

CITY OF REDLANDS GENERAL PLAN,  
HOUSING ELEMENT UPDATE

(General Plan Amendment No. 130)

INITIAL STUDY & NEGATIVE DECLARATION

*December 2013*



## TABLE OF CONTENTS

1	Background	1
2	Sources	2
3	Environmental Factors Potentially Affected	2
4	Determination	2
5	Background and Introduction	4
6	Project Description	4
7	Discretionary Action	7
8	Environmental Checklist	8
	I. Aesthetics	8
	II. Agriculture Resources	9
	III. Air Quality	10
	IV. Biological Resources	11
	V. Cultural Resources	12
	VI. Geology and Soils	13
	VII. Greenhouse Gas Emissions	14
	VIII. Hazards and Hazardous Materials	15
	IX. Hydrology and Water Quality	16
	X. Land Use and Planning	18
	XI. Mineral Resources	18
	XII. Noise	19
	XIII. Population and Housing	20
	XIV. Public Services	20
	XV. Recreation	21
	XVI. Transportation and Circulation	22
	XVII. Utilities and Service Systems	23
	XVIII. Mandatory Findings of Significance	24



**I BACKGROUND**

---

1. Project Title: City of Redlands General Plan, Housing Element Update  
(General Plan Amendment No. 130)
  
2. Lead Agency Name and Address: City of Redlands  
Development Services Department  
210 E Citrus Avenue  
Redlands, CA 92373
  
3. Contact Person and Phone Number: Robert Dalquest, AICP  
Assistant Director  
Development Services Department  
City of Redlands  
909.798.7562
  
4. Project Location: The City of Redlands
  
5. Project Sponsor's Name and Address: City of Redlands  
Development Services Department  
210 E Citrus Avenue  
Redlands, CA 92373
  
6. General Plan Designation: N/A
  
7. Zoning: N/A
  
8. Project Description Summary:

The proposed project is a general plan amendment to update of the Housing Element of the City of Redlands General Plan. See further discussion that follows in the "Background and Introduction" and "Project Description" sections.

## 2 SOURCES

---

The following documents are referenced information sources utilized by this analysis:

- City of Redlands General Plan, 1995 (as amended to present);
- City of Redlands General Plan Environmental Impact Report, 1995;
- City of Redlands Community Sustainability Plan, 2011; and
- San Bernardino County Regional Greenhouse Gas Reduction Plan—Public Review Draft, June 2013.

## 3 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.” A more detailed assessment may be found on the following pages.

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

## 4 DETERMINATION

---

On the basis of this initial study:

- ✘ 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 applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” on the environment, but at least one effect 1) has

been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Pursuant to Public Resources Code Section 21080(c)(2) and CEQA Guidelines Section 15168(c)(1), the City of Redlands, as lead agency for the proposed project, has prepared an initial study to make the following findings:

1. Pursuant to CEQA Guidelines Section 15162, the proposed activity is adequately described and is within the scope of the General Plan EIR.
2. All feasible mitigation measures developed in the General Plan EIR have been incorporated into the project.
3. There is no substantial evidence before the lead agency that the subsequent project, as revised, may have a significant effect on the environment.
4. The analyses of cumulative impacts, growth inducing impacts, and irreversible significant effects on the environment contained in the General Plan EIR are adequate for this subsequent project.
5. Pursuant to Public Resources Code Section 21157.6(a), having reviewed the General Plan EIR, the City of Redlands finds and determines that:
  - a. no substantial changes have occurred with respect to the circumstances under which the General Plan EIR was certified, and
  - b. that there is no new available information which was not and could not have been known at the time the General Plan EIR was certified.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
City of Redlands  
For

## **5 BACKGROUND AND INTRODUCTION**

---

This Initial Study provides environmental analysis pursuant to the California Environmental Quality Act (CEQA) for the proposed City of Redlands General Plan Housing Element Update (proposed project).

The project site to be affected by the Housing Element Update is the area within the City's Sphere of Influence (SOI), which also includes all land within the present City limits (see attached map). The Planning Area for this Housing Element Update is identical to the Planning Area of the City's current General Plan.

