Madam:

As a grassroots group in Redlands who fought hard to preserve the current agricultural zoning in the Live Oak Canyon area, we ask you not to approve the Robinson Ranch development. Furthermore, we ask you to consider the following potentially damaging and disastrous environmental impacts of the Robinson Ranch proposal on our canyon area.

First, the proposed area has historically been agricultural with prime agricultural and grazing land. The surrounding areas in Redlands are zoned for agriculture activities and are designated resource preservation/conservation areas; these should be preserved. Agriculture is a vital business that is very important to America's future. If the current land owner(s) are not interested in pursuing an agricultural business then they are free to sell their land, but have no right to change the historic and current land use of the properties for their own financial greed. Agricultural land has been fast disappearing in Southern California and in the future will be a prized commodity. Changing the zoning is short sighted. The intersection of the proposed site offers a beautiful and pastoral entrance into Yucaipa and Redlands which is something to be proud of and preserved.

Yucaipa's current center of commerce appears to be located along Yucaipa Boulevard. Isn't it better to draw more people into your current center of commerce. Locating your big box retail centers along your main area of commerce makes much more sense than to draw commerce away. The current project will destroy what commerce Yucaipa has achieved to date with a net potential effect of a financial loss to the city.

The potential environmental impacts of the proposed project are many. The traffic, noise and air pollution are major concerns. There is a tremendous movement in this world, country and state to reduce green house gas emissions. Destroying agricultural land to put in more traffic from high density apartments and commercial areas will definitely increase exhaust emissions, clog our freeways and side streets. The noise and light pollution will increase too. **Please conduct a traffic study of the increased traffic impact on side streets in Redlands, Yucaipa, freeways and surrounding roads. We further ask for a complete study and projection of noise, lights and air pollution for the proposed project.**

The drainage from the proposed project will have devastating effects to the creek that runs through Live Oak Canyon and all land in our valley. Consider the change from agriculture land that can absorb the water versus paving over the prime eg land for impermeable concrete. The effects are numerous. Furthermore, the run off of building materials, buildings and toxic by products and associated waste of humans and cars which will drain into our water shed. **Please study the pollution effects to our watershed and the water drainage issues.**

Does Yucaipa really need more housing and low income housing? Currently, the housing market has produced an excess of housing with plummeting prices. The Wall Street Journal has rated this area as 30% overvalued—we haven't seen the bottom of the housing market yet. Yucaipa is not an urban area why would you allow someone to build potential slums on productive agricultural land.

Why not consider working with local, state and federal agencies to preserve this area as an agricultural preserve and / or park for the future? If you want low income housing why not preserve 5 acre parcels with low income houses so people can pursue agricultural endeavors at a low cost? Small Hobby farms are a trend across the country. The cost to the city of Yucaipa will be much less with 1 house per 5 acres versus 4000 apartments. **Please study the environmental effect of the carbon footprint of the proposed project versus the current land use.**

The proposed project is devastating to habitats. This area is a wildlife corridor. **Please consider the plant and animal habitats in this area.**

Remember Redlands has designated the surrounding areas around the project with agricultural zoning and resource preservation areas. It would be reckless for Yucaipa to approve the proposed project. Yucaipa has a tremendous agricultural resource and asset by keeping this area zoned agricultural. After all, every person on this planet needs to eat and the trend is going toward local produce and grass fed beef. Keep the zoning and you preserve a valuable resource. Look at how Napa Valley has capitalized on the agriculture and turned agriculture into millions of dollars for the area through tourism. Yucaipa could be the next Napa Valley by preserving the agriculture land and use.

Thank you for considering our comments and including our concerns in the Environmental Impact Review.

Sincerely,



The Citizens of Redlands for Redlands
Amanda Frye, Chairman
Helen Waitz, Treasurer

Redlands Residents for Rural Living

13202 Bruder Ln.
Redlands, Ca. 92373

December 13, 2007

John McMains
Director of Community Development
City of Yucaipa
34272 Yucaipa Blvd.
Yucaipa, Ca. 92399

Dear Sir or Madam:

As the co-chairman of the Redlands Residents for Rural Living and a representative of the Redlands Conservancy, I wish to take this earliest opportunity to comment on the Robinson Ranch project.

After reading the extent of the proposed project and the initial study, we feel that a project of such concentrated density on the rural fringes of both Yucaipa and Redlands could cause irreparable damage to both communities. This assessment appears to be shared by your planning department staff as, of the eighty-five areas of concern in the initial study, fifty were checked as being the highest level of negative impacts.

There are numerous concerns for Redlands connected to this project, drainage, traffic, and the real possibility of Redlands police and fire departments being increasingly asked to respond outside the city.

