



REDLANDS RHNA REZONE PROJECT SCH NO. 2016081041

Draft Environmental Impact Report

Prepared for
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1. Executive Summary

Based on the analysis in the Initial Study included as Appendix A 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.” This Draft Subsequent Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Redlands RHNA Rezone (proposed Project) at a programmatic level. This Draft Subsequent EIR has been prepared in conformance with the City of Redlands environmental policy guidelines for implementation of the California Environmental Quality Act (CEQA).

The Subsequent EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft Subsequent EIR will be available for public review on the City’s website.

Written comments related to environmental issues in the Draft Subsequent EIR should be addressed to:

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A Notice of Availability of the Draft Subsequent EIR was published concurrently with distribution of this document.

1.1 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 the cities of 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 the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change 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. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project (“proposed Project”, or “Project”). The 24 sites are broken up into two distinct areas:

Sites 1 through 16A and Site 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 also in the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just 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 View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

1.2 PROJECT BACKGROUND SUMMARY

The City of Redland'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 the long-term policy direction, and quality of life, economic health, and sustainability goals 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.

1.3 BASIS FOR A SUBSEQUENT EIR

When an EIR has been adopted and a project is proposed to be modified or expanded upon, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines §15162.

Pursuant to CEQA Guidelines §15162, no subsequent EIR shall be prepared unless one or more of the following conditions is present:

1. Substantial changes are proposed in the project 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;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken 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; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As detailed below, the Project involves a General Plan Amendment and rezoning of parcels to provide for future housing development as required by the RHNA. These actions involve a potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, the City has determined that the preparation of a Subsequent EIR is the appropriate approach to CEQA compliance in accordance with CEQA Guidelines §15162(a)(1). Consistent with CEQA Guidelines §15050, the City of Redlands General Plan 2035 EIR and the 2021-2029 Housing Element are incorporated into this document by reference.

1.4 PROJECT DESCRIPTION SUMMARY

Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites within the City to allow for increased 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 17 of the Project sites out of the EVCSP, and a 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 Draft Subsequent EIR assumes and analyzes 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). This Subsequent EIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite.

Infrastructure Improvements

Roadways and utilities may be necessary 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 sites 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.

1.5 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

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. Minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning.
4. 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.

1.6 SUMMARY OF ALTERNATIVES

Section 6.0, *Alternatives*, of this EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 6.0 are summarized below.

Alternative 1: No Project/No Development. Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft Subsequent EIR is required to “discuss the existing conditions at the time the Notice of Preparation (NOP) is published, or if no NOP is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the Project site were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site is currently developed single family residences, agricultural uses, and industrial storage facilities. See Section 4.0, *Environmental Setting*, for additional details and figures regarding the existing conditions at the Project site.

The No Project/No Development Alternative would result in continuation of the existing uses within the Project site at the time the NOP was published (July 1, 2024), and the proposed development would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Table 1-1 below, which include measures related to air quality, cultural resources, greenhouse gas emissions, noise, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, and vehicle miles traveled. This alternative would result in lessened impacts to all 20 of the environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3 in Section 6.0, *Alternatives*).

However, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands, which is legally required under the RHNA.

Alternative 2: No Project/Buildout of Existing Land Use Alternative. Under this alternative, buildout of the residential and nonresidential uses would occur as permitted under the existing land use designations, but the Project site would not be rezoned to allow for additional residential uses. Pursuant to CEQA Guidelines Section 15126.6(e), this alternative analysis the likely buildout of the Project area according to the existing General Plan Land Use Designations for the site. Buildout would result in up to 2,209,040.26 square feet of Commercial/Industrial or Commercial/Admin Professional uses and 111 units of residential development. As a result, this alternative would not lessen any impacts compared to the proposed Project and would even worsen impacts related to air quality, greenhouse gas emissions, noise, and transportation. This alternative would result in no decrease to any of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3 in Section 6.0, *Alternatives*).

In addition, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands, which is legally required under the RHNA.

Alternative 3: Reduced Project Site Alternative. The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the allowed area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located adjacent to the Morrey Arroyo Creek located just north of Orange Avenue (Sites 2, 7, 8, 11, 12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

The Reduced Project Site Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, air quality, GHG emissions, and VMT that would occur from implementation of the proposed Project, as buildout under this alternative would be only slightly reduced in comparison to that allowed under the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less-than-significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise.

Implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4 as it would introduce additional residential units in the City to help reach the City's RHNA goals. The Reduced Project Site Alternative would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses to allow for less intense development more similar to its surrounding proposed residential uses.

Alternative 4: Reduced Project Development Intensity Alternative. The Reduced Project Development Intensity Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, Project buildout would be reduced by 55 percent; thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF of nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,096 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling-unit deficit in meeting their State mandated RHNA fair share.

The Reduced Project Development Intensity Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, construction air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. However, this alternative would avoid the significant and unavoidable impact related to operational air quality emissions.

The Reduced Project Development Intensity Alternative would meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would be rezoned to Public/Institutional uses to allow for less intense development more similar to its surrounding proposed residential uses. The Alternative would not meet Objectives 1, 2, or 4 as the amount of housing proposed by this Alternative would not be enough for the City to meet their RHNA goals as discussed in the certified Housing Element for the 2021-2029 housing cycle and would not provide enough housing to accommodate all income groups as allocated by RHNA.

1.7 SUMMARY OF IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft Subsequent EIR. The level of significance of impacts before and after the proposed mitigation measures are applied are identified as significant and unavoidable, less than significant, or no impact. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts.

Table 1-1: Summary of Impacts, Mitigation Measures, and Level of Significance

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.1 Agriculture				
Impact AG-1: The Project would 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 Resource Agency, to non-agricultural use.	None	Potentially significant	None	Significant and unavoidable
Impact AG-5: The Project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use.	None	Potentially significant	None	Significant and unavoidable
Cumulative	None	Potentially significant	None	Significant and unavoidable
5.2 Air Quality				
Impact AQ-1: The Project would conflict with or obstruct implementation of an applicable air quality plan.	None	Potentially significant	MM AQ-1 through MM AQ-3 , as listed below.	Significant and unavoidable
Impact AQ-2: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	None	Potentially significant	MM AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management	Significant and unavoidable

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:</p> <ul style="list-style-type: none"> • Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards. • Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes. • Require the use of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>building materials that do not require the use of architectural coatings.</p> <ul style="list-style-type: none"> • The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines. • The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment. • The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification. <p>MM AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized; • Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC); • Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insulation (R-8); 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> • Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF); • Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards; • Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. • Landscaping palette of drought tolerant plants exceeding City requirements; • Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use); 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads. <p>MM AQ-3: Toxic Air Contaminants. Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 microgram per cubic meter ($\mu\text{g}/\text{m}^3$), PM2.5 concentrations exceed 2.5 $\mu\text{g}/\text{m}^3$, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> Air intakes located away from high volume roadways and/or truck loading zones. Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better). 	
Impact AQ-3: The Project could expose sensitive receptors to substantial pollutant concentrations.	None	Potentially significant	MM AQ-1 through MM AQ-3 , as listed above.	Significant and unavoidable
Cumulative	None	Potentially significant	MM AQ-1 through MM AQ-3 , as listed above.	Significant and unavoidable
5.3 Cultural Resources				
Impact CUL-2: The Project would not cause a substantial adverse change in the significance of an archaeological resources pursuant to CEQA Guidelines Section 15064.5.	None	Potentially significant	MM CUL-3: Archeological Resources Assessment. Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G. Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply.</p> <p>MM CUL-4: Archaeological Monitoring/Preservation.</p> <ul style="list-style-type: none"> • <i>Highly Sensitive Sites:</i> Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.</p> <p>In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>been handled through one of the following methods:</p> <ul style="list-style-type: none"> • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. <p>In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.</p> <p>If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.</p> <p>A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> • <i>Moderately Sensitive Sites:</i> If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods: 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. <p>In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.</p> <p>If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.</p> <p>A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.</p>	
Cumulative	None	Potentially significant	MM CUL-3 and MM CUL-4 , listed above.	Less than significant
5.4 Energy				

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact E-1: The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.	None	Less than significant	None required	Less than significant
Impact E-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	None	No impact	None required	No impact
Cumulative	None	Less than significant	None required	Less than significant
5.5 Greenhouse Gases				
Impact GHG-1: The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	None	Potentially significant	MM AQ-1 and MM AQ-2 , listed above.	Significant and unavoidable
Impact GHG-2: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	None	Potentially significant	MM AQ-1 and MM AQ-2 , listed above.	Significant and unavoidable
Cumulative	None	Potentially significant	MM AQ-1 and MM AQ-2 . Listed above.	Significant and unavoidable
5.6 Land Use and Planning				
Impact LU-2: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation	None	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
adopted for the purpose of avoiding or mitigating an environmental effect.				
Cumulative	None	Less than significant	None required	Less than significant
5.7 Noise				
Impact NOI-1: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	None	Potentially significant	<p>MM NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors:</p> <p>Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity.</p> <p>Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>MM NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall:</p> <p>Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;</p> <p>Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and</p> <p>Be removed and the site appropriately restored upon the conclusion of the construction activity.</p>	
Impact NOI-2: The Project would not generate excessive groundborne vibration or groundborne noise levels.	None	Potentially significant	<p>MM NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.</p> <p>MM NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.</p>	
Cumulative	None	Potentially significant	MM NOI-1 through MM NOI-4 , listed above.	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.8 Population and Housing				
Impact POP-1: The Project would not 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).	None	Less than significant	None required	Less than significant
Cumulative	None	Less than significant	None required	Less than significant
5.9 Public Services				
Impact PS-1: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities.	PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the TVSP Area, 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.	Less than significant	None required	Less than significant
Impact PS-2: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered police station facilities.	PPP PS-1 , listed above.	Less than significant	None required	Less than significant
Impact PS-3: The Project would not result in substantial adverse physical impacts associated with the construction or expansion of new or physically altered school facilities.	PPP PS-1 , listed above.	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative	PPP PS-1 , listed above.	Less than significant	None required	Less than significant
5.10 Transportation				
Impact TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle or pedestrian facilities.	None	Less than significant	None required	Less than significant
Impact TR-2: The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (B) regarding vehicle miles traveled.	None	<p>Sites 1-19, 22, and 24 would be less than significant.</p> <p>Sites 20, 21, and 23 would be potentially significant.</p>	<p>Mitigation Measure TR-1: VMT Screening and Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines.</p> <p>If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance</p>	Sites 20, 21, and 23 significant and unavoidable impacts

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to:</p> <ul style="list-style-type: none"> • <i>Increase Residential Density:</i> Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT. • <i>Integrate Affordable and Below Market Rate Housing:</i> Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project. • <i>Implement Commute Trip Reduction Marketing:</i> Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA).</p> <ul style="list-style-type: none"> • <i>Provide Ridesharing Program:</i> Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA. • <i>Implement Subsidized or Discounted Transit Program:</i> Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA. • <i>Limit Residential Parking Supply:</i> The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project. 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> • <i>Unbundle Residential Parking Costs from Property Cost:</i> Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT. • <i>Provide Pedestrian Network Improvement:</i> Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT. • <i>Construct or Improve Bike Facility:</i> Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT. • <i>Construct or Improve Bike Boulevard:</i> Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT. • <i>Expand Bikeway Network:</i> Expanding the bikeway network connects different parts of the community with safe and accessible 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT.</p> <ul style="list-style-type: none"> • <i>Implement Conventional Carshare Program:</i> Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT. • <i>Implement Electric Carshare Program:</i> Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions. • <i>Implement Pedal (Non-Electric) Bikeshare Program:</i> Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT. • <i>Implement Electric Bikeshare Program:</i> Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible to a broader range of users and 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>encourage more trips to be taken by bike instead of by car, contributing to reduced VMT.</p> <ul style="list-style-type: none"> • <i>Implement Scooter Share Program:</i> Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT. • <i>Provide Community-Based Travel Planning (CBTP):</i> CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA. • <i>Implement Market Price Public Parking (On-Street):</i> Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. • <i>Implement Transit-Supportive Roadway Treatments:</i> Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This 	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			results in a mode shift from single occupancy vehicles to transit, which reduces VMT.	
Cumulative	None	Less than significant	None required	Less than significant
5.15 Tribal Cultural Resources				
Impact TCR-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is 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).	None	Potentially significant	<p>Mitigation Measure CUL-3 and CUL-4, listed previously.</p> <p>Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.</p> <p>If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:</p> <p>A. Full avoidance.</p> <p>B. If avoidance is not feasible, Preservation in place.</p> <p>C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.</p> <p>D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)</p>	
Impact TCR-2: The Project would not cause a substantial adverse change in the significance of a	None	Potentially significant	Mitigation Measures CUL-3 and CUL-4, listed previously.	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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, that considers the significance of the resource to a California Native American tribe.			Mitigation Measure TCR-1 , listed previously.	
Cumulative	None	Potentially significant	Mitigation Measure CUL-3 and CUL-4 , listed previously. Mitigation Measure TCR-1 , listed previously.	Less than significant
5.16 Utilities and Service Systems				
Impact UT-1: The Project would not 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.	None	Less than significant	None required	Less than significant
Impact UT-2: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years.	None	Less than significant	None required	Less than significant
Impact UT-3: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the	None	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Project's projected demand in addition to the providers existing commitments.				
Cumulative	None	Less than significant	None required	Less than significant

2. Introduction

2.1 SUBSEQUENT EIR INTRODUCTION

This Draft Subsequent Environmental Impact Report (EIR) has been prepared as a Draft Subsequent EIR to the General Plan 2035 EIR that was certified in July 2017 (State Clearinghouse Number 2016081041). This Draft Subsequent EIR evaluates the environmental effects that may result from the construction and operation of the proposed Project, as detailed in Section 3.0, *Project Description*. This EIR has been prepared by the City of Redlands (City) in its capacity as Lead Agency, as that term is defined in Section 15367 of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) and in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This EIR has been prepared to programmatically identify, analyze, and mitigate the potentially significant environmental effects of the proposed Project.