This Housing Element Update is required by State law (Section 65580 – 65589.8 of the California Government Code). The Draft Housing Element identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under State law (Section 65583 of the California Government Code), analyzes governmental constraints to housing maintenance, improvement and development, addresses conservation and improvement of the condition of the existing affordable housing stock, and outlines policies to promote housing opportunities for all persons.

The Initial Study focuses on whether the proposed project may cause significant effects on the environment. In particular, consistent with Section 21083.3, this Initial Study is intended to assess any effects on the environment that are peculiar to the proposed project or to the parcels on which the project would be located that were not addressed or analyzed as significant effects in the General Plan EIR, or which substantial new information shows will be more significant than described in the General Plan EIR. Implementation of any mitigation measures identified in the General Plan EIR that apply to the proposed project will be required as part of the project.

No new housing sites, beyond those already identified in the current General Plan, are proposed as part of this update. The Housing Element Update does not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Other proposed developments in the city that do not currently have City entitlements are not included in this Housing Element.

## **6 PROJECT DESCRIPTION**

---

### **Housing Element Overview**

The Housing Element is a comprehensive statement by the City of Redlands of its broad and specific commitments to facilitate the development of housing in the City. The Housing Element is one of the seven General Plan elements mandated by the State of California, as articulated in sections 65580 to 65589.8 of the Government Code. State law requires that the Housing Element consist of "...an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing." The residential character of the City is, to a large extent, determined by the variety of its housing and the locations and maintenance of the housing. The Housing Element is an official response to the need to provide housing for all economic segments of the population, establishing goals

and programs that will guide City decision making, and set forth an action plan to implement these housing programs through 2021.

Government Code Section 65583 requires that Housing Element include the following components:

- A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.
- An assessment of housing needs and an inventory of resources and constraints related to the meeting of these needs.
- An analysis and program for preserving assisted housing developments.
- A housing sites inventory that provides a unique geographic identifier for parcels that will fulfill the Regional Housing Needs Allocation (RHNA).
- A statement of community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.
- A program which sets forth an eight-year schedule of actions that the City is undertaking or intends to undertake, in implementing the policies set forth in the Housing Element.

### **City of Redlands' Housing Needs**

Several factors influence the demand for housing as well as the type of housing demanded in the City of Redlands. Major "needs" categories considered in the Housing Element include: housing needs resulting from population growth in the City and the surrounding region; housing needs that result when households are paying more than they can afford for housing; housing needs of "special needs groups" such as the elderly, large families, female heads of households, households with persons with disabilities, and the homeless; and housing needs resulting from overcrowding in existing units.

The RHNA reflects the California Department of Housing and Community Development's (HCD) determination of the housing needs in a region, broken down by income level. The Southern California Association of Governments (SCAG) is tasked with allocating this regional RHNA amongst the jurisdictions in six counties, including those in San Bernardino County. Redlands' RHNA is 2,429 housing units as shown in Table 1. As part of the 2013-2021 Housing Element update, a housing sites inventory was created to demonstrate Redlands' ability to fulfill its RHNA.

**Table 1: Redlands Regional Housing Needs Allocation (RHNA): 2014-2021**

<i>Income Category</i>	<i>RHNA</i>	<i>Percent</i>
Extremely Low (<30% of AMI, <\$18,780)	289	12%
Very Low (30-50% of AMI, \$18,781-\$31,850)	290	12%
Low (50-80% of AMI, \$31,851-\$50,950)	396	16%
Moderate (81-120% of AMI, \$50,951-\$75,120)	453	19%
Above Moderate (>120% of AMI, >\$75,120)	1,001	41%
<b>Total</b>	<b>2,429</b>	<b>100%</b>

Sources: California Department of Housing and Community Development; SCAG, 2013.

### Sites

To fulfill this housing needs allocation, as well as its long-term planning objectives, the City has identified sites in the current General Plan that can accommodate 3,849 housing units, as shown in Table 2, taken from the Housing Element.