Of particular concern to both the Redlands Conservancy and the Redlands Residents for Rural Living is the growth inducing nature of this project. Our organizations and residents have fought long, hard and successfully in both the courts and on the ballot to save our resource preservation zoning. If memory serves, the citizens of Yucaipa prevailed against a Robinson development some time ago thru the initiative process. The Robinson Ranch project provides no transition whatsoever between their intense development and Redlands one house per five acre, rural zoning.

Yucaipa and Redlands share the kinship of small town neighbors. The residents of both communities deeply value the diversity of life styles, unique character, and health benefits provided by our fast disappearing, agricultural and natural open areas.

We would ask that you give this project your full consideration and not amend your general plan for the benefit of this development.

Thank you for your consideration.

Caroline Laymon

Former Planning Commissioner, City of Redlands

Thursday, December 13, 2007 at 6:30 P.M.
Response to Notice of Preparation/Public Scoping Meeting

Project Title: Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA)

PROPOSAL: The proposed project includes three (3) individual Preliminary Development Plans for a cumulative total of 4,159 multiple-family and single-family dwelling units on 335.8 acres (including 339 very-low income units), 109 acres of commercial uses, 28 acres of business-park uses, and 49.2 acres of natural open space; with three (3) corresponding General Plan Amendments for each planning area to adopt the Official Land Use Plan for that area.

LOCATION: The project area includes 522 mostly vacant acres that generally extend westerly 2,000 ft. from Live Oak Canyon Road on the south side of the I-10 Freeway; westerly 3,000 ft from the I-10 Freeway, north of County Line Road, and easterly 3,000 ft, from Oak Glen Road, north of the I-10 Freeway and South of Colorado Street.

To Whom It May Concern:

Although the Initial Study has done an excellent job identifying most of the Potentially Significant Impacts, we would hope the following would also be addressed:

On page 3, under West Oak Center:

North - The General Plan designation (City of Redlands) Resource Preservation is zoned RRA - 1 house per acre. The area west has no Yucaipa residential (which is shown on the chart as RM-10M - Multiple Residential, 10,000 sq. ft. min. lot size). This area is Resource Preservation (City of Redlands) zoned A-1 - Agricultural District 5 acres.*

2) AGRICULTURE RESOURCES:

Please refer to the above mentioned corrected adjacent land use zones for the property which contradicts the findings of less than significant impacts.

Item 2a) *This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS*

Converting A-1 Agricultural Farmland and Grazing land should be the basis for additional analysis of significant impacts. A portion of the West Oak Center along Live Oak Canyon Road and Outer Highway South is designated "Prime Farmland" and Robinson Ranch North has Agricultural Preserve.

4) BIOLOGICAL RESOURCES.

d) In addition to what you have identified, there are active wildlife corridors on the project sites. The animals travel under I10 at Wilson Creek (probably Wildwood Creek as well).

The migratory birds and animals move from area to area depending on the habitat types: coastal sage, buckwheat, grassland, four-wing saltbush, coast live oak woodland, mule fat scrub, stands of laurel sumac and Mexican elderberry and other vegetation, etc. These habitats provide habitat for federal and state candidates, sensitive, or special status species including: Plummer's mariposa lily, slender-horned spine flower, Hall's monardella, San Bernardino kangaroo rat, Stephens's kangaroo rat, northwest San Diego pocket mouse, southern California rufous-crowned sparrow, southwestern willow flycatcher, least Bell's vireo, coastal California gnatcatcher, coast (San Diego) horned lizard, and orange-throated whiptail. This development will interfere with local wildlife movement by converting suitable habitat to urban use.

*Resource Preservation as stated in the City of Redlands General Plan.

"The Resource Preservation designation limits uses in areas which possess a unique character and fragile ecology which are prime resources for water conservation, wildlife preservation, open space recreation and agriculture. Preservation of such lands is essential to the health, safety and welfare of the community."

6) GEOLOGY AND SOILS.

a) (iii) Seismic-related ground failure, including liquefaction?

The status of this area as Alluvial flood plain suggests that at different periods the groundwater height has been higher than the 50 ft and the estimate of 100 is only temporary. Investigation of West Oak Center and Wildwood Ranch sites is essential. There is potential for landslides and liquefaction to occur.

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS

8) HYDROLOGY AND WATER QUALITY.

a), b), c), d), f) *It is important to understand that all the properties West of the West Oak Center are on wells and it is essential that their groundwater does not drop or become contaminated. With the tremendous amount of grading followed by the enormous amount of impervious surfaces, the guesstimates of runoff, siltation, etc. could prove to be disastrous. Hopefully, the errors will be on the side of caution!*

Concrete channelization must be avoided due to the wildlife corridors as well as the effect of acceleration of water flows. Concrete channelization components are not acceptable design elements in this area and extensive legal actions have set a precedent in this region for natural streamcourse protection. The project needs to incorporate soft bottom channel designs that complement the open space opportunity for this important wildlife corridor and very hazardous, alluvial flood zone.