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze Project impacts, analyses and conclusions regarding the level of significance of impacts both before and after mitigation, the identification and application of mitigation measures to avoid or reduce Project-related impacts, and the consideration of alternatives to the proposed Project. In preparing this Draft Subsequent EIR, the City has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this Draft Subsequent EIR reflect the independent judgment of the City of Redlands as Lead Agency.

2.2 GENERAL PLAN 2035 AND HOUSING ELEMENT HISTORY AND ENVIRONMENTAL BACKGROUND

The City of Redlands General Plan 2035 was adopted in December 2017, after the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan provides the long-term policy direction, and quality of life, economic health, and sustainability goals 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.

The General Plan EIR analyzed an assumed buildout of the General Plan with up to 36,561 residences and 39,704,566 square feet of nonresidential development. Table ES-4 of the General Plan EIR Executive Summary provides a list of the impacts that would result from buildout of the General Plan, which include the following:

Significant and Unavoidable Impacts: The General Plan EIR identified significant and unavoidable impacts in the following environmental topic areas:

- Agricultural Resources (Impact 3.2-1);
- Air Quality (Impacts 3.3-2 and 3.3-3); and
- Transportation (Impacts 3.15-1 and 3.15-2).

Less-Than-Significant Impacts with Incorporation of Mitigation: The General Plan EIR did not identify any impacts that could be mitigated to less-than-significant levels with incorporation of mitigation measures.

Less-Than-Significant Impacts: The General Plan EIR identified less-than-significant impacts in the following environmental topic areas:

- Aesthetics (Impacts 3.1-1, 3.1-2, and 3.1-3);
- Agricultural Resources (Impacts 3.2-2 and 3.2-3);
- Air Quality (Impacts 3.3-1, 3.3-4, and 3.3-5);
- Biological Resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-4, 3.4-5, 3.4-6);
- Energy, Greenhouse Gases, and Climate Change (Impacts 3.5-1, 3.5-2, 3.5-3, and 3.5-4);
- Geology, Soils, and Seismicity (Impacts 3.6-1, 3.6-2, 3.6-3, and 3.6-4);
- Hazards (Impacts 3.7-1, 3.7-2, 3.7-3, 3.7-4, 3.7-5, 3.7-6, and 3.7-7);
- Historical, Archaeological, and Paleontological Resources (Impacts 3.8-1, 3.8-2, 3.8-3, 3.8-4, and 3.8-5);
- Hydrology and Water Quality (Impacts 3.9-1, 3.9-2, 3.9-3, 3.9-4, 3.9-5, 3.9-6, 3.9-7, 3.9-8, and 3.9-9);
- Land Use and Housing (Impact 3.10-3);
- Mineral Resources (Impact 3.11-1);
- Noise (Impacts 3.12-1, 3.12-2, 3.12-3, and 3.12-4);
- Public Facilities and Services (Impacts 3.13-1, 3.13-2, 3.13-3, 3.13-4, and 3.13-5);
- Public Utilities and Infrastructure (Impacts 3.14-1, 3.14-2, 3.14-3, 3.14-4, 3.14-5, 3.14-6, and 3.14-7);
- Transportation (Impacts 3.15-3, 3.15-4, 3.15-5, 3.15-6).

No Impact: The General Plan EIR determined that no impact would occur with respect to the following environmental topic areas:

- Land Use and Housing (Impacts 3.10-1 and 3.10-2); and
- Mineral Resources (Impact 3.11-2).

2.3 PURPOSE OF AN EIR

CEQA requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. Pursuant to the provisions of CEQA Guidelines Section 15121(a), this Draft Subsequent EIR is intended as an informational document to inform public agency decision makers and the general public of the significant environmental effects of the proposed Project, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the Project that might avoid or lessen significant environmental effects. Thus, this Draft Subsequent EIR is intended to aid the review and decision-making process.

The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement

among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

Basis for a Subsequent EIR

The 2017 EIR for the General Plan 2035 is a Program EIR that examined the total scope of environmental effects that would occur as a result of buildout of the General Plan. Once a Program EIR has been prepared, subsequent activities within the program or changes to the program must be evaluated to determine whether additional CEQA documentation needs to be prepared. The key considerations in determining the need for additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines §15162, which state that no subsequent EIR shall be prepared unless one or more of the following conditions is present:

1. Substantial changes are proposed in the project 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;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken 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; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As detailed in Section 3.0, *Project Description*, the proposed Project involves a General Plan Amendment, a Specific Plan Amendment, and rezoning of parcels to provide for future housing development as required by the Regional Housing Needs Allocation (RHNA). This Project may involve new significant environmental effects or a substantial increase in the previously identified effects. Thus, the City of Redlands has prepared this Draft Subsequent EIR that evaluates the potential of the proposed Project to result in new or substantially greater impacts than previously identified in the General Plan 2035 EIR, pursuant to the requirements of CEQA, as detailed below.

Program EIR CEQA Coverage

A Program EIR is an EIR prepared to assess a series of actions characterized as one project. The actions can be related to one another geographically, because they are part of a chain of contemplated actions, because they governed by the same rules, regulations, plans, or other general criteria associated with a

program, or because they are individual activities carried out under the same statutory or regulatory authorities and have similar environmental effects and mitigation needs. The General Plan 2035 EIR, certified in 2017, is a Program EIR that examined the General Plan 2035 buildout.

Given the planning and development nature of the proposed Project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions to implement the proposed Project, this document is also a Program EIR has been prepared as a Subsequent EIR, pursuant to Section 15162 of the CEQA Guidelines that tiers from a certified Program EIR.

2.4 SUBSEQUENT EIR SCOPE AND CONTENT

CEQA Updates Since Certification of the General Plan 2035 EIR in 2017

As discussed herein, the General Plan 2035 EIR was certified in 2017. However, in the intervening years, several changes have been made to the CEQA Guidelines, regulatory, and statutory requirements. In December 28, 2018, a comprehensive update to the State CEQA Guidelines became effective, which addressed legislative changes to the CEQA statute, clarified certain portions of the existing CEQA Guidelines, and updated the CEQA Guidelines to be consistent with recent court decisions. The changes to the Guidelines include but are not limited to CEQA Guidelines Section 15064.3, related to vehicle miles traveled (VMT), and incorporation of energy and wildfire as new separate topics in the CEQA Guidelines Appendix G, *Environmental Checklist Form*. Impacts related to wildfires were evaluated in the Initial Study (included as Appendix A) and were found to be less than significant.

This Draft Subsequent EIR addresses these changes, minor updates to other environmental topics, and the proposed Project.

Environmental Setting and Baseline

The environmental setting is normally the existing conditions at the time the CEQA analysis begins (CEQA Guidelines Section 15125). In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when the project is within the scope of a Program EIR (such as the General Plan 2035 EIR), the effective baseline is the previously approved and analyzed project for which the Program EIR was certified (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523). “When a lead agency is considering whether to prepare a Subsequent EIR, it is specifically authorized to limit its consideration of the later project to effects not considered in connection with the earlier project” (*Temecula Band of Luiseño Mission Indians v. Rancho Cal. Water Dist.* [1996] 43 Cal.App.4th 425, 437). Here, the previous project is the General Plan 2035.

CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). The intent of this Subsequent EIR is to provide a reasonably conservative analysis that identifies the reasonable maximum potential impact. Thus, this Subsequent EIR provides an analysis of impacts from buildout of the proposed Project in comparison to those from buildout of Project site per the General Plan 2035.

Impacts Found to Be Potentially Significant. Based on the Initial Study conducted for the proposed Project, the City determined that an EIR should be prepared for the Redlands RHNA Rezone Project (“proposed Project”). Topics requiring a detailed level of analysis evaluated in this Draft Subsequent EIR have been identified based upon the responses to both the Notice of Preparation (NOP) for the Project and a review of the Project by the City of Redlands. The City determined through the Initial Study process that impacts related to the following topics are potentially significant and require a detailed level of analysis in this Draft Subsequent EIR:

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

Impacts Found Not to Be Significant. CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment.” Topics that have been determined not to be significant and are therefore not discussed in detail in the Subsequent EIR were identified based upon the responses to the NOP and an Initial Study prepared by the City of Redlands. The City determined through the initial review process that impacts related to the following topics are not potentially significant and are not required to be analyzed in this Draft Subsequent EIR:

- Aesthetics
- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Recreation
- Wildfire

2.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The CEQA Guidelines define Lead, Responsible, and Trustee Agencies. The City of Redlands is the Lead Agency because it holds principal responsibility for approving the proposed Project.

A Responsible Agency refers to a public agency other than the Lead Agency that has discretionary approval over the proposed Project. State, regional and/or local government permits may be required for the proposed Project, whether or not they are explicitly listed below. State and regional agencies that may have jurisdiction over some aspects include (but are not limited to):

- Santa Ana Regional Water Quality Control Board
- South Coast Air Quality Management District

Trustee Agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. CEQA Guidelines §15386 designates four agencies as Trustee Agencies: the California Department of Fish and Wildlife with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission with regard to State-owned “sovereign” lands, such as the beds of navigable waters and State school lands; the California Department of Parks and Recreation with regard to units of the State park system; and the University of California with regard to sites within the Natural Land and Water Reserves System. There are no Trustee Agencies for the proposed Project.

2.6 SUBSEQUENT EIR PROCESS

Notice of Preparation/Initial Study

Pursuant to the requirements of CEQA, the City of Redlands, as Lead Agency, prepared an Initial Study (IS) and Notice of Preparation (NOP) for the proposed Project, which was distributed on July 1, 2024, for a 30-day public review and comment period that ended on July 31, 2024. The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the Draft Subsequent EIR being prepared. Comments received on the NOP are included in

Appendix A and summarized in Table 2-1, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP/Initial Study Comment Letters

Comment Letter and Comment	Relevant EIR Section
State Agencies	
Native American Heritage Commission, July 19, 2024	
This letter discusses Project compliance with AB 52 and SB 18. The letter recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project as early as possible. The letter also outlines the AB 52 requirements. In addition, the letter provides recommendations for the Cultural Resources Assessment in order 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.	Cultural Resources, Tribal Cultural Resources
Department of Toxic Substances Control, July 17, 2024	
This letter provides background on the proposed Project and makes four requests on the behalf of the Department of Toxic Substances Control (DTSC). The requests include identification of the amount of Pesticides and Organochlorine Pesticides historically used onsite. They also warn that additional contaminants may be found due to specific uses present on the Project site. DTSC also recommends that all soil and fill material should be tested to assess any contaminants. Lastly, they state that surveys should be conducted for the presence of contaminants linked to preexisting building onsite.	Hazards and Hazardous Materials
Regional/Local Agencies	
Department of Public Works, San Bernardino County, July 24, 2024	
<p>This letter informs that The San Bernardino County Flood Control District (District) possesses fee-owned right-of-way adjacent to the eastern side of Site 16 and they also possess easement-owned right-of-way totally encumbered by Site 16A.</p> <p>The comment includes the District's recommendations for the proposed Project. The first is that the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project lies within the Special Flood Hazard Area (SFHA). The District recommends that the Project includes the most recent FEMA regulations for development in an SFHA. If encroachment on District right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations Support Section. They also recommend that the San Bernardino County Comprehensive Storm Drain Plan (CSDP) be utilized in the design of drainage facilities. The Project will be subject to the CSDP No. 4 and is to be used as a guideline for drainage in the area and any design will be subject to review and approval by the jurisdictional agency.</p> <p>The Department has also requested to be included in the circulation list for all Project notices, public reviews, or public hearings.</p>	Hydrology & Water Quality, Land Use & Planning, Utilities & Service Systems
Individuals	
Alan Gotta, July 15, 2024	
This letter provides the commenter's opposition to the Project. The commenter expresses his concern for the landowners in the Western portion of the city. He is concerned about the loss of property value for these landowners and associated infrastructure, as well as associated costs.	Population and Housing
Kim Price, July 2, 2024	