**Table 2: Redlands RHNA and Housing Sites: 2013-2021**

<i>Income Level</i>	<i>RHNA</i>	<i>Available Sites</i>
Very Low-Income	579	1,247
Low-Income	396	
Moderate-Income	453	2,602
Above Moderate-Income	1,001	
<b>Total</b>	<b>2,429</b>	<b>3,849</b>

\*The 2013 County median for a family of four was \$65,000, as determined by HUD.

Sources: California Department of Housing and Community Development; SCAG 2012.

The City's housing sites consist of vacant residentially zoned sites, vacant non-residentially zoned sites, underutilized residentially zoned sites capable of being developed at a higher density or with greater intensity, and non-residentially zoned sites that can be redeveloped for residential use. All of the housing sites shown in Table 2, above, are described and incorporated in the 1995 General Plan and thus are consistent with that document. Therefore, no new environmental impacts are associated with the Housing Element Update as compared to the 1995 General Plan EIR.

## **Housing Element Organization**

The City of Redlands' Housing Element is organized into five primary sections as outlined below:

- Housing Needs Assessment (Chapter 2), describes Redlands' demographic and employment trends, characteristics of the city's current housing stock, housing affordability, and energy conservation opportunities.
- Regional Housing Needs Assessment and Special Needs (Chapter 3), describes Redlands' allocation of the regional housing need, projects its housing needs, and describes the characteristics and needs of various special populations, including the elderly, disabled, homeless, single parents, and others.
- Land Inventory (Chapter 4), identifies specific sites suitable for residential development to allow for a comparison of the Regional Housing Needs Allocation (RHNA) with realistic development capacity. Environmental and infrastructure constraints on potential housing sites are also described.
- Constraints (Chapter 5), identifies and analyzes potential and actual constraints to housing development in Redlands, both related to governmental actions (e.g. regulatory standards) and non-governmental conditions (e.g. the housing market or construction costs).
- Program Accomplishments (Chapter 6), describes the City's accomplishments related to housing provision in the last Housing Element planning period and provides an assessment of the effectiveness of the programs in the last Housing Element.
- Programs (Chapter 7), includes the goals, objectives, policies, and programs for this Housing Element planning period.

## **7 DISCRETIONARY ACTION**

---

Implementation of the proposed project would require the following discretionary actions by the City of Redlands Planning Commission/City Council:

- Certification of a Negative Declaration;
- Adoption of the Housing Element for the City of Redlands through the General Plan Amendment process.

## 8 ENVIRONMENTAL CHECKLIST

The following section adapts and completes the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist is used to describe the impacts of the proposed project.

For this checklist, the following designations are used:

- **Potentially Significant Impact:** An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.
- **Potentially Significant With Mitigation Incorporated:** An impact that requires mitigation to reduce the impact to a less-than-significant level.
- **Less-Than-Significant Impact:** Any impact that would not be considered significant under CEQA relative to existing standards.
- **No Impact:** The project would not have any impact.

### I. AESTHETICS

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
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 type="checkbox"/>	✘
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

a-d. No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Design review of future housing projects will continue to be reviewed through the City's entitlement process and CEQA to ensure that existing views and aesthetic conditions are

preserved, and that the projects are consistent with all General Plan goals, objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a *no impact* level.

## II. 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 prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

*Would the project:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-e: According the Department of Conservation’s Important Farmland Map, there are areas within Redlands designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance. Adopting the updated Housing Element will not by itself covert farmland to non-agricultural uses to meet Housing Element programs beyond what was anticipated in the 1995 General Plan. Therefore, the proposed project would have **no impact** on agricultural resources.

### III. 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:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-e: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future development anticipated under the Housing Element shall comply with the density and intensity standards outlined in the Land Use Element of the General Plan and the City’s current Zoning Ordinance. Future housing projects will continue to be reviewed

through the City’s entitlement process and CEQA to ensure consistency with local, State, and federal air quality standards and consistent with the goals, policies, and standards established within the other elements of the General Plan that are intended to protect air quality. Adherence to such standards and guidelines would reduce potential impacts related to this issue to a *no impact* level.