Increased water consumption will deplete groundwater supplies. The increased amount of impervious surfaces will decrease groundwater recharge.

Both Yucaipa Water District and Western Heights Water Company are in over draft. Both agencies are proposing the use of State Water through the State Water Project. With the proposed one-third cutback in Southern California State Water for next year, one would think this dependency unwise.

9) LAND USE

There is no visible effort to buffer the agricultural lands (25 feet of open space is totally inappropriate) or the RRA (1 acre home sites) west and north of the West Oak Center site. It is essential that this be adequately addressed.

12. POPULATION AND HOUSING.

These developments are growth inducing.

13. PUBLIC SERVICES.

The impacts on Police, Fire, Schools, Parks and Other Facilities are monumental. Unfortunately school fees will not adequately address the problems created. Police and Fire fees will not pay for the needed stations. How will these expenses be covered?

Police and Fire response times will be inadequate if new facilities are not provided on site by the developer.

14. TRANSPORTATION

The traffic impacts from each of these proposals will be difficult to mitigate. Outer Highway 10 is currently two lanes. In order to widen it (and it will need widening), property will need to be acquired - at whose expense? Widening will be necessary from Yucaipa Blvd. to Live Oak Canyon if West Oak Center is approved. Level of Service will also be difficult to mitigate.

16. UTILITIES AND SERVICE SYSTEMS.

With the intensity of these developments, will the generated wastewater exceed the wastewater facilities capacity? If not, who will have to pay for the expansion of said facility?

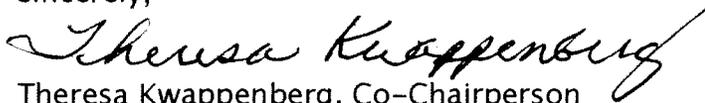
The densities for all three sites are far too great. These projects are in the rural areas of Yucaipa and adjacent to the rural areas of Redlands and Calimesa. The low income housing being

encouraged by the State of California is to be located as infill in urban areas. These sites are not infill and the sites are not urban. These sites are not located near public transportation or other needed services for walking accessibility.

The Open Space for all three sites is inadequate.

We look forward to the EIR. Please put us on your mailing list.

Sincerely,

A handwritten signature in black ink that reads "Theresa Kwappenberg". The signature is written in a cursive style with a long, sweeping underline.

Theresa Kwappenberg, Co-Chairperson
Redlands Residents for Rural Living
31265 Freya Drive
Redlands, CA 92373

Hello

This is Robert Smith at 33315 Colo. St.
(the South-East corner of Colo & 10th).

I attended the Dec. 13th meeting and realized I am better of writing my concerns than I am expressing them in Public.

What I realized at the meeting was a 100% disapproval of the Robinson project. I realize we must allow the Robinsons to develop their property. I would only hope that the happiness of the majority will outweigh the greed of a few. Please allow the least amount of density in this area and save our foothills and rural fill. Maybe a low impact plan will save our roads from gridlock.

My one other concern was my property. I was told by city people that there may be a road going along side my property. I know you are still in the planning stages and have made no decisions. I fill there are many ways to enter this project without destroying my way of life. Putting a road by my home would leave me with a skinny lot where car traffic and the many new people walking would be right at my back door. Please let us welcome a low density project that does not destroy our way of life. I know you heard the concerns of the people and will do the right thing.

Thank You

Robert M. Smith
705-2007

December 12, 2007

223 Carver Circle
Redlands, CA. 92373

City of Yucaipa
Planning Staff
Yucaipa, Ca.

Dear Staff

Re: Robinson Ranch

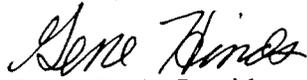
I have an environmental concern about the proposed 4,000 DU's on the Robinson Ranch.

Inland Empire cities must have open space. The City of Redlands has designated conservation areas to retain our cherished rural characteristics. The nearness of the proposed project is not compatible with Redlands rural plan.

In addition, the fire risk is great in southern California. Annually, lives and property are lost when housing is constructed in areas subjected to high winds and other contributing factors. The proposed building site has some of the strongest Santanna winds in our area. We do not need homes destroyed by fire as we recently experienced throughout our area.

Would you please reject the proposed Robinson Ranch project as presently planned.

