



NOTICE OF PREPARATION AND NOTICE OF PUBLIC SCOPING MEETING

Date: June 28, 2024

To: California State Clearinghouse
Responsible and Trustee Agencies

Subject: Notice of Preparation of a Subsequent Environmental Impact Report for the proposed Redlands RHNA Rezone Project in the City of Redlands

Lead Agency: City of Redlands

Contact: Kevin Beery, Senior Planner

Project Title: Redlands RHNA Rezone Project

Project Location: The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes a total of 196 housing sites identified to allow for additional housing in the City of Redlands. Of the 196 sites, the Rezone Project (“proposed Project”, “Project”) includes a total of 23 sites, encompassing approximately 109.25 acres, were identified as requiring rezoning to meet the City’s assigned housing production target. The sites to be rezoned (including Site 24, collectively the “Project site”, “sites”), encompasses approximately 116.19 acres. The Project site is broken up into two distinct areas (see Figure 1, *Project Location*).

- Sites 1 through 16A and 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.
- Sites 17 through 23 are centrally located in the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, south of San Bernardino Avenue. The sites are located in North Redlands north of I-10 and Downtown Redlands.

In accordance with Section 15021 of the California Environmental Quality Act (CEQA) Guidelines, the City of Redlands (City), as lead agency, will prepare a Draft Subsequent Environmental Impact Report (Draft SEIR) for the Project. Pursuant to Section 15082(a) of the State CEQA Guidelines, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee

agencies, the San Bernardino County Clerk, and other interested parties with information describing the Proposed Project and its potential environmental effects. The City is soliciting your comments on the scope of the analysis to be contained in the Draft SEIR.

In compliance with the time limits mandated by CEQA, the comment period for this NOP is **30 calendar days** starting on **July 1, 2024, and ending on July 31, 2024**. **Your response must be sent at the earliest possible date, but no later than 30 days after the date of this notice pursuant to State CEQA Guidelines Section 15082(b)** and must include the name of a contact person at your agency or organization. Please send or e-mail your written responses to:

Kevin Beery, Senior Planner
City of Redlands
P.O. Box 3005
Redlands, CA 92373
Email: kbeery@cityofredlands.org

Copies of the NOP and Initial Study are available for review at the following locations:

City of Redlands, Planning Division
35 Cajon Street, Suite 20
Redlands, CA 92373

A.K. Smiley Public Library
125 W. Vine Street
Redlands, CA 92373
(909) 798 – 7565

The document can also be accessed on the City's website at:

<https://www.cityofredlands.org/post/environmental-documents>

Notice of Scoping Meeting: Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties as to the scope and content of the Draft SEIR. The Responsible/Trustee Agency scoping meeting will be held at the following time and location: **July 18, 2024, at 4:30 p.m.** online via Zoom webinar, which can be accessed at the following link:
<https://cityofredlands.zoom.us/j/81507164112>

Or Telephone:

877 853 5247 US Toll Free

888 788 0099 US Toll Free

If you have further questions or require additional information, please contact Kevin Beery, Senior Planner, at (909) 798-7562, or send an email to 'kbeery@cityofredlands.org'.



Kevin Beery
Senior Planner

June 28, 2024

Date

Project Description: Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites for the purpose of increasing residential development capacity. The Project includes the following components: a General Plan Amendment (GPA) to change the land use designations to enable the proposed rezoning, Specific Plan Amendments (SPA) to remove 15 of the sites out of the EVCSP and 3 sites from Concept Plan 4, and Zone Change to allow for future medium and high-density residential development within the Project site.

According to the Housing Element, upon rezoning the Project site could yield 2,436 housing units through a development horizon of 2035. No specific development project is proposed as part of this Project, but the forthcoming Draft SEIR will assume and analyze anticipated impacts associated with the future development of 2,436 housing units and 151,048.46 SF of Public/Institutional development compared to buildout under the existing General Plan land use and zoning designations (i.e., the *status quo*). The Draft SEIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite. Existing and proposed General Plan land use and zoning district designations are shown in Table 1 *Existing and Proposed Land Use and Zoning*.

Table 1: Existing and Proposed Land Use and Zoning

Plot Number	APN	Acres	Existing General Plan Land Use Designation	Proposed General Plan Land Use Designation	Existing Zoning	Proposed Zoning	Existing Residential Buildout Capacity (Dwelling Units)	Existing Non-Residential Buildout Capacity (SF)	Proposed Density (DU/Acre)	Proposed Maximum Buildout (DU/Acre)
1	0292-163-02-0000	8.91	Commercial/Industrial	MDR	EV/IC	R-2	0	194,059.8	15	133
2	0292-163-03-0000	4.26	Commercial/Industrial	MDR	EV/IC	R-2	0	92,782.8	15	63
3	0292-165-05-0000	5.84	Commercial/Industrial	HDR	EV/IC	R-3	0	127,195.2	30	175
4	0292-165-06-0000	3.15	Commercial/Industrial	HDR	EV/IC	R-3	0	68,607.0	30	94
5	0292-165-07-0000	1.07	Commercial/Industrial	HDR	EV/IC	R-3	0	23,304.6	30	32
6	0292-165-08-0000	1.9	Commercial/Industrial	HDR	EV/IC	R-3	0	41,382.0	30	57
7	0292-165-09-0000	1.9	Commercial/Industrial	HDR	EV/IC	R-3	0	41,382.0	30	57
8	0292-165-10-0000	4.07	MDR	MDR	EV3000RM	EV2500RM	40	0	15	61
9	0292-165-16-0000	2.5	Commercial/Industrial	HDR	EV/IC	R-3	0	54,450.0	30	75
10	0292-165-17-0000	4.03	Commercial/Industrial	HDR	EV/IC	R-3	0	87,773.4	30	120
10A	0292-165-04-0000	0.08	Commercial/Industrial	MDR	EV/IC	R-3	0	1,742.4	30	2
11	0292-167-02-0000	4.70	Commercial/Industrial	MDR	EV/IC	R-2	0	102,366.0	30	70
12	0292-167-07-0000	2.31	Commercial/Industrial	MDR	EV/IC	R-2	0	50,311.8	30	34
13	0292-167-28-0000	4.70	Commercial/Industrial	HDR	EV/IC	R-3	0	103,019.4	30	141
14	0292-167-29-0000	4.21	Commercial/Industrial	HDR	EV/IC	R-3	0	91,693.8	30	126
15	0292-167-30-0000	8.86	Commercial/Industrial	HDR	EV/IC	R-3	0	192,970.8	30	265
15A	0292-167-17-0000	0.02	Commercial/Industrial	HDR	EV/IC	R-3	0	435.6	30	1
16	0292-201-20-0000	10.65	Commercial/Industrial	MDR	EV/IC	R-2	0	231,957.0	30	159
16A	0292-201-14-0000	0.01	Commercial/Industrial	MDR	EV/IC	R-2	0	217.8	15	0
17	0167-141-04-0000	14.05	Commercial/Admin Professional	MDR	CP-4	R-2	0	306,009.0	15	210
18	0167-141-05-0000	5.0	Commercial/Admin Professional	HDR	CP-4	R-3	0	108,900.0	30	150
19	0167-141-06-0000	6.31	Commercial/Admin Professional	HDR	CP-4	R-3	0	137,431.8	30	189
20	0169-021-02-0000	4.76	MDR	MDR	A-1	R-2	1	0	15	71
21	0169-021-11-0000	1.64	MDR	MDR	R-1	R-2	9	0	15	24
22	0167-151-23-0000	0.33	HDR	HDR	R-2	R-3	4	0	27	9
23	0167-161-10-0000	3.96	HDR	HDR	R-2	R-3	57	0	27	118
24	0292-165-15-0000	6.94	Commercial/Industrial	Public/Institutional (PI)	EV/IC	EV/IP	0	151,048.46	0.5 Floor Area Ratio (FAR)	151,048.46 SF
Total		116.19					111	2,209,040.66		2,436

Proposed General Plan Amendment

The General Plan land use designations of all sites, except for Sites 8, 20, 21, 22, 23 and 24, would be amended from Commercial/Industrial or Commercial/Administrative Professional to Medium Density Residential or High Density Residential and would have a planned density of 15 and 27 dwelling units per acre (DU/acre), respectively. The intent of the Medium Density Residential land use category is to provide areas for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated Medium Density are generally more suitable for development in the low- to mid-level of the permitted density range for this category. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). The intent of the High Density Residential land use category is to provide for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated High Density are generally more suitable for development at the mid- to high-level of the density range for this category. Site 24 would require a GPA to change its existing land use designation from Commercial/Industrial to Public Institutional to be more aligned with the site's current use as a school, and achieve compatibility with adjacent proposed residential General Plan land use designations.

Proposed Zone Change

All the sites would require a zone change to allow for medium and high-density residential development, except for Site 24, which would require a zone change to allow for Public/Institutional land uses. The zone change would allow the zoning designation of Site 24 to be more aligned with the site's current use as a school, and achieve compatibility with adjacent proposed residential zones. A majority of the sites are currently within the EVCSP (sites 1-16A) or Concept Plan No. 4 (Sites 17-19) and would be de-annexed from the Specific Plan and zoned either Multiple Family Residential (R-2) or Multiple Family Residential (R-3). The Multiple Family Residential (R-2) zoning designation allows for single and multi-family development with a maximum density of 3,000 square feet (SF) of lot area per dwelling unit, which equates to approximately 15 DU/acre. The Multiple Family Residential (R-3) zoning designation also allows for single-family and multi-family developments with an allowed density of 1,450 SF of lot area per dwelling unit, which equates to approximately 30 DU/acre. Site 8 located on Iowa Street would remain in the EVCSP but would require a SPA to modify the zoning of the site from Multi-Family Residential-3000 District to Multi-Family Residential-2500 District. The Multi-Family Residential-2500 District zoning is intended to provide for the development of high-quality apartments on large lots with a maximum density of 15 DU/acre with a minimum of 2,500 SF of lot space for each dwelling unit. Sites 20-23 would require a zone change from their current Agriculture, Single Family Residential (R-1), and Multiple Family Residential (R-2) zoning designations to Multiple Family Residential (R-2) and Multiple Family Residential (R-3) zoning designations.

Proposed Specific Plan Amendment

A SPA would be required to remove Sites 1 through 16A, except for Sites 8 and 24, from the EVCSP and place them in either the Multiple Family Residential (R-2) or Multiple Family Residential (R-3) base zoning district. Site 8 would remain within the EVCSP but would require a SPA to change the zoning for the site from Multi Family Residential 3000-District to Multi Family Residential-2500 District. Similarly, Site 24 would remain within the EVCSP but would require a SPA to change the Specific Plan zoning from Commercial/Industrial to Public/Institutional. Sites 17 through 19 would be deannexed from Concept Plan No. 4.

Comparison of Approved General Plan Buildout to Proposed Land Uses

As detailed in Table 2, *Comparison of Approved General Plan Buildout to Proposed Project*, buildout of the proposed Project would convert approximately 2,057,992.2 square feet of planned nonresidential floor area, based on allowed floor area ratio under the General Plan, to residential uses with an allowed capacity of 2,436 units.

Table 2: Comparison of Approved General Plan Buildout to Proposed Project

Land Use	Unit	Sites 1-16A		Sites 17-24		GP Total	Proposed Total	Proposed Project minus Approved GP
		Approved GP	Proposed Project	Approved GP	Proposed Project			
CI	SF	1,505,651.40	-	151,048.46	-	1,656,699.86	-	(1,656,699.86)
C	SF	-	-	552,340.80	-	552,340.80	-	(552,340.80)
PI	SF	-	-	-	151,048.46	-	151,048.46	151,048.46
MDR	DU	40	522	10	305	50	827	777
HDR	DU	-	1143	61	466	61	1609	1,548
Total Residential	DU	40	1665	71	771	111	2,436	2,325
Total Nonresidential	SF	1,505,651.40	0	703,389.26	151,048.46	2,209,040.66	151,048.46	(2,057,992.20)

Infrastructure Improvements

Roadways and utilities may be required to support development within the Project site. Possible onsite infrastructure improvements that may be necessary for future residential development projects include storm drains, wastewater, water (potable and reclaimed), and dry utilities within the Project site or its vicinity. Specific infrastructure improvements required to support residential development within the Project site are not known at this time and will not be evaluated until a development project is proposed.

Environmental Issues: Based on the Initial Study, the City anticipates that the following environmental topic areas will be addressed in the Draft SEIR:

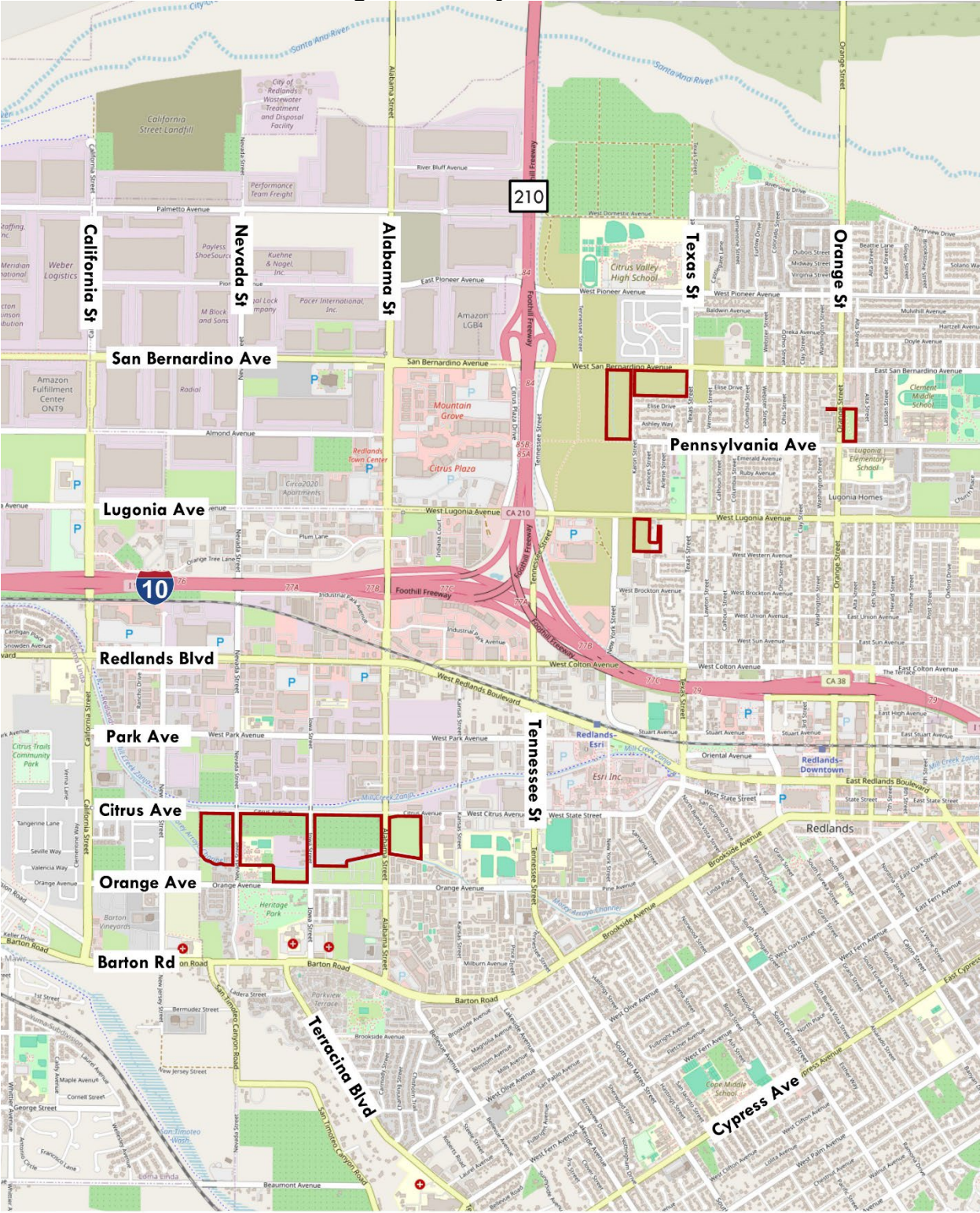
- Agriculture and Forestry Resources
- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance

Environmental Issues not Potentially Affected: As analyzed and determined in the Initial Study, no significant impacts associated with Aesthetics, Biological Resource, Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Recreation, and Wildfire would occur as a result of the Project, and therefore these factors will not need to be analyzed further in the Draft SEIR.

Figures

- Figure 1 Project Location
- Figure 2 Project Aerial
- Figure 3 Project Aerial

Figure 1 – Project Location

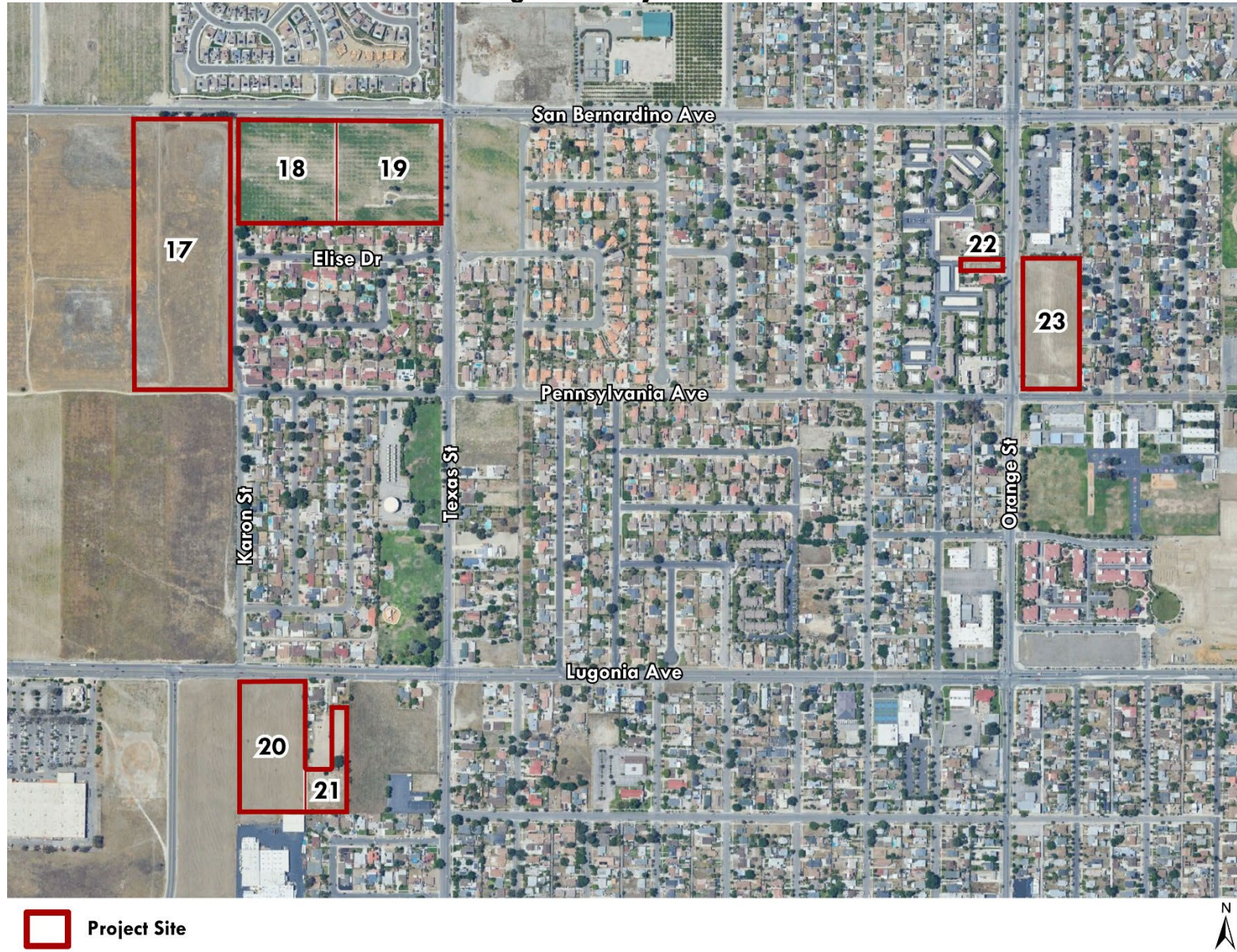


 Project Site

Figure 2 – Project Aerial



Figure 3- Project Aerial





City of Redlands RHNA Rezone Project

Initial Study

Lead Agency:

City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373

Project Sponsor:

City of Redlands
35 Cajon Street, Suite 20
Redlands, CA 92373

CEQA Consultant:

E | P | D SOLUTIONS, INC
3333 Michelson Drive, Suite 500
Irvine, CA 92612

June 2024

Table of Contents

1. INTRODUCTION	1
1.1. PURPOSE OF THE INITIAL STUDY	1
1.2. DOCUMENT ORGANIZATION	1
2. ENVIRONMENTAL SETTING	3
2.1. PROJECT BACKGROUND	3
2.2. EXISTING CONDITIONS	4
3. PROJECT DESCRIPTION	23
3.1. PROJECT OVERVIEW	23
3.2. PROJECT OBJECTIVES	26
3.3. DISCRETIONARY ACTION CHECKLIST	26
4. ENVIRONMENTAL CHECKLIST	35
4.1. BACKGROUND	35
4.2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	35
4.3. DETERMINATION	36
4.4. EVALUATION OF ENVIRONMENTAL IMPACTS	37
5. ENVIRONMENTAL ANALYSIS	38
5.1. AESTHETICS	38
5.2. AGRICULTURE AND FORESTRY RESOURCES	42
5.3. AIR QUALITY	45
5.4. BIOLOGICAL RESOURCES	48
5.5. CULTURAL RESOURCES	53
5.6. ENERGY	56
5.7. GEOLOGY AND SOILS	58
5.8. GREENHOUSE GAS EMISSIONS	65
5.9. HAZARDS AND HAZARDOUS MATERIALS	66
5.10. HYDROLOGY AND WATER QUALITY	71
5.11. LAND USE AND PLANNING	80
5.12. MINERAL RESOURCES	81
5.13. NOISE	83
5.14. POPULATION AND HOUSING	85
5.15. PUBLIC SERVICES	87
5.16. RECREATION	90
5.17. TRANSPORTATION	92
5.18. TRIBAL CULTURAL RESOURCES	94
5.19. UTILITIES AND SERVICE SYSTEMS	96
5.20. WILDFIRE	99
5.21. MANDATORY FINDINGS OF SIGNIFICANCE	101
6. REFERENCES	104

Tables

TABLE 2-1: EXISTING GENERAL PLAN BUILDOUT	5
TABLE 3-1: PROPOSED GENERAL PLAN BUILDOUT	23
TABLE 3-2: COMPARISON OF APPROVED GENERAL PLAN BUILDOUT TO PROPOSED PROJECT	25
TABLE 5-1: GENERAL PLAN AND PROPOSED PROJECT POPULATION GROWTH	85

Figures

FIGURE 2-1: REGIONAL LOCATION..... 7
FIGURE 2-2: LOCAL VICINITY 9
FIGURE 2-3A: AERIAL 11
FIGURE 2-3B: AERIAL..... 113
FIGURE 2-4A: EXISTING GENERAL PLAN LAND USE DESIGNATION 115
FIGURE 2-4B: EXISTING GENERAL PLAN LAND USE DESIGNATION 117
FIGURE 2-5A: EXISTING ZONING..... 119
FIGURE 2-5B: EXISTING ZONING 211
FIGURE 3-1 A: PROPOSED GENERAL PLAN LAND USE DESIGNATION 27
FIGURE 3-1 B: PROPOSED GENERAL PLAN LAND USE DESIGNATION..... 279
FIGURE 3-2A: PROPOSED ZONING 31
FIGURE 3-2B: PROPOSED ZONING 33

Acronym List

A-P	Alquist-Priolo Earthquake Fault Zoning Act
AQMP	Air Quality Management Plan
AB	Assembly Bill
APN	Assessor's Parcel Numbers
BMPs	Best Management Practices
CARB	California Air Resources Board
CBC	California Building Code
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CFC	California Fire Code
CNEL	Community Noise Equivalent Level
dBA	A-weighted decibel
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse Gas
LHMP	Local Hazard Mitigation Plan
MBTA	Migratory Bird Treaty Act
MSHCP	Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NO _x	Nitrous Oxides
O ₃	Ozone
PM	Particulate Matter
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SWPPP	Stormwater Pollution Prevention Plan
TPZ	Timberland Production Zone
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
WQMP	Water Quality Management Plan

1. INTRODUCTION

1.1.PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.) as amended and approved on December 28, 2018.