**IV. BIOLOGICAL RESOURCES**

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-f: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future housing projects will continue to be reviewed through the City’s entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan goals and policies intended to protect biological resources. Adherence to such requirements would reduce potential impacts associated with this issue to a **no impact** level.

**V. CULTURAL RESOURCES**

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c. Directly or indirectly destroy a unique paleontological resource on site or unique geologic features?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-d: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future housing projects will continue to be reviewed through the City’s entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan goals, objectives and policies intended to protect cultural resources. Adherence to such requirements would reduce potential impacts related to cultural resources to a **no impact** level.

**VI. GEOLOGY AND SOILS**

*Would the project:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
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 based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-e: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. All new housing development and rehabilitation that might result from Housing Element implementation would be required to be consistent with existing State and local building codes, which are designed to ensure that new construction does not expose people to significant geological impacts. Furthermore, Housing Element policies and programs to

facilitate housing rehabilitation and neighborhood upgrading have the potential to improve the seismic safety of older housing units in Redlands. Therefore, there is *no impact* associated with geologic hazards and no mitigation is required.

**VII. GREENHOUSE GAS EMISSIONS<sup>1</sup>**

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-b: At the time of the 1995 General Plan EIR, greenhouse gas (GHG) emissions were not an issue area that jurisdictions were tasked with considering as part of their environmental analysis. Therefore, GHG emissions were not analyzed in the General Plan EIR. As directed by SB97, the Natural Resources Agency adopted Amendments to the CEQA Guidelines for greenhouse gas emissions on December 30, 2009, which became effective on March 18, 2010.

In March 2011, the Redlands City Council adopted the Redlands Community Sustainability Plan (RCSP), which identifies opportunities for achieving economic growth based on energy efficiency, expanded use of renewable energy and other clean technologies, and other sustainable practices. Adoption of the RCSP demonstrates the City’s commitment to reducing GHG emissions in Redlands, and includes a 2008 baseline GHG inventory, a 2020 GHG emissions forecast, and a stated goal of meeting the GHG reduction goals of AB 32 and Executive Order S-3-05 through participation in a regional approach. Subsequently, San Bernardino County, in conjunction with the municipalities in the County, has prepared a Public Review Draft Regional Greenhouse Gas Reduction Plan (June 2013), which includes a chapter on the City of Redlands’ emissions targets and quantified GHG reduction measures, making it a qualified greenhouse gas reduction strategy. The Draft EIR on the San Bernardino County Regional Greenhouse Gas Reduction Plan was released for public review in October 2013.

For its section on the City of Redlands, the County’s Reduction Plan is based on buildout and policies articulated in the 1995 General Plan, with which the proposed Housing Element

---

<sup>1</sup> Based on Appendix G in the Preliminary Draft CEQA Guideline Amendments, developed by the Governor’s Office of Planning and Research (OPR) for public workshop and approval, as announced January 8, 2009.

Update is also consistent. Adherence to the goals and actions identified in the RCSP and the San Bernardino County Regional Greenhouse Gas Reduction Plan (upon adoption) would reduce potential impacts associated with this issue to a *no impact* level.

### VIII. HAZARDS AND HAZARDOUS MATERIALS

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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 type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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"/>	<b>✘</b>
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"/>	<b>✘</b>
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"/>	<b>✘</b>
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"/>	<b>✘</b>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
h. Expose people or structures to the 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-h: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Actions to implement the goals, policies, and programs included in the Housing Element must be consistent with the goals, policies, and standards established within the other elements of the General Plan that are intended to protect the safety of the community. However, review of future housing projects will continue to be carried out to ensure that development of housing does not result in potentially significant hazards or expose people to potential health hazards and for consistency with local, State, and federal requirements and guidelines. Adherence to such requirements would reduce potential impacts associated with this issue to a *no impact* level.

## IX. HYDROLOGY AND WATER QUALITY

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Substantially deplete 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 (i.e., 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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 amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
h. Place within a 100-year floodplain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
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"/>	✘
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

a-j: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. All future development will be subject to site specific environmental studies as determined appropriate by the City and will comply with applicable policies related to hydrology and water quality issues.