Sincerely,



Gene Hinds, President
Redlands Area Democratic Club

John McMains

From: "SHERLI LEONARD" <sleonard@keyway.net>
To: <jmorrissey@yucaipa.org>; <trimflex@aol.com>; "Jon Harrison" <jonharrisoncc@hotmail.com>; <jmcmains@yucaipa.org>; <gcharlton@yucaipa.org>; <jshankland@yucaipa.org>
Sent: Wednesday, December 12, 2007 1:33 PM
Subject: letter, response - Robinson Ranch - Dec. 07

REDLANDS CONSERVANCY

P O Box 855, Redlands CA 92373;

(909) 792-1800; (909) 389-7810

www.redlandsconservancy.com

Protecting Our Land ~ Our Heritage



President: Bob Clark **Vice Presidents:** John Terry, Mark Gorden **Secretary:** **Treasurer:**
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Executive Director: Sherli Leonard

Jim Morrissey, AICP
City of Yucaipa
Community Development Department

Re: Robinson Ranch Properties
130 E. Montecito Avenue,
#246, Sierra Madre, CA 91024-2434

Project Title: Robinson Ranch Preliminary Development Plans and General Plan Amendments (Case No. 04-174/PDP/GPA; 04-175/PDP/GPA; and 05-203/PDP/GPA)

December 11, 2007

Dear Sir/Ms.

With this letter, the Redlands Conservancy is responding to the Robinson Ranch Properties Notice of Preparation (NOP) dated December 4, 2007. The Redlands Conservancy's work involves preserving and conserving Redlands' built and natural environment and heritage, and encompasses the region from Highland on the north to Beaumont on the east to Moreno Valley on the south and to Loma Linda on the west. The City of Redlands is not an island, and its integrity is dependent on the integrity of the entire region. Therefore, we have a keen interest in the Robinson Ranch proposal as it will have a severe negative impact on the quality of life in Redlands.

We request a meeting with the Robinson Ranch Properties staff to discuss the potential alternatives for this project. We are already engaged in regional efforts to develop a comprehensive, integrated plan for this area, and would like to share these ideas with you.

We are currently working with Cities, regional agencies, and other groups to define more successful development designs that meet our region's needs culturally and environmentally while ensuring appropriate housing needs are met in the region. This regional effort includes identifying 1) protected areas and trails already established, 2) potential wildlife corridor and habitat connectivity and trail

connectivity, and 3) regional development standards that reflect current informed thinking on sustainable development design. This proposal will significantly impact this regional effort to improve and enhance the quality of life for the region's residents.

Regarding the NOP, we are especially concerned about the items this Notice has labeled as "Less than Significant," and request more appropriate analyses and proposed mitigations to these impacts.

We are concerned that the proposal's seven-fold increase in the number of dwelling units over what is currently allowed directly conflicts with the Yucaipa General Plan designation for this region, and exacerbates the City's problem of a high vacancy rate of existing dwelling units. As importantly, this NOP does not appropriately respond to the true environmental impacts for many of the elements identified by CEQA. Thus, this NOP and the potential EIR must require that ALL elements be analyzed accurately. In this letter, we recommended specific changes to comply with CEQA requirements.

We also request to obtain maps in Attachment 2 that were not included in the digital version. Project area maps absolutely need to be included in any further communication or public documentation lest likely misunderstandings of the project's impacts be promulgated.

Please review and respond to the specific discussion points on the following pages addressing additional concerns with the Robinson Ranch Preliminary Development Plans and General Plan NOP as filed.

Contact:
Sherli Leonard, Executive Director, Redlands Conservancy
31534 Highview Dr.
Redlands CA 92373
(909) 389-7810
sleonard@keyway.net

1) **AESTHETICS:** Items a), b) & c)

Item 1b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway

Item 1b) This element assessment needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

Viewshed impacts can be better mitigated using at minimum a five-fold increase in open space elements to each of the proposed project sites; this increase will better protect the Live Oak Canyon Stream and its tributaries and Wildwood Creek. The 3 proposed project sites compose key wildlife habitats & wildlife corridors; this requires that the aesthetic analysis incorporates a much more aggressive mitigation plan for landscaping using native plant palettes and conservation of existing hillside slope areas. The recreational opportunity and connectivity to existing trails also make these project sites key components to the regional trail aesthetics.

2) **AGRICULTURE RESOURCES:** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Please refer to the NOP Attachment 3, page 2, item 8 which shows a table designating adjacent land use zones for the property; this contradicts the findings of “less than significant” impacts.

Item 2a) This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

The proposed conversion of Prime Farmland and Grazing Land should demand additional analysis of significant impacts. The current designation as “less than significance” blatantly contradicts the NOP attachment which states: “The San Bernardino County Important Farmland 2004 Map, prepared by the California Department of Conservation, provides that most of the project area is categorized as ‘Grazing Land’, which is consistent with the Yucaipa General Plan, Exhibit XII-1. A portion of the proposed West Oak Center along Live Oak Canyon Road and Outer Highway South is designated ‘Farmland of Local Importance’.”

As such, the potential impact upon important farmland is highly significant. Based upon this condition, further evaluation is necessary.