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project, described in greater detail in Section 3.0, *Project Description*. As required by State CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Redlands (City), to "scope out" non-significant environmental issues from further consideration in the forthcoming Subsequent Environmental Impact Report to the City's General Plan Update and Climate Action Plan Environmental Impact Report (General Plan EIR).

This Initial Study informs City decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A "significant effect" or "significant impact" on the environment means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (State CEQA Guidelines Section 15382).

Given the Project's broad scope and level of detail, combined with previous analyses and current information about the site and environs, the City intends to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Public Resources Code Section 21003.1)
- Encourage future applicants to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (State CEQA Guidelines Section 15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicants to future measures containing performance standards to ensure the measure's adequacy when detailed development plans and applications are submitted. (State CEQA Guidelines Section 15126.4)

Based on the analysis in this Initial Study and in accordance with CEQA Guidelines Section 15162, the City has determined that a Subsequent EIR shall be prepared for the proposed Project pursuant to CEQA guidelines Section 15162 because the Project proposes "Substantial changes which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects."

1.2.DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared to evaluate the proposed Project's potential impacts to the physical environment, and to determine if an Environmental Impact Report (EIR) is required.

Section 2. Environmental Setting

Provides information about the proposed Project's location.

Section 3. Project Description

Includes a description of the proposed Project's planning features and characteristics.

Section 4. Environmental Checklist

Includes the Environmental Checklist from Appendix G of the State CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment and identifies what environmental topics need to be further analyzed in the EIR.

Section 5. Environmental Analysis

This section provides evidence to substantiate the conclusions in the environmental checklist.

Section 6. References

Includes any resources or documents cited in the Environmental Analysis

2. ENVIRONMENTAL SETTING

Project Location

The City of Redlands is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles east of the City of Los Angeles and approximately 45 miles west of the City of Palm Springs. The city is situated along the Interstate 10 (I-10) corridor, which links it with San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley to the east. State Route 210 (SR-210) originates in the City of Redlands and traverses the northwest part of the city, heading north then west towards Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes a total of 196 housing sites identified to allow for additional housing in the City. Of the 196 sites, the Rezone Project (“proposed Project”, “Project”) includes a total of 23 sites, encompassing approximately 109.25 acres, were identified as requiring rezoning to meet the City’s assigned housing production target. The sites to be rezoned (including Site 24, collectively the “Project site”, “sites”), encompasses approximately 116.19 acres. Site 24 is not identified in the Housing Element but is proposed for rezoning as part of the Project in order to conform with the existing onsite school use and achieve land use compatibility with the surrounding proposed residential designations. While sites 10A, 15A, and 16A are within their own specific parcels, they are located within their respective site (Sites 10, 15, and 16) and are not counted as their own site. The Project site is broken up into two distinct areas.

- Sites 1 through 16A and 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.
- Sites 17 through 23 are centrally located in the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, south of San Bernardino Avenue. The sites are located in North Redlands north of I-10 and Downtown Redlands.

Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, Figure 3-3a, *Aerial*, and Figure 3-3b, *Aerial*.

2.1.PROJECT BACKGROUND

City of Redlands General Plan 2035

The City’s 2035 General Plan (General Plan) was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan EIR serves as a program EIR pursuant to CEQA Guidelines Section 15168 analyzing potential buildout of the City pursuant to the General Plan land use designations. Pursuant to CEQA Guidelines Section 15168(d), the General Plan EIR can simplify the preparation of future environmental documents on later activities pursuant to the General Plan program and can focus a future Subsequent EIR on the effects which had not been considered before. The General Plan provides long-term policy direction, quality of life, economic health, and sustainability of the Redlands community through 2035. The General Plan includes seven State-mandated elements: Land Use, Circulation, Open Space, Conservation, Health and Safety, Noise, and Housing which include policies for the entire City. The General Plan Housing Element builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production.

Any decision by the City affecting land use and development must be consistent with the General Plan. Any action, program, or project is considered consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan or not obstruct their attainment. The General Plan EIR evaluated the potential environmental effects associated with implementation of the General Plan and addresses appropriate and feasible mitigation measures that would minimize or eliminate these impacts.

A project is consistent with the General Plan if the development density does not exceed what was contemplated and analyzed for the parcel(s) in the certified General Plan EIR and complies with the associated standards applicable to that development density (State CEQA Guidelines Section 15183(i)(2)). Development density standards include the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, size limitations, and use restrictions.

City of Redlands 2021-2029 Housing Element

The California Department of Housing and Community Development (HCD) prepares a RHNA for each Council of Governments in the state of California. The RHNA identifies projected housing needs for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for a six-county area of southern California in which the City of Redlands is included. SCAG then further allocates fair shares of the total regional RHNA to individual local governments within their jurisdiction. Each local government must demonstrate that it has planned to fully accommodate its assigned RHNA within its Housing Element. The intent of the process is to promote a mix of unit types, tenure, and affordability in all cities and counties. SCAG adopted a Final RHNA based on the HCD determination for the region's "fair share" of statewide forecasted growth through October 15, 2029. SCAG assigned the City of Redlands a RHNA share of 3,516 units which the City is required to accommodate in its Housing Element by increasing residential zoning capacity.

The City of Redlands prepared the 2021-2029 Housing Element (Housing Element) of the General Plan in accordance with Government Code Section 65580 et seq. The update to the Housing Element covers the Sixth Cycle planning period from October 15, 2021, to October 15, 2029. On February 1, 2022, the City Council adopted Resolution No. 1565, certifying the Addendum to the certified 2035 General Plan Environmental Impact Report, which analyzed environmental impacts related to the City's Draft Housing Element of the General Plan. Following preparation of the Draft Housing Element Update and adoption of the Addendum, the Draft Housing Element went through several rounds of revisions and submittal for review to the HCD. The City received formal certification of the Housing Element Update from HCD on September 26, 2022.

The 2021-2029 Housing Element includes several provisions that aim to ensure the City can meet the required "fair share" of affordable housing units. During the Housing Element process, the City assessed several properties and areas throughout the community able to accommodate the City's assigned 2021 RHNA. The City identified 196 sites as qualifying sites to accommodate their RHNA allocation. Of the 196 Housing Element inventory sites (shown in Appendix B to the Housing Element), 23 are identified for rezoning under Housing Element Program 1.1-1 to allow for medium and high-density residential development.

2.2. EXISTING CONDITIONS

Sites 1 through 16A and 24

Sites 1 through 16A and 24 are located south of Citrus Avenue and are within the EVCSP. The sites are surrounded by agricultural and mixed uses and are currently designated for commercial and industrial uses. Many of the sites are vacant or are being used for agricultural purposes with no permanent structures on-

site. The sites range in size from 1.90 to 8.91 acres. A few properties have single-family homes on-site, and others are used for industrial storage. The sites identified in the EVCSP area are adjacent to multiple schools and parks and have excellent access to nearby regional job centers, including Esri headquarters and Loma Linda University Medical Center.

Sites 17 through 23

Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. The sites are surrounded by a variety of uses, including single and multi-family residences, parks, schools, and commercial buildings. These sites are currently vacant and covered with non-native grasses. The sites range in size from 0.33 to 14.05 acres. Sites 17 through 21 had historically been used for agricultural purposes up until approximately 2005. They have remained undisturbed since then except for occasional disking.

Existing General Plan & Zoning Designations

The City General Plan currently designates the subject sites as Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-4b, *Existing General Plan Land Use*, show the existing General Plan land use designations.

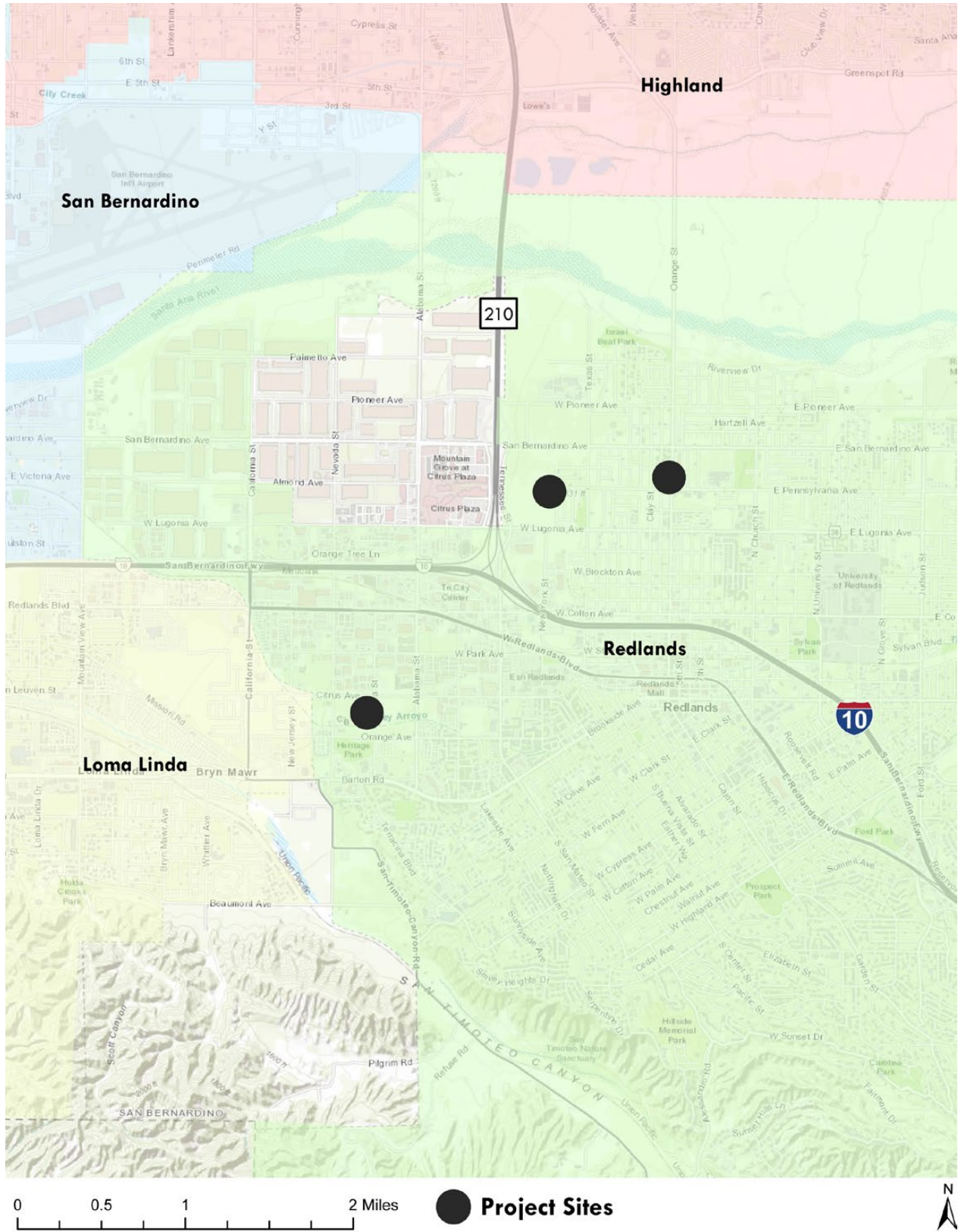
The subject sites currently have zoning designations of Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single family Residential (R-1) and Multiple Family Residential (R-2). Figures 3-5a and 3-5b show the Project site's existing zoning designations. Table 3-1, *Existing General Plan Buildout*, shows the existing General Plan land use and zoning designations for each Rezone Site and the potential buildout of each site pursuant to buildout of the existing General Plan land use designation.

Table 2-1: Existing General Plan Buildout

Plot Number	APN	Acres	General Plan Land Use Designation	Zoning	Residential Buildout Capacity (Dwelling Units)	Non-Residential Buildout Capacity (SF)
1	0292-163-02	8.91	Commercial/Industrial	EV/IC	0	194,059.8
2	0292-163-03	4.26	Commercial/Industrial	EV/IC	0	92,782.8
3	0292-165-05	5.84	Commercial/Industrial	EV/IC	0	127,195.2
4	0292-165-06	3.15	Commercial/Industrial	EV/IC	0	68,607.0
5	0292-165-07	1.07	Commercial/Industrial	EV/IC	0	23,304.6
6	0292-165-08	1.9	Commercial/Industrial	EV/IC	0	41,382.0
7	0292-165-09	1.9	Commercial/Industrial	EV/IC	0	41,382.0
8	0292-165-10	4.07	MDR	EV3000RM	40	0
9	0292-165-16	2.5	Commercial/Industrial	EV/IC	0	54,450.0
10	0292-165-17	4.03	Commercial/Industrial	EV/IC	0	87,773.4
10A	0292-165-04	0.08	Commercial/Industrial	EV/IC	0	1,742.4
11	0292-167-02	4.70	Commercial/Industrial	EV/IC	0	102,366.0
12	0292-167-07	2.31	Commercial/Industrial	EV/IC	0	50,311.8
13	0292-167-28	4.70	Commercial/Industrial	EV/IC	0	103,019.4
14	0292-167-29	4.21	Commercial/Industrial	EV/IC	0	91,693.8
15	0292-167-30	8.86	Commercial/Industrial	EV/IC	0	192,970.8
15A	0292-167-17	0.02	Commercial/Industrial	EV/IC	0	435.6
16	0292-201-20	10.65	Commercial/Industrial	EV/IC	0	231,957.0

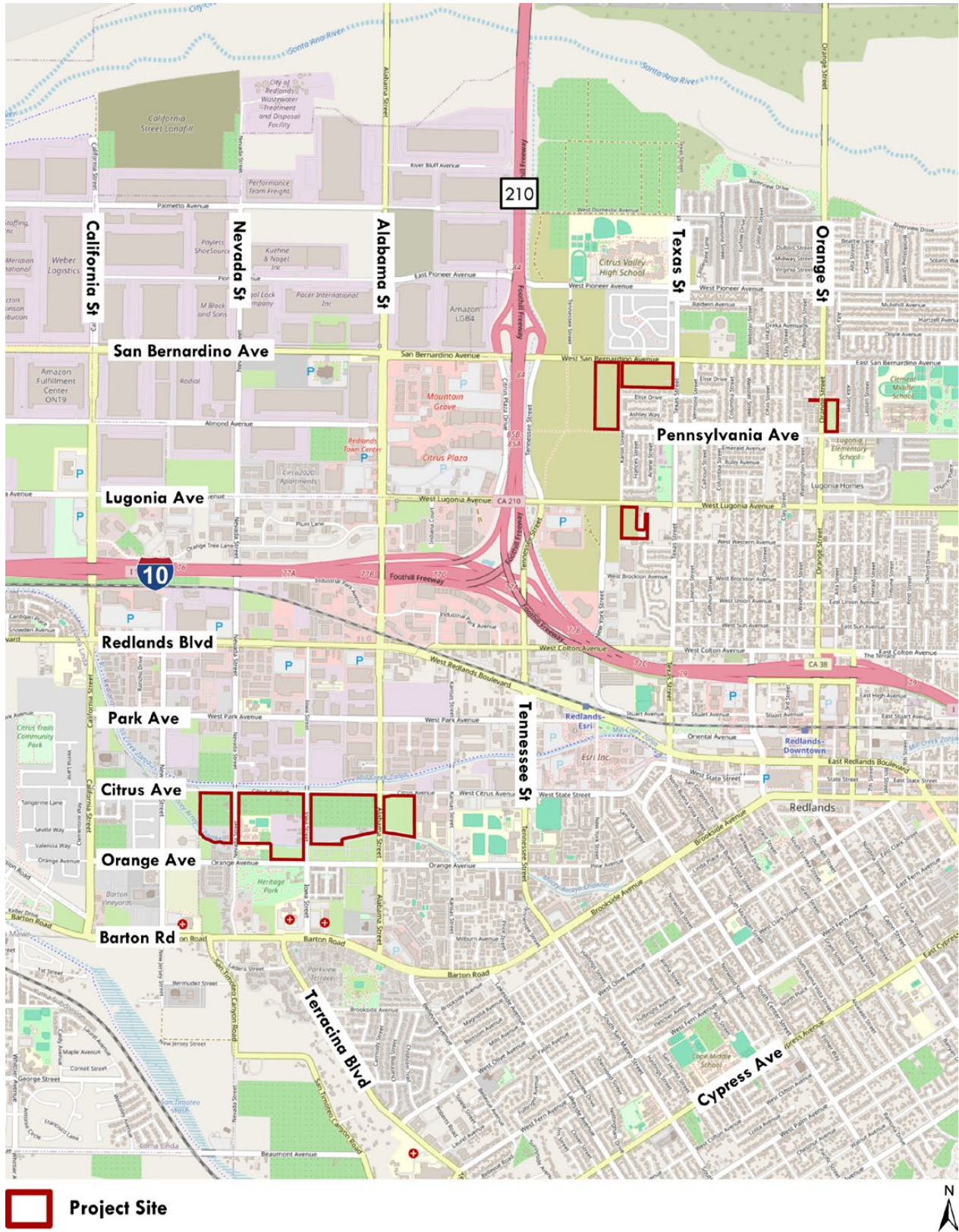
16A	0292-201-14	0.01	Commercial/Industrial	EV/IC	0	217.8
17	0167-141-04	14.05	Commercial/Admin Professional	CP-4	0	306,009.0
18	0167-141-05	5.0	Commercial/Admin Professional	CP-4	0	108,900.0
19	0167-141-06	6.31	Commercial/Admin Professional	CP-4	0	137,431.8
20	0169-021-02	4.76	MDR	A-1	1	0
21	0169-021-11	1.64	MDR	R-1	9	0
22	0167-151-23	0.33	HDR	R-2	4	0
23	0167-161-10	3.96	HDR	R-2	57	0
24	0292-165-15	6.94	Commercial/Industrial	EV/IC	0	151,048.46
Total		116.19			111	2,209,040.66

Regional Location



This page intentionally left blank.

Local Vicinity



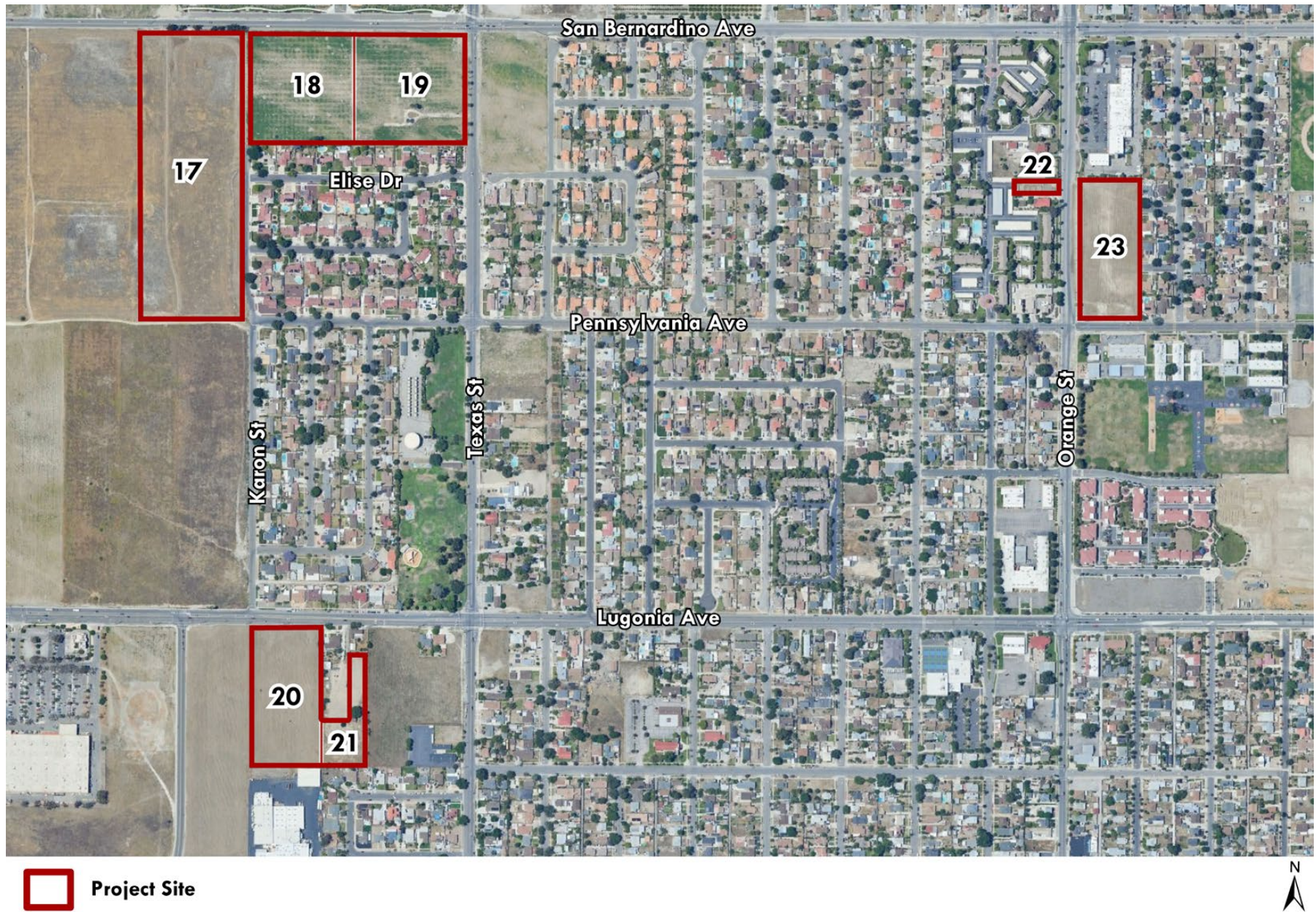
This page intentionally left blank.