Comment Letter and Comment	Relevant EIR Section
This letter provides the commenter's opposition to the density of the proposed Project. The commenter is concerned that the high-density zoning could lead to heavy traffic due to lot 23's proximity to Lugonia School. The commentor advocates for a lower density of the proposed Project. The letter also requests that entrances and exits to the development be situated away from schools and residential uses and opposition to units facing neighboring residential uses to maintain the privacy of existing residents. Additional requests include a request for at a minimum three spaces per unit and installation of block walls along the perimeter of the Project sites.	Transportation, Land Use and Planning
Richard Ruiz Jr., July 22, 2024	
This letter provides the commenter's concern of the proposed Project, specifically the development of lot 23. The commentor is a neighbor to the proposed Project and is concerned that San Marcos Ave will be open for through traffic and may lead to the increase of traffic and crime. The commentor also expresses their concern for a loss of privacy and also suggests construction of high walls around the property to increase the security of the site. The commentor also expressed concern for the impact of increased traffic on Lugonia Elementary School parents. The commenter advises that the zoning remains as R-2 rather than R-3.	Public Services, Transportation, Alternatives

Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Redlands hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft Subsequent EIR for the proposed Project. The Public Scoping Meeting was held on July 18, 2024, at 4:30 p.m. via Zoom. Comments received during the scoping meeting are summarized in Table 2-2, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

Table 2-2: Summary of Public Scoping Meeting Comments

Comment Letter and Comment	Relevant EIR Section
Redlands Chamber of Commerce	
The commenter asked how the Project aligns with the development horizon past 2035. The commenter also asked who made the determination on the topics screened out of the Draft EIR. They also expressed concern for the loss of farmland since agriculture heritage is what the City was founded on. The last concern they had was what can be done to increase the amount of open space to combat the depletion of air quality with the rising amount of warehouses.	Agricultural Resources, Air Quality, Land Use and Planning
Bobby Garrity	
The Redlands Yes In My Backyard (YIMBY) advocated for higher density to reduce the amount of total space housing takes up within the city and reduce total emissions. Redlands YIMBY requests that zoning in Redlands allows for housing beyond the RHNA requirement.	Air Quality, Energy, Greenhouse Gases, Population and Housing, Land Use and Planning

Public Review of the Draft Subsequent EIR

The City of Redlands filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this Draft Subsequent EIR has been completed and is available for review. A Notice of Availability of the Draft Subsequent EIR was published concurrently with distribution of this document. The Draft Subsequent EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and

Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft Subsequent EIR is available for public review digitally on the City's website:

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

Written comments related to environmental issues in the Draft Subsequent EIR should be addressed to:

Kevin Beery, Senior Planner
City of Redlands
35 Cajon Street, Suite 20
Mailing: P.O. Box 3005
Redlands, CA 92373

Email: kbeery@cityofredlands.org

Final Subsequent EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft Subsequent EIR will be prepared and incorporated into a Final Subsequent EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final Subsequent EIR will be considered. These comments, and their responses, will be included in the Final Subsequent EIR for consideration by the City, as well as other responsible agencies per CEQA. The Final Subsequent EIR may also contain corrections and additions to the Draft Subsequent EIR, and other information relevant to the environmental issues associated with the Project. The Final Subsequent EIR will be available for public review prior to its certification by the City. Notice of the availability of the Final Subsequent EIR will be sent to all who commented on the Draft Subsequent EIR.

2.7 ORGANIZATION OF THIS DRAFT SUBSEQUENT EIR

The Draft Subsequent EIR is organized into the following sections. To help the reader locate information of interest, a brief summary of the contents of each section of this Draft Subsequent EIR is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the proposed Project, and alternatives. The section also provides a summary of environmental impacts and mitigation measures that lists each identified environmental impact, applicable Project design features, standard conditions, proposed mitigation measure(s) (if any), and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Section 2, Introduction:** This section provides an overview of the purpose and use of the Draft Subsequent EIR, the scope of this Draft Subsequent EIR, a summary of the legal authority for the Draft Subsequent EIR, a summary of the environmental review process, and the general format of the document.
- **Section 3, Project Description:** This section provides a detailed description of the proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5, Environmental Impact Analysis:** This section includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the proposed Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the

feasible mitigation measures that would reduce or eliminate any significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

This section also summarizes the significant and unavoidable impacts that would occur from implementation of the proposed Project and provides a summary of the environmental effects of the implementation of the proposed Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the proposed Project.

- **Section 6, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is identified.
- **Section 7, Report Preparation and Persons Contacted:** This section lists authors of the Draft Subsequent EIR and City staff that assisted with the preparation and review of this document. This section also lists other individuals or organizations that were contacted for information that is included in this Draft Subsequent EIR document.

2.8 INCORPORATION BY REFERENCE

State CEQA Guidelines Section 15150 allows for the incorporation “by reference all or portions of another document...[and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Draft Subsequent EIR. Where this Draft Subsequent EIR incorporates a document by reference, the document is identified in the body of the Draft Subsequent EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this Draft Subsequent EIR.

City of Redlands General Plan 2035. The Project is within the geographical limits of the City of Redlands and is covered by its General Plan 2035. The General Plan 2035 was adopted by the City on December 5, 2017, and provides the fundamental basis for the City’s land use and development policies. The General Plan 2035 documents are available at <https://www.cityofredlands.org/post/planning-division-general-plan>. Land use and development policies are utilized throughout this document as a regulatory document governing development and land use activities within the City.

City of Redlands General Plan EIR. The General Plan 2035 was the subject of an environmental review under CEQA; a Program EIR for the General Plan 2035 was certified by the City in 2017 (State Clearinghouse Number 2016081041). The Program EIR contains information relevant to the impacts from building out the Project site pursuant to the existing land use and zoning designations and includes the impact findings that are listed previously. Accordingly, the Program EIR for the General Plan 2035 is herein incorporated by reference in accordance with State CEQA Guidelines Section 15150. The General Plan 2035 documents are available at <https://www.cityofredlands.org/post/planning-division-general-plan>.

City of Redlands Housing Element: The City of Redlands Housing Element identifies projected housing needs for all economic segments based on Department of Finance population estimates. 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 a number of 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 of the Housing Element), 23 of them were identified as necessary for rezoning

under Housing Element Program 1.1-1 to allow for medium and high-density residential development. The City of Redlands Housing Element is incorporated throughout this Subsequent Draft EIR and is available at <https://www.cityofredlands.org/post/housing-element>.

City of Redlands Municipal Code: The City of Redlands Municipal Code consists of regulatory, penal, and administrative ordinances of the City. The City's Zoning Regulations (Municipal Code Section 18) identifies land uses permitted and prohibited according to the zoning category of particular parcels, and provide regulations for development. The Municipal Code is utilized throughout this document as a regulatory document governing development and land use activities within the City. Regulatory information from the Municipal Code is cited in various sections of this Draft Subsequent EIR.

3. Project Description

“Project,” as defined by the State CEQA Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)... enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.” (14 California Code of Regulations [CCR] Section 15378(a).)

The City has determined that a Subsequent Environmental Impact Report (“EIR”) to the City’s General Plan Final Recirculated Program EIR (SCH # 2016081041) is necessary pursuant to California Environmental Quality Act (“CEQA”) Guidelines Section 15162 to evaluate the potential environmental impacts from the proposed Project. This Draft Subsequent EIR (Draft SEIR) analyzes buildout at a programmatic level of detail, based upon land use changes proposed pursuant to the City of Redlands recently adopted City of Redlands 2021-2029 Housing Element (Housing Element), compared to the buildout of the approved City General Plan.

3.1 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 the cities of 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 the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the City’s Housing Element sites, 23 sites from the Housing Element sites inventory totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site, including Site 24, is approximately 116.19 acres. The Rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change 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. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project (“proposed Project”, “Project”). The 24 sites are 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 the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just 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*.

3.2 PROJECT BACKGROUND

3.2.1 City of Redlands General Plan 2035

The City of Redlands (City) General Plan 2035 was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). 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 can 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 October 7, 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 a number of 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 of them were identified as necessary for rezoning under Housing Element Program 1.1-1 to allow for medium and high-density residential development.

3.3 EXISTING CONDITIONS

Rezone 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 rezone sites are vacant or are being used for agricultural purposes with no permanent structures onsite. The sites range in size from 1.90 to 10.91 acres. A few properties have single-family homes onsite, and others are used for industrial storage. The sites identified in the EVCSP area are adjacent to multiple schools and parks and have access to nearby local-serving retail and regional job centers, including Esri headquarters and Loma Linda University Medical Center.

Rezone 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. 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. Sites 22 and 23 are vacant, but heavily disturbed.

3.3.1 Existing General Plan & Zoning Designations

The City of Redlands General Plan currently designates the subject sites (1-24) 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.

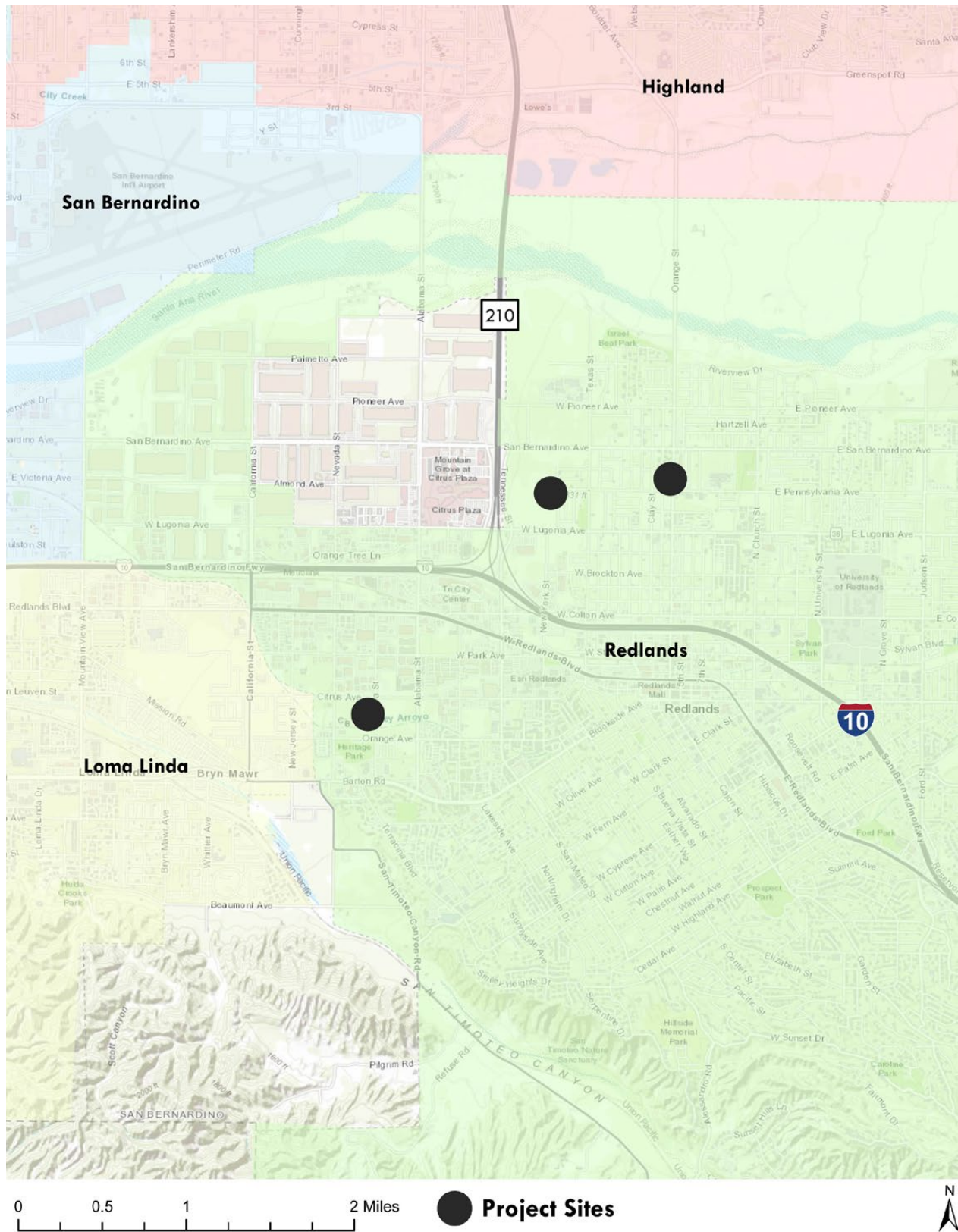
The Rezone sites currently have zoning designations of Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single Family Residential (R-1), and Multiple Family Residential (R-2). Figures 3-5a and 3-5b show the existing zoning designations for the Rezone Sites. Table 3-1, *Existing 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 3-1: Existing General Plan Buildout