Item 2b) This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS

The Robinson Ranch has been historically and is currently used as active grazing land and, as such, is designated as having Williamson Act farmland status.

Item 2c notes:

“As noted above, the property to the north of Robinson Ranch North, along Oak Glen Road, is designated Agricultural Preserve (AP). The area is vacant and unimproved. West Oak Center is located adjacent to an existing agricultural use on Live Oak Canyon Road that is designated as Prime Farmland. The introduction of urban level development and the associated infrastructure improvements needed to support it could significantly affect and increase the probability of this Farmland being converted to a non-agricultural use.”

This directly contradicts the current status for item 2b.

Also, refer to Biological and Hazard elements which discuss further reasons for not rezoning this site due to its high risk status and biological significance.

3) **AIR QUALITY:** This item is designated as significant and for this reason the density in this proposal needs to be significantly decreased to address the already high concerns about air quality in the Inland Empire. **The number of children impacted with asthma in this region is already**

epidemic. The extreme density of these proposed projects increases the contributions to the region's poor air quality at the same time it increases the number of children; hence, the projects increase the likelihood of more children with asthma. The 8,318 additional school-aged children (2 children per DU) brought in by the projects would require an additional seven (7) elementary schools, two (2) middle schools, and one (1) high school; the poor air quality impacts to these school-aged children from the adjacent I-10 freeway traffic and increased numbers of vehicle trips per day resulting from the projects are significant.

Regarding the comment on Item 3c:

Item 3c) "The easterly portion of the site involves the establishment of 65 acres of RM (Medium Residential) land uses that include 26 acres of natural and improved open space."

"Improved open space" needs to be defined, especially with consideration of using open space to improve air quality and to mitigate for fire risks. Fire mitigation designs that preserve natural habitat also imply the minimizing of additional contributions to poor air quality. The new methods and techniques of utilizing natural habitat to reduce fire risk are well documented and proven successful, and can be incorporated into these proposals to reduce fire risk, to improve air quality, and to preserve natural open space. Of course, this can be best achieved by MINIMIZING the number of housing units that place people in high risk fire locations.

For these proposals, "open space" must refer to natural habitat - not "improved parks and recreational areas" - and must be maximized.

Tree preservation and habitat preservation for this development footprint will ensure the protection of native habitat and help improve air quality.

4) BIOLOGICAL RESOURCES

The Yucaipa General Plan section on Biological Resources notes that the map XII -2 shows the project area has significant biological and cultural resources. This document DOES define a conservation plan that needs to be considered for impacts.

The NOP comments regarding Biological Resources need extensive rewriting and a much higher level of understanding of the region's Open Space and Local Community Conservation plans already in place and which impact the need for this development to consider extensive redesign. The Williamson Act applies to this project Study Area. As noted in the Yucaipa General Plan, this area is designated as Important FARMLAND.

Item 4d currently states, "Due to this condition is it likely that the northerly portion of the project area would not significantly affect migratory corridors."

This statement is inaccurate. The project will extensively impact migratory corridors and will require extensive mitigation.

Item 4f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan.

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS

<http://www.yucaipa.org/cityDepartments/communityDevelopment/generalPlan.php>

The proposed project DOES conflict with existing Open Space Provisions with the City of Yucaipa's Open Space Element in their General plan. The City of Redlands' Open Space Element, which has Sphere of Influence, identifies part of the project area as being designated as resource preservation area; this conflicts with the "less than significant" assessment indicated in the NOP. Also, many regional analyses have shown this area as a key Regional Habitat Linkage.

<http://www.scwildlands.org/index.aspx>

5) CULTURAL RESOURCES This region has extensive cultural resources that will require mitigation.

6) GEOLOGY AND SOILS.

Item (iii) Seismic-related ground failure, including liquefaction.

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

The status of this area as alluvial flood plain suggests that at different periods the groundwater height has been higher than the 50 ft and the estimate of 100 ft is only temporary. This requires further investigation. Also, due to the faults in the region, the site is at risk for extensive flooding and other hazards.

7) HAZARDS Items c) and d) are not defined or checked in any manner

Item 7c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

Item 7c) does not have a check mark currently and this should be changed to POTENTIALLY SIGNIFICANT IMPACTS due to items noted in Element 3.

Item 7h) We recommend designs that preserve natural habitat while ensuring fire safety concerns are mitigated. These newer methods and techniques are well documented and proven, and need to be incorporated into this development plan. Tree preservation and habitat preservation for this development footprint will ensure the protection of native habitat and help improve air quality.

8) HYDROLOGY AND WATER QUALITY.

Items b-h in this Element all need to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

Concrete channelization components are not acceptable design elements in this area, and repeated legal judgments have set a precedent in this region for natural stream course protection. The project needs to incorporate soft bottom channel designs that complement the open space opportunity for this important wildlife corridor and very hazardous, alluvial flood zone. This 100-year flood zone and surrounding alluvial area should be removed from the development footprint and retained for open space and flood management purposes.