Aerial View



This page intentionally left blank.

Aerial View



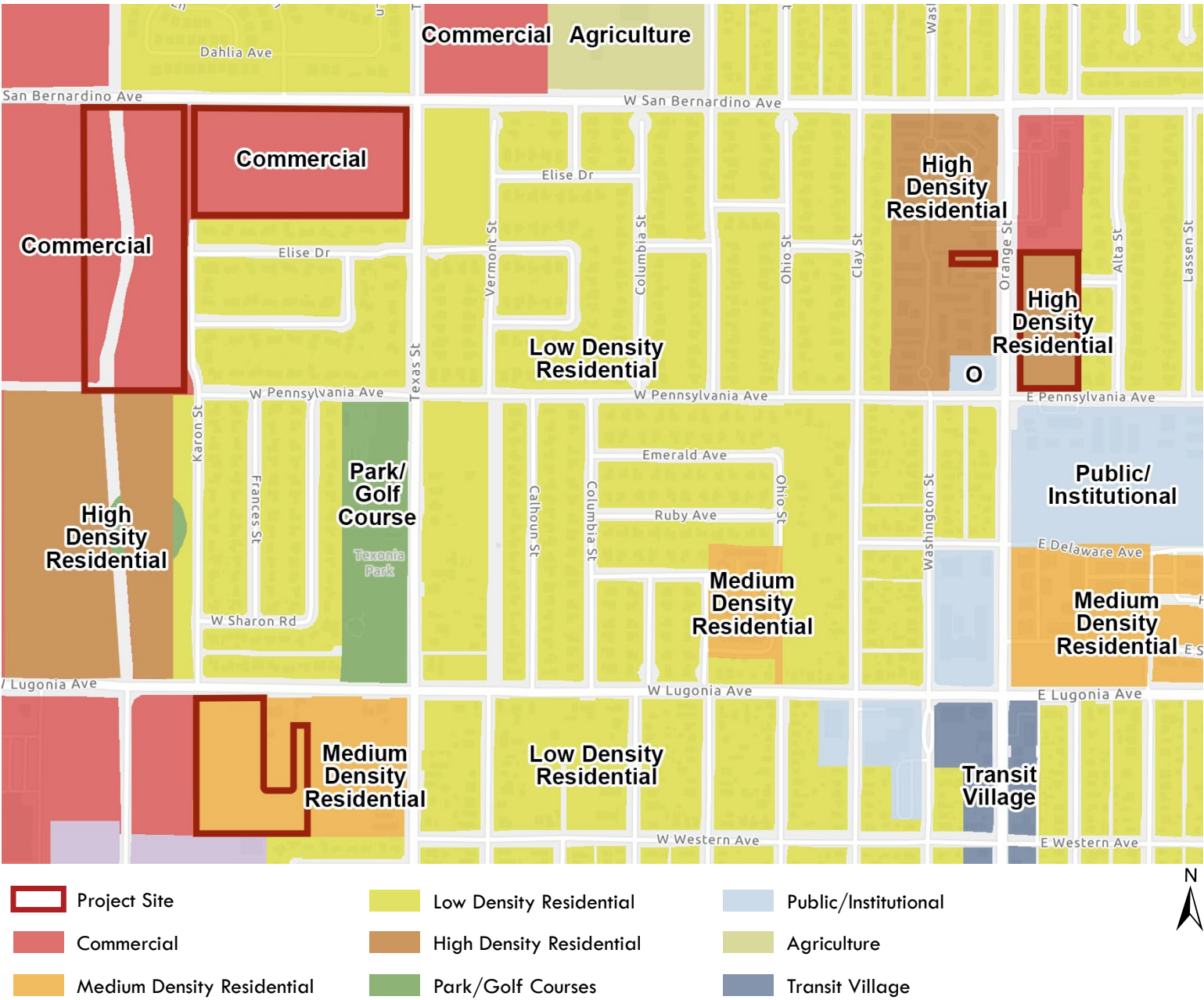
This page intentionally left blank.

Existing General Plan Land Use



This page intentionally left blank.

Existing General Plan Land Use



This page intentionally left blank.

Existing Zoning

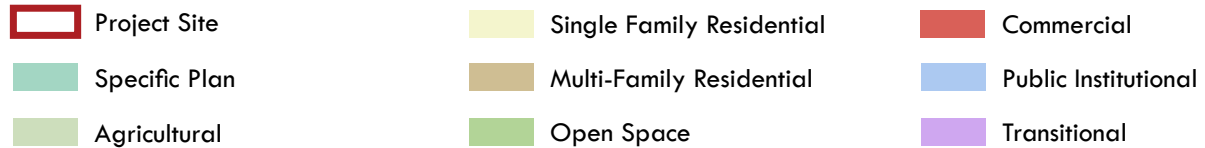
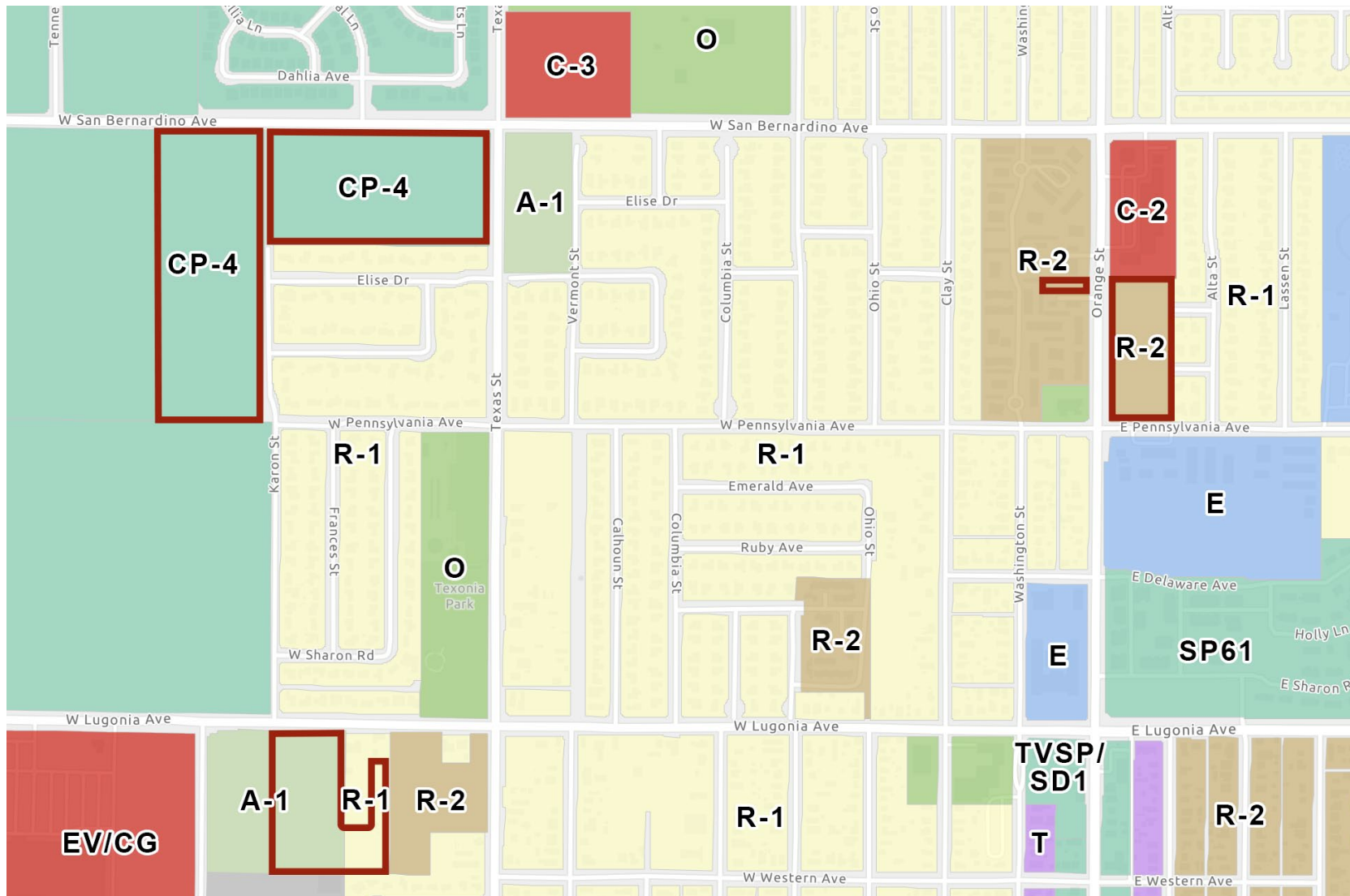


- Project Site
- Commercial Industrial
- Multiple Family Residential
- Administrative
- Specific Plan
- Public Institutional
- Agricultural



This page intentionally left blank.

Existing Zoning



This page intentionally left blank.

3. PROJECT DESCRIPTION

3.1. PROJECT OVERVIEW

Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites for the purpose of increasing residential development capacity. The Project includes the following components: a General Plan Amendment (GPA) to change the land use designations to enable the proposed rezoning, a Specific Plan Amendments (SPA) to remove 18 lots out of the EVCSP and 3 lots out of Concept Plan 4, and zone change to allow for medium and high-density residential development within the Project site.

According to the Housing Element, upon rezoning, the Project sites could yield 2,436 housing units through a development horizon of 2035. No specific development project is proposed as part of this Project, but this Initial Study and the forthcoming Subsequent EIR assume and programmatically analyze anticipated impacts associated with the development of 2,436 housing units and 151,048.46 SF of Public/Institutional development compared to buildout under the existing General Plan land use and zoning designations (i.e., the *status quo*). The Initial Study and Subsequent EIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite. Table 3-1 lists the proposed General Plan land use designation, zoning, and buildout of the 24 sites.

Table 3-1: Proposed General Plan Buildout

Site Number	Proposed GP Land Use Designation	Proposed Zoning	Proposed Density (DU/acre)	Acres	Proposed Maximum Buildout (DU)
1	MDR	R-2	15	8.91	133
2	MDR	R-2	15	4.26	63
3	HDR	R-3	30	5.84	175
4	HDR	R-3	30	3.15	94
5	HDR	R-3	30	1.07	32
6	HDR	R-3	30	1.9	57
7	HDR	R-3	30	1.9	57
8	MDR	EV2500RM	15	4.07	61
9	HDR	R-3	30	2.5	75
10	HDR	R-3	30	4.03	120
10A	MDR	R-3	30	0.08	2
11	MDR	R-2	30	4.7	70
12	MDR	R-2	30	2.31	34
13	HDR	R-3	30	4.73	141
14	HDR	R-3	30	4.21	126
15	HDR	R-3	30	8.86	265
15A	HDR	R-3	30	0.02	1
16	MDR	R-2	30	10.65	159
16A	MDR	R-2	15	0.01	0
17	MDR	R-2	15	14.05	210
18	HDR	R-3	30	5	150
19	HDR	R-3	30	6.31	189
20	MDR	R-2	15	4.76	71

21	MDR	R-2	15	1.64	24
22	HDR	R-3	27	0.33	9
23	HDR	R-3	27	3.96	118
24	Public/Institutional (PI)	EV/PI	0.5 Floor Area Ratio (FAR)	6.94	151,048.46 SF
Total				116.19	2,436 DU; 151,048.46 SF of PI

Proposed General Plan Amendment

The General Plan land use designations of all sites, except for Sites 8, 20, 21, 22, 23 and 24, would be amended from Commercial/Industrial or Commercial/Administrative Professional to Medium Density Residential or High Density Residential and would have a planned density of 15 and 27 dwelling units per acre (DU/acre), respectively. The intent of the Medium Density Residential land use category is to provide areas for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated Medium Density are generally more suitable for development in the low- to mid-level of the permitted density range for this category. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). The intent of the High Density Residential land use category is to provide for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated High Density are generally more suitable for development at the mid- to high-level of the density range for this category. Site 24 would require a GPA to change its existing General Plan land use designation from Commercial/Industrial to Public Institutional to be more aligned with the site's current use as a school, and achieve compatibility with adjacent proposed residential General Plan land use designations. The proposed General Plan land use designations for all the sites are shown in Figures 3-6a and 3-6b, *Proposed General Plan Land Use Designation*.

Proposed Zone Change

All the sites would require a zone change to allow for medium and high-density residential development, except for Site 24, which would require a zone change to allow for Public/Institutional land uses. The zone change would allow the zoning designation of Site 24 to be more aligned with the site's current use as a school, and achieve compatibility with the adjacent proposed residential zones. A majority of the sites are currently within the EVCSP (sites 1-16A) or Concept Plan No. 4 (sites 17-19) and would be de-annexed from the Specific Plan and placed in the Multiple Family Residential (R-2) or Multiple Family Residential (R-3) zoning district. The Multiple Family Residential (R-2) zoning designation allows for single and multi-family development with a maximum density of 3,000 square feet (SF) of lot area per dwelling unit, which equates to approximately 15 DU/acre. The Multiple Family Residential (R-3) zoning designation also allows for single-family and multi-family developments with an allowed density of 1,450 SF of lot area per dwelling unit, which equates to approximately 30 DU/acre. Site 8 located on Iowa Street would remain in the EVCSP but would require a SPA to modify the zoning of the site from Multi-Family Residential-3000 District to Multi-Family Residential-2500 District. The Multi-Family Residential-2500 District zoning is intended to provide for the development of high-quality apartments on large lots with a maximum density of 15 DU/acre with a minimum of 2,500 SF of lot space for each dwelling unit.

Site 24 would also remain within the EVCSP but would require a SPA to modify the zoning of the site from EV/IC to EV/PI to allow for less intense development, compatible with its surrounding proposed residential uses. Sites 20-23 would require a zone change from their current Agriculture, Single Family Residential (R-1), and Multiple Family Residential (R-2) zoning designations to Multiple Family Residential (R-2) and Multiple Family Residential (R-3) zoning designations. The proposed zoning for all the sites is shown in Figures 3-7a and 3-7b, *Proposed Zoning*.

Proposed Specific Plan Amendment

A SPA would be required to de-annex sites 1 through 16A, except for site 8, from the EVCSP and place them in either the Multiple Family Residential (R-2) or Multiple Family Residential (R-3) base zoning district. Site 8 would remain within the EVCSP but would require a SPA to change the zoning for the site from Multi Family Residential 3000-District to Multi Family Residential-2500 District. Sites 17 through 19 would be de-annexed from Concept Plan No. 4.

Comparison of Approved General Plan Buildout to Proposed Land Uses

As detailed in Table 3-2, *Comparison of Approved General Plan Buildout to Proposed Project*, buildout of the proposed Project would convert approximately 2,057,992.2 SF of planned nonresidential land uses, based on allowed FAR under the General Plan, to residential uses with an allowed capacity of 2,436 units.

Table 3-2: Comparison of Approved General Plan Buildout to Proposed Project

Land Use	Unit	Sites 1-16A		Sites 17-24		GP Total	Proposed Total	Proposed Project minus Approved GP
		Approved GP	Proposed Project	Approved GP	Proposed Project			
CI	SF	1,505,651.40	-	151,048.46	-	1,656,699.86	-	(1,656,699.86)
C	SF	-	-	552,340.80	-	552,340.80	-	(552,340.80)
PI	SF	-	-	-	151,048.46	-	151,048.46	151,048.46
MDR	DU	40	522	10	305	50	827	777
HDR	DU	-	1143	61	466	61	1609	1,548
Total Residential	DU	40	1665	71	771	111	2,436	2,325
Total Nonresidential	SF	1,505,651.40	0	703,389.26	151,048.46	2,209,040.66	151,048.46	(2,057,992.2)

The buildout projections listed in Table 3-2, *Comparison of Approved General Plan Buildout to Proposed Project*, are used throughout this Initial Study to estimate the net difference in the magnitude of development that could possibly occur in Redlands upon implementation of the proposed Project to year 2035 in comparison to the buildout that may occur pursuant to the existing General Plan land use designations (i.e., the *status quo*) in accordance with CEQA Guidelines Section 15162 regarding Subsequent Environmental Impact Reports for projects “which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect” (AEP, 2024). Land use calculations are used to estimate the number of dwelling units that could be generated by proposed land uses and to estimate the decrease in non-residential buildout.

Infrastructure Improvements

Roadways and utilities may be required to support development of future residential construction within the Project site. Future onsite infrastructure improvements that may be necessary for residential development include storm drains, wastewater, water (potable and reclaimed), and dry utilities that would connect to existing facilities within the Project site or adjacent to the Project area. Specific infrastructure improvements required to support residential development within the Rezone areas are not known at this time and will not be known until a development project is proposed.

3.2. PROJECT OBJECTIVES

In accordance with CEQA Guidelines Section 15124, the following primary objectives support the purpose of the Project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this report, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. Specifically, the Project objectives are as follows:

1. Implement Program 1.1-1 of the 6th Cycle 2021-2029 Housing Element to provide adequate capacity for at least 4,219 units on suitable sites.
2. Maintain adequate housing sites for all income groups throughout the eight-year planning period.
3. Increase the City’s overall housing capacity and capability to accommodate housing as required per the certified Housing Element for the 2021-2029 housing cycle.
4. Minimize potential land use conflicts associated with the proposed change to existing land use designations and zoning.

3.3. DISCRETIONARY ACTION CHECKLIST

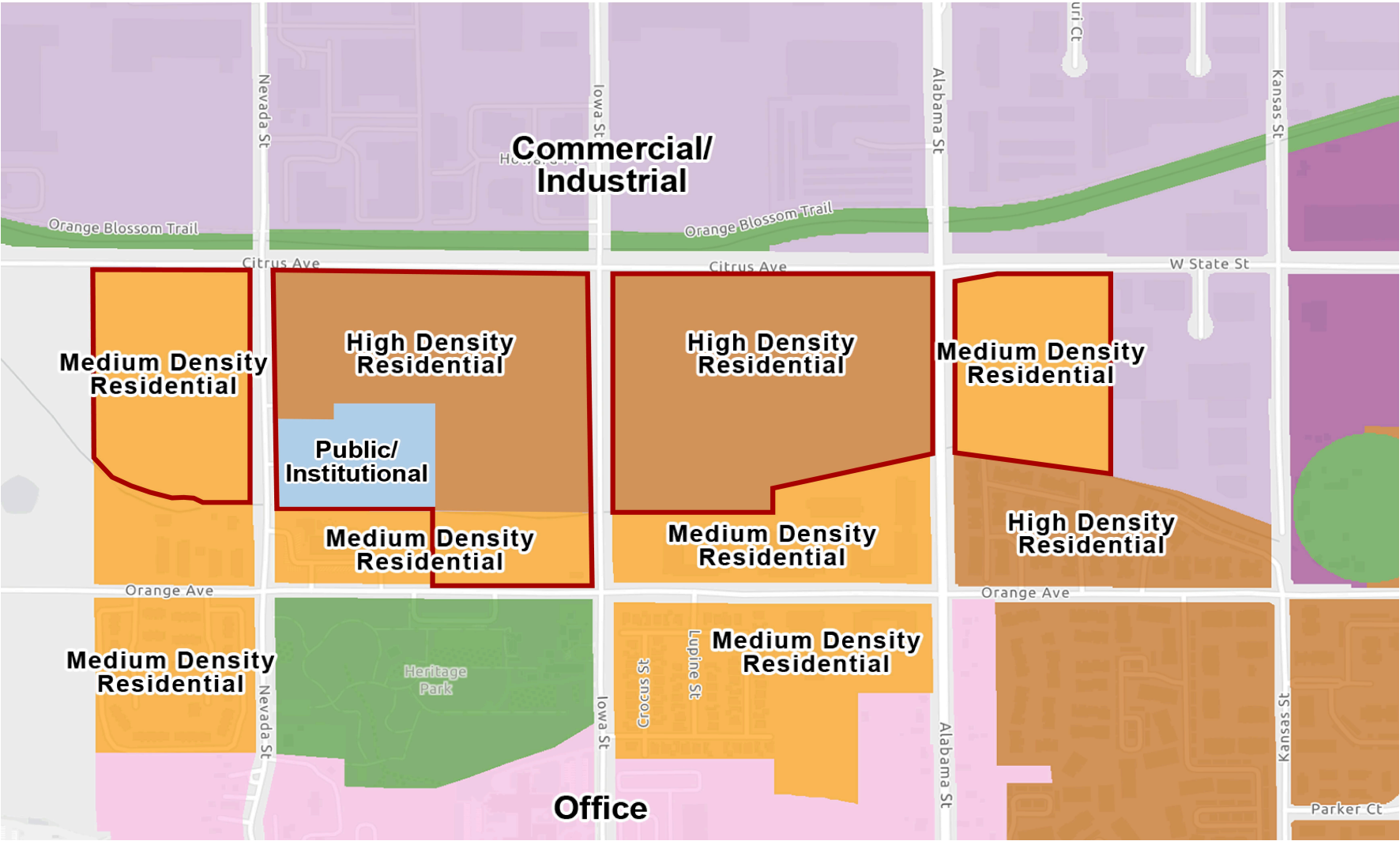
The City of Redlands and the following responsible agencies are expected to use the information contained in this Initial Study for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

As part of the proposed Project, the following discretionary actions would be necessary:

Table 3-3: Project Approvals Needed

Lead Agency	Action
City of Redlands	<ul style="list-style-type: none"> • Certification of the SEIR • Adoption of General Plan Amendment(s) • Adoption of Specific Plan Amendment(s) • Approval of the Zone Change(s)