The City’s Downtown is located within a 100-year flood hazard area where a structure must raise its finished floor approximately 1.5 feet above the adjacent street profile. Approximately 1,247 housing sites have been identified for the development of affordable housing in the Downtown. No significant impacts will result by placing housing within the floodplain as these projects will be mixed-use with commercial uses on the ground floor and residential units above. New development in the City will comply with the requirements of the Federal Water Pollution Control Act as enforced by the State Regional Water Control Board, which requires compliance with the National Pollution Discharge Elimination System (NPDES) permit for construction runoff and long-term urban runoff. Each new development, rehabilitation, or improvement in the City must comply with these NPDES and WQMP requirements and other applicable policies related to the City’s drainage requirements as part of standard development procedures. Adherence to all local, State, and federal rules and regulations on these issues would ensure that any potential impacts would be reduced to a *no impact* level.

**X. LAND USE AND PLANNING**

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b. Conflict with any applicable land use plans, policies, or regulations 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 on environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-c: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future housing projects will continue to be reviewed through the City’s entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan goals, objectives and policies intended to protect established communities and land uses. Adherence to such requirements would reduce potential impacts associated with this issue to a *no impact* level.

**XI. MINERAL RESOURCES**

*Would the project:*

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-b: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. The housing sites identified are not in areas that contain known mineral

resources, in accordance with Figure 8.2 of the MEA/EIR for the General Plan. Potential impacts associated with this issue are at a *no impact* level.

**XII. NOISE**

*Would the project result in:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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"/>	<b>✘</b>
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"/>	<b>✘</b>

a-f: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future housing projects will continue to be reviewed through the City’s entitlement process and CEQA to ensure that residents and employees are not exposed to unacceptable noise and vibration levels, and that the projects are consistent with all General Plan goals, objectives, and policies, and the City’s Noise Ordinance. Adherence to such requirements would reduce potential impacts associated with this issue to a *no impact* level.

### XIII. POPULATION AND HOUSING

Would the project:

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>

a-c: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future developments anticipated by the Housing Element Update would be constructed on vacant and underutilized land, and existing housing would not be displaced. The proposed housing would be developed to meet the needs of the City under existing General Plan and Zoning designations. Project impacts would therefore be considered *no impact*.

### XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✗</b>

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-e: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future housing projects will continue to be reviewed through the City’s entitlement process and CEQA to ensure the adequate provision of public services through the adequate facilities policies already in place in the City, reducing the potential impacts to a ***no impact*** level.

**XV. RECREATION**

*Would the project:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-b: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. All future residential development would be reviewed through the City’s entitlement process and CEQA to ensure consistency with the Redlands General Plan and the community’s open space and recreational needs. Fees, land dedications, or improvements are also required in most instances by the City of Redlands to provide an adequate supply of public parkland. Adherence to these measures would reduce impacts associated with this issue to a ***no impact*** level.

**XVI. TRANSPORTATION AND CIRCULATION**

*Would the project:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Substantially increase hazards due to a design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-f: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Future development anticipated under the Housing Element shall comply with all regional and local transportation plans and policies, the Redlands General Plan, and all applicable City ordinances. Adherence to such requirements would reduce potential impacts associated with this issue to a *no impact* level.

**XVII. UTILITIES AND SERVICE SYSTEMS**

*Would the project:*

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Potentially Significant With Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-g: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Development anticipated in the Housing Element Update would be consistent with General Plan goals and policies as well as local, State, and federal regulations related to utilities and services. Demand for utilities facilities and services would continue to be addressed primarily through existing adequate facilities requirements. Project impacts would therefore be considered *no impact*.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE**

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

a-c: No new housing sites are proposed as a part of this Housing Element Update beyond those already identified in the current General Plan. The Housing Element does not include specific development proposals that elaborate on or change the nature of future housing development beyond what was known and accounted for in the preparation of the current General Plan. Development projects would continue to be subject to existing requirements for specific plan or project-level review. Due to the lack of change in conditions from the last General Plan Housing Element, the impact would be considered to have *no impact*.