Rezone Site		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

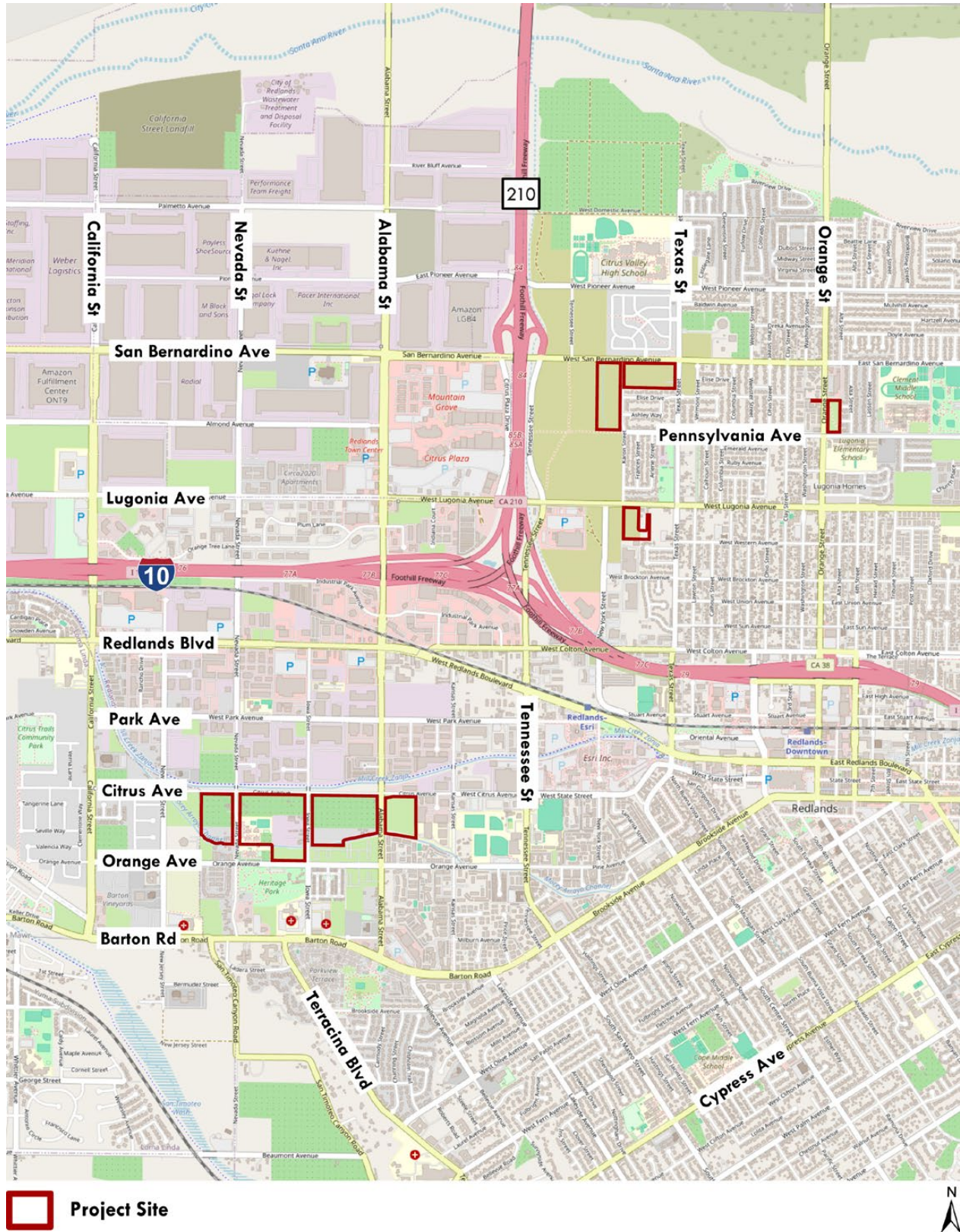
Rezone Site		Acres	General Plan Land Use Designation	Zoning	Residential Buildout Capacity (Dwelling Units)	Non-Residential Buildout Capacity (SF)
5	0292-165-07	1.07	Commercial/Industrial	EV/IC	0	23,304.6
6	0292-165-08	1.9	Commercial/Industrial	EV/IC	0	41,382.0
7	0292-165-09	1.9	Commercial/Industrial	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	2,209,040.46

Regional Location



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Local Vicinity



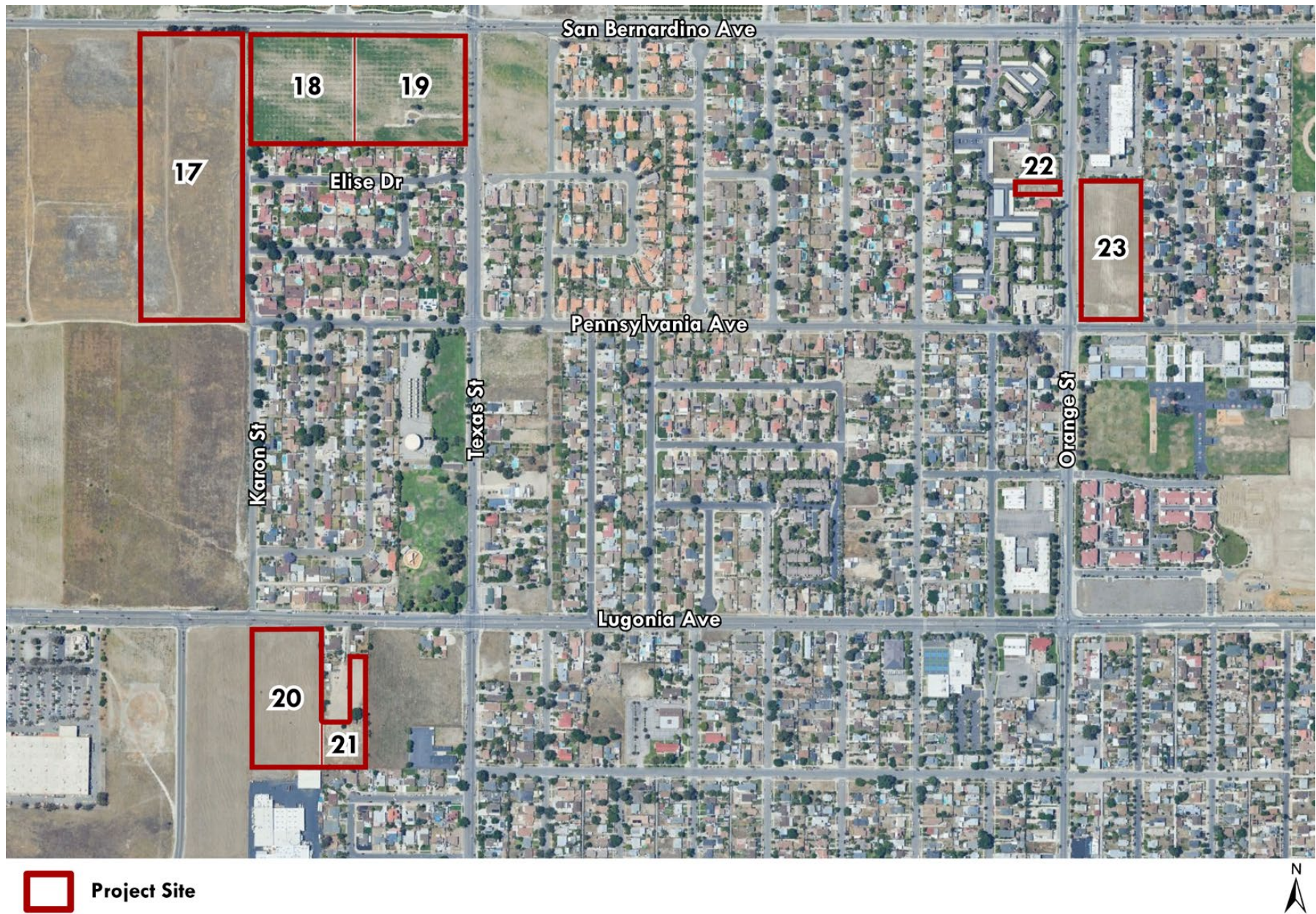
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Aerial View



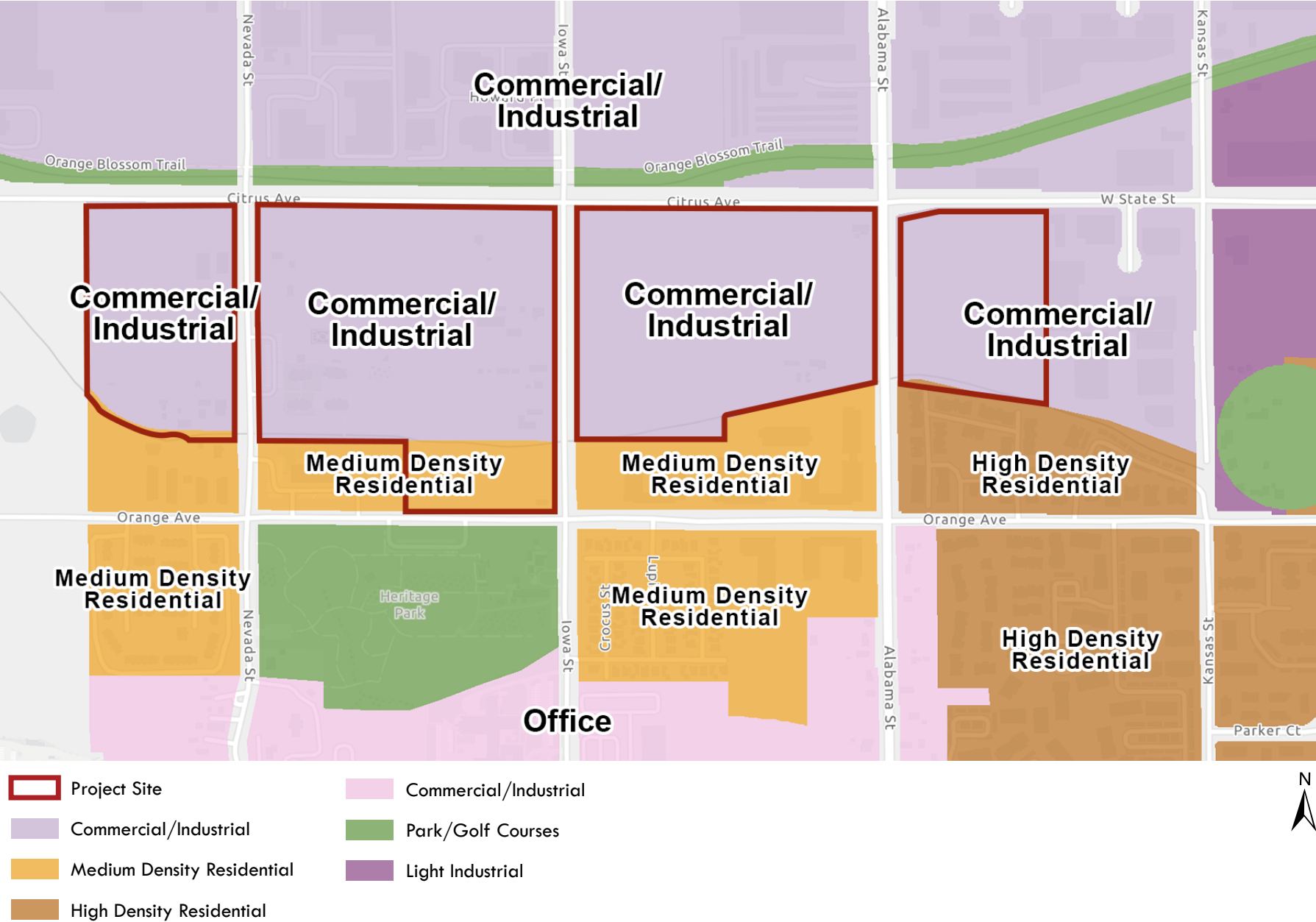
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Aerial View