Proposed General Plan Land Use

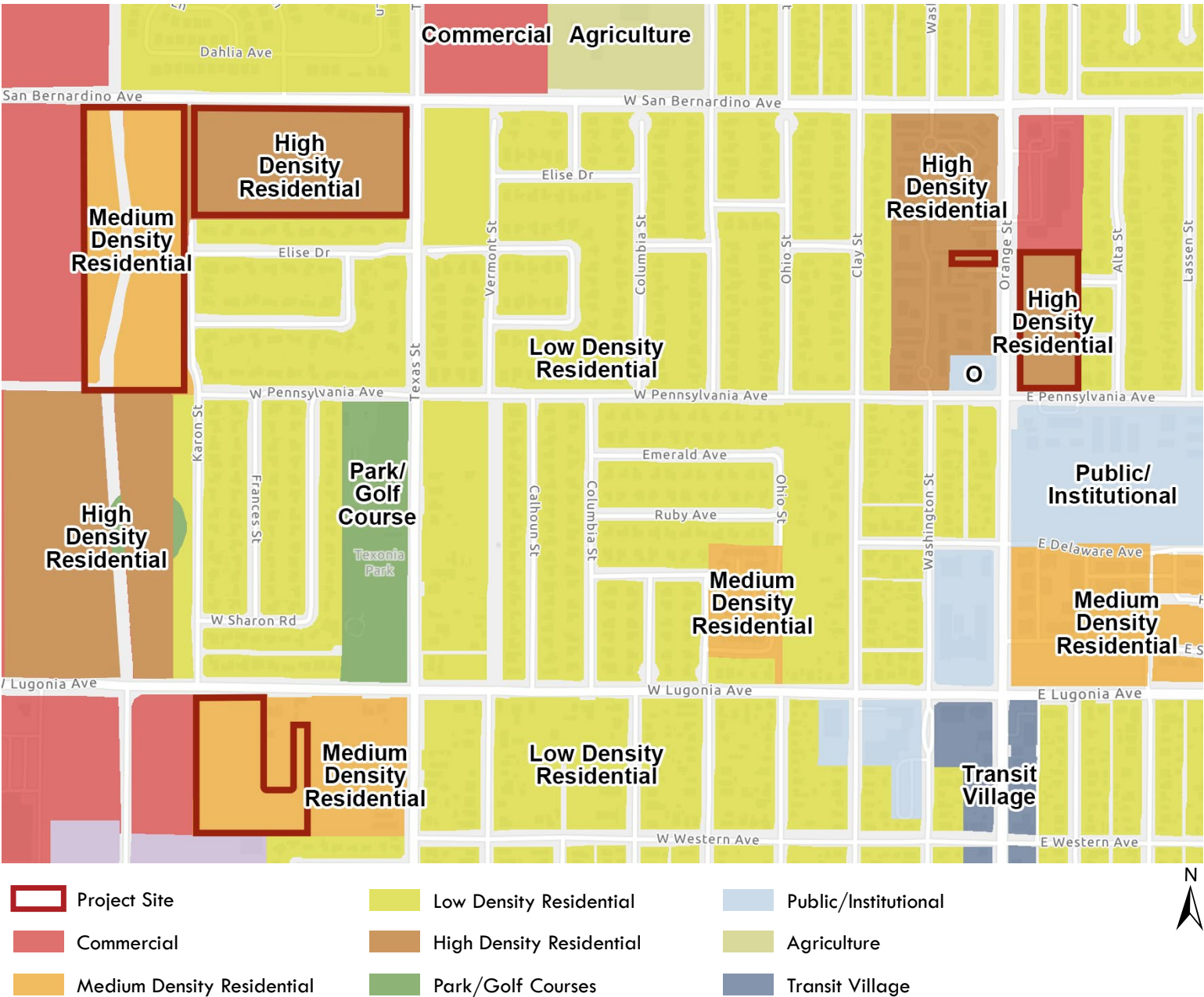


- Project Site
- Commercial/Industrial
- Medium Density Residential
- High Density Residential
- Park/Golf Courses
- Light Industrial
- Public/Institutional



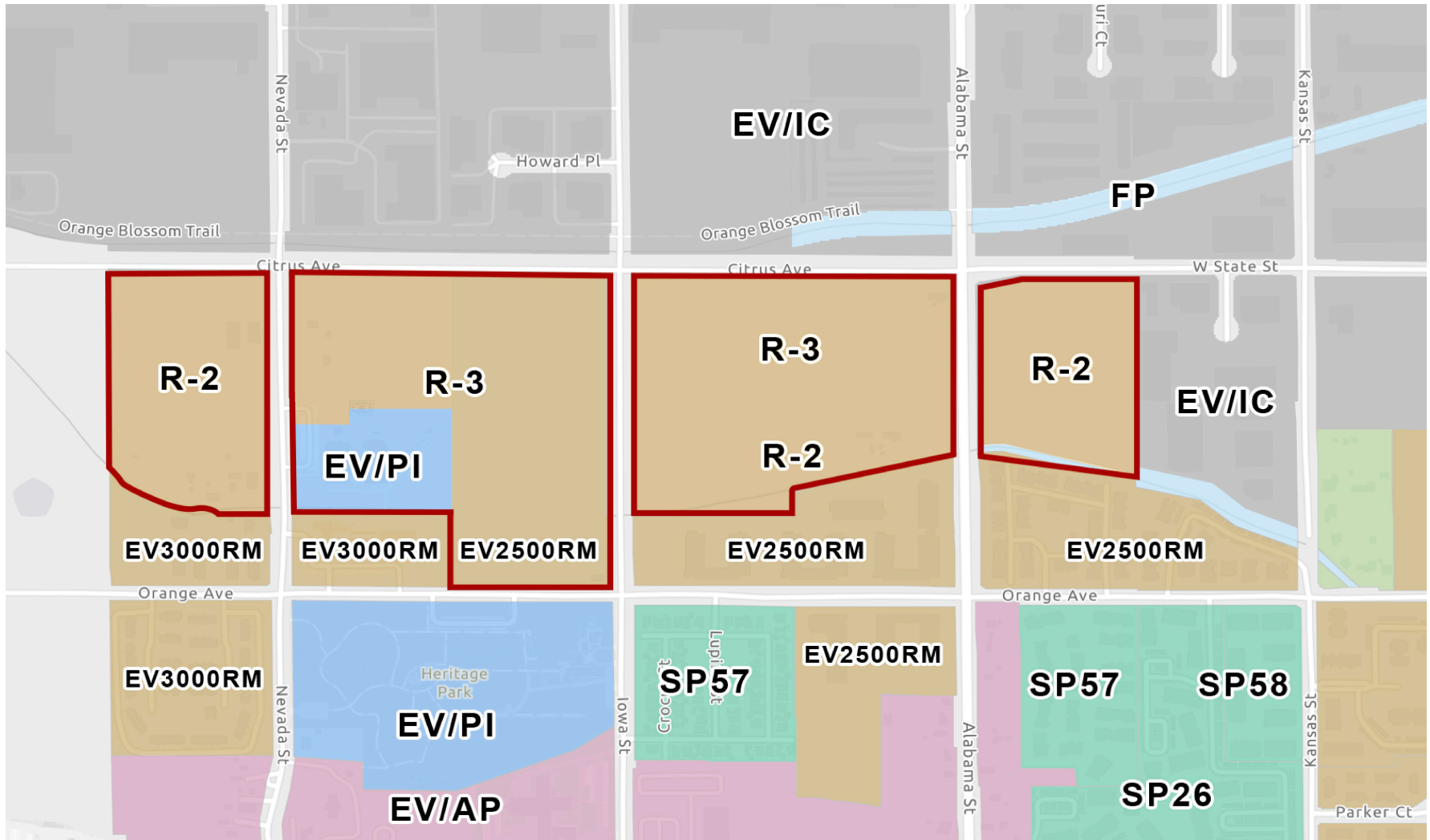
This page intentionally left blank.

Proposed General Plan Land Use



This page intentionally left blank.

Proposed Zoning

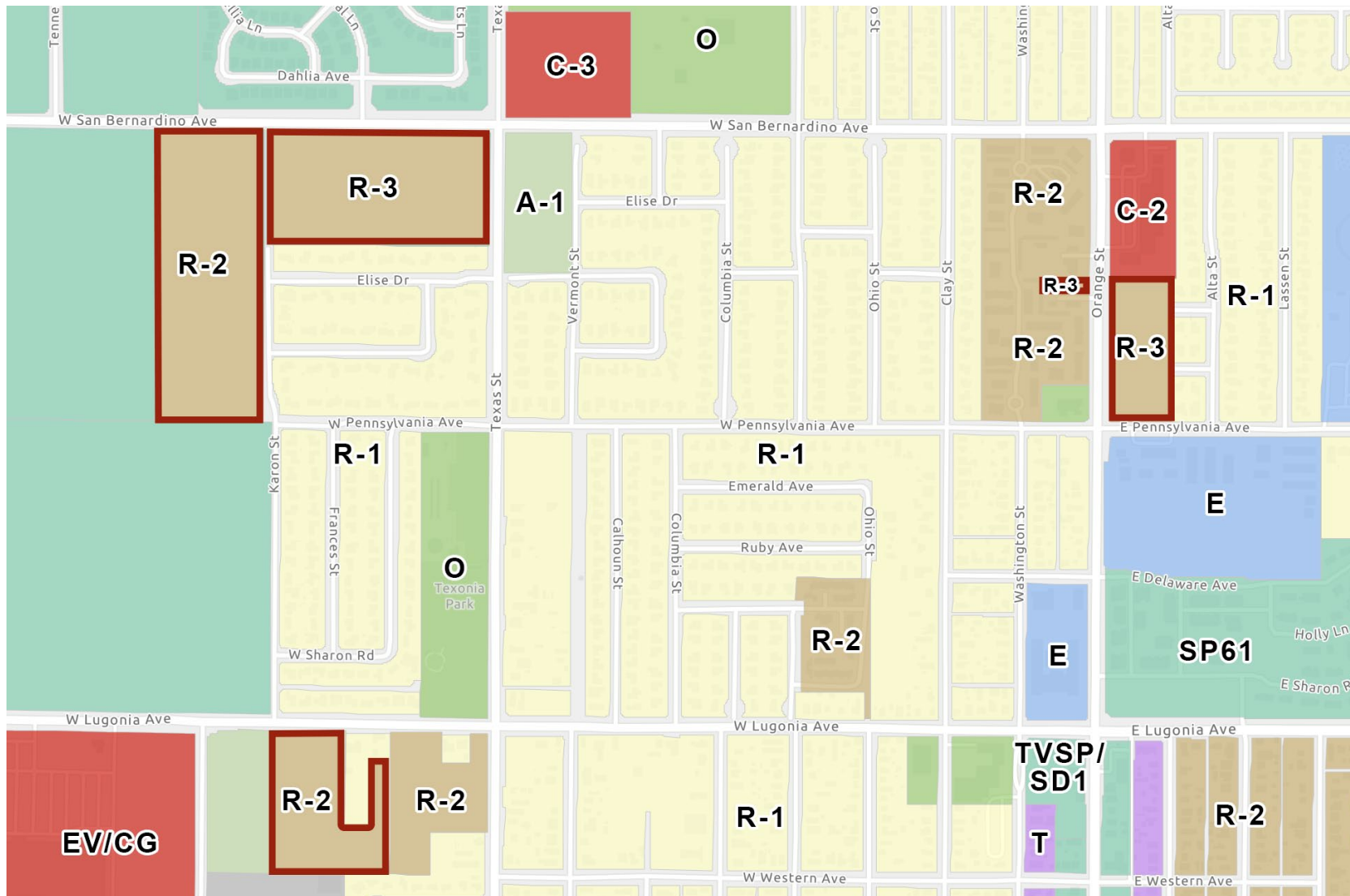


- Project Site
- Commercial Industrial
- Multiple Family Residential
- Administrative
- Specific Plan
- Public Institutional
- Agricultural



This page intentionally left blank.

Proposed Zoning



- Project Site
- Specific Plan
- Agricultural

- Single Family Residential
- Multi-Family Residential
- Open Space

- Commercial
- Public Institutional
- Transitional



This page intentionally left blank.

4. ENVIRONMENTAL CHECKLIST

4.1. BACKGROUND

Project Title: Redlands RHNA Rezone Project
Lead Agency: City of Redlands
Lead Agency Contact: Kevin Beery, Senior Planner
Project Location: City of Redlands
Project Sponsor's Name and Address: City of Redlands 35 Cajon Street, Suite 20 Redlands, CA 92373
General Plan and Zoning Designation: Parcels include the following General Plan Land Use Designations: Commercial/Industrial, Commercial, Medium Density Residential, and High Density Residential. Parcels include the following Zoning Designations: Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single family Residential (R-1) and Multiple Family Residential (R-2)
Project Description: Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites within the City to allow residential development, which includes an application for a General Plan Amendment (GPA) to change the land use designations of the sites to allow for residential development, a Specific Plan Amendment (SPA) in order to remove 18 lots out of the EV CSP and 3 lots out of Concept Plan No. 4, and zone change to allow for medium and high-density residential development within the Project site.
Other Public Agencies Whose Approval is Required:

4.2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity compared to those impacts identified in the City of Redlands General Plan EIR either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

<input type="checkbox"/>	Aesthetics	<input checked="" type="checkbox"/>	Agriculture/Forestry Resources	<input checked="" type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Energy
<input type="checkbox"/>	Geology/Soils	<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards/Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input checked="" type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources

<input checked="" type="checkbox"/>	Noise	<input checked="" type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input checked="" type="checkbox"/>	Transportation	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input checked="" type="checkbox"/>	Utilities and Service Systems	<input type="checkbox"/>	Wildfire	<input checked="" type="checkbox"/>	Mandatory Findings of Significances

4.3. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier analysis pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Kevin Beery
Signature

Kevin Beery, Senior Planner
Name and Title

June 26, 2024
Date

City of Redlands
Lead Agency

4.4. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project 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 offsite 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: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less 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 “Earlier Analysis,” as described in (5) below, 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. Guidelines Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
 - Earlier Analysis Used. Identify and state where they are available for review.
 - 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.
 - 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.

5. ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

5.1.AESTHETICS

Would the project:	Potentially Significant Impact	Less Than 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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential aesthetic impacts resulting from implementation of the General Plan. The Certified EIR analysis recognized that the General Plan would introduce land use changes that would potentially affect existing views to and from open spaces, canyonlands, hillsides, groves, the San Bernardino Mountains, and along scenic and historic drives. However, development would be focused in infill areas, where there is existing development, and any new development would not greatly affect the existing scenic quality. In addition, General Plan policies seek to ensure that any development or redevelopment is visually compatible with the surrounding environment. Most development would take place in areas where light and glare already exist. The General Plan includes policies related to buffering between development and sensitive habitats, and between commercial, residential, and industrial uses. With implementation of the goals and policies of the General Plan, potential aesthetic impacts of the Certified EIR were found to be less than significant.

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

Less Than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

As discussed in the General Plan EIR, scenic vistas in the City consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives (Redlands, 2017). The sites are all located within developed areas of the city and are not designated as having a Resource Preservation land use category and are not located within a Historic or Scenic Preservation District. The Project area (Sites 1-24) consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the Project are in or near already developed areas of the City and coincide with areas designated for development under the current General Plan land use designations. Additionally, structures resulting from the Project would be generally within the heights of the existing developed areas and within the development guidelines set forth in the Municipal Code to ensure they would not block views of or from these scenic vistas as the structures would be consistent with views presently found in the area.

The General Plan includes several policies pertaining to preserving the unique visual qualities of the City's natural environment, including waterways, open space, hillsides, and vegetation. The General Plan includes policies to reduce the deterioration of these natural features, and consequently their scenic qualities. Policies 2-A.10, 2-A.14, 2-A.18, 2-A.29, 2-A.31, and 2-A.35 include context-specific design of new developments and limiting development in areas with scenic qualities. Future individual development projects would still be subject to development and planning review and must therefore conform to zoning and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks. Due to the siting and nature of the proposed land use changes, and General Plan policies that ensure that new development will have minimal impact on scenic corridors and other scenic resources, the proposed Project will have a less than significant impact on the City's scenic vistas, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. There are currently no designated State Scenic highways within the vicinity of the Project site. However, State Route (SR) 38 is an eligible, however not officially designated, State Scenic Highway (Caltrans, 2022). State Route 38 traverses between the two project areas, however neither is within the viewshed of the highway, as sites 1 through 16A and 24 are located approximately 1 mile southeast and sites 17 through 23 are located approximately one half to one mile north of the eligible highway, with various commercial and residential developments between the highway and the proposed Project site. The City has designated numerous roadway segments as scenic highways, drives, and historic streets subject to special development standards (GP EIR, p. 3.1-11). The proposed Project site is not located adjacent to or within the viewshed of any of the City designated scenic/historical streets. As such, the Project would not result in the potential to damage scenic resources within a state or City-designated scenic highway or roadway. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. As defined by Public Resources Code Section 21071; "Urbanized area" means either of the following:

(a) An incorporated city that meets either of the following criteria:

(1) Has a population of at least 100,000 persons.

- (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

According to the California Department of Finance E-5 Population Estimates in January 2023, the City of Redlands has a current population of 72,696. Combined with the adjacent cities of Loma Linda (23,965) and Highland (55,676), the population exceeds 100,000 persons thus qualifying the City as being in an “Urbanized Area” (CDF, 2024). Therefore, a significant impact would occur if an implementing project under the RHNA Rezone conflicts with applicable zoning and other regulations governing scenic quality.

Redlands General Plan. The Redlands General Plan designates the Project area with a mix of land uses including: Medium Density Residential (up to 15 DU/acre), Commercial, Agriculture, and Commercial/Industrial. The proposed Project includes multiple General Plan amendments to change the land use designation of parcels throughout the Project area to either High Density Residential (up to 27 DU/acre) or Medium Density Residential (up to 15 DU/acre). The new land use designations would encourage development on underused lots, providing a plan for introducing new residential uses to meet the City’s RHNA housing needs.

City of Redlands Municipal Code. Existing zoning within the Project area is primarily within the East Valley Corridor Specific Plan. Sites 1 through 7 and 8 through 16A and 24 are all zoned Commercial/Industrial within the EVCSP. Site 8 is zoned for Multiple Family Residential-3000. Sites 17 through 19 are zoned within the Concept plan No.4 Specific Plan, and Sites 20 through 23 are zoned for Agriculture, Single Family Residential, and Multiple Family Residential (See Figures 3-5a and 3-5b, *Existing Zoning*). The proposed Project would replace the current zones within the Project area with either Multiple Family Residential (R-2) or Multiple Family Residential (R-3) (with the exception of Site 24 which would be rezoned to Public/Institutional), which then would implement the design standards found in the Municipal Code.

City of Redlands Municipal Code Chapter 18, *Zoning Regulations*, provides detailed regulations for development and describes how these regulations would be used as part of the City’s development review process. For example, the R-3 Multiple Family Residential District set forth in Chapter 18.60 of the Municipal Code allows for development of buildings and structures with a height of no greater than four stories. Future development under the proposed Project would have a maximum height of four stories. Therefore, the proposed Project would remain consistent with the applicable zoning once the zone changes are enacted.

Full buildout of the Project area would result in the development of 2,436 dwelling units and 151,048.46 SF of Public/Institutional space. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. Implementing projects pursuant to the proposed Project would undergo development review in order to ensure that the Project would meet all applicable development standards pursuant to the Redlands General Plan and Redlands Municipal Code. Overall, the proposed Project area is located within an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. Hence, the proposed Project would not degrade the visual character of the surrounding area; and impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. Spill light occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Sensitive uses (e.g., residential uses) surrounding the Project site could be impacted by the light from development within the boundaries of the Project site if light spill occurs.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of off-site locations but results in a visible source of light viewable from a distance. Glare could also occur from building materials of the new structures, including glass and other reflective materials.

Construction

Limited, if any, nighttime lighting would be needed during future construction projects allowed by the proposed Project because Redlands Municipal Section 8.06.120 limits construction activities to the hours of 7:00 a.m. and 6:00 p.m. on weekdays and Saturdays. Construction activities may be permitted outside of those limitations identified in the case of urgent necessity or upon a finding that such approval will not adversely impact adjacent properties and the health, safety and welfare of the community if a temporary exception is granted. Thus, most construction activity would occur during daytime hours, and construction-related low-level illumination would be used for safety and security purposes only. In addition, construction activities do not include any materials or machinery that would generate offsite glare. Therefore, impacts related to lighting and glare during construction activities would be less than significant.

Operation

The Project does not propose any development but would allow for the future development of Medium and High-Density Residential land uses within sites with existing Commercial, Commercial/Industrial and Low-Density Residential land use designations. Future development could add additional nighttime light sources, such as landscape lighting, security lighting, and the lighting from additional cars. As previously discussed, all future projects would be required to comply with the applicable development standards for the site. Glare is not expected to result from the increase in pavement or from any future structures as non-reflective materials and architectural coatings would be utilized in the project design in accordance with Redlands Municipal Code Section 18.12.170(B)(7). Future projects would include specific setbacks, lighting standards, and building materials that would ensure the avoidance of potential lighting impacts. Further, all future projects would be required to comply with the City's General Plan Policy 2-A.35 which develops standards for exterior lighting for new developments, and would be verified through plan check prior to project approval. Therefore, the Project would result in a less than significant impact, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.2.AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential agricultural resource impacts resulting from implementation of the General Plan. Under the General Plan, approximately 200 acres of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland could be impacted by future development. Despite proposed policies and existing State and local regulations that would make the loss of Prime, Important, or Unique farmland less severe, the conversion of farmland would be considered a significant and unavoidable impact.

Most land contracted under the Williamson Act would not be susceptible to buildout pressure due to their categorization as low-density Rural Living and Agriculture land uses under the proposed General Plan. Because none of the land use changes proposed in this General Plan update conflict with an existing Williamson Act contract, this impact is considered less than significant.

The General Plan policies allow for agricultural uses throughout the city and aim to preserve agricultural land from fragmentation or isolation by directing development to infill sites in the urbanized part of the city and allowing for larger areas of low-density and agricultural uses in the periphery. Therefore, impacts related to the conversion of Farmland were determined to be less than significant.

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

Potentially Significant Impact. The State of California Department of Conservation's Farmland Mapping and Monitoring Program is charged with producing maps for analyzing impacts on the state's agricultural resources. California's agricultural lands are rated based on soil quality and irrigation status. For CEQA purposes, the following categories qualify as "agricultural land": Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Per Section 21060.1 of the State CEQA Guidelines, Farmland of Local Importance and Grazing Land are not considered Farmland. According to the Farmland Mapping and Monitoring Program, there are approximately 54 acres of Prime Farmland throughout the Project area on Sites 1, 3, 8, 9, 10, 13, 14, and 15. Therefore, the Project has the potential to convert existing designated farmland and impacts will be further evaluated in the Subsequent EIR.

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

Less Than Significant Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments. None of the parcels within the Project area are currently under a Williamson Act contract within the Project area (GP2035 EIR, Figure 3.2-1). There is one site, Site 20, which is zoned for agricultural uses. However, the Project site has not been used for agricultural purposes since at least 1994 and since then the site has remained vacant. In addition, the site has an existing General Plan designation of Medium Density Residential. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

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

No Impact. "Forest land" is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." "Timberland" is defined as "land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees." "Timberland Production Zone" (TPZ) is defined as "an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h)."

The proposed Project area is an urbanized environment. None of the parcels within the proposed Project area are currently zoned as forest land, timberland, or Timberland Production (City Zoning 2020). Therefore, no impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

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

No Impact. The proposed Project area is located within an urbanized environment. No forest land exists in the Project area, and implementation will not result in the loss of forest land or the conversion of forest land

to non-forest use. Therefore, no impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

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

Potentially Significant Impact. As discussed above, implementation of the proposed Project could result in the conversion Prime Farmland to a non-agricultural use and multiple sites are currently under agricultural production. Therefore, this impact will be further evaluated in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.3.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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential air quality impacts resulting from implementation of the General Plan. Buildout of the General Plan could result in significant air quality impacts associated with construction activities. As shown in Table 3.3-6 of the Certified EIR, implementation of the General Plan was determined to result in an exceedance of SCAQMD’s regional threshold for daily operational emissions. Therefore, the proposed General Plan would result in a significant and unavoidable and cumulatively considerable impacts associated with long-term operational criteria pollutant emissions.

However, air quality impacts related to nearby sensitive receptors during both construction and operation were found to be less than significant by the Certified EIR. Development under the General Plan was determined to meet all local, State, and federal regulations related to odor control, including permit requirements and impacts related to odors were determined to be less than significant.