Regarding specific inaccuracies

Item 8b currently states, "At present the proposed project could have a substantial adverse effect upon the District's ability to maintain existing groundwater supplies. Even though the District is in the process of completing improvements to address this issue, the potential exists for a significant effect upon the groundwater basin until the final operation of that system is in place."

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

This element suggests this project will have GROWTH INDUCING IMPACTS and the existing plans in place to mitigate the potential groundwater and water supply concerns do not guarantee relief.

Item 8c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site
This Element need to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

The mitigation possibilities for this item to protect riparian oak woodlands and maintain historic

stream courses offer an opportunity to integrate an open space component that would also resolve the flood concerns in a very high risk zone. This element needs extensive redesign to mitigate potential impacts.

Item 8d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

Concrete channelization components are not acceptable design elements in this area and extensive legal actions have set a precedent in this region for natural stream course protection. The project needs to incorporate soft bottom channel designs that complement the open space opportunity for this important wildlife corridor and very hazardous, alluvial flood zone. This 100 year flood zone and surrounding alluvial area should be removed from the development footprint and retained for open space purposes.

Item 8f) Otherwise substantially degrade water quality

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

Erosion potential and urban runoff mitigation plans need to be included in this project. Purple pipe for irrigation use of reclaimed water from the Yucaipa Valley Water District needs to be incorporated into this project design to mitigate.

Item 8g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

This 100-year flood zone and surrounding alluvial area should be removed from the development footprint and retained for open space purposes.

Item 8h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

This 100-year flood zone and surrounding alluvial area should be removed from the development footprint and retained for open space purposes.

9) LAND USE

Item 9c) Conflict with any applicable habitat conservation plan or natural communities conservation plan

This Element needs to be changed to POTENTIALLY SIGNIFICANT IMPACTS.

The Yucaipa General Plan section on Biological Resources notes that the map XII -2 shows this affected project area as having significant biological and cultural resources and thus DOES define a conservation plan that needs to be considered for impacts. The NOP comments regarding Biological Resources need extensive rewriting and a much higher level of understanding of the region's Open Space and Local Community Conservation plans already in place locally and do impact the need for this development to consider extensive redesign. The Williamson Act applies to this project Study Area. As noted in the Yucaipa General Plan, this area is designated as Important FARMLAND, and thus, this element will require extensive rewriting and appropriate mitigation.

Item 9d currently states: Due to this condition it is likely that the northerly portion of the project area would not significantly affect migratory corridors."

This statement is inaccurate as the project will significantly impact migratory corridors; this requires extensive mitigation.

Thank you for considering the many concerns of the Redlands Conservancy. We look forward to meeting with you to discuss potential alternatives.

Sincerely,

Sherli Leonard, Executive Director
Redlands Conservancy

CC:

W. Robert Clark, President
Redlands Conservancy

Jon Harrison, Mayor
City of Redlands

John McMains
Director of Community Development
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399

Gretchen Charlton, City Planner
City of Yucaipa

Jennifer Shankland, City Clerk,
City of Yucaipa

12 December 2007

Jim Morrissey, AICP
City of Yucaipa
Community Development Department
34272 Yucaipa Boulevard
Yucaipa
CA 92399

Re: **Robinson Ranch Preliminary Development Plans and General Plan Amendments, Program Environmental Impact Report**

Firstly I would like to commend the City of Yucaipa and in particular the Community Development Department on the Initial Study of this project. In my opinion the assessment of items of potentially significant impact are serious and accurate and will be very difficult to adequately mitigate. I do not support the related General Plan Amendments but request that the Yucaipa General Plan as an established, well considered and debated document, on the basis of which many decisions have been made, be respected and upheld.

I live in the City of Redlands in close proximity to the land in question and I am very concerned about the impact of the plans as they relate to the City of Redlands. I will address some of my concerns in the format of the Initial Study, Evaluation of Environmental Impacts, though not in order of importance.

1. AESTHETICS

The Robinson Ranch projects, especially the West Oak Center have the potential to seriously negatively impact the beauty and scenic vistas of the agricultural area of Live Oak Canyon. Redlands is distinguished and thrives largely on the basis of its beautiful environment and this is defined on the south and east by the Live Oak and San Timoteo Canyons. Redlands must protect its identity in order to continue to attract high quality educational and commercial organizations and the employees they seek.

d. We have at our home on the edge of Live Oak Canyon, an astronomical observatory which would be further impacted for nighttime viewing of the skies by this new source of night light and glare.