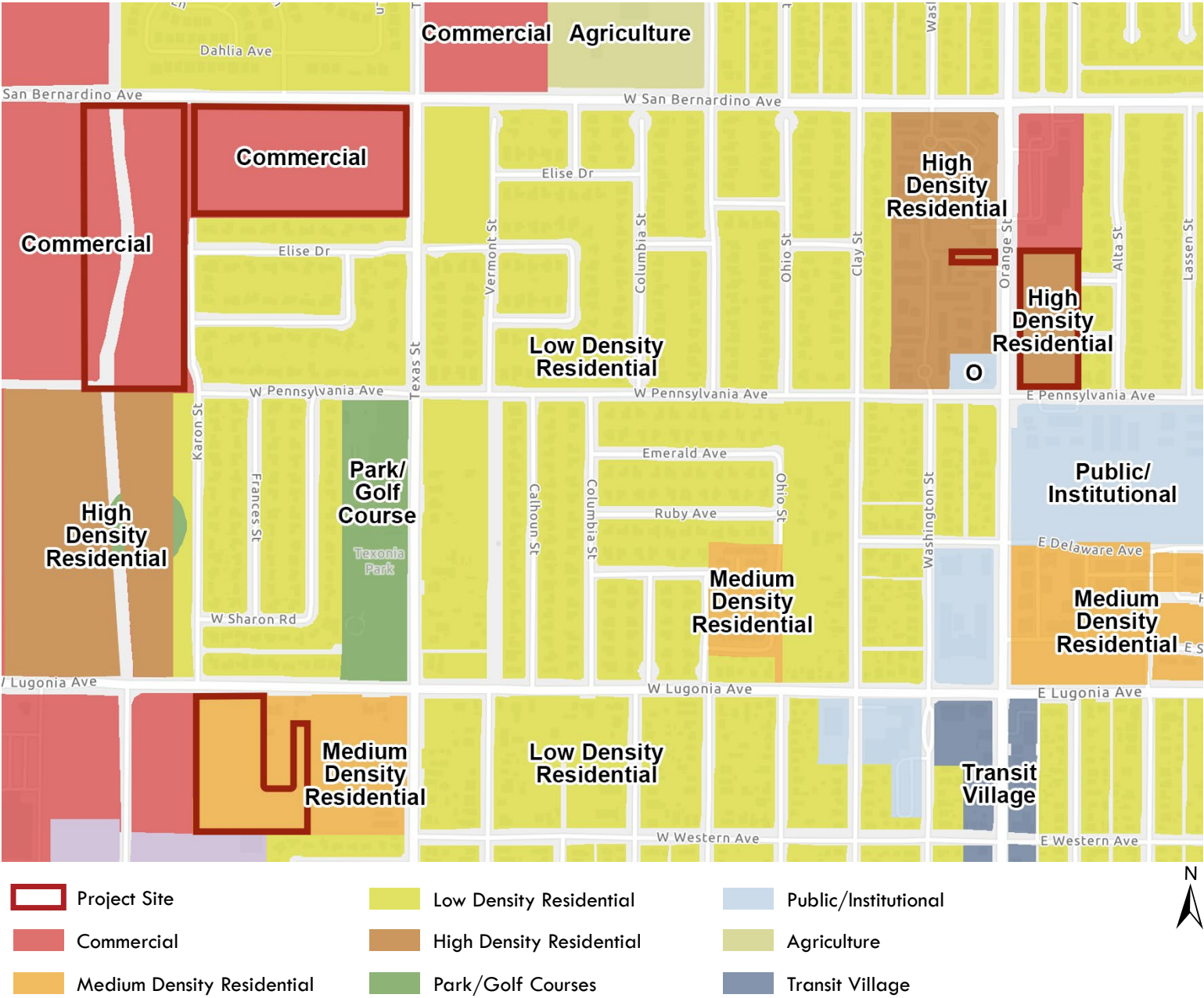
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Existing General Plan Land Use



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Existing General Plan Land Use



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Existing Zoning

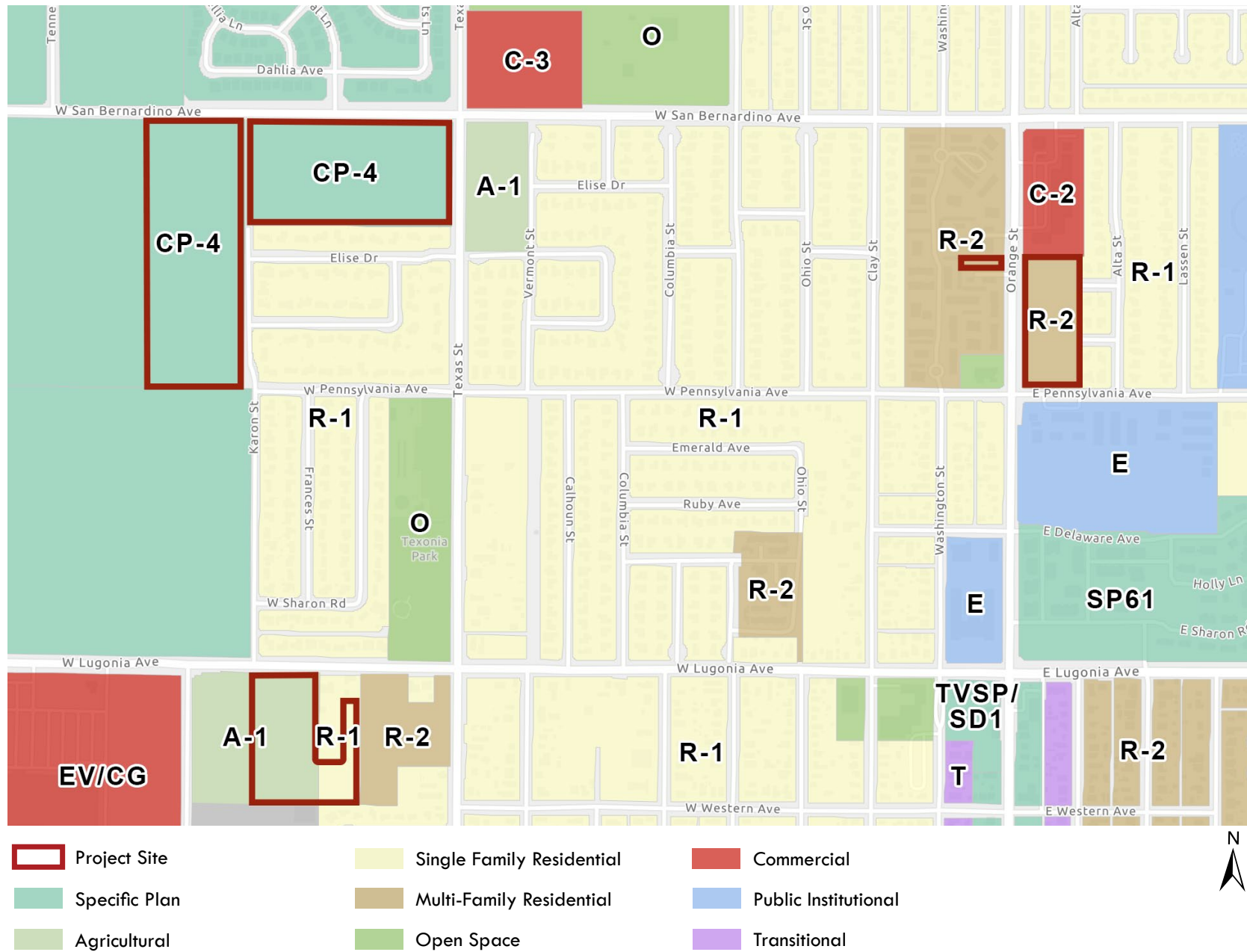


- | | |
|--|---|
| Project Site | Specific Plan |
| Commercial Industrial | Public Institutional |
| Multiple Family Residential | Agricultural |
| Administrative | |



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Existing Zoning



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3.4 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:

- 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.
- Maintain adequate housing sites for all income groups throughout the eight-year planning period.
- Minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning.
- 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.

3.5 DESCRIPTION OF THE PROJECT

3.5.1 Project Overview

Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites within the City to allow for increased 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 EVCSP, 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 Draft Subsequent EIR assumes and analyzes 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). While this analysis assumes that Site 24 could be developed to its maximum floor area ratio for approximately 151,048.46 SF of Public/Institutional uses, the existing daycare uses would remain onsite and no redevelopment of the site is proposed by this Project. This Subsequent EIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite. Table 3-2 lists the proposed General Plan land use designation, zoning, and buildout of the 24 sites.

Table 3-2: Proposed RHNA Rezone 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

Site Number	Proposed GP Land Use Designation	Proposed Zoning	Proposed Density (DU/acre)	Acres	Proposed Maximum Buildout (DU)
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	15	4.7	70
12	MDR	R-2	15	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	15	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	30	0.33	9
23	HDR	R-3	30	3.96	118
24	Public/Institutional (PI)	EV/IP	0.5 Floor Area Ratio (FAR)	6.94	151,048.46 SF
Total				116.19	2,436

3.5.2 Proposed General Plan Amendment

The General Plan designation of all sites, with the exception of 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 either 15 or 30 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. 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*.

3.5.3 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 Site 24 to be more aligned with the site's current use as a school and surrounding proposed residential land uses. 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.

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/IP to allow for less intense development more similar to its surrounding proposed residential uses. Sites 20-23 would require a zone change from their current Agriculture (A-1), 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*.

3.5.4 Proposed Specific Plan Amendment

A SPA would be required to remove Sites 1 through 16A, except for Site 8, from the EVCSP and return them to base zoning of either Multiple Family Residential (R-2) or Multiple Family Residential (R-3). 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.

3.5.5 Comparison of Approved General Plan Buildout to Proposed Land Uses

As detailed in Table 3-3, *Comparison of Approved General Plan 2035 Buildout to Proposed Project*, buildout of the proposed Project would result in a decrease of 2,057,992.2 SF of planned nonresidential uses and an increase of 2,325 dwelling units compared to buildout under the existing General Plan and zoning designations.

Table 3-3: Comparison of Approved General Plan 2035 Buildout to Proposed RHNA Rezone 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)

The buildout projections listed in Table 3-2, *Proposed RHNA Rezone Buildout*, are used throughout this Draft Subsequent EIR to estimate the magnitude of development that could likely occur in Redlands upon implementation of the proposed Project to year 2035. Land use calculations are used to estimate the number of dwelling units that could be generated by proposed land uses. These projections are then used to provide a conservative estimate of how much noise, traffic, and other impacts could occur due to these changes.

3.5.6 Infrastructure Improvements

While all of the Rezone sites are surrounded by existing roadways and utilities, roadway and utility improvements 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 sites 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.

3.6 INTENDED USES OF THE SUBSEQUENT EIR

This Draft Subsequent EIR will serve as the primary source of environmental information for the actions and approvals associated with the Redlands RHNA Rezone. In accordance with California Public Resources Code Section 21002.1, the purpose of this Draft Subsequent EIR is to provide the City, serving as the lead agency, information on: the potentially significant environmental impacts that would result from implementation of the Redlands RHNA Rezone; alternatives to the Project; and mitigation measures, which may reduce or avoid any significant effects. This Draft Subsequent EIR will also be used as an informational document by other public agencies, in connection with any approvals or permits necessary for construction and operation of the Redlands RHNA Rezone.

This Draft EIR is intended to serve as a Subsequent EIR, as defined in State CEQA Guidelines Section 15162, for use by the City as lead agency and by responsible agencies as needed. This Draft Subsequent EIR analyzes buildout at a programmatic level of detail, based upon land use changes proposed pursuant to the City of Redlands recently adopted City of Redlands 2021-2029 Housing Element (Housing Element), compared to the buildout of the approved City General Plan.

In a Program EIR, CEQA allows the general analysis of broad environmental effects of the program, with the acknowledgement that subsequent, project-specific environmental review may be required for particular aspects or portions of the program at the time of project implementation, in accordance with State CEQA Guidelines Section 15168. The Program EIR can be incorporated by reference into subsequently prepared environmental documentation to address issues such as cumulative impacts and growth-inducing impacts, allowing the subsequent documents to focus on new or site-specific impacts pursuant to State CEQA Guidelines Section 15168(d). To assess the potential broad-scale environmental impacts that may result from implementation of the Redlands RHNA Rezone, development assumptions have been made at this time and are described in Table 3-2, *Proposed RHNA Rezone Buildout*, above.

3.7 DISCRETIONARY APPROVALS AND PERMITS

The City of Redlands has primary approval responsibility for the Project. As such, the City serves as the Lead Agency for this Draft Subsequent EIR pursuant to State CEQA Guidelines Section 15050. The City's Planning Commission will evaluate this Draft Subsequent EIR and make a recommendation to the City Council whether the Redlands RHNA Rezone Project should be adopted and the Draft Subsequent EIR be certified. The City Council is the decision-making authority for the Project and will consider the Project along with the Planning Commission's recommendations and will make a final decision to approve, approve with changes, or deny the Project. The City, including the Planning Commission and City Council, will consider the information in this Draft Subsequent EIR and the Project's administrative record in its decision-making processes. In the event of approval of the Project and certification of the Draft Subsequent EIR, the City would conduct administrative and discretionary review and grant ministerial and discretionary permits and approvals to implement Project requirements, conditions of approval, and future developments within the Project Area. Approval and implementation of the RHNA Rezone Project requires City approval of the following discretionary actions:

City of Redlands

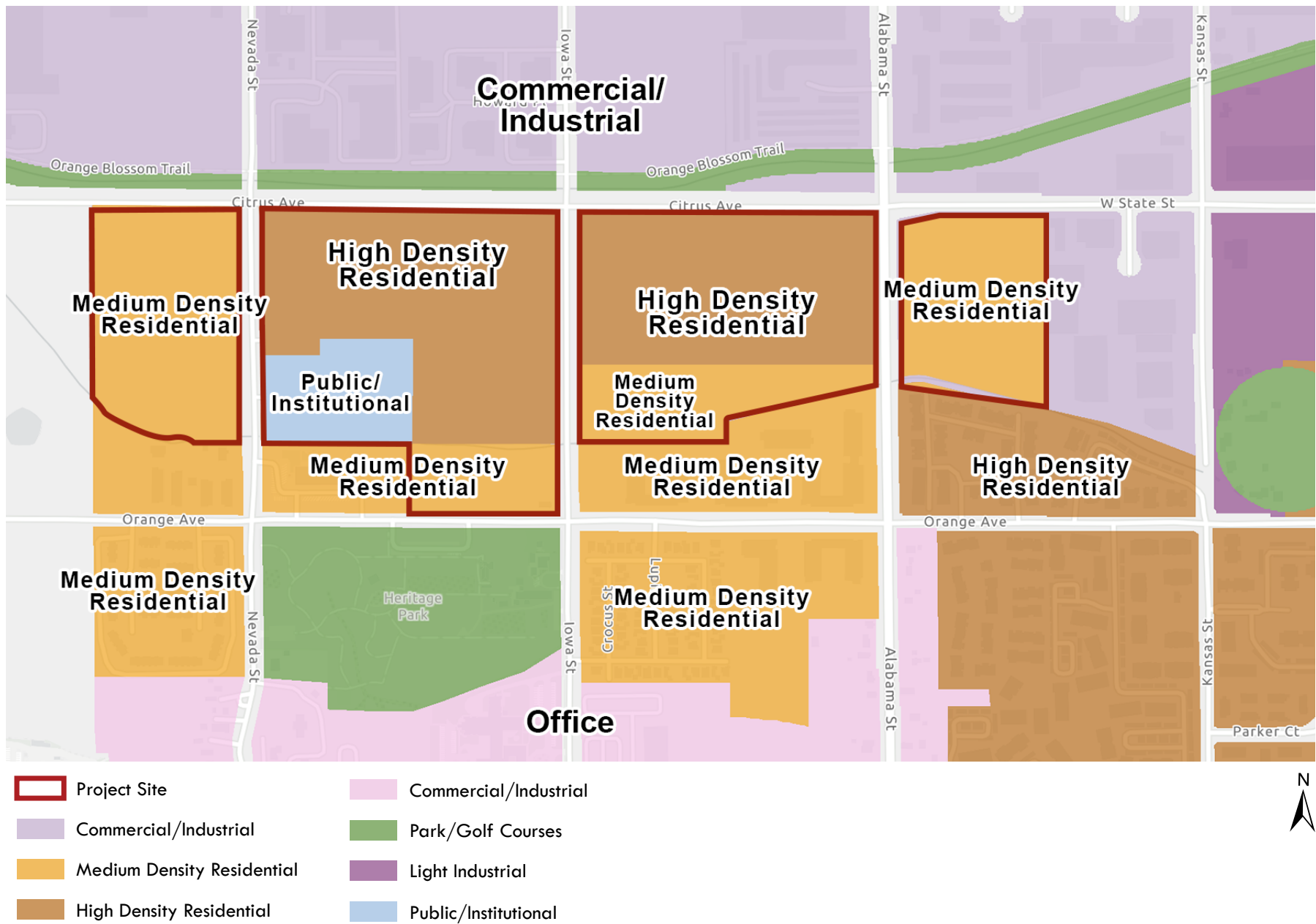
- Adoption of a General Plan Amendment
- Adoption of Specific Plan Amendment(s)
- Approval of a Zone Change
- Certification of the Subsequent EIR.

This Draft Subsequent EIR may be used by various governmental decision-makers for discretionary permits and actions that are necessary or may be requested in connection with implementation of future development projects pursuant to the proposed GPA, zone change, and SPAs. Additional discretionary, administrative and/or ministerial actions may be necessary from other responsible agencies to fully implement the Project. The state or local agencies that may rely upon the information contained in this Draft Subsequent EIR when considering approval of permits may include, but are not limited to, the following:

- South Coast Air Quality Management District (point source emissions permits)
- California Regional Water Quality Control Board (National Pollutant Discharge Elimination System [NPDES] permit)
- State Water Resources Control Board (General Construction Activity Stormwater Permit)
- California Department of Transportation (Caltrans) (improvements to intersections and roadway and underpass design modifications, if located within Caltrans jurisdiction)

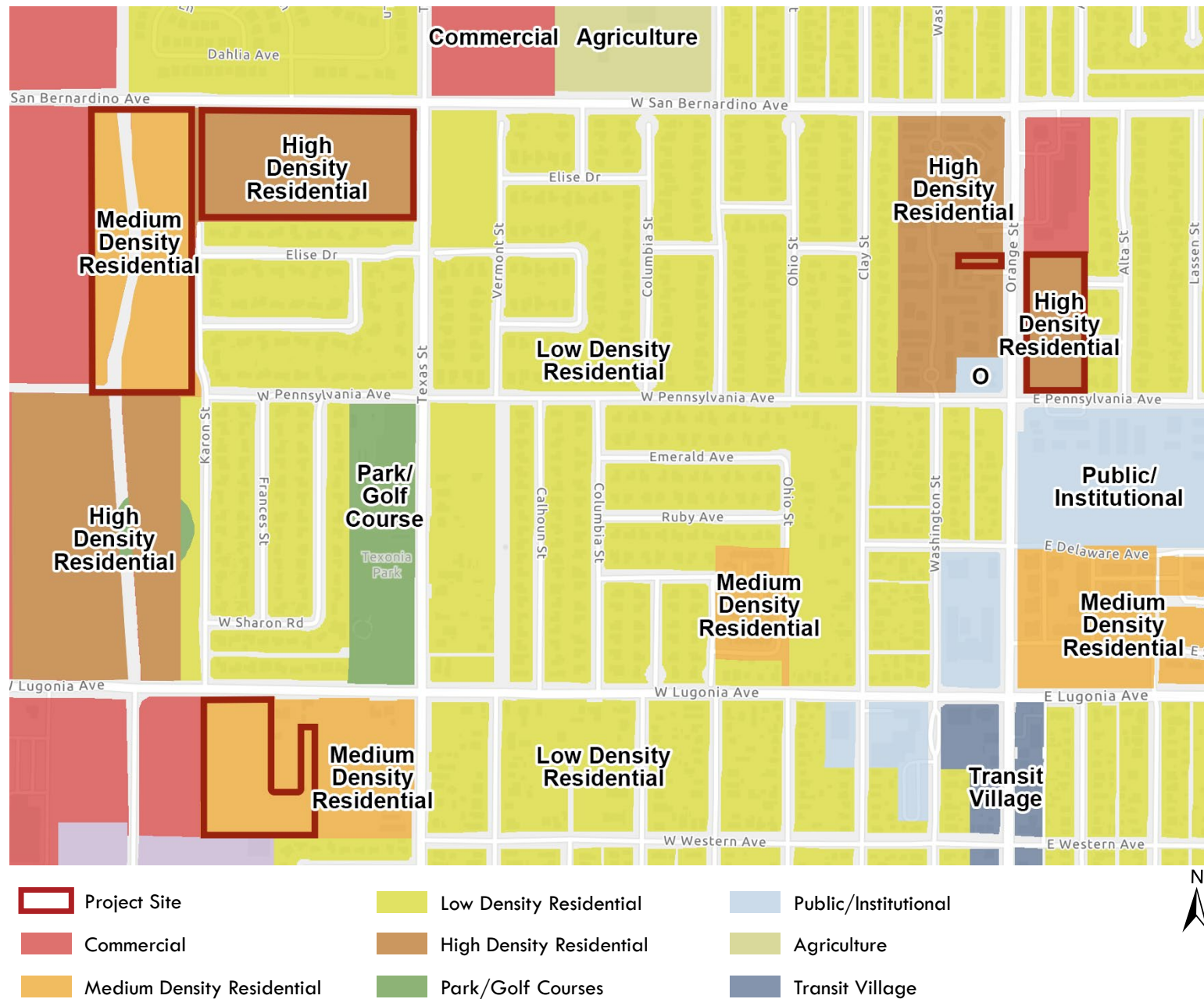
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Proposed General Plan Land Use



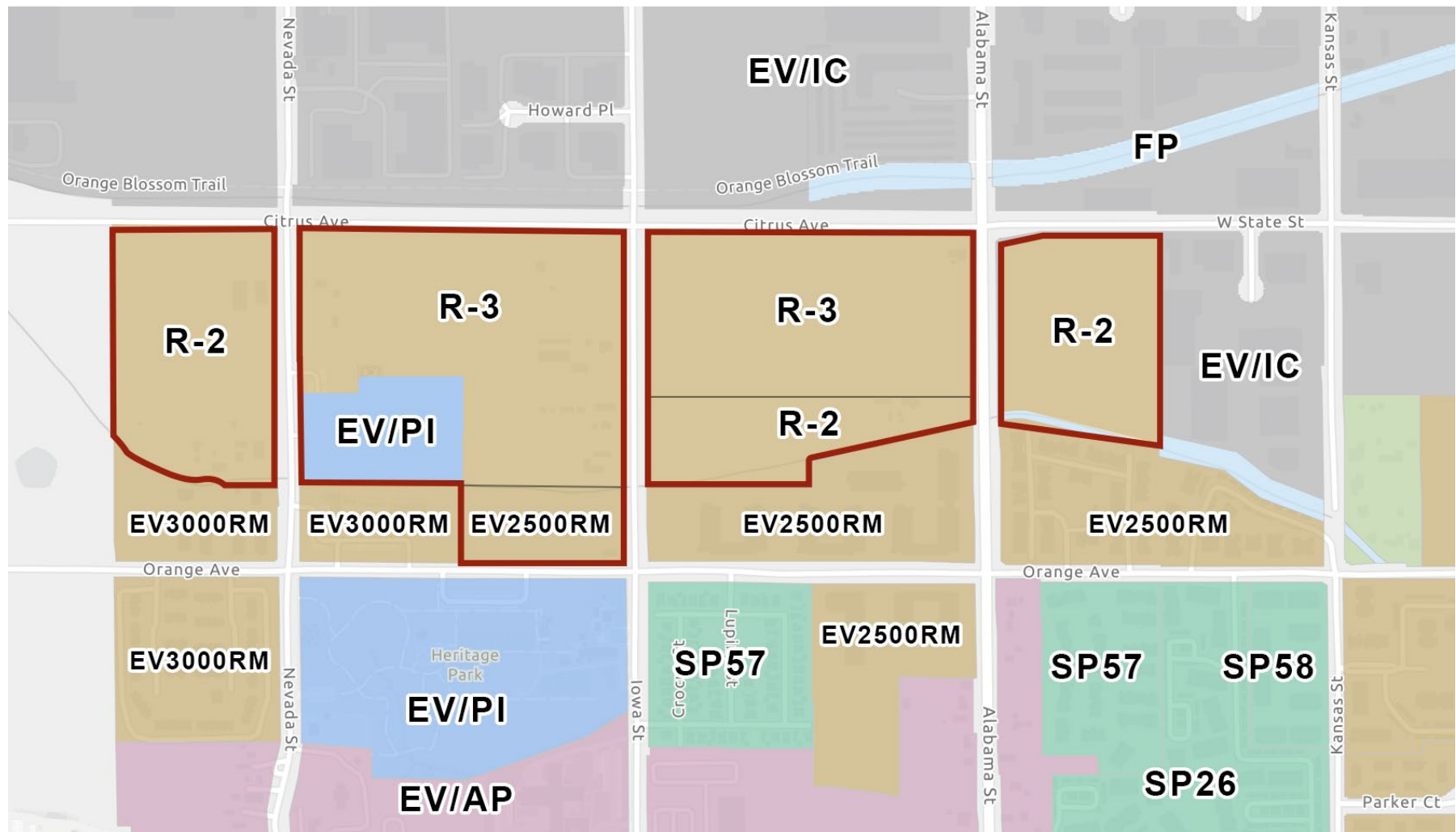
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Proposed General Plan Land Use



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Proposed Zoning

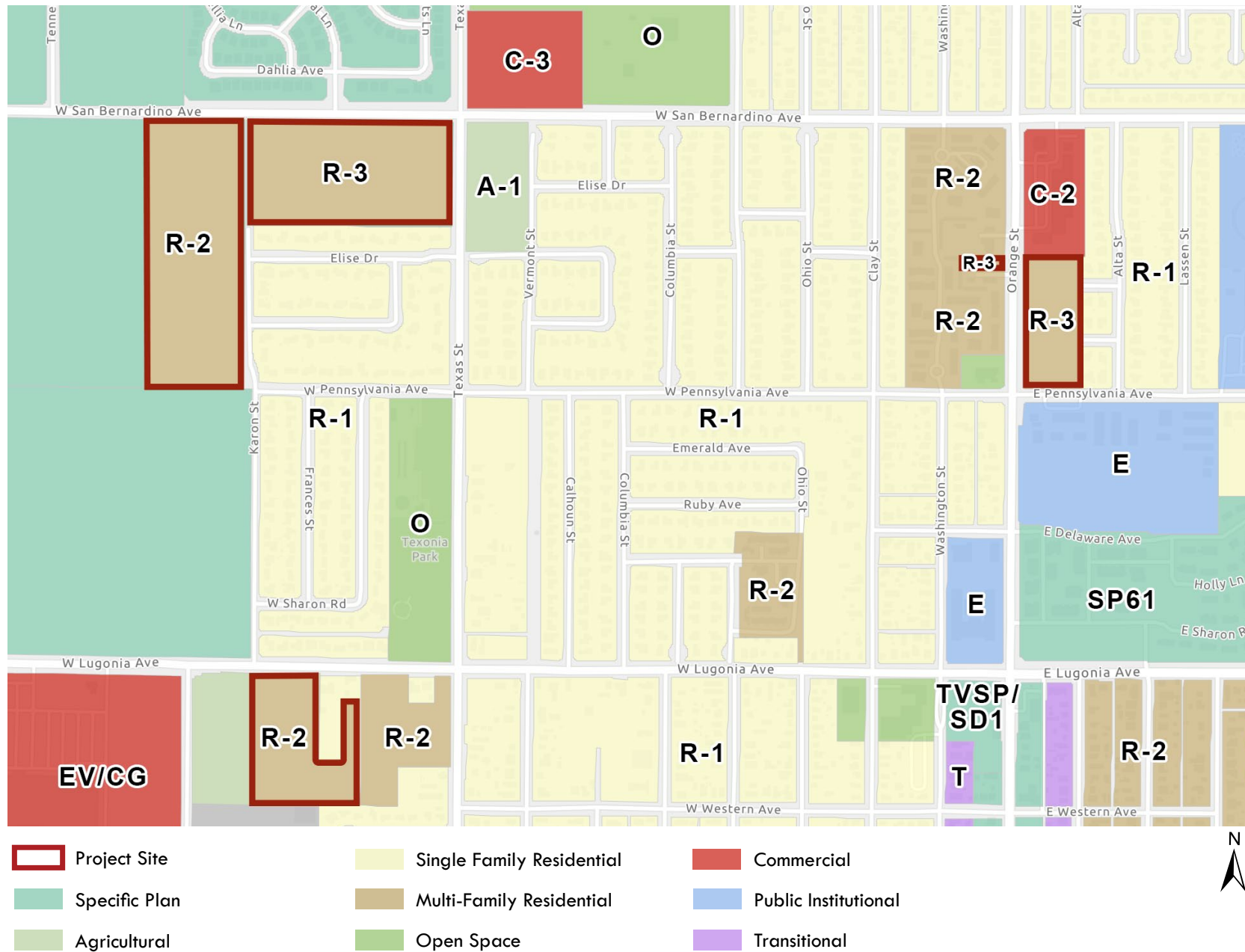


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| Project Site | Specific Plan |
| Commercial Industrial | Public Institutional |
| Multiple Family Residential | Agricultural |
| Administrative | |