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

Potentially Significant Impact. The City of Redlands is located within the South Coast Air Basin (“Basin”) and is under the jurisdiction of the SCAQMD. The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the AQMP, which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a proposed project would result in growth that is substantially greater than what was anticipated, then the proposed project would conflict with the AQMP. On the other hand, if a project’s density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD’s attainment plans. In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The Basin is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the Basin, including the Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

Implementation of the Project would generate pollutant emissions during both construction and operation of new developments. During construction, sources of pollutant emissions include heavy off-road equipment as well as on-road motor vehicles and workers' commutes to and from development sites. Construction activities would result in emissions of particulate matter, as well as nitrous oxides (NO_x) and volatile organic compounds (VOCs), which are precursors to ozone formation. Additionally, because the buildout of the Project would involve changes in land use intensity and traffic patterns, an increase of air pollutant emissions could occur that may result in significant impacts to air quality. Furthermore, operation of new or altered buildings could increase emissions from new area sources. Overall, the pollutant emissions associated with the Project could result in potentially significant impacts to air quality in the area and could potentially conflict with SCAQMD's AQMP. Thus, the potential for implementation of the Project to conflict with or obstruct implementation of the AQMP will be evaluated in the Subsequent EIR.

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

Potentially Significant Impact. As indicated above, short-term construction activities and long-term operation of development implemented by the Project may generate emissions that could result in either a violation of an ambient air quality standard or contribute to an existing air quality violation. Due to the elevated concentrations of air pollutants that currently occur in the Basin, when combined with other past, present, or reasonably foreseeable future projects in the area, the net increase of criteria pollutants could cumulatively contribute to the nonattainment designations of pollutants in the Basin. Thus, the potential for the Project to generate a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment will be evaluated in the Subsequent EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). Examples of land uses that can be classified as sensitive receptors include residences, schools, daycare centers, parks, recreational areas, medical facilities, rest homes, and convalescent care facilities. Sensitive receptors near the Project site include existing and proposed residential areas, schools, parks, and recreational areas. Future development pursuant to implementation of the Project may expose these existing and/or new sensitive receptors to substantial pollutant concentrations. Therefore, the potential for construction and operation of the future developments in the proposed Project area to expose sensitive receptors to substantial pollutant concentrations will be evaluated in the Subsequent EIR.

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

Less Than Significant Impact. The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass

manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

During construction of future development allowed under the Project, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The Project would allow for the development of future residential and public/institutional uses and would not include any activities or operations that would generate objectionable odors once operational. Therefore, the proposed Project would not result in other emissions (such as those leading to odors) affecting a substantial number of people, and further analysis of this issue is not required in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.4.BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential impacts on biological resources resulting from implementation of the General Plan. The Certified EIR determined that through implementation of the goals and policies of the General Plan, potential impacts to sensitive wildlife species, riparian and sensitive habitats would be less than significant. The General Plan’s policies to promote the health and maintenance of street trees is consistent with Municipal Code Chapter 12.52, and it was determined there would be no conflict with any existing local polices or ordinances.

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 Wildlife or U.S. Fish and Wildlife Service?

Less than Significant with Mitigation Incorporated. As described by the City’s General Plan EIR, there are 19 species that are state or federally listed as rare, threatened, or endangered species that have been or were identified as potentially present within the City and its Sphere of Influence. Only eight species are known to either be present or have a moderate to high probability of occurring due to the presence of

suitable habitat, mainly along the Santa Ana River, Mill Creek, or San Timoteo Creek (GP EIR, p. 3.4-23). The sites are not located within any of the areas identified for sensitive habitat within the General Plan EIR (GP EIR, Figure 3.4-2).

The Project area is urbanized and developed and is currently slated for urban development pursuant to the current General Plan land use designations analyzed under the General Plan EIR. Implementation of the Project would implement infill development within an already highly disturbed urban environment and would not result in any direct impacts to special status species, nor involve or result in any existing habitat modifications that could indirectly result in a substantial adverse effect on any special status species. According to the General Plan EIR, areas where vegetation types are categorized as developed/ruderal, agriculture, and annual grassland have limited value for native plant and animal species. Future development in these areas would therefore be expected to have a lower impact on sensitive species and their habitats (GP EIR, p.3.4-24). Furthermore, while it is not expected that the Project site would support suitable habitat for rare plant and animal species, General Biological Surveys would be performed for future development projects within the proposed Project site to confirm whether suitable habitat exists, as outlined in Mitigation Measure BIO-1. If suitable habitat is identified, rare plant/wildlife surveys should be conducted to determine presence of species, in accordance with California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) and during the appropriate time of year. If rare plants/wildlife are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level. Therefore, the Project would not result in impacts on species identified as candidate, sensitive, or special status with implementation of Mitigation Measure BIO-1, and further analysis of this issue is not required in the Subsequent EIR.

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. As shown in Figure 3.4-2 of the Redlands GP EIR, there are no critical habitats located within the Project site and the sites are currently slated for urban development pursuant to the current General Plan land use designations analyzed under the General Plan EIR. Existing vegetation communities onsite consist of agricultural land, annual grassland, and developed/ruderal land as shown in Figure 3.4-1 of the Redlands General Plan EIR. None of these vegetation communities are considered sensitive pursuant to local or regional plans, policies, regulations or by CDFW or USFWS. However, several sites are located near the Morey Arroyo riverine, which is a riparian habitat according to the USFWS National Wetland Inventory. Therefore, future developments related to the proposed Project within the Project site shall require a biological survey for jurisdictional features prior to the approval of any development applications, as outlined in Mitigation Measure BIO-2. If jurisdictional waters are identified on a site, avoidance is preferred. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. Thus, with implementation of Mitigation Measure BIO-2, impacts to riparian habitat would be less than significant, and further analysis of this issue is not required in the Subsequent EIR.

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

Less Than Significant with Mitigation Incorporated. Several sites are located near the Morey Arroyo riverine, which is a riparian habitat according to the USFWS National Wetland Inventory. These sites are already slated for urban development pursuant to their respective current General Plan land use designations, as analyzed under the General Plan EIR. Nevertheless, Mitigation Measure BIO-2 has been included to require jurisdictional assessments for individual development projects within the Project site prior

to approval of any development applications. If resources under CDFW, USACE, and/or RWQCB jurisdiction are identified, impacts should be avoided where feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources would be mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include on-site or off-site preservation, enhancement, creation, and/or restoration. With implementation of Mitigation Measure BIO-2, impacts to federally protected wetlands would be less than significant, and further analysis of this issue is not required in the Subsequent EIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The General Plan identifies potential wildlife corridors through the Live Oak Canyon and San Timoteo Canyon areas, and for the City to protect wildlife corridors connecting the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak canyons, the Badlands, and other open space areas (GP EIR, p. 3.4-29). These areas are not located within or adjacent to the Project site. Further, these sites are already slated for urban development pursuant to their respective current General Plan land use designations, as analyzed under the General Plan EIR.

No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located within the Project site or in the surrounding area. However, mature trees are scattered throughout the area. Although the trees are mainly ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The U.S. Fish and Wildlife Service (USFWS) administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. Projects implemented under the Project would be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements, less than significant impacts would occur and no further analysis is required in the Subsequent EIR.

e) Conflict with any local policies or ordinances protecting biological resources?

Less Than Significant Impact. The City has a Street Tree Policy and Protection Guidelines Manual (adopted January 2013) and a tree protection ordinance codified as Redlands Municipal Chapter 12.52 for street trees and trees in public places. The General Plan also includes tree protection policies consistent with the guidelines manual.

Implementation of the Project is not anticipated to conflict with the provisions of these existing tree policies and guidelines. Future development and/or redevelopment activities that would be permitted under the Project would be required to be reviewed by the City for consistency with the existing tree policies and guidelines. Therefore, implementation of the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no further analysis is required in the Subsequent EIR.

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

No Impact. The Project is within an urbanized area, and there are no adopted regional conservation plans in the City (CDFW, 2019). There is, however, the Upper Santa Ana Wash Land Management and Habitat

Conservation Plan, known also as the Wash Plan. The Wash Plan is the culmination of over a decade of coordination to develop an integrated approach to permit and mitigate all construction and maintenance activities within the Santa Ana River wash area, including water conservation, wells and water infrastructure, aggregate mining, transportation, flood control, agriculture, trails, and habitat enhancement. Specifically, the Wash Plan has been prepared as part of the Incidental Take Permit application submitted by the San Bernardino Valley Water Conservation District to the USFWS. The City, among other agencies, is a signatory to the Wash Plan and would participate in the implementation of the plan through a Certificate of Inclusion to receive coverage for planned projects. Implementation of the Wash Plan would result in permanent conservation and management of approximately 1,659.9 acres of native habitats that support slender-horned spine-flower, Santa Ana River woolly-star, cactus wren, California gnatcatcher, and San Bernardino kangaroo rat.

The Wash Plan was adopted in 2020 (SBVWCD, 2020). The Project area is located approximately 0.75 miles southwest of the nearest Wash Plan boundaries (WP 2023, Figure 1), with residential and commercial development in between the Project and the Wash Plan boundaries. Implementation of the Project would not conflict or otherwise impact the Wash Plan policies or objectives. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

MM BIO-1 Biological Assessment. Future projects proposed within the proposed Project site shall be surveyed by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur or if any riparian habitats, jurisdictional drainages, or wetlands are present onsite. If suitable habitat is present, a qualified biologist shall survey for special-status species during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating any ground disturbing activities in a given area. The focused surveys shall be conducted in accordance with CDFW guidelines. If special-status species are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.

MM BIO-2 Jurisdictional Resources: If potential jurisdictional waters are determined to be present onsite through the biological assessment require by MM BIO-1 above, a jurisdictional assessment shall be conducted for future projects within Sites 1 through 24. Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW.

Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction are subject to approval by permitting agencies and shall include, but are not limited to, the following:

- Construction-related equipment shall be stored in developed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage.
- Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants.
- Substances harmful to aquatic life shall not be discharged into the drainage. All hazardous substances shall be properly handled and stored.
- A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction.
- To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.

5.5.CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential impacts on cultural resources resulting from implementation of the General Plan. Future development and redevelopment permitted under the General Plan could result in changes that affect historic resources. At the time development or redevelopment projects are proposed, the project-level CEQA document would need to identify potential impacts on known or potential historic sites and structures. The Redlands Historic and Scenic Preservation Ordinance offers additional protections to historic resources by giving the City the authority to make recommendations, decisions, and determinations regarding the designation, preservation, protection, and enhancement of historic resources, including the authority to deny demolition, except in cases of proven hardship. With implementation of the goals and policies of the General plan and the Historical and Scenic Preservation, impacts to historical resources were determined to be less than significant.

Although implementation of the proposed General Plan may result in actions that could adversely affect archaeological resources, the Certified EIR determined that General Plan policies 2-P.17, 2-A.71, 2-A.72, 2-A.73, and 2-A.74 would minimize or avoid impacts by requiring the protection and preservation of such resources. With implementation of the identified General Plan principles and actions, potential impacts on archaeological resources from future development within the city were determined to be reduced to less than significant levels.

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

Less Than Significant Impact with Mitigation Incorporated. State CEQA Guidelines Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

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

Any project altering a historic resource would be subject to a Certificate of Appropriateness application reviewed by the Historic and Scenic Preservation Commission, and a demolition permit application for a structure over 50 years of age is subject to review by the Redlands Historic and Scenic Preservation

Commission. Although none of the structures on the Project site are considered historical resources according to the General Plan, and the Project site is already slated for urban development pursuant to the General Plan and the proposed Project aims to ensure preservation of historic resources, implementation of site-specific development projects pursuant to the proposed Project could cause a substantial adverse change in the significance of a historical resource by altering a historical resource's physical characteristics, which convey its historical significance. While there are no designated historical resources on the Project site, some structures may be older than 45 years and may Adherence to Redlands Municipal Code Section 2.62.200 (included as PPP CUL-1) and Certificate of Appropriateness procedures would address unidentified, potential historical resources (buildings, structures, and features aged 45 years and older) and would ensure preservation of known historic resources as new development within the Project area occurs. A project that follows the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* is considered to have a less than significant impact. Furthermore, Mitigation Measure CUL-1 is included to require evaluation of potential historic resources for implementing projects that could potentially impact a building or structure in excess of 45 years of age. Mitigation Measure CUL-2 requires any identified historical resources to meet the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. Therefore, with implementation of Mitigation Measure CUL-1 and CUL-2, and Redlands Municipal Code Section 2.62.200 (provided as PPP CUL-1), impacts related to a substantial adverse change in the significance of a historic resource would be less than significant. Therefore, no further analysis is required within the forthcoming Subsequent EIR.

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

Potentially Significant. A records search was conducted for the General Plan EIR and indicated the presence of 11 prehistoric resources within 1 mile of the General Plan Planning area. Many of the sites are developed with single family residences or agricultural uses and have heavily disturbed soils. The Project area is in an urbanized environment that has been previously disturbed and developed. However, future development, revitalization, and/or redevelopment activities that would be permitted under the individual development projects could involve grading and excavation to greater depths than previously undertaken. Therefore, individual development project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils, and this issue will be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. There are no known human remains on or near the Project area, including formal cemeteries. Additionally, the sites are located within an urbanized environment. Because the area has already been previously disturbed and developed, it has been subject to construction and ground-disturbing activities. The likelihood that human remains may be discovered during further site clearing and grading activities is considered extremely low. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 states that if human remains are discovered, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). This regulation is applicable to any project where ground disturbance would occur. Section 7052 of the California Health and Safety Code makes the willful mutilation, disinterment, or removal of human remains a felony. Therefore, compliance with existing law regarding the discovery of human remains would reduce potential impacts to

human remains to less than significant levels, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP CUL-1 **Municipal Code Chapter 2.62.** The City of Redlands Historic Architectural Design Guidelines shall apply to all future projects within the proposed Project. The Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* may also be applicable to properties or projects that may affect historic buildings and resources.

Mitigation Measures (MM)

MM CUL-1 Demolition or alteration of a building or structure that is at least 50 years old at the time of permit application and has not previously been evaluated for demolition or renovation within the last five years from the time demolition or alternation is proposed shall be subject to review at the request of the City by a qualified architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify if the building or structure proposed for demolition or alteration qualifies as a historical resource under CEQA guidelines. Buildings and structures shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the City for review and approval prior to the issuance of a building permit. If no historic resources are identified, no further analysis is warranted. If historic resources are identified, the applicant shall be required to implement Mitigation Measure CR-2.

MM CUL-2 For renovations involving historical resources identified through the process described in the architectural history evaluation mitigation measure (MM CUL-2), project activities shall comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. The memorandum should recommend design modifications necessary to bring projects into compliance with the Standards for Rehabilitation, which shall be incorporated into project designs to ensure compliance with the Standards. The memorandum shall be submitted to the City for review and approval prior to the issuance of a building permit.

5.6.ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential energy impacts resulting from implementation of the General Plan. The Certified EIR found that despite the overall increase in future energy use, the state’s current and future energy code and the General Plan policies would ensure energy efficient designs in new development and encourage energy efficiency upgrades in existing development, both of which would minimize wasteful, inefficient energy consumption and impacts related to energy would be less than significant.

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

Potentially Significant Impact. Buildout pursuant to the proposed Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. During construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities, if applicable).

During operation of Project related development, energy would be consumed for multiple purposes, including, but not limited to: heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during operations related to water usage, solid waste disposal, and vehicle trips. The potential for the proposed Project to result in wasteful, inefficient, or unnecessary consumption of energy resources will be analyzed in the Subsequent EIR.

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

Potentially Significant Impact. As discussed previously, implementation of the proposed Project would consume energy during construction and operation in the form of electricity, natural gas, and transportation fuel. The development could result in a significant impact to state or local plans for renewable energy or energy efficiency if they failed to meet energy efficiency standards for equipment or prevented energy suppliers from meeting renewable energy source targets. Therefore, the consumption of energy and its effects on renewable energy plans and energy efficiency requirements may be significant, and this issue will be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.7.GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential geology and soils impacts resulting from implementation of the General Plan. Potential adverse effects on people or structures from the rupture of a known earthquake fault, ground shaking, liquefaction, or unstable soil would be minimized to the greatest extent feasible by California building Code (CBC) requirements that protect buildings from fault rupture and the policies in the General Plan that require geotechnical reports and continued restrictions near active/potentially active faulting. Future development projects that disturb more than one acre would be required to implement Best Management Practices (BMPs) as required through the National Pollutant Discharge Elimination System (NPDES) permit which would minimize soil erosion during construction.

The Certified EIR discussed that the majority of development anticipated under the General Plan would involve redevelopment of or new development within existing developed areas. Thus, the likelihood of finding new or undiscovered paleontological resources would be limited. In addition, the General Plan includes policies that were determined to reduce impacts on paleontological resources to a less than significant level.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

No Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate “Earthquake Fault Zones” along with faults that are “sufficiently active” and “well-defined.” The boundary of an “Earthquake Fault Zone” is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

No known fault lines or Alquist-Priolo Fault Zones traverse the proposed Project site or are within 500 feet of any potential future development as part of the proposed Project (GP EIR, Figure 3.6-2). The nearest fault line to the proposed Project is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue/Fifth Avenue (approximately 2.25 miles from Site 24). Therefore, future development projects constructed under the proposed Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

- ii. Strong seismic ground shaking?**

Less Than Significant Impact. Earthquakes in and near the City have the potential to cause ground shaking of significant magnitude. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude. The Project site is located within a seismically active region of Southern California. As stated above, the nearest fault line is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue and Fifth Avenue (GP EIR, Figure 3.6-2).

The proposed Project would increase the potential residential buildout within the City; however, new structures built in the City are required to be built in compliance with the California Building Code (CBC), as codified in City of Redlands Municipal Code Chapter 15.04. CBC Section 1613 requires all structures be designed and constructed to resist the effects of earthquake motions in accordance with the Minimum Design Loads for Buildings and Other Structures established by the American Society of Civil Engineers. Compliance with the CBC would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Regulatory compliance with the CBC would minimize the potential for structures, including individual development projects under the proposed Project, to sustain substantial damage during an earthquake as modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement. Development under the proposed Project would not directly or indirectly exacerbate seismic conditions in the City of Redlands or elsewhere in the region. Therefore, impacts would be less than significant with respect to risk of loss, injury, or death involving strong seismic ground shaking, and this issue will not be analyzed further in the Subsequent EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires “mobility” sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

The proposed Project would increase the potential residential buildout within the City; however, the Project site and the immediate surrounding areas are not located in an area that is susceptible to liquefaction (GP EIR, Figure 3.6-4). Soils on the Project sites are mostly made up of either Hanford Sandy Loam or Tujunga Gravelly Loamy Sand (GP EIR, Figure 3.6-1), which are not typically susceptible to liquefaction, but may result in liquefaction as a result of severe seismic shaking. Impacts from seismic ground shaking, including liquefaction, associated with future development pursuant to the proposed Project would be addressed through site specific geotechnical investigations prepared in accordance with the CBC requirements, adopted by the City of Redlands Municipal Code Chapter 15.04. Development projects would also be required to adhere to local policies in the Redlands Municipal Code that contain seismic safety requirements and help strengthen existing code requirements such as limiting the disturbance of natural terrain and vegetation to the minimum necessary to accommodate reasonable use of property. Therefore, the potential impact related to seismically related ground failure including liquefaction would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

iv. Landslides?

No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

The Project site and the surrounding areas consist of relatively flat terrain. There are no existing hillsides within or adjacent to the proposed Project area. Additionally, the sites are not located in an area susceptible to landslides as mapped in Figure 3.6-3 of the General Plan EIR and are not in the path of any potential landslides. Further, the proposed Project does not propose substantial alteration to the existing topography and would not directly or indirectly exacerbate existing environmental conditions related to landslides. Therefore, no impacts would occur, and this issue will not be further analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The proposed Project would increase the potential residential buildout within the City; however, the proposed Project area is in an urbanized environment and in an area that is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the proposed Project area. Generally, earthwork and ground-disturbing activities, unless below minimum requirements, require a grading permit, compliance with which minimizes erosion, and the City’s grading permit requirements ensure that construction

practices include measures to protect exposed soils such as limiting work to dry seasons, covering stockpiled soils and use of straw bales and silt fences to minimize offsite sedimentation.

In addition, individual development projects that disturb more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit, including the implementation of best management practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a stormwater pollution prevention plan (SWPPP) (and included as PPP HYD-1). BMPs that are required under a SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced. Therefore, the potential for adverse soil erosion and topsoil loss would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Insert text.

Subsidence is a general lowering of the ground surface over a large area that is generally attributed to lowering of the ground water levels within a groundwater basin. Localized or focal subsidence or settlement of the ground can occur as a result of an earthquake motion in an area where groundwater in basin is lowered. Insert text.

The proposed Project would increase the potential residential buildout within the City; however, the proposed sites are within a generally flat area that is not subject to landslides, and due to the flat topography, the potential for lateral spreading is also considered very low. The proposed Project area is not identified as being located on a geologic unit or soil that is unstable, or that would become unstable because of development activities.

As described previously, future individual development proposals submitted pursuant to the proposed Project would be required to implement CBC requirements and site-specific geotechnical investigations that are typically required for all new developments. Therefore, compliance with the requirements of the CBC requires adherence to any and all geotechnical design recommendations that may be applicable to a particular project, which would be reviewed by the City for appropriate inclusion as part of the development review process and subsequent building plan check process, and would reduce potential impacts related to any unstable geologic unit or soil to a less than significant level. This issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils.

Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The soil types within the proposed Project site include Hanford Sandy Loam (HaC), Hanford Coarse Sandy Loam (HaC, HaD), and Tujunga Loamy Sand (TuB), as shown in GP EIR Figure 3.6-1. None of these soils are clay based and are not prone to expansion.

Also, as discussed above, any potential hazards related to unstable soils would be addressed through the integration of geotechnical information and design recommendations in the design and construction process for future individual development projects in accordance with the CBC requirements which minimize the risk associated with soils hazards. Therefore, compliance with the requirements of the CBC, which would be verified as part of the development review process as well as the subsequent building plan check and permitting process, would reduce potential impacts related to expansive soil to a less than significant level. This issue will not be analyzed further in the Subsequent EIR.

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

No Impact. The proposed Project area is currently served by existing sewer and wastewater treatment systems. Future development projects would include connection to existing sewer mainlines and service lines. Future development under the proposed Project would not include the use of septic systems. Therefore, no impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources, including fossils, have been found in the Redlands area, and there is potential for paleontological finds to occur in the City (Redlands, 2017). Paleontological resources are the fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations.