2.c EFFECT ON REDLANDS AGRICULTURAL ZONING AND AREA OF RESOURCE PRESERVATION

The Agricultural Zoning and Area of Resource Preservation are currently and historically of great value and importance to the Redlands community. It is requested that the City of Yucaipa respect the efforts of Redlands to preserve this zoning and the environment it protects.

4. BIOLOGICAL RESOURCES

The area in question is part of a wildlife migration corridor from the San Bernardino Mountains to areas of Riverside County. "Little Live Oak Canyon", a side canyon of Live Oak Canyon is still a pristine habitat which is the focus of considerable preservation efforts and is adjacent to the Robinson Ranch. Buffer zones around it are necessary to sustain its value. It is notable that in response to the agreement with the State of California Attorney General, the San Bernardino County Board of Supervisors has asked the San Bernardino County Museum to develop a database of important wildlife corridors and to craft guidelines to protect them when approving development projects. This is one of those most important of wildlife corridors, recognized as such by establishment of the San Timoteo Canyon State Park.

5. CULTURAL RESOURCES

Documentation exists of considerable activity of Native American Indians in the area in question. Geoglyphs, the size of a football field, were constructed with celestial orientation on hillsides, at

least one, I believe within the Robinson Ranch. I have photographs taken in the 1930s of one in Little Live Oak Canyon.

8. b. HYDROLOGY AND WATER QUALITY

There is the possibility of hazardous waste from the business park and commercial enterprises entering the ground water which would contaminate the supply for Western Heights Water Company which I understand is partially on the south side of the 10 freeway and which serves a considerable number of homes in Redlands including my own. The wells of people living in Live Oak Canyon would also be at risk.

c. The most significant Planning Area so far as Redlands is concerned is the West Oak Center, however drainage from the 4,159 dwelling units which are planned for the three planning areas will all funnel through Live Oak and San Timoteo Canyons. In addition to this, a new drainage pattern has resulted from the Sunset area through the Trimark Oakmont development and oak grove into Live Oak Canyon Creek. We are seeing marked erosion from the latter through the fields down to the bridge and are reminded that Live Oak Creek was once a ditch that could be jumped across but now the crumbling walls are 50 feet or more high in some places. The added density contributes to the problems in an area which is already a flood channel which flows all the way from the mountains. This is in my opinion, the most critical of significant impacts of the projects. It is potentially a serious public works issue for some city, state or federal agency.

12 a. POPULATION AND HOUSING

The Robinson Ranch plans and General Plan Amendments are extremely growth inducing to the City of Redlands in an area where it is struggling to preserve the current zoning.

13. PUBLIC SERVICES

EFFECT ON POLICE AND FIRE RESOURCES

Being on the outer edge of Redlands this project would spread the resources of Redlands Police and Fire departments thinner than they are now even if there were a Joint Powers agreement with the City of Yucaipa.

15. TRANSPORTATION AND TRAFFIC

INCREASE IN TRAFFIC THROUGH LIVE OAK AND SAN TIMOTEO CANYONS AND REDLANDS LOCAL STREETS

We understand that big box retailers are among the businesses to be included in the projects and traffic to these in addition to the increase in population associated with more than 4000 dwelling units in this location will cause a major impact on surrounding roads and the necessary maintenance. There are still hopes to secure scenic road designation for Live Oak Canyon Road.

16. UTILITIES AND SERVICE SYSTEMS

d. I understand that the Yucaipa Valley Water District has no written agreements regarding State Project Water and this source of supply is becoming increasingly uncertain. In addition, it's purity to dilute Colorado River water to achieve acceptable consumer standards is in question and cost of delivery to current residents may thus increase because of the need for treatment.

Cumulatively, these environmental impacts indicate a No Project alternative especially as they negatively impact Redlands south of the 10 Freeway.

Thank you for your consideration of these concerns.

Joanne Lessard
31543 Highview Drive
Redlands, CA 92373
909-794-5036

PO Box 986
Yucaipa, California 92399

December 10, 2007

Dear Members of the Planning Commission and Yucaipa City Council,

I am writing you regarding the Robinson proposal to build 4,159 housing units at the entrance to our city. Please note that the Friends of Colorado Street strongly oppose this project.

Years ago the Robinson's proposed to tear down the hills on then Avenue F and use these hills as fill under a freeway in Redlands. The first city council rejected that proposal. More recently, the Robinson's proposed big box stores on Colorado Street at the entrance to our city. The Friends of Colorado Street and the voters of Yucaipa defeated that proposal with a resounding no vote on proposition "O".

Now, in the face of an eight year drought, the Robinson's propose to build 4,159 units! The city has already approved a large commercial and housing development on the south side of the freeway. At a time when the Metropolitan Water District is advising southern California residents to conserve water even to the extent that we close the tap when we brush our teeth, building golf courses and approving massive construction projects can not continue. Even in Yucaipa, contractors are restricted based on their use of water.