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Proposed Zoning



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4. Environmental Setting

The purpose of this section is to provide a “description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation (NOP) is published, from both a local and a regional perspective” pursuant to CEQA Guidelines Section 15125(a). In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 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 the cities of 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 the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

4.2 PROJECT SITE DESCRIPTION

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (Rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change 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. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project (“proposed Project”, or “Project”). The 24 sites are broken up into two distinct areas:

- Sites 1 through 16A and Site 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 also in the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just 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 View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

4.3 SURROUNDING LAND USES

Uses surrounding the proposed Rezone sites include single-family residences, multi-family residences, industrial buildings, commercial buildings, and vacant land.

4.4 PHYSICAL ENVIRONMENTAL CONDITIONS

CEQA Guidelines § 15125(a)(1) states that the physical environmental condition in the vicinity of the Project as it existed at the time the EIR's NOP was released for public review normally be used as the comparative baseline for the EIR. In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA's standards limiting the scope of subsequent environmental review. (State CEQA Guidelines §15162.) Once an EIR has been certified for a project (such as the General Plan 2035 EIR), the baseline for analyzing proposed changes to that project is adjusted such that the originally approved project is assumed to exist. (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523, 542-543). Here, the previously approved project is buildout of the City of Redlands General Plan 2035 for the Project sites. Therefore, the baseline for analyzing the changes proposed by the RHNA Rezone is buildout of General Plan 2035. The following sections provide summaries of the environmental conditions for each environmental topic area included in this Draft Subsequent EIR. More information regarding the Project sites' environmental setting is provided in the specific subsections of EIR Section 5.0, *Environmental Analysis*.

4.4.1 Agriculture

Regional

Natural resources in San Bernardino County and City of Redlands include agricultural and grazing lands. In 2017, the County had approximately 11,315 acres of Prime Farmland, 5,705 acres of Farmland of Statewide Importance, and 2,585 acres of Unique Farmland (San Bernardino County, 2015a). In 2020, the County had approximately 9,805 acres of Prime farmland, 5,304 acres of Farmland of Statewide Importance, and 2,575 acres of Unique Farmland (DOC, 2020).

Local

The Redlands General Plan EIR describes that, as of 2014, there was approximately 745 acres of Prime Farmland, 142.9 acres of Farmland of Statewide Importance, and 249.3 acres of Unique Farmland (City of Redlands, 2017b). The General Plan EIR projected continued population growth, and areas designated for residential, commercial, and industrial development, would result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to nonagricultural land use (City of Redlands, 2017b).

Project Site

Portions of the Project site are currently utilized for agricultural production that includes orange groves (Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A). The portions of the Project site that are currently utilized for agricultural purposes have an existing General Plan designation of Commercial/Industrial. As shown in Figure 5.1-1, approximately 44.67 acres of the Project site is designated as Prime Farmland. The relevant sites contain some small structures and have existing irrigation infrastructure throughout the sites that are used for the existing agricultural use.

Approved General Plan 2035 Buildout

The Project site is currently planned for either commercial/industrial or residential development. While Site 20 has a zoning designation of Agriculture (A-1), the site has a General Plan Land Use designation of Medium Density Residential (MDR). Thus, all of the parcels included in the proposed Project are planned for future development that would redevelop the existing farmland onsite.

4.4.2 Air Quality

Climate and Meteorology

The Project area is located within the South Coast Air Basin (SCAB, or Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

Existing Conditions

The SCAQMD maintains monitoring stations within district boundaries, Source/Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The City is located within SRA 35, East San Bernardino. The East San Bernardino monitoring station reports air quality statistics for ozone and particulate matter 10 microns in diameter (PM₁₀). The East San Bernardino Valley monitoring station does not provide information for carbon monoxide (CO), nitrogen dioxide (NO₂), and particulate matter 2.5 microns in diameter (PM_{2.5}); as such, statistics for these were obtained from the nearest station with data, the Central San Bernardino 2 monitoring station.

In 2023, the federal and State ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone at most monitoring locations. No areas of the SCAB exceeded federal or State standards for NO₂, SO₂, CO, sulfates, or lead.

The Project area consists of approximately 116.19 acres of land that is currently a mix of undeveloped or agricultural use properties, and sites developed with residences and industrial storage. Air quality emissions are currently generated by operation of these existing uses and related vehicular trips.

Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Existing sensitive receptors within and in the vicinity of the Rezone sites consist of residences and schools.

Approved General Plan 2035 Buildout

The operational emissions from buildout of the existing General Plan land use designations of the 24 rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}.

4.4.3 Cultural Resources

Historic Setting

An asistencia was established in Redlands in 1819 to help facilitate the Mission San Gabriel Arcángel's control and colonization of the surrounding rancheria. Missionaries instructed Serrano, Gabrielino, and Cahuilla workers to build the Mill Creek Zanja, a 12-mile-long irrigation ditch routing water from Mill Creek to Guachama Rancheria, which served as the area's first stable water resource. In 1842, the Lugo family, including José del Carmen Lugo, José María Lugo, Vicente Lugo, and Diego Sepulveda, received a land grant, Rancho San Bernardino, which encompassed the San Bernardino and Yucaipa valleys, including present day City of Redlands.

In 1881, E.G. Judson and Frank E. Brown formed the Redlands Water Company and began construction of a water canal to supply future citrus groves. During the development, the pair noticed the red-colored adobe soil and gave the new town its name, Redlands. Three years later, Brown built the Bear Valley Dam and reservoir, securing a steady supply of water for the town and associated citrus groves. With a stable water source and booming railways, the City of Redlands experienced a development boom with the creation of paved streets, sidewalks, sewage, and electricity systems. The City was officially incorporated in 1888. For 75 years, citrus growing was the main economic source for the City. The citrus industry eventually declined and agricultural areas were replaced with subdivisions.

Archaeological Resources

Archaeological sensitivity in the City of Redlands is often related to proximity to the City's numerous waterways, many of which were constructed to serve as storm water ditches in the 1800s. As shown in Figure 5.3-1, multiple Rezone sites are located in close proximity to the Morey Arroyo. The Morey Arroyo borders Rezone sites 2, 24, 7, 12, and 16 to the south and Site 8 to the north. Site 11 contains a portion of the Morey

Arroyo in the southern part of the site, within the property line. The Morey Arroyo is a partially improved natural drainage that has been used as a storm water ditch since the 1800s. A portion of the Morey Arroyo (Site 36-029388) was originally recorded in 2014 and an additional portion was recorded in 2018 (McKenna, 2015).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources.

4.4.4 Energy

Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Redlands. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2023 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut greenhouse gas emissions 40 percent below 1990 levels by 2030 and 80 percent from the same baseline by 2050 in order to help achieve carbon neutrality by 2045. The Report describes that in 2024, approximately 44% of power that SCE delivered to customers came from carbon-free resources (SCE, 2024).

The Project site is currently served by the electricity distribution systems that exist along the roadways throughout the RHNA area.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Redlands and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of two percent each year through 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure. The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2040 in its 2024 report (CGEU, 2024).

The Rezone sites are currently served by the natural gas distribution system that exists within the roadways throughout the RHNA area.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would

result in the annual consumption of 4,330,815 gallons of fuel per year from traffic, 31,062,419 kBtu of natural gas per year, and 19,869,824 kWh of energy per year.

4.4.5 Greenhouse Gases

Sites 1 through 16A and 24 are located south of Citrus Avenue. Many of these sites are vacant or are being used for agricultural purposes; however, a few sites contain single-family residences, and others are used for industrial storage. Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. These sites are currently vacant and covered with non-native grasses. No activities other than occasional disking occur. The existing GHG emissions from the Project site are limited due to the limited development of the area. The existing primary GHG emissions in the Project site area are from on-road transportation, building energy, and waste.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would generate approximately 46,446.76 MT per year of CO₂e or 18.16 CO₂e per service population.

4.4.6 Land Use and Planning

The City of Redlands 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*, in Section 3.0, *Project Description*, 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, *Existing Zoning*, and 3-5b, *Existing Zoning*, show the existing zoning designations for the Rezone sites. 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.

4.4.7 Noise

Sensitive Receptors

Noise sensitive receptors 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: residences, schools, hospitals, and recreation areas. Sensitive receptors are located throughout and adjacent to the Project site.

The background ambient noise level in the areas around the proposed Rezone sites is dominated by the transportation-related noise associated with surface streets. The volume of noise is dependent on the traffic volumes and structures, such as walls, that are located between streets and sensitive receptors.

Airports

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 (City of Redlands, 2017b, p. 3.7-2). Neither of these sites are within the modeled noise contours for

the Redlands Municipal Airport (City of Redlands, 2017b, 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 (San Bernardino County, 2020). Thus, the proposed Rezone sites are not subject to excessive noise levels from airport operations.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the proposed Rezone sites, other sources of groundborne vibration include heavy-duty trucks on area roadways related to the existing urban uses throughout the City. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, construction activity would be required to comply with Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed General Plan would be subject to the City's noise ordinance.

4.4.8 Population and Housing

Population

The California Department of Finance (DOF) estimates that the City of Redlands population is 72,696, representing approximately 3.3 percent of the County's total population (DOF, 2024). The Southern California Association of Governments (SCAG) estimates that the City will have a population increase of 18.0 percent between 2019 and 2050, and the County will have population growth rate of over 20.6 percent over the same period. Table 5.8-2, in Section 5.8, *Population and Housing*, provides population figures for the City of Redlands and the County in 2019, and SCAG projections for year 2050.

Housing and Households

The DOF estimates that there were 28,139 housing units in Redlands in 2023, which is 3.7 percent of the County total. The City's housing stock is about 64 percent single-family residential and is estimated to be 94.9 percent occupied. The DOF estimated persons per household is 2.62 (DOF, 2024).

According to SCAG's Connect SoCal 2024-2050 RTP/SCS, the City of Redlands is projected to add approximately 5,600 households by 2050. This averages approximately 224 new households annually through 2050 (SCAG, 2024).

Employment

According to SCAG's 2024-2050 RTP/SCS, the number of jobs within the City is projected to increase from 49,400 jobs in 2019 to 60,100 jobs in 2050. This represents an increase of over 21 percent, and an average of 345 jobs annually through the year 2050.

The SCAG 2019 Local Profile for Redlands identifies that 22.5 percent of Redlands residents work and live in the City, while 77.5 percent commute to other places. Of the commuters residing in Redlands, the largest percentage commute to the City of San Bernardino (15.3 percent), Loma Linda (7.5 percent), Riverside (5.6 percent), and Los Angeles (3.8 percent) (SCAG, 2019).

Jobs – Housing Balance

The SCAG considers an area balanced when the jobs-housing ratio is 1.36; communities with more than 1.36 jobs per dwelling unit are considered “jobs rich,” meaning that more employment opportunities are provided than housing in the area, and those with fewer than 1.36 are “housing rich,” meaning that more housing is provided than employment opportunities in the area (SCAG, 2004).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the generation of 2,263 jobs and 294 residents according to the General Plan EIR growth induction rate shown on Table 2.3-6 (City of Redlands, 2008).

4.4.9 Public Services

Redlands Fire Department

The Redlands Fire Department (RFD) provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response to the city of Redlands including the Project area.