The proposed Project would increase the potential residential buildout within the City; however, the Project site is already slated for urban development pursuant to the General Plan. In addition, the proposed Project area is in an urbanized environment that has been previously disturbed and developed. However, future development pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken and could inadvertently uncover unknown paleontological resources buried in site soils. Therefore, future projects would be required to adhere to Mitigation Measure PAL-1, which would require future project applicants to provide an assessment of whether grading would impact any underlying soil units or geologic formations that have potential to yield fossiliferous materials. Mitigation Measure PAL-2 would establish a procedure for the management of paleontological materials on sites with potential to yield paleontological resources. Therefore, with implementation of the proposed mitigation measures, impacts related to paleontological resources would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP HYD-1 SWPPP. As listed in Section 5.10, Hydrology and Water Quality

Mitigation Measures (MM)

MM PAL-1: Paleontological Resources. Future project applicants within the Project sites shall provide a paleontological assessment by a qualified paleontologist meeting the standards of the Society of Vertebrate Paleontology (SVP) to determine whether grading for the project could impact underlying soil units or geologic formations that have a low to high potential

to yield fossiliferous materials, prior to project approval. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and shall recommend a project-specific paleontological resources monitoring and mitigation plan (PRMMP), if warranted, based on paleontological sensitivity. This plan will address specifics of monitoring and mitigation for the development project, and will take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. This PRMMP must meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity:

- High- All projects involving ground disturbances in previously undisturbed areas sediments mapped as having high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist and shall be monitored by a qualified paleontological monitor on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be of scientific significance, professionally and efficiently recover the fossil specimens and collect associated data pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010). Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.
- Low to High- All projects involving ground disturbance in previously undisturbed areas mapped with low-to-high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist. The PRMMP shall specify that monitoring shall only be required when construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units shall require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account: a) the most recent local geologic mapping, b) depths at which fossils have been found in the vicinity of the project area, as revealed by the museum records search, and c) geotechnical studies of the project area, if available.
- Low- All projects involving ground disturbance in previously undisturbed areas mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found. Paleontological monitoring is usually not required for sediments with low paleontological sensitivity.
- None- Projects determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological mitigation measures, but shall implement MM PAL-2, if incidental discoveries occur.

MM PAL-2 Fossil Discovery. In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50 foot radius of the find until its significance

can be determined by a Qualified Paleontologist. Scientifically significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP. A repository shall be identified and a curatorial arrangement will be signed prior to collection of the fossils. Any accredited institution may serve as a repository.

5.8.GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential greenhouse gas emission impacts resulting from implementation of the General Plan. The Certified EIR calculated the GHG emissions generated from the buildout of the General Plan and found that with the implementation of federal and State standards relating to renewable energy and other GHG reduction measures, the buildout of the General Plan would meet emissions targets for both 2030 and 2035.

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on the earth that can be measured by wind patterns, storms, precipitation, and temperature. The construction and operation of future development projects under the proposed Project would have the potential to generate significant GHG emissions, either directly or indirectly. Therefore, impacts may be significant and the generation of GHG emissions resulting from proposed Project implementation will be further evaluated in the Subsequent EIR.

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

Potentially Significant Impact. The construction and operation of development projects under the proposed Project would generate GHG emissions. The Project, as it is built-out over a period of years, could result in more motor vehicle trips and other related activities that generate greenhouse gases compared to buildout pursuant to the current General Plan land use designations. The City adopted a Climate Action Plan along with the GP in December 2017, which is designed to reinforce the City’s commitment to reducing GHG emissions. The proposed Project will implement the guiding policies in the General Plan and is anticipated to be consistent overall with the City’s Climate Action Plan. Therefore, impacts will be analyzed for any significance and the Project’s consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of greenhouse gases in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.9.HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than 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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential hazards and hazardous waste impacts resulting from implementation of the General Plan. The Certified EIR found that implementation of the General Plan policies along with existing federal, State, and local regulations pertaining to hazardous materials, airport hazards, emergency response, and wildland fires would ensure potential impacts would remain below a level of significance.

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

Less Than Significant Impact. A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or

the local implementing agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The sites are currently developed with many different uses including agriculture, single family residences, and industrial storage and are designated for urban development pursuant to the sites' current General Plan land use designations. The Project would include GPAs and zone changes to allow for future development of the Project site with up to 2,436 housing units within 116.19 acres on 27 total parcels, consistent with the City's certified 2021-2029 Housing Element, in conjunction with 151,048.46 square feet of floor area of public/institutional development. Potential buildout pursuant to the proposed Project would result in a net increase in 2,325 residential units and a net decrease of 2,057,992.20 square feet of floor area of public/institutional development. No development is proposed as part of this Project.

Construction

Future construction activities could involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials could be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements that are implemented by the City during building permitting for construction activities. These regulations include: the federal Occupational Safety and Health Act and Hazardous Materials Transportation Act; Title 8 of the California Code of Regulations (CalOSHA), and the state Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. As a result, routine transport and use of hazardous materials during construction would be consistent with applicable regulations and would be less than significant.

Operation

The Project involves changes to zoning capacity to allow for future development of up to 2,436 housing units and 237,619.5 SF of public/institutional use, which involve routinely using household hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. However, the Project would result in an overall decrease of nonresidential uses within the City. The types of materials customarily used by residential and public/institutional uses are not acutely hazardous and would only be used and stored in limited quantities. The normal routine use of these products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project site. Therefore, buildout pursuant to the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact.

Construction

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during potential future construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation, and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. To avoid an impact related to an accidental release, the use of BMPs during construction are implemented as part of a SWPPP as required by the NPDES General Construction Permit (and included as PPP HYD-1). Implementation of a SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling and construction dewatering activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

All future development which would disturb more than 1-acre resulting from the implementation of proposed Project and the City's certified 2021-2029 Housing Element would be required to develop and implement a SWPPP with BMPs as required by NPDES regulations. Depending on the age of the structure that would be demolished, asbestos-containing materials (ACMs) and lead-based paints (LBPs) may be present in the existing buildings. However, demolition activities would be required to implement SCAG Rule 1403, CalOSHA, and the sections of the California Health and Safety Code, which specify work practices to minimize asbestos and lead emissions during demolition. Therefore, construction of future development would result in a less than significant impact.

Operation

As described previously, future operation of up to 2,436 residential units and 237,619.5 SF of public/institutional use would include use of limited hazardous materials, such as solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. Normal routine use of typical residential products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the Project. Further, the Project would result in an overall decrease in nonresidential development. As a result, operation of the proposed Project would not create a reasonably foreseeable upset and accident condition involving the release of hazardous materials into the environment, and impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The following schools are located within a quarter mile of the proposed Project site:

- Montessori Redlands (On Site 24)
- Grove High School (On Site 24)
- Redlands Christian Lower School and Preschool
- Arrowhead Christina Academy Upper School
- Barbara Phelps Community School
- Clement Middle School
- Lugonia Elementary School
- Citrus Valley High School

As described previously, construction and operation from buildout pursuant to the Project could involve the use, storage, and disposal of small amounts of hazardous materials throughout the City of Redlands. Prior to construction, a SWPPP would need to be prepared and implemented, which would ensure hazardous materials are properly handled during construction and BMPs would be in place to avoid potential contaminated runoff from leaving the future development sites (PPP HYD-1). During operation, these hazardous materials would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential for accidental release into the environment near a school. Therefore, buildout pursuant to the proposed Project would not emit or handle acutely hazardous materials,

substances, or waste near a school, and impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

No Impact. None of the sites are located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control, 2023). Therefore, buildout pursuant to the Project would result in no impact, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The nearest airports to the proposed Project area are Redlands Municipal Airport (approximately 1.75 miles to the northeast of Sites 17-23) and San Bernardino International Airport (approximately 2.33 miles northwest of Sites 17-23). Only Site 23 is within the airport compatibility Zone D for the Redlands Municipal Airport (GP EIR, Figure 3.7-2), and none of the proposed sites are within the modeled noise contours for the Redlands Municipal Airport (GP EIR, Figure 3.12-3) or San Bernardino International Airport (GP EIR, Figure 3.12-4). According to the Redlands Airport Land Use Compatibility Plan (ALUCP), Zone D does not have any development restrictions. Additionally, future development pursuant to the proposed Project would be developed pursuant to the City's and applicable Airport Land Use Compatibility Plan development guidelines to ensure that future development would not pose a hazard to airport operations, flight patterns, or otherwise result in substantial aviation-related safety risks. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. Relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan and, to the extent that they mitigate potential disasters in the City, the City's Hazard Mitigation Plan (HMP), and the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Physical development pursuant to the proposed Project, including roadway improvements, is not expected to create obstacles to the implementation of emergency response or evacuation plans adopted for the City. Physical development pursuant to the proposed Project, including roadway improvements, is not expected to create obstacles to the implementation of emergency response or evacuation plans adopted for the City. Emergency access and circulation during construction and operation of individual development projects under the proposed Project would be part of each project's review and approval by the City. Therefore, as existing City development standards would require new development within the proposed Project to be designed so as to not interfere with an adopted emergency response plan or emergency evacuation plan, impacts from implementation of the proposed Project would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The proposed Project site, as with most of the City, is characterized as having a moderate fire threat level (GP EIR, Figure 3.7-3). Areas with high, very high, and extreme fire threat levels are located on the periphery of the City. Areas of high to extreme fire threat levels are characterized by

natural vegetation that can serve as fuel for wildland fires, and steeper topography that can impede emergency access and facilitate the rapid spread of potential fire.

The proposed sites are located in an urbanized environment that does not contain wildlands. In addition, the sites are already designated for urban development pursuant to the current General Plan land use designations for each site. Chapter 15.04 of the Redlands Municipal Code requires all development to adhere to safety standards provided in the CBC and Chapter 15.20 adopts the California Fire Code, including construction and design methods that effectively reduce the risk of structure fires. The City's close coordination of the Redlands Fire Department with the fire services of neighboring jurisdictions ensures the safety of new development from wildland fires. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP HYD-1 SWPPP. As listed in Section 5.10, Hydrology and Water Quality

Mitigation Measures (MM)

None

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the potential hydrology and water quality impacts resulting from implementation of the General Plan. The Certified EIR found that with implementation of federal, state, and local regulations such as the NPDES permit and the policies within the General Plan, impacts related to hydrology and water quality would be less than significant.

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

Less Than Significant Impact. The sites are mostly undeveloped with some agricultural uses, single family residences, and industrial storage structures. The Redlands General Plan designates the Project site with a mix of land uses including: Medium Density Residential (up to 15 DU/acre), Commercial, Agriculture, and Commercial/Industrial. The proposed Project includes GPAs to the land use designation of parcels throughout the Project area to High Density Residential (up to 27 DU/acre) and Medium Density Residential (up to 15 DU/acre). Sites 1 through 7, 9 through 16A, and 24 are all zoned Commercial/Industrial within the EV CSP. Site 8 is zoned for Multiple Family Residential-3000. Sites 17 through 19 are zoned within the Concept Plan

No. 4 Specific Plan, and Sites 20 through 23 are zoned for Agriculture, Single Family Residential, and Multiple Family Residential (See Figures 3-5a and 3-5b, *Existing Zoning*). The proposed Project would change the current zoning classifications of the Project site with either Multiple Family Residential (R-2) or Multiple Family Residential (R-3) (except for Site 24 which would be rezoned to Public/Institutional), consistent with the City's certified 2021-2029 Housing Element. No development is proposed as part of this Project.

Construction

The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Construction of future development facilitated by the Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute waters.

These types of water quality impacts during construction would be prevented through implementation of a SWPPP (PPP HYD-1). Any future construction activities that would disturb more than one acre of soil would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a SWPPP that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. The SWPPP would also include construction BMPs.

Adherence to the existing requirements and implementation of the appropriate BMPs, as ensured through the City's plan check and permitting process, would ensure that future construction pursuant to future construction pursuant to the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and construction impacts would be less than significant.

Operation

Future development facilitated by the Project would include operation of residential and nonresidential uses. Potential pollutants associated with the proposed uses include various chemicals from cleaners, pathogens from pet wastes, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into existing stormwater systems, it could result in further degradation of water quality.

However, in accordance with State Water Resources Board Order R8-2010-0036, NPDES No. CAS618033, the proposed Project would be required to incorporate a WQMP with post-construction (or permanent) Low Impact Development (LID) site design, source control, and treatment control BMPs, included as PPP HYD-2. The City's Pretreatment and Regulation of Wastes Ordinance and its Storm Drains Ordinance further protect water quality in the City and would be applicable to development projects under the proposed Project. As a standard requirement in the City, individual development projects are required to demonstrate compliance with the applicable regulations prior to issuance of building or engineering permits.

Implementation of practices required by the NPDES permit would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring

onsite for the development projects, which would improve the quality of stormwater before it enters the City's stormwater system. Compliance with federal, state, and local water quality regulations will ensure that water quality is protected to the maximum extent practicable. Therefore, impacts from implementation of the proposed Project would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The City is in the Upper Santa Ana Valley Groundwater Basin. The City's domestic water wells constitute approximately 50 percent of the water supply. According to the City of Redlands Urban Water Management Plan (UWMP), the City has sufficient water supply to meet demand through multiple dry years. As shown on Table 4-16 of the UWMP, the City would maintain a surplus from 4,453 acre-feet up to 5,100 acre-feet of potable water through multiple drought years. The 2020 water use rate was 279 gallons per-capita daily, which means the Project would result in an increase of 1,719,198 gallons or 5.28 acre-feet of potable water used per day, which is within the capacity of the Redlands water service for multiple dry years through 2045. The proposed Project would result in buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. Future residential development associated with the proposed Project would result in similar permeable surface areas as what is considered in the General Plan. Similar to Projects that would be implemented under the approved General Plan, future implementing projects under the proposed Project would be required to implement the policies and regulations within the General Plan that would help conserve groundwater in the area. In addition, none of the proposed Project sites are currently zoned for open space or other land uses that would preserve any permeable surfaces. Many of the sites are planned to be developed with Commercial/Industrial uses and would similarly introduce impervious surfaces to the Project area. However, as discussed in the General Plan EIR, any future projects would be required to implement the policies of the General Plan which would reduce any impacts to the groundwater supply to a less than significant level. Thus, impacts would be less than significant and this issue will not be analyzed further in the Subsequent EIR.

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

i. result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact.

Construction

Construction of future developments pursuant to the proposed Project could result in demolition of the existing structures and vegetation removal, that would expose and loosen building materials and sediment, which has the potential to mix with storm water runoff and result in erosion or siltation off-site. However, the Project site does not include any steep slopes, which reduces the erosion potential. Additionally, the majority of soil disturbance would be related to excavation and backfill for installation of building foundations and underground utilities.

The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP for the proposed construction activities (included as PPP HYD-1). The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Common types of construction BMPs include:

- Silt fencing, fiber rolls, or gravel bags
- Street sweeping and vacuuming
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseeding
- Material delivery and storage
- Stockpile management
- Spill prevention and control
- Solid waste management
- Concrete waste management

In addition, all grading plans within the City of Redlands require an accompanying set of “stand alone” Erosion Control Plans to minimize water and windborne erosion. Mandatory compliance with the SWPPP and the erosion control plan would ensure that future developments pursuant to the Project do not violate any water quality standards or waste discharge requirements during construction activities.

As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations to minimize the potential of future development to result in a degradation of the quality of receiving waters. Plans for grading, drainage, erosion control and water quality would be reviewed by the City’s Engineering Division prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during buildout pursuant to the Project.

Therefore, compliance with the City of Redlands Municipal Code Chapter 13.54, Storm Drains, MS4 Permit, and other applicable requirements, which would be verified during the City’s construction permitting process, would ensure that impacts of future development implemented as part of the proposed Project are avoided. Impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Operation

As described previously, buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the Project site is already slated for urban development, buildout pursuant to the Project would not result in an increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. However, projects implementing the proposed Project would be required to comply with the requirements under Chapter 3.65 of the Redlands Municipal Code, Storm Drain Facilities Fees. Section 3.56.030 of the City’s Municipal Code states that:

“No development permit shall be approved for new development unless the city finds that the storm drain facilities proposed within the development satisfy the requirements of the city’s master storm drain plan. To ensure consistency with the plan, the city may impose conditions to approval of the development which are necessary to implement the plan. The requirements of this chapter are imposed as a condition of development to ensure implementation of and consistency with the city’s general plan and to protect the public health, safety and welfare by ensuring that adequate public facilities and improvements will be installed and available to serve new development prior to, or concurrently with, the need.”

Development applicants are required to pay development storm drain impact fees per Section 3.56.040, Storm Drain Fees, established for the purpose of constructing the storm facilities provided in the City's Master Storm Drain Plan.

Additionally, the MS4 permit requires any new development project to prepare a WQMP (included as PPP HYD-2) that includes post-construction BMPs to reduce the potential of erosion and/or sedimentation through site design and structural treatment control BMPs. As part of the permitting approval process for each project, proposed drainage and water quality design and engineering plans would be reviewed by the City's Engineering Division to ensure that the site-specific design limits the potential for erosion and siltation. Overall, future drainage systems and adherence to the existing regulations would ensure that future development impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

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

Less Than Significant Impact.

Construction

Construction of future developments pursuant to the Project could require demolition of the existing building structures, including foundations, floor slabs, and utilities systems. These activities could temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of future projects would require a SWPPP (included as PPP HYD-1) that would address site specific drainage issues related to construction and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP implemented by a Qualified SWPPP Developer (QSP) (per PPP HYD-1) as verified by the City through the construction permitting process would prevent construction-related impacts related to potential alteration of a drainage pattern or flooding on or off-site from development activities. Therefore, impacts would be less than significant.

Operation

The Project area contains areas of flood risk. Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within FEMA flood zones. Per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new "occupiable" finished floor must be at least two feet above the one percent (100-year) base flood elevation. Any floodplain cross-section modifications (earthen platforms) may not cause more than one-foot water surface elevation increase upstream.

As described previously, buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the Project site is already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Future developments proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, adherence to the existing NPDES permit regulations and Municipal Code would ensure that impacts related

to alteration of a drainage pattern or flooding from operational activities related to future developments would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

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

Less Than Significant Impact.

Construction

As described in the previous response, construction of future developments pursuant to the Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. However, as described previously, implementation of future developments would require a SWPPP (included as PPP HYD-1) that would address site specific pollutant and drainage issues related to construction of future developments pursuant to the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared implemented by a QSP (per PPP HYD-1) as verified by the City through the construction permitting process would prevent construction-related impacts related to increases in runoff and pollution from development activities. Therefore, the impacts would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

Operation

The existing topography of the Project area is relatively flat. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the Project site is already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Projects proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, adherence to the existing NPDES permit regulations and Municipal Code would ensure that impacts related to exceeding the capacity of existing or planned stormwater drainage systems or creating additional sources of polluted runoff from operational activities related to future developments would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

- iv. **impede or redirect flood flows?**

Less than Significant Impact.

Construction

As described in the previous response, construction of future developments pursuant to the proposed Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff. However, as described previously, implementation of the future developments would require a SWPPP (included as PPP HYD-1) that would address site specific pollutant and drainage issues related to construction of future developments and include BMPs to eliminate the potential of increased runoff during construction activities. This includes regular monitoring and visual

inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP (per PPP HYD-1) as verified by the City through the construction permitting process would prevent construction-related impacts related to increases in runoff from development activities. Therefore, impacts would be less than significant.

Operation

As discussed previously, the Project area contains areas of flood risk. Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within a FEMA flood zone. Per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new “occupiable” finished floor must be at least two feet above the one percent (100-year) base flood elevation. Any floodplain cross-section modifications (earthen platforms) may not cause more than one-foot water surface elevation increase upstream.

As described previously, buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the Project site is already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout under existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Developments proposed pursuant to the proposed Project would be required to be consistent with the City’s drainage plans. Improvements would be implemented by the City as regional drainage improvements. However, future developments would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to address the City’s flooding issues. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City’s Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, the proposed drainage system and adherence to the existing NPDES permit regulations would ensure that future development impacts related to alteration of a drainage pattern or flooding from operational activities would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

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

Less Than Significant Impact.

Construction

As described in the previous response, construction of future developments pursuant to the Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased polluted runoff. However, as described previously, implementation of the Project requires a SWPPP (included as PPP HYD-1) that would address site specific pollutant and drainage issues related to construction of the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP (per PPP HYD-1) as verified by the City through the construction permitting process would prevent the release of pollutants due to inundation. Therefore, the impacts would be less than significant.

Operation

The Project would facilitate the development of new residential uses within the Project site.. As described previously, buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the Project site is already slated for

urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Projects proposed in implementation of the RHNA Rezone would be required to be consistent with the City's drainage plans and the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code). Additionally, projects would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Proposed project design would be reviewed for consistency during design check by the City.

Additionally, the MS4 permit requires any new development project to prepare a WQMP (included as PPP HYD-2) that includes post-construction BMPs to reduce the potential of stormwater runoff pollution through site design and structural treatment control BMPs. As part of the permitting approval process for each project, proposed drainage and water quality design and engineering plans would be reviewed by the City's Engineering Division to ensure that the site-specific design would adequately treat and capture onsite stormwater runoff. Overall, with compliance to the existing regulations as verified by the City's permitting process, impacts related to the release of pollutants due to flood hazards would be less than significant, and this issue will not be further analyzed in the Subsequent EIR.

Tsunamis are ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The City is approximately 50 miles inland from the Pacific Ocean. Therefore, the proposed Project area is not at risk of inundation from a tsunami, and this issue will not be analyzed further in the Subsequent EIR.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The proposed Project area is not located adjacent to any water retention facilities, lakes, or other bodies of water. Therefore, the proposed Project is not at risk of inundation from seiching, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The City is within the Santa Ana RWQCB jurisdiction. The Santa Ana RWQCB adopted the Santa Ana Region Basin Plan which designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As summarized below, future development projects pursuant to the proposed Project would comply with the applicable NPDES permits, and implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff.

As discussed above, construction activity within the City is required to comply with the NPDES Stormwater Discharge Permit. The City's Pretreatment and Regulation of Wastes Ordinance and its Storm Drains Ordinance further protect water quality in the City and would be applicable to development projects under the RHNA Rezone. Implementation of practices required by the NPDES permit and verified through City construction and operational permitting would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring onsite for the development projects, generally improving the quality of stormwater before it infiltrates into the groundwater basin.

Future developments pursuant to the Project would implement City policies that promote the protection of the City's natural water bodies, prevent water pollution, ensure preparation and implementation of

applicable water quality plans, require incorporation of BMPs, and otherwise ensure compliance with the City's NPDES permit. As such, implementation would not result in water quality impacts that would conflict with the RWQCB's Santa Ana Region Basin Plan.

Regarding a sustainable groundwater management plan, one has not yet been adopted for the Bunker Hill Basin which underlies the City. The Bunker Hill Basin stores approximately five million acre-feet of water and is recharged by rain, runoff from the surrounding mountains, and imported water. The Bunker Hill Basin provides water to the cities of Redlands, Highland, San Bernardino, Loma Linda, Colton, Rialto, Fontana, Grand Terrace, Riverside, and portions of unincorporated San Bernardino County. While there is no sustainable groundwater management plan for the Bunker Hill Basin, the 2020 San Bernardino Valley Regional Urban Water Quality Control Management Plan (UWMP), provides management strategies to meet targets for future water use, including groundwater supply from the Bunker Hill Basin. Project specific WQMP's required for development pursuant to the Project would address quality and quantity of stormwater runoff and provide BMPs for construction and operation to ensure compliance with the current General Stormwater Permit. Therefore, as buildout pursuant to the Project would not conflict with a water quality control plan or sustainable groundwater management plan, impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP HYD-1 **SWPPP.** Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2 **WQMP.** Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be prepared by the Project applicant and submitted to and approved by the City Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

Mitigation Measures (MM)

None

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the land use impacts resulting from implementation of the General Plan. The Certified EIR found that implementation of the General Plan would improve improving connectivity within and between existing and proposed neighborhoods, the proposed General Plan would provide more linkages within the city and the surrounding area by focusing on mobility and connectivity of the City’s transportation system. The General Plan does not contain provisions that conflict with federal, State, regional, or other local agency plans, regulations, or policies. Thus, impacts regarding land use were determined to be less than significant upon implementation of the General Plan.

a) Physically divide an established community?