Some day, if our water shortage is resolved, single family residences *without destroying the hills* may be suitable for the entrance to our city. However, this is not the time to squander our limited water supply.

As a final note I would also like to draw attention to the fact that this 4,159 unit project will create such traffic congestion as to negatively affect the entire city.

Please reject this Robinson proposal.

Yours truly,



Thomas P. Cahraman, Ed.D.
Chairman of the Friends of Colorado Street

December 3, 2007

Mr. John McMains -- Director
Community Development Department
CITY OF YUCAIPA
34272 Yucaipa Boulevard
Yucaipa CA 92399

RECEIVED

DEC 18 2007

City of Yucaipa
PLANNING DIVISION

Subject: **Robinson Ranch LLP**

Dear Mr. McMains:

We are in receipt of the Public Meeting Notice regarding the Robinson Ranch Scoping meeting for the "Robinson Ranch Environmental Impact Report (EIR)." By virtue of this Notice, it would appear that the City feels the Robinson application has merit and is interested in pursuing the application. Unfortunately, many of the City's residents do not share Staff's optimism.

The proposed project includes 3 Preliminary Development Plans (PDP's) which will require 3 General Plan Amendments (GPA's). Haven't we just gone through an extensive planning effort in the general area of this proposal (Plan A, I-10 Specific Plan) which has recently been approved? Haven't we just spent in excess of \$750,000 in environmental and planning efforts to get to approval of that document? Now, when the document is less than a year old, we are already proposing to amend it, not once but 3 times. Was the moratorium not put in place so that the City could develop a plan for this area that worked for the City, the residents and the neighboring jurisdictions? This was done. We need to give the plan time to work and be implemented before we already start amending it.

The new proposed plan appears to increase the number of residential units. Utilizing the numbers provided in the Notice, the overall residential density is proposed to be 12.38 dwelling units to the acre (du/ac). In order to achieve this, the "single family" homes will be developed in the "Low density" range of the General Plan which would indicate that the "multi-family" housing would have to be developed at the "High density" range in order to average 12.38 du/ac on the 335.8 acres proposed for residential development. Included in the plan are 339 "very-low" income units. Where are the "moderate" and "low" income units to be placed that generally encompass the requirements of an Inclusionary Housing Ordinance? Proposing to put the poorest people out at I-10 and Oak Glen Road, away from goods and services and public transportation, certainly seems short sighted and destined to fail. Shouldn't our Inclusionary units be placed nearer the urban core of Yucaipa, near City Hall and the businesses and transportation networks along Yucaipa Boulevard?

It is impossible to determine from the Notice whether a complete EIR, Focused EIR or Mitigated Negative Declaration will be utilized for this proposed project. As the Notice states that the Scoping meeting is for an EIR, it can generally be assumed that the

Mr. John McMains – Director
December 3, 2007
Page 2

proposal is enough of a change from the approved plan that significant environmental analysis is needed. Toward that end, the additional impact of the proposed development should be considered with specific reference to traffic, noise, City services (such as Police, Fire, and Public Utilities [especially water and waste water], Schools, Cumulative Impacts, etc.), light and glare, global warming, and open space to name a few items. Surely there are more items that need analysis to review a project of this magnitude.

As you can see from this letter, we have concerns and before Staff marches forward to begin a process that will cost a lot of money and serve to divide this community yet again, why not take the proposal forward to the City Council to determine if they are even willing to consider this application. Based on the recent approval, they may not. Should the Council indicate that they are willing to entertain this proposal, may be the Council can give direction to the Staff and the applicant as to items they want included or excluded so the project that is reviewed might stand a chance of being approved.

While the tone of his letter might give the reader the impression that development of the Robinson property is opposed at all costs. That is not true, however, when extensive efforts have been undertaken through the legislative process to prepare, review and approve a plan, it appears that the Robinson's were unhappy with the outcome so they are making their own proposal which would effectively render the recently approved plan null and void as it applies to them.

The residents of Yucaipa have been through a process and a plan emerged which seems balanced and fair. Adjacent communities have allowed development to occur at breakneck speed with what would appear to be poorly addressed concerns and revisions after revision. The resultant increases in traffic congestion, diminished air quality, additional crime and significant impacts have left these adjacent communities wanting as a quality environment for residents. Stick with the plan that was approved and keep Yucaipa a community that has thought about their future and the future of its residents.

Sincerely,



11889 Annandale Rd
Yucaipa CA 92399

December 3, 2007

Mr. John McMains - Director
Community Development Department
CITY OF YUCAIPA
34272 Yucaipa Boulevard
Yucaipa CA 92399

RECEIVED
DEC 13 2007
CITY OF YUCAIPA

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Duane Bender
Shay Bender 12977 11th St
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