Less than Significant Impact. The proposed Project provides for infill development and redevelopment and would provide up to 2,325 additional residential dwelling units (that provides for approximately 6,126 additional residents) within the City. Individual development projects pursuant to the proposed Project may result in temporary displacement of residents during construction activities. However, development projects would occur at a parcel-by-parcel project level. The potential displacement of persons residing on an infill or redevelopment parcel (if any) would be short-term, and the proposed Project would result in a greater number of residential units to house residents of the area. The proposed Project would not require the extension of any roads that could potentially divide an established community, only roads necessary for internal circulation. Therefore, impacts related to displacement of housing or persons that would physically divide an established community would less than significant, and this issue will not be analyzed further in the Subsequent EIR.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The proposed Project identifies sites that have the potential for development, revitalization, and/or redevelopment and proposes to rezone and amend General Plan land uses of specific parcels within the area to provide for residential uses in order to reach the City’s RHNA needs. The proposed Project would result in increases in development intensity for residential uses and changes in land uses that might possibly conflict with an applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed Project’s compatibility with existing plans, policies, and regulations will be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.1.2. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input checked="" type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the mineral resource impacts resulting from implementation of the General Plan. The General Plan proposed land use changes for areas designated to have regionally significant aggregate mineral resources. However, these land use changes would redesignate these sites as Open Space which would continue to allow mining operations as a conditionally permitted use. The proposed changes would not impact any mining uses currently existing in the Planning Area and would thus not result in the loss of availability of any resource recovery sites. Thus, impacts to mineral resources from implementation of the General Plan were determined to be less than significant.

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?

Less Than Significant. In order to protect the availability of mineral resources of value, the California Department of Conservation identifies sites to which continuing access is important to satisfying mineral production needs of the region and the State. The relative importance of potential mineral resource sites is indicated by inclusion in one of four Mineral Resource Zones (MRZ):

- MRZ 1: No mineral resources
- MRZ 2: Significant resource area (quality and quantity known)
- MRZ 3: Significant resource area (quality and quantity unknown)
- MRZ 4: No information (applies primarily to high-value ores)

Large areas in the northern portion of the City centered around the Santa Ana River wash are classified as MRZ-2, which contains high quality construction aggregates (e.g., sand, gravel, and crushed stone) that have been mined since the 1920s. Active mining in the Santa Ana River wash is located on both sides of the boundary between the cities of Redlands and Highland. These mining operations in the Santa Ana River wash are not within or adjacent to the proposed Project area.

Sites 17 through 23 of the RHNA rezone area are within MRZ-2 (City of Redlands GP, Figure 3.11-1). Portions of Sites 1 through 16A and 24 of the RHNA Rezone area are within MRZ-1 (GP EIR, Figure 3.11-1). The Project site is currently designated for urban development under the current General Plan land use designations and have not historically included mineral extraction, nor does the proposed Project area currently support mineral extraction or confirmed the identification mineral resources on the sites. Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource of value to the region and state. Therefore, impacts would be less than significant from implementation of the proposed Project, and this issue will not be analyzed further in the Subsequent EIR.

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

No Impact. The proposed Project area does not include areas designated for mining in any land use plan. Also, as described previously, implementation of the proposed Project would not result in the loss of availability of a known mineral resource recovery site. Therefore, there would be no impact from implementation of the proposed Project, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the noise impacts resulting from implementation of the General Plan. The Certified EIR found that increased noise and vibration levels due to future construction activities and increased vehicular traffic associated with the planned future growth of the City were determined to be considered less than significant.

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

Potentially Significant Impact. The City’s General Plan Noise Element establishes limitations on sound levels at various land uses. The Redlands Municipal Code Chapters 8.06.070 and 8.06.080 include residential exterior and interior noise standards, which represent the maximum acceptable noise levels.

Sensitive receivers of generated noise are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses which are considered relatively insensitive to noise include business, commercial, and professional developments.

Future development under the proposed Project would have the potential to increase temporary and/or permanent noise levels due to vehicle trips that would be generated, potential traffic, and from on-site operational activities, such as outdoor use recreational areas accompanying future residential developments, and stationary sources including mechanical systems. In addition, Project-related demolition and construction activities could generate substantial noise affecting existing residents. Therefore, impacts may be potentially significant, and this issue will be analyzed in the Subsequent EIR.

b) Generation of excessive ground-borne vibration or ground-borne noise levels?

Potentially Significant Impact. Per the Federal Transit Administration Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures. It is expected that ground-borne vibration from individual development projects under the proposed Project may cause intermittent, localized intrusion. Even so, implementation of the proposed Project may result in individual development projects that could generate excessive vibratory or ground-borne noise levels that could substantially impact sensitive land uses and older or historic structures. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The nearest airports to the proposed Project site are San Bernardino International Airport, approximately 2.5 miles to the northwest of Site 17, and Redlands Municipal Airport, approximately 1.85 miles northeast of Site 23. Site 23 is the only Rezone Site within airport compatibility Zone D for the Redlands Municipal Airport (GP EIR, p.3.7-2), but none of the proposed Project site are within the modeled noise contours for the Redlands Municipal Airport (GP EIR, Figure 3.12-3) or San Bernardino International Airport according to the *2017 Existing CNEL Contours and Generalized Land Uses for San Bernardino International Airport* included within the Final Environmental Assessment for Eastgate Air Cargo Facility (Environmental Science Associates, 2019). Thus, individual development projects under the proposed Project would not expose people residing or working in the area to excessive noise levels from airport operations. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.14. POPULATION AND HOUSING

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

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the population and housing impacts resulting from implementation of the General Plan. The 20-year buildout projected in the proposed General Plan assumes the majority of development will occur on infill sites within urbanized areas of the city. As infill sites are scattered throughout the city and are generally already served by public services and facilities, there should not be a significant increase in population and business in one particular part of the city. Redevelopment of existing uses will likely occur; however, such development will take place over time as the market allows and will result in a net increase in residential units. Though it is impossible to guarantee residents will not be displaced as a result of implementation of the General Plan, proposed General Plan policies seek to preserve existing neighborhoods, thus impacts were found to be less than significant.

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

Potentially Significant Impact. Implementation of the proposed Project would introduce the development of 2,436 residential dwelling units and approximately 151,048.46 SF of public/institutional development. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. Using the Redlands GP EIR growth induction rate of 2.65 people per household, the proposed Project has the potential generate up to 6,162 additional residents. Table 5-1 lays out the growth of buildout of the approved General plan compared to growth induced from the proposed Project.

Table 5-1: General Plan and Proposed Project Population Growth

	Approved General Plan	Proposed Project	Difference (Proposed Project – approved General Plan)
Employees	2,263	181	-2,082
Residents	294	6,456	6,162

This development may result in population growth that exceeds population projections. Therefore, impacts may be potentially significant, and this issue will be analyzed in the Subsequent EIR.

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

Less Than Significant Impact. The proposed Project would not result in the displacement of substantial amount of existing housing, nor would it result in the displacement of substantial numbers of people within the Project area. The proposed Project provides for infill development and redevelopment and would

provide up to 2,325 additional residential dwelling units (that provides for approximately 6,162 additional residents) within the City compared to the General Plan. Individual development projects pursuant to the proposed Project may result in temporary displacement of residents during construction activities. However, development projects would occur at a parcel-by-parcel project level. The potential displacement of persons residing on an infill or redevelopment parcel (if any) would be short-term, and the proposed Project would result in a greater number of residential units to house residents of the area. Therefore, impacts related to displacement of housing or persons that would require replacement housing elsewhere would not occur, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.15. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the public services impacts resulting from implementation of the General Plan. The Certified EIR found that implementation of the proposed Project could result in a population increase of up to 16,355 new residents. The General plan includes policies that seek to address park, recreation, and safety needs as development occurs, in combination with the City’s development impact fees, would serve to ensure the maintenance of existing facilities and the provision of new facilities in order to prevent the deterioration of existing and new facilities. Thus, impacts related to public services were determined to be less than significant upon implementation of the General Plan.

a) Result in substantial adverse physical impacts associated with the provision of 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:

i. Fire Protection and Emergency Services

Potentially Significant Impact. Fire protection services in the City, including the Project site, are provided by the Redlands Fire Department (RFD). The nearest fire station to Sites 1- 16A and 24 would be Station 264, which is located approximately 0.60 miles east of the Project site. The nearest station to sites 17 through 23 would be Station 263, which is located approximately 0.58 miles east of the sites.

Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. which would increase the permanent population in the City and thereby increase the number of calls for RFD services. RFD has indicated that it will need to increase the number of fire stations to meet increased future service demands based upon General Plan buildout (GP EIR, p. 3.13-27). Therefore, implementation of the Project may result in significant impacts to fire protection services, and this issue will be analyzed further in the EIR.

ii. Police Services

Potentially Significant Impact. Public safety services in the City, including the Project area, are provided by the Redlands Police Department (RPD). The Project site would be serviced by the Redlands Police Department located approximately 0.6 miles from Sites 1 through 16A and 24 and approximately 1.6 miles

from Sites 17 through 23 at 1270 W Park Avenue. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development, which would increase the permanent population in the City and thereby increase the number of calls for RPD services. RPD expects that it would need additional staffing to accommodate increases in demand from a growing population, which may require new construction or physically altering an existing RPD facility (GP EIR, p. 3.13-27). Therefore, implementation of the Project may result in significant impacts to police protection services, and this issue will be analyzed further in the EIR.

iii. School Services

Potentially Significant Impact. The City, including the Project site, is within the Redlands Unified School District (RUSD). RUSD has 16 elementary schools (grades K-5), four middle schools (grades 6-8), and three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, home education learning program, and a grades K-12 online academy. Current enrollment at RUSD is approximately 19,773 students (RUSD, 2023). RUSD currently has an excess capacity of 1,676 students (RUSD, 2024).

As proposed unit types are not known at this time, estimating the proposed growth of student population within RUSD would be speculative. However, as new residential units would be included in the proposed Project, the school-aged population is expected to increase and increase enrollment at the schools. Therefore, implementation of the proposed Project may result in significant impacts to school services, and this issue will be analyzed further in the EIR.

iv. Parks

Less Than Significant Impact. As discussed in Section 5.13, *Population and Housing*, full buildout of the proposed Project would result in the generation of up to 6,162 additional residents compared to the buildout of the approved general Plan. Without the development of new parks, this population increase would place additional physical demands on existing parks and recreational facilities, which could result in deterioration of existing facilities. The City of Redlands has 424.2 acres of parkland, or a ratio of 5.9 acres of parkland per 1,000 residents which exceeds the state law requirement of 5.0 acres per 1,000 residents. As such, buildout of the proposed Project would result in a demand for 32.26 acres of parkland. According to the City's General Plan Parks and Recreational Open Space Element (Section 7.2), there are several different kinds of parks in Redlands, including community parks, neighborhood parks, and pocket parks. There are 3 existing parks totaling 38.1 acres within one half mile of the Project site. The addition of 6,162 new residents would increase the use of recreational facilities and would require approximately 30.81 acres of new parkland based on the parkland/recreational space standard of 5.0 acres per 1,000 residents. However, with a total of 79,152 residents, the City of Redlands would need 392.93 acres of parkland to meet the City's requirement which would be exceeded by the already existing 424.2 acres.

Furthermore, the City's mechanism for addressing parkland needs are its development impact fees as set forth in Municipal Code Chapter 3.32 included as PPP PS-2. The funds would be used to maintain and operate the existing park facilities and construct additional facilities, as deemed warranted by the City. Development impact fees are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. Any potential new facilities would be subject to the City's policies designed to protect environmental resources and environmental review under CEQA, which would be separate from this Project. Based on the existing parkland within the Project area and the incremental population increase resulting from buildout of the proposed Project, the Project would not result in overuse of existing parks and facilities that would result in substantial deterioration of existing facilities. Additional City policies requiring maintenance and funding of existing and future recreational facilities would ensure that parks are in good physical condition. The development of future recreational facilities would be subject to existing building and construction regulations as well as additional environmental review that would ensure

that construction activities have a minimal effect on the surrounding environment. These, along with Redlands General Plan policies established to protect environmental resources, air quality, and water quality, would ensure that future park construction within the City would have a less than significant impact. Therefore, this issue will not be analyzed further in the Subsequent EIR.

v. Other Public Facilities

Less Than Significant Impact. As with all developments, buildout of the proposed Project would contribute to the incremental demand for expanded government services and facilities, including libraries, community recreation centers, public health facilities, and/or animal shelters. The policies set forth by the Redlands General Plan ensure that within the City these public services are improved and expanded to meet demand as development occurs. Future development of new public facilities would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated. Additionally, the Project would generate new tax revenues that would contribute to and supplement existing revenue sources for the maintenance and enhancement of these facilities. Therefore, Project implementation would not adversely affect public facilities or require the construction of new or modified public facilities that are not already addressed in this document. Impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP PS-1 **Development Impact Fees.** As a standard requirement for implementing projects within the proposed Project, and prior to issuance of any building permits for the implementing project, the project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.

PPP PS-2 As a Condition of Approval for implementing projects within the proposed Project, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.

Mitigation Measures (MM)

None

5.16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the recreation impacts resulting from implementation of the General Plan. The Certified EIR found that the City of Redlands has a surplus of both existing and proposed parkland that would meet the expected demand of the 16,355 new residents generated from the buildout of the General Plan. Therefore, impacts were determined to be less than significant.

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less Than Significant Impact. As discussed previously in Section 5.15, *Public Services*, there are 38.1 acres of existing parks within a half mile of the proposed Project area and 424.2 acres of parks within the City of Redlands.

In addition to parks, the City operates numerous recreational community centers and facilities, and has a joint use agreement with RUSD allowing public access to school recreational facilities. Other recreational opportunities include open spaces such as San Timoteo Canyon, Live Oak Canyon, Crafton Hills, and approximately 27.58 acres of recreational trails. At the estimated 2023 population of 72,696 residents, the ratio of existing parkland acres per 1,000 residents is 5.9, which exceeds the GP’s parkland/recreational space standard of 5.0 acres per 1,000 residents.

Without the development of new parks and recreational facilities, future increases would place additional physical demands on existing parks and facilities. The General Plan designates areas for parkland, recreational facilities, and trails to serve the City’s population as it grows. The City’s mechanism for addressing parkland and recreational facility needs are its development impact fees as set forth in the Redlands Municipal Code Chapter 3.32, included as PPP PS-2. Development impact fees are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. The development impact fee program is set forth in Government Code Sections 66000-66025. In the City, development impact fees are collected at the time a building permit is issued for the purpose of further alleviating the impacts caused by new development on the City’s infrastructure. Fees are used for the acquisition, construction, and improvement of public facilities demanded by new development. A separate funding structure has been established to account for the impact of new development on each of the following types of public facilities: open space, parks and recreational facilities, public facilities (including public safety, library and general government facilities), transportation, water, solid waste, and sewer.

Individual future development projects under the proposed Project would be subject to the payment of these development impact fees to the City. As noted, the addition of approximately 6,162 residents would place additional physical demands on existing parks and facilities. The addition of 6,162 new residents would increase the use of recreational facilities and would require approximately 30.81 acres of new parkland based on the parkland/recreational space standard of 5.0 acres per 1000 residents. However, with a total of 79,152 residents, the City of Redlands would need 391.53 acres of parkland which would be exceeded by the already existing 424.2 acres. Thus, the Project would not significantly increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated. Impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The precise timing of open space or other public improvements associated with buildout of the Project are not known with certainty, as improvements would likely depend on the timing of future developments, buildout of private development projects, future availability and amounts of public grant funding or other public funds, and other factors. The development of future parkland and recreational facilities would be subject to existing building and construction regulations and environmental review that would ensure that future construction activities have a minimal effect on the surrounding environment. Furthermore, individual recreational facility projects within the Project site would be subject to the mitigation measures included throughout this Initial Study, the Subsequent EIR, and the Redlands General Plan policies established to protect cultural resources, paleontological resources, air quality, and water quality. Adherence to existing regulations and mitigation measures included in this Initial Study and the future Subsequent EIR would ensure that the Project would not result in construction or expansion of recreational facilities which might have an adverse impact on the environment, and impacts would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

PPP PS-2 As listed in Section 5.14, Public Services

Mitigation Measures (MM)

None

5.17. TRANSPORTATION

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

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the transportation impacts resulting from implementation of the General Plan. Implementation of the General Plan is anticipated to increase traffic volumes on the study intersections, roadway segments and freeway segments. Based on County of San Bernardino significance criteria, the proposed General Plan would result in a significant and unavoidable impact by worsening LOS at deficient facilities at two intersections and one roadway segment. However, implementation of the General plan was determined to result in less than significant impacts related to modifying operations of the Redlands Municipal Airport and determined to not substantially increase hazards due to design features.

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

Potentially Significant Impact. The proposed Project would maintain existing roadways therefore there would not be any redesigns that could potentially conflict with the existing circulation system. However, implementation of the proposed Project would result in additional vehicular trips that could result in traffic impacts. Thus, future development pursuant to the proposed Project could conflict with an existing program, plan, ordinance, or policy addressing the circulation system in effect near the Project site or Citywide including the SCAG Regional Transportation Plan/Sustainable Communities Strategy and General Plan Principal 5-P.7, and impacts may be potentially significant. This issue will be analyzed further in the Subsequent EIR.

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

Potentially Significant Impact. State CEQA Guidelines Section 15064.3 codifies that transportation impacts are measured by evaluating a project’s vehicle miles travelled (VMT). Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that lead agencies may not be able to quantitatively estimate VMT for

every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that lead agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT, and the City of Redlands has adopted its own Local VMT Guidelines. Implementation of the proposed Project would result in additional vehicular trips and land use changes and land use changes that could result in significant impacts related to VMT. Therefore, this issue will be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The proposed Project would not alter the design of current roadways and streetscapes. Most of the development pursuant to the proposed Project would result in infill development and would not create hazards from incompatible uses in the Project site or within the surrounding area. Future development projects under the proposed Project would be subject to the typical development review process, which includes Planning and Engineering review, and compliance with standard engineering design requirements would ensure no hazardous design conditions. Therefore, impacts from proposed Project implementation would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

d) Result in inadequate emergency access?

Less Than Significant Impact. Development pursuant to the proposed Project would not alter the design of current roadways or streetscapes in a manner which would result in inadequate emergency access. Construction of development projects under the proposed Project may require the presence of construction equipment and materials adjacent to roadways. Construction activities and future development designs would be required to ensure emergency access in accordance with California Fire Code Section 503 (CCR Title 24, Part 9), which would be confirmed and approved through the City's standard development review and permitting process. Therefore, impacts from proposed Project implementation would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.18. TRIBAL CULTURAL RESOURCES

<p>α) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</p>	☒	☐	☐	☐
<p>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</p>	☒	☐	☐	☐

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041 addressed the tribal cultural impacts resulting from implementation of the General Plan. The Certified EIR found that there are no known tribal cultural resources in the Planning Area. However, future development allowed under the proposed General Plan could result in direct or indirect impacts through grading, overland vehicle travel, or other ground-disturbing activities, or through facilitation of access to archaeological sites by the public. Policies in the General Plan were determined to minimize or avoid potential impacts to any resources not known at this time that may be encountered in future and would promote consultation with local Native American tribal groups during future projects to ensure the protection of tribal cultural resources. Thus, implementation of the General Plan was determined to result in less than significant impacts to tribal cultural resources.

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

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

Potentially Significant Impact. Assembly Bill 52 (AB 52) requires lead agencies to evaluate a project’s potential to impact Tribal Cultural Resources (TCRs) and establishes a formal notification and, if requested, consultation process for California Native American tribes as part of CEQA. TCRs include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that an agency provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project. Additionally, Senate Bill 18 (SB 18) requires when a city or county’s general plan is proposed to be amended that California Native

American tribes be notified and, if requested, conduct consultations for the purpose of preserving specified places, features, and objects that are located within that agency's jurisdiction. The City has provided both SB 18 and AB 52 notification to tribal governments and has initiated consultation with multiple responding tribes as requested, and consultations remain on-going.

The sites are located within an urbanized environment and have been disturbed by past development activities. However, construction of development projects under the proposed Project may involve excavation and other ground-disturbing activities beyond previous levels of disturbance, and thus, the potential exists for the discovery of TCRs. At the present time, the City has not been provided with any information or evidence from tribal governments concerning any known or likely potential sub-surface tribal cultural resources, although consultations are on-going. Therefore, impacts from proposed Project implementation may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

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

Potentially Significant Impact. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (Public Resources Code § 21074).

If a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. To be considered a TCR as defined in PRC Section 21074, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. Construction of development projects under the proposed Project may involve excavation and other ground-disturbing activities beyond previous levels of disturbance. Therefore, impacts from implementation of the proposed Project may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.19. UTILITIES AND SERVICE SYSTEMS

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

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041, addressed the utilities and service systems impacts resulting from implementation of the General Plan. The Certified EIR found that while buildout of the General Plan would result in increased demand for public utility services, compliance with federal, State, and local regulations, as well as policies in the General Plan was determined to ensure that impacts of the Proposed Project would be less than significant.

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

Potentially Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units (approximately 6,162 residents) and a decrease of 2,057,992.20 SF of nonresidential development. These land use changes could increase demand for water and generation of wastewater that would be conveyed to and from the Project area in comparison to the demand analyzed under the General Plan EIR for buildout pursuant to the current General Plan land use designations. In comparison to the demand analyzed under the General Plan EIR for buildout pursuant to the current General Plan land use designations. This may result in the need for additional or expanded water and sewer pipelines and other existing facilities. Therefore, impacts resulting from the proposed Project may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

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

Potentially Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units (approximately 6,162 residents) and a decrease of 2,057,992.20 SF of nonresidential development. The addition of these residential land uses could increase demand for water area in comparison to the demand analyzed under the General Plan EIR for buildout pursuant to the current General Plan land use designations. The change of these land uses has the potential to increase water demand, which could impact existing and project water supplies. Therefore, impacts from the proposed Project may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

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

Potentially Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units (approximately 6,162 residents) and a decrease of 2,057,992.20 SF of nonresidential development. The addition of these residential land uses could increase the generation of wastewater in comparison to the generation analyzed under the General Plan EIR for buildout pursuant to the current General Plan land use designations. The addition of these land uses could increase the amount of wastewater to be treated at the existing wastewater treatment facility, which may exceed capacity at the facility. Therefore, impacts resulting from buildout of the proposed Project may be potentially significant, and this issue will be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact.

Construction

Construction for implementing projects within the Project site would require demolition of various buildings. The majority of waste generated during demolition and construction activities by implementing projects would be building materials (e.g., concrete, dirt, and waste generated by construction workers). Nonhazardous waste from construction activities would be recycled to the extent feasible. As stated in Section 13.66.040 of the the City's Municipal Code, *Construction and Demolition Recycling Requirements*, no demolition permit or building permit shall be issued for any development activity subject to this chapter unless the construction and demolition recycling plan has been approved by the municipal utilities director. Thus, implementing projects pursuant to the proposed Project would be required to meet the City's waste diversion requirements as they pertain to project construction. Furthermore, construction waste is anticipated to be minimal compared to waste generated from peak operations at full buildout of the proposed Project area.

Operation

Buildout pursuant to the proposed Project would result in a decrease of 2,057,992.20 SF of nonresidential development. Thus, implementation of the proposed Project is expected to decrease waste generation. As described previously, full buildout of the proposed Project would result in the development and operation of 2,436 residential dwelling units and approximately 151,048.46 SF of public/institutional development. Based on the CalRecycle waste generation rates, residential uses generate 10 pounds of waste per unit per day, and .007 pounds of waste per square foot of institutional uses per day. Using these waste generation rates; the buildout of the proposed Project would generate approximately 12.70 tons of waste per day (4,635.5 tons per year). However, future projects would be required to implement AB 341, which requires

a diversion of 75% of waste from landfill which means approximately 3.18 tons of waste per day (1,158.88 tons per year) would be directed to landfills.

As the California Street Landfill has the capacity to process an additional 527.31 tons of solid waste per day and the San Timoteo Sanitary Landfill has the capacity to process an additional 337.1 tons per day, the solid waste generated by the Project would be within the capacity of the landfill. The solid waste generated by full buildout of the proposed Project would represent approximately 0.6 percent of the excess capacity of the California Street Landfill and 0.9 percent of the excess capacity at the San Timoteo Sanitary Landfill each day. Furthermore, the California Street Landfill is permitted to operate through buildout of the proposed Project. Thus, the proposed Project would be served by existing landfills with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The Resource Conservation and Recovery Act of 1976 (United States Code Title 42, Section 6901 et seq.) governs the creation, storage, transport, and disposal of hazardous wastes and operators of hazardous waste disposal sites. AB 939, the Integrated Waste Management Act of 1989 (California Public Resources Code Section 40000 et seq.) requires all local governments to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. Compliance with AB 939 is measured for each jurisdiction, in part, as actual disposal amounts compared to target disposal amounts. Actual disposal amounts at or below target amounts comply with AB 939.

According to the City's General Plan Sustainable Community Element, future solid waste reduction strategies include improved commercial recycling diversion rates, enhanced food waste diversion, and exploring the potential to generate energy using biomethane from the City's landfill and wastewater treatment plant, among other strategies.

Future developments pursuant to the proposed Project would be required comply with Redlands Municipal Code Section 13.66.040, Construction and Demolition Recycling Requirements, which requires that no demolition permit or building permit shall be issued for any development activity unless the construction and demolition recycling plan has been approved by the municipal utilities director. In addition, individual development projects under the proposed Project would be required to comply with all federal, state, and local regulations related to solid waste, and toward that end, future developments would comply with all applicable standards related to solid waste diversion, reduction, and recycling during construction and operation. Therefore, implementation of the proposed Project would result in less than significant impacts related to potential conflicts with federal, state, and local management and reduction statutes and regulations pertaining to solid waste. This issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.20. WILDFIRE

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

General Plan EIR Analysis

The Certified EIR, EIR No. 2016081041, did not specifically analyze impacts related to wildfire as it was not a CEQA threshold at the time. However, the Certified EIR discussed potential hazards related to wildfire. The General Plan EIR discussed that in the City, the highest fire risk areas are in San Timoteo and Live Oak Canyons where the threat from wildfire is the highest. Crafton Hills is another higher risk area, situated in the northeast area of the city and in the Redlands Sphere of Influence (SOI) outside of city limits. The Certified EIR determined that impacts related to wildland fires would be less than significant with adherence to the California Fire Code and other building codes.

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

Less Than Significant Impact. As discussed in response to 9(g) above, the sites are classified in a moderate fire threat area per the High Fire Hazard Area Redland GIS map. The sites are also not located in a state responsibility area. Moreover, as previously discussed in response 9(f) above, future development pursuant to the proposed Project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts from proposed Project implementation would be less than significant, and this issue will not be analyzed further in the Subsequent EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The sites are located within an urbanized environment with moderate fire threat level and do not include, nor are they around, wildlands or areas of high fire hazard terrain or vegetation. Implementation of the proposed Project would neither exacerbate wildfire risks nor expose occupants to risk of pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

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

No Impact. The sites are within an urbanized environment with a moderate fire threat level and do not include wildlands or areas of high fire hazard terrain or vegetation. The sites are served by existing utility and roadway infrastructure and the Project does not propose the expansion of such infrastructure. Implementation of the proposed Project would include the introduction of new residential developments and may require individual projects to connect to existing infrastructure within roadways. However, these new developments within an existing urbanized environment, and anticipated utility upgrades if needed, would not exacerbate fire risk or result in temporary or ongoing impacts to the environment in regard to wildfires. Therefore, no impact would occur, and this issue will not be analyzed further in the Subsequent EIR.

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

Less Than Significant Impact. The sites are within an urbanized environment with a moderate fire threat level. The proposed sites are generally flat and are not located near hillside areas or in the downslope pathway of a potential landslide. While a few of the sites are within a special flood hazard area, implementation of the proposed Project would improve the existing drainage. Therefore, post-fire risks related to downstream flooding or landslides would be less than significant. This issue will not be analyzed further in the Subsequent EIR.

Plans, Policies and Programs (PPP)

None

Mitigation Measures (MM)

None

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant with Mitigation Incorporated. As discussed in Section 5.4, *Biological Resources*, the sites are currently developed and do not contain habitat of a fish or wildlife species. However, General Biological Surveys would be performed for future development projects within the proposed Project site to confirm whether suitable habitat exists, included as Mitigation Measure BIO-1. If rare plants/wildlife are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.

Additionally, as described in Section 5.5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. However, Mitigation Measure CUL-1 is included to require evaluation of potential historic resources for implementing projects that could potentially impact a building or structure in excess of 50 years of age. Most of the sites are developed with single family residences or agricultural uses and have heavily disturbed soils. Therefore, there is a low potential that future construction could result in inadvertent discovery of a buried archeological or paleontological resource. Future development projects would be required to implement Mitigation Measures CUL-2 and PAL-1, which require developments within the proposed Project site to prepare archaeological/paleontological resource assessments in accordance with the California Office of Historic Preservation. On properties where the potential for resources is identified, such studies shall provide a detailed mitigation plan, including a

monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified cultural preservation expert, included as Mitigation Measures CUL-3 and PAL-2.

Therefore, the Project would result in a less-than-significant impact with mitigation incorporated concerning the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

As presented in this document, potential Project-related impacts are either less than significant, would be less than significant with mitigation incorporated, or would result in no impact for impacts related to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, and wildfire risk. Given that these impacts would be less than significant or mitigated to a less than significant level, implementation of the proposed Project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects. Therefore, the proposed Project's contribution to any significant cumulative impacts would be less than cumulatively considerable for aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, and wildfire risk.

The Project could result in significant impacts for several other environmental topics, and thus, cumulatively considerable impacts. Specifically, the Project has the potential to result in cumulatively considerable impacts related to air quality, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, transportation, tribal cultural resources, and utilities and service systems. The Project's potential for contribution to cumulatively considerable impacts related to these environmental topics will be further analyzed in the Subsequent EIR.

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

Potentially Significant Impact. As discussed in Sections 5.3, 5.11, and 5.13, the Project could facilitate development that could result in significant air quality and noise impacts, as well as conflict with policies

implemented to mitigate environmental impacts on existing populations. An air quality and noise study will be prepared for the Project to evaluate potential impacts on human beings, with specific focus on sensitive receptor populations. Therefore, the Project could result in a potentially significant impact and this topic will be further analyzed in the Subsequent EIR.

6. REFERENCES

- AirNav (AirNav 2020), <https://www.airnav.com/airports/search.html>
- California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Accessed: 31 July 2023.
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>
- CalRecycle. Estimated Solid Waste Generation Rates, Accessed March 14, 2024 from <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>
- CalRecycle. (2024a). SWIS Facility/Site Activity Details- San Timoteo Sanitary Landfill (36-AA-0087), Accessed March 15, 2024, from <https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Details/365726>
- CalRecycle. (2024b). SWIS Facility/Site Activity Details- California Street Landfill (36-AA-0017), Accessed March 15, 2024, from <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2637>
- City of Redlands (City Zoning 2020), Zoning Map, <https://www.cityofredlands.org/sites/main/files/file-attachments/zoning.pdf> (accessed March 16, 2024)
- City of Redlands (GP EIR), General Plan 2035 Environmental Impact Report, accessed March 16, 2024 from <https://www.cityofredlands.org/post/planning-division-general-plan>
- City of Redlands (GP), General Plan 2035. Accessed March 16, 2024 from <https://www.cityofredlands.org/post/planning-division-general-plan>
- City of Redlands, City of Redlands Municipal Code. Accessed March 16, 2024, from https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1
- Department of Conservation (DOC). 2022. California Important Farmland Finder. Accessed March 17, 2024 from <https://maps.conservation.ca.gov/dlrp/ciff/>.
- DOF (California Department of Finance). January 2023. *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2023, with 2020 Benchmark*. Accessed March 15, 2024 from: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/>
- Environmental Science Associates. (2019). *Final Environmental Assessment Eastgate Air Cargo Facility* Accessed March 26, 2024, from chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.sbiaa.org/wp-content/uploads/2022/05/SBD-Eastgate-Final-EA-122019.pdf.
- Federal Emergency Management Agency. (2021). *FEMA Flood Map*. Accessed March 15, 2024, from <https://msc.fema.gov/portal/search?AddressQuery=10940%20nevada%20st%20redlands>
- Morse, Ken. Coordinator, RUSD Operations and Facilities Planning, (RUSD, 2024), Written Correspondence on May 28, 2024.
- Redlands Police Department (RPD, 2024), RHNA Rezone Request Police Information, Written Correspondence

Redlands Unified School District (RUSD 2020), Accessed March 16, 2024 from
<https://www.redlandsusd.net/Page/107>

[San Bernardino County, San Bernardino County General Plan](#)

San Bernardino Valley Water Conservation District (SBVWCD Site), Accessed March 16, 2024 from
<https://www.sbvwd.org/our-projects/wash-plan>.

San Bernardino Valley Water Conservation District (WP 2020), Draft Wash Plan, Accessed March 15, 2024
from <https://www.sbvwd.org/wash-plan/6167-washplan-hcp-final-full-clean-20200420/file>

United States Fish and Wildlife Service (USFWS 2020), Accessed March 15, 2024 from
<https://www.fws.gov/wetlands/Data/Mapper.html>



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 17, 2024

Kevin Beery

Senior Planner

City of Redlands

35 Cajon Street Ste. 20

Redlands, CA 92373

kbeery@cityofredlands.org

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE REDLANDS RHNA REZONE PROJECT DATED JUNE 28, 2024, STATE CLEARINGHOUSE NUMBER [2016081041](#)

Dear Kevin Beery,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Redlands Regional Housing Needs Allocation (RHNA) Rezone Project (Project). This document is an NOP for a Subsequent EIR to the City of Redlands General Plan Update. The City of Redlands is proposing to rezone 24 sites within the City to allow residential development, which includes an application for a General Plan Amendment (GPA) to change the land use designations of the sites to allow for residential development, a Specific Plan Amendment (SPA) in order to remove 15 of the Project Sites out of the East Valley Corridor Specific Plan, and zone change to allow for medium and high-density residential development within the rezone sites. The Housing Element identifies the Project Sites as having a capacity of up to 2,436 housing units and assumes that


implementation of residential development within the Project Sites would occur through the year 2035. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are Dichlorodiphenyltrichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
2. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.
3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

DTSC appreciates the opportunity to comment on the NOP of a Draft EIR for the Redlands RHNA Rezone Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Kevin Beery
July 17, 2024
Page 4

cc: (via email)

Governor's Office of Planning and
Research State Clearinghouse
State.Clearinghouse@opr.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION

July 19, 2024

Kevin Beery
City of Redlands
35 Cajon Street
Suite 20
Redlands CA 92373

Re: 2016081041, Redlands RHNA Rezone Project, San Bernardino County

Dear Mr. Beery:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a.** A brief description of the project.
- b.** The lead agency contact information.
- c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a.** Alternatives to the project.
- b.** Recommended mitigation measures.
- c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a.** Type of environmental review necessary.
- b.** Significance of the tribal cultural resources.
- c.** Significance of the project's impacts on tribal cultural resources.
- d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. 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.
 - a. The final report containing site forms, site significance, and mitigation measures 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.

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3.** Contact the NAHC for:
- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Murphy.Donahue@NAHC.ca.gov.

Sincerely,

Murphy Donahue

Murphy Donahue
Cultural Resources Analyst

cc: State Clearinghouse



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Noel Castillo, P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

July 24, 2024

Transmitted Via Email

File: 10(ENV)-4.01

City of Redlands, Planning Division
Attn: Kevin Beery, Senior Planner
P.O. Box 3005
Redlands, CA 92373
kbeery@cityofredlands.org

RE: PROJECT COMMENT – NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED REDLANDS REGIONAL HOUSING NEEDS ALLOCATION (RHNA) REZONE PROJECT IN THE CITY OF RELANDS.

Dear Mr. Beery:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on July 8, 2024**, and pursuant to our review, the following comments are provided:

Flood Control Planning/Water Resources/Operations Support Division (Michael Fam, Engineering Manager, (909) 387-8120):

The San Bernardino County Flood Control District (District) possesses fee-owned right-of-way directly adjacent to the eastern side of Site 16 of the project. See attached map. The District also possesses easement-owned right-of-way totally encumbered by Site 16A.

The District's recommendations are most often made for site specific conditions. Therefore, the recommendations made here are general in nature until more detailed plans become available.

1. According to the most recent Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project lies within the Special Flood Hazard Area (SFHA).
2. We recommend that the project include, and the city enforce, the most recent FEMA regulations for development in an SFHA.
3. If any encroachment on District right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations Support Section. Other on-site or off-site improvements may be required, which cannot be determined at this time.

BOARD OF SUPERVISORS

COL. PAUL COOK (RET.)
Vice Chairman, First District

JESSE ARMENDAREZ
Second District

DAWN ROWE
Chair, Third District

CURT HAGMAN
Fourth District

JOE BACA, JR.
Fifth District

Luther Snoke
Chief Executive Officer

July 24, 2024

Page 2 of 2

4. We recommend that the San Bernardino County Comprehensive Storm Drain Plan (CSDP) No. 4, dated February 2013, be utilized in the design of drainage facilities.
5. The proposed Project may affect storm drains in and around the site. When planning for or altering existing or future storm drains, the Project will be subject to the CSDP No. 4, dated February 2013. It is to be used as a guideline for drainage in the area and is available in the County's Flood Control District offices. Any revision to the drainage should be reviewed and approved by the jurisdictional agency in which the revision occurs.

Permits/Operations Support Division (Johnny Gayman, Engineering Manager, (909)387-7995):

6. The proposed Project is located adjacent to District right-of-way. As noted in No. 3 above, an encroachment permit may need to be obtained if any work occurs within District right-of-way. If you have any questions regarding this process, please contact the District's Permit Section at (909) 387-1863.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please directly contact the individuals providing the specific comment, as listed above.

Sincerely,



ARLENE B. CHUN, M.S., P.E.

Engineering Manager, Environmental Management Division

ABC:MC:ml

Cc: Manie Cruz, Planner II

Attachment: 1- Maps_City of Redlands_NOP_RHNA Rezone
2- City of Redlands_NOP_Redlands RHNA Rezone

Dear City of Redlands Planning Department,

July 2, 2024

I am writing in response to your recent correspondence regarding lot 23, located at the corner of Pennsylvania St & Orange St. We acknowledge the need for improvements in our neighborhood that will enhance safety and property value for the community.

We acknowledge the necessity for improvements in our neighborhood to enhance safety and property values. It is important for us to collaborate and show support for the new building project on lot 23, located across from Lugonia School.

The proposed project aims to introduce up to 118 apartment units, potentially bringing 3 to 5 residents per unit and 2-4 cars per unit, leading to an increase in traffic within the neighborhood, particularly near the schools.

There are concerns about the high-density nature of the development, as it exceeds the recommended unit count for the size of the lot. We advocate for a lower-density approach to maintain the integrity and safety of the neighborhood.

Additionally, we request that any entrances and exits to the development be situated away from schools and residential areas to minimize traffic congestion and ensure the safety of children walking to school.

To protect the privacy of residents, we oppose any units facing neighboring properties and outdoor features, like patios, that could disrupt the tranquility of the community.

Parking provisions for the apartments should include a minimum of three spaces per unit to prevent overflow into school areas and ensure the safety of both tenants and students.

Lastly, we propose the installation of block walls along the project perimeter to prevent unauthorized access and address safety concerns related to potential criminal activity in the area.

Your prompt attention to these matters is greatly appreciated as we work together to create a safe and harmonious community environment.

Thank you,

Kim Price

100 San Juan Ave Redlands

From: [Kevin Beery](#)
To: [Meaghan Truman](#); [Brady Connolly](#)
Cc: [Brian Foote](#)
Subject: FW: Upcoming Notice of Public Scoping Meeting Titled Redlands RHNA Rezone Project
Date: Wednesday, July 17, 2024 10:16:14 AM

[NON-EPD]

Below is an email we received regarding tomorrow's scoping meeting.

Sincerely,

Kevin Beery

Senior Planner

Planning Division
City of Redlands
35 Cajon Street, Ste. 20
Redlands, CA 92373

(909) 798-7555 x1797

<https://www.cityofredlands.org/>

[Schedule a meeting with me](#)

From: Alan And Robin Gotta <gottafam@verizon.net>
Sent: Monday, July 15, 2024 20:16
To: Kevin Beery <kbeery@cityofredlands.org>
Subject: Upcoming Notice of Public Scoping Meeting Titled Redlands RHNA Rezone Project

You don't often get email from gottafam@verizon.net. [Learn why this is important](#)

[**NOTICE:** This message originated outside of City of Redlands -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

I know you could care less, but you have absolutely no concern for the land owners on the Western portion of the city. You are in the process of rezoning their land that is currently zoned EVIC that is worth \$900K + per acre to less than half of that by one swipe of the ink pen. Put yourself in their shoes. The land owners have owned their land for many years, and are ready for retirement, and with one swipe of the ink pen you just pulled the rug out from under them. I find it truly amazing that of all the different parcels of land around town that you are getting

ready to rezone to meet RHNA requirements, you ARE NOT naming even one City Owned parcel of land.
But then again, I know you could care less.

Alan Gotta
11018 Iowa Street and 11034 Iowa Street

This message contains confidential information and is intended only for the individual(s) addressed in the message. If you are not the named addressee, you should not disseminate, distribute, or copy this e-mail. If you are not the intended recipient, you are notified that disclosing, distributing, or copying this e-mail is strictly prohibited.

From: [Kevin Beery](#)
To: [Meaghan Truman](#)
Cc: [Brady Connolly](#)
Subject: FW: Notice of Preparation of a Subsequent Environmental Impact Report for the proposed Redlands RHNA Rezone Project in the City of Redlands
Date: Tuesday, July 23, 2024 12:53:43 PM

[NON-EPD]

Please see below comment.

Sincerely,

Kevin Beery

Senior Planner

Planning Division
City of Redlands
35 Cajon Street, Ste. 20
Redlands, CA 92373

(909) 798-7555 x1797

<https://www.cityofredlands.org/>

[Schedule a meeting with me](#)

From: Home Ruiz <ruizhome100@hotmail.com>
Sent: Monday, July 22, 2024 14:17
To: Kevin Beery <kbeery@cityofredlands.org>
Cc: ejejeda@cityofredlands.org; Jeanne Donaldson <jdonaldson@cityofredlands.org>
Subject: Notice of Preparation of a Subsequent Environmental Impact Report for the proposed Redlands RHNA Rezone Project in the City of Redlands

Some people who received this message don't often get email from ruizhome100@hotmail.com. [Learn why this is important](#)

[**NOTICE:** This message originated outside of City of Redlands -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

I am writing this letter in response to the "Notice of Preparation of a Subsequent Environmental Impact Report for the Proposed Redlands RHNA Rezone Project in the City of Redlands", regarding lot 23 corner of Pennsylvania St and Orange St.

My property is 100 San Marcos Ave, and has been my home since 1998 which is adjacent to this proposed housing development on lot 23. I am a life-time resident of North Redlands and this surrounding neighborhood and now retired and very familiar with the general area

of this lot 23.

San Marcos Ave and San Juan Ave are both cul-de-sacs, or closed streets since these homes were built in 1977 and is regarded as quiet and low traffic streets.

- I am concerned that San Marcos Ave will be opened for through traffic; both for vehicles and pedestrian. I do not want traffic to be opened on San Marcos Ave and San Juan Ave for it will bring a high volume of cars and pedestrian traffic through this street and Alta St, as well as attract vandalism and crime.
- I am concerned for losing our privacy to our home; if this housing development has only low fence boundaries, and front entrances to units, or high balconies overlooking my property, this will greatly effect my privacy. For this privacy was a key factor as to why I purchased my home.

I would hope that a high level wall would be built to separate the adjoining lots of lot 23 and San Marcos Ave and San Juan Ave to prevent the jumping of fences by the future residence, and the current homeless population in this are from scaling fences and walls for their “convenient passage ways” that we currently see at the apartment complex directly across the street from lot 23 on Orange Street.

Most traffic near and around lot 23 is due to Lugonia Elementary School parents dropping off and picking up school children, to which the flow of vehicle traffic is moderately slow and safe.

- My concern about your proposal for lot 23 is that this proposed development rezoning from (R-2) Multiple Family Residential to (R-3) allowing a Maximum Capacity of volume buildout will increase tremendously the volume of traffic in this school zone during school hours, as well as affecting the safety of school children crossing streets; unless the traffic to and from lot 23 is only isolated to Orange Street.

By keeping zoning for lot 23 to (R-2) rather than (R-3) will increase the parking capacity for this housing development to stay within the boundaries of this lot.

- And/or to include in the building plans enough parking spaces for all residences within the boundaries of lot 23 thus lowering the probability of parking space to overflow on the streets outside the boundaries of this slot.

Thank you for allowing this time period for comments.

Richard Ruiz Jr – concerned resident

Ruiz50407@gmail.com

This message contains confidential information and is intended only for the individual(s) addressed in the message. If you are not the named addressee, you should not disseminate, distribute, or copy this e-mail. If you are not the intended recipient, you are notified that disclosing, distributing, or copying this e-mail is strictly prohibited.