According to the Redlands General Plan EIR, the RFD recognizes two response time standards. The first is from the National Fire Protection Association (NFPA), which recommends that the first unit arrive within four minutes 90 percent of the time. The second is a more lenient goal of arriving within seven minutes 90 percent of the time, as recommended by the 2008 High-Level Fire Department Review for the RFD. According to the City of Redlands, the current 90 percent response time is eight and a half minutes, which is over twice the NFPA standard and one and a half minutes slower than the more lenient guideline. In 2023, the RFD received 14,757 calls for service and had 71,776 residents, which results in 0.21 calls per resident (California Department of Finance, 2024).

The Project area would be served by four fire stations as shown in Table 5.9-1 and on Figure 5.9-1 in Section 5.9, *Public Services*. The City currently has plans to relocate Station 264 based on the annual increase in calls for service and location of service needed. RFD is also in the beginning stages of a planned capital improvement project that would include the construction of two new fire stations within the City. The specifications and locations of those stations are not known at this time (Appendix I).

Redlands Police Department

Public safety services in the City, including the Rezone sites, are provided by the Redlands Police Department (RPD). RPD's main police station is located at 1270 West Park Avenue within the boundaries of the New

York Street/Esri Transit Village. The Police Department personnel is made up of approximately 46 sworn officers and five full and part-time civilians, resulting in a service level of 0.54 officers per 1,000 residents. Based on existing staffing levels, RPD estimates response times to Sites 1 through 16A and 24 are 13 minutes and 47 seconds for Priority 1 police service calls and 9 minutes and 44 seconds for Priority 2 police service calls. The RPD estimates a response time of 11 minutes and 22 seconds for Priority 1 police service calls and 14 minutes and 21 seconds for Priority 2 police service calls for Sites 17 through 23 (Appendix I).

School Services

The City, including the Project site, is within the Redlands Unified School District (RUSD). The RUSD has 16 elementary school (grades K-5), four middle schools (grades 6-8), three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, home education leaning program, and a K-12 online academy (City of Redlands, 2017b). Current enrollment is approximately 19,773 students (RUSD, n.d., a).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. As discussed in Section 5.8, *Population and Housing*, this would result in the generation of 2,263 employees and 294 new residences in the City. Similar to the proposed Project, implementing projects of the General Plan would be required to pay Development Impacts Fees which would go towards the maintenance and expansion of service facilities such as police and fire stations to ensure that acceptable levels of service are met.

4.4.10 Transportation

Existing Roadways

Table 5.10-1, *Existing Major Roadway Characteristics Within the Project Area*, shows the roadway characteristics that are observed within the Project area. Roadways within the Project area include:

- Citrus Avenue – Collector
- Nevada Street – Minor Arterial
- Orange Avenue – Collector
- Iowa Street – Collector
- Alabama Street – Major Arterial
- Orange Street – Minor Arterial
- Texas Street – Minor Arterial
- New York Street – Collector
- Pennsylvania Avenue – Collector
- Lugonia Avenue – Major/Minor Arterial
- San Bernardino Avenue – Major/Minor Arterial

Existing Transit Service

The Project area is served by bus service via Omnitrans, which serves the San Bernardino Valley. Omnitrans Route 8 connects San Bernardino and Yucaipa via Loma Linda, Redlands, and Mentone, including the Project area, with buses running every 60 minutes Monday through Sunday, and has stops along Redlands Boulevard and Lugonia Avenue. Omnitrans Route 15 serves the cities of Fontana and Redlands (including the Project area) via San Bernardino and Rialto, with buses running every 60 minutes Monday through Sunday, and has

stops along Orange Street, Redlands Boulevard, and Eureka Street. Omnitrans Route 19 provides service between Fontana, the San Bernardino Transit Center, and Yucaipa. Route 19 has stops at the Redlands Mall and has buses running every 60 minutes, Monday through Sunday.

Furthermore, the San Bernardino County Transportation Authority's (SBCTA) Arrow line connects the city of Redlands to the city of San Bernardino and provides further direct rail trips once a day to the city of Los Angeles.

During morning and afternoon peak commute hours, trains operate every 30 minutes. During non-commute or off-peak hours, trains operate every 60 minutes. Services start at 5 a.m. and run until 10 p.m. In addition to standard passenger rail service, the Metrolink Express train will be extended to serve the Redlands – Downtown Station with limited stop service to and from Los Angeles during peak commute hours.

Existing Bicycle and Pedestrian Facilities

Within the Project site area, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue contain bicycle lanes. The Orange Blossom Trail, a paved walking and cycling path, is located approximately 150 feet north of Site-16 along the northern edge of the drainage channel just north of Citrus Avenue.

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Buildout based on existing General Plan land use designations would result in 45,792 trips.

4.4.11 Tribal Cultural Resources

Native American Tribes

The Project site is within a region where the traditional use territories of the Serrano, Cahuilla, and Gabrielino meet. These three cultural groups spoke languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock.

Serrano

The Serrano people once occupied the Mountain, North Desert, and East Desert Regions of present-day San Bernardino County. Mainly due to the inland territory that the Serrano occupied beyond Cajon Pass, contact between Serrano and Europeans was minimal. As early as 1790, some Serrano people were drawn into mission life. After a failed attack of the Mission San Gabriel in 1811, some Serrano people relocated to Morongo with the Cahuilla tribe. Others followed the Serrano leader Santos Manuel toward the San Bernardino County valley floors and eventually settled to become the San Manuel Band of Mission Indians Reservation.

Cahuilla

The eastern portion of the Valley Region, the southeastern part of the Mountain Region, and the southern portion of the East Desert Region of San Bernardino County were once home to the Cahuilla people. It is

thought that the Cahuilla migrated to southern California approximately 2,000 to 3,000 years ago with related sociolinguistic groups, most likely from the southern Sierra Nevada Mountain ranges. The Cahuilla settled in a territory that extended from the present-day city of Riverside to the central portion of the Salton Sea in the Colorado Desert, and from the San Jacinto Valley to the San Bernardino Mountains.

Gabrielino

The Gabrielino historically occupied the southwestern portion of San Bernardino County, including the Valley Region. The name Gabrielino denotes the people who were under the control of the Spanish from Mission San Gabriel, which included people from the Gabrielino proper as well as other social groups. Many contemporary Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and use the native term Tongva. Historic-era Tongva settlements in the San Bernardino Valley were primarily located at the base of the foothills and along perennial watercourses.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried tribal cultural resources.

4.4.12 Utilities and Service Systems

Water Supply

The Project site is located within the water service area of the City of Redlands Municipal Utilities and Engineering Department (MUED), which provides retail water service to the majority of the City of Redlands, a portion of the City of Loma Linda, and unincorporated areas of the Donut Hole (an area in unincorporated San Bernardino County surrounded by Redlands), Mentone, and most of Crafton.

The City of Redlands participates in the Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (IRUWMP). The IRUWMP is a tool that provides a summary of anticipated supplies and demands for the years 2020 to 2045 within the Valley Region of San Bernardino County, including various incorporated cities such as the City of Redlands.

Supply and Demand – MUED

The MUED utilizes four primary sources for drinking water supply: groundwater, surface water, imported water, and recycled water. The MUED's water supply is a combination of groundwater from the Bunker Hill Subbasin; groundwater from the Yucaipa Subbasin; surface water from the Santa Ana River; surface water from Mill Creek; imported water from the State Water Project (SWP); and recycled water. As shown on Table 5.12-1 in Section 5.12, *Utilities and Service Systems*, in 2020 the MUED obtained the majority of its water supply from the Bunker Hill Subbasin.

As shown in Table 5.12-2, the 2020 IRUWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of surface water, groundwater, and purchased or imported water. The 2020 IRUWMP anticipates that the MUED's water supply will increase from 31,039 AF in 2025 to 35,544 AF in 2045 (increase of 4,505 AFY) to meet MUED's anticipated growth in water demands.

The 2035 projections anticipate that 60.2 percent of supply would be from the groundwater sources, 31.4 percent from surface water, 2.0 percent from imported/purchased sources, and 6.3 percent from recycled water. The IRUWMP also describes that there has been a historical trend associated with drier years and an increase in water use among agencies. Conservation efforts have proven to be effective in decreasing water use in dry years. Additionally, according to the IRUWMP, MUED has adequate supplies to serve 100 percent of its customers during normal, dry year, and multiple dry year demand through 2045 with projected population increases and accompanying increases in water demand (San Bernardino Valley Water Conservation District, 2021).

Groundwater

The Redlands MUED extracts groundwater from the Bunker Hill Subbasin (also known as San Bernardino Basin or SBB) and Yucaipa Subbasin. Extractions from both basins include potable and non-potable water. In 2020, Redlands MUED extracted 13,619 AF of groundwater from the Bunker Hill Subbasin and 297 AF from the Yucaipa Subbasin. The City of Redlands uses 15 wells that pump directly into the system or into reservoirs (San Bernardino Valley Water Conservation District, 2021).

Purchased or Imported Water

Imported water from the SWP is available for the MUED to purchase when needed. The MUED has purchased supplemental water from the SWP only in years when surface water flows have not been able to meet demands and on occasion when surface water supplies are turbid and require blending or for other operational purposes. The MUED contributes to regional efforts to recharge the Bunker Hill groundwater basin with SWP water and local surface water in wet years when available so that storage is available for use in dry years when other supplies may be limited (San Bernardino Valley Water Conservation District, 2021).

Surface Water

The MUED receives water from the Mill Creek watershed and the Santa Ana River watershed. Water from the Mill Creek watershed is treated at Henry Tate Surface Water Treatment Plant. Water from the Santa Ana River watershed is treated at the Horace P. Hinckley Surface Water Treatment Plant. The MUED has ownership in a variety of private and mutual water companies to supply water to the City's Tate and Hinckley Surface Water Treatment Plants (San Bernardino Valley Water Conservation District, 2021).

Recycled Water

The City's Wastewater Treatment Plant has the capability of treating 7.2 million gallons per day (mgd) of wastewater to a Title 22 Recycled Water level. The City's recycled water customers include SCE, a landfill, and recycled/non-potable water customers. SCE uses recycled water for its Mountain View Power Plant and recycled water customers use recycled water for irrigation (San Bernardino Valley Water Conservation District, 2021).

Water Infrastructure

The City's water treatment plants include the Henry Tate Water Treatment Plant and the Horace Hinckley Surface Water Treatment Plant. The Henry Tate Water Treatment Plant is a conventional water treatment plant built in 1967. These facilities treat surface water and groundwater to meet drinking water standards. The design capacity of the Tate plant is 20 million gallons per day (mgd). The City added enhancements to the Tate WTP to provide more water supply reliability by allowing State Water Project water to be mixed with Mill Creek water for treatment. The Horace Hinckley Surface Water Treatment Plant started operation in 1987 and has a permitted capacity of 14.5 mgd. The 10-year average flow (up to and including 2016)

is 6,363 AF at the Henry Tate Plant, and 6,697 AF at the Horace Hinckley Plant. Roads adjacent to the Project site contain a network of water lines from 1 to 36-inches in diameter, which operate within capacity for existing development within the Project area. The City of Redlands maintains approximately 400 miles of pipeline with over 21,500 metered connections that serve potable water (City of Redlands, n.d.).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 square feet of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Fuscoe Engineering, Inc., 2024a).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Appendix G).

Wastewater

Sewer service throughout the Project sites are provided by the City of Redlands. The City's Wastewater Treatment Plant (WWTP) is located on the south side of the Santa Ana River Wash at Nevada Street. The City's WWTP has the capacity to treat up to 9.5 mgd. The City's WWTP includes two treatment systems: a membrane bioreactor with a capacity of 6.0 mgd for producing recycled water, and an activated sludge process with a capacity of 3.5 mgd. The plant's total permitted annual average flow is 9.5 mgd and has an average daily flow around 6 mgd (Fuscoe Engineering, Inc., 2024b).

In 2020, 6,620 AF of wastewater was treated at the City's WWTP. In 2020, 3,813 AF were treated to a secondary level and released to spreading basins east of the City's WWTP for percolation into the Bunker Hill groundwater basin, while 1,806 acre feet was treated to a tertiary level and distributed as recycled water (San Bernardino Valley Water Conservation District, 2021).

The wastewater system has one lift station that serves the western-most portion of the city south of Interstate 10 (I-10). The collections system in the City of Redlands consists of approximately 245 miles of pipelines. Wastewater pipelines range from 6-inches to 48-inches in diameter.

Approved General Plan Buildout Wastewater Generation

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Buildout of the Project area according to the current General Plan would have an annual wastewater generation of approximately 358 AFY (Appendix H).

Stormwater

The City of Redlands's stormwater drainage system serves an area of approximately 37 square miles. The Downtown stormwater drainage system is composed of reinforced concrete pipe (RCP) and corrugated metal pipe (CMP) with diameters ranging from 8 inches to 96 inches, box culverts, covered rubble rock and concrete channels, and concrete and natural drains. Stormwater runoff from the City's drainage systems flows by

gravity into the Mission Channel, Morrey Arroyo Creek, and San Timoteo Canyon, and discharges to the Santa Ana River (City of Redlands, 2017b).

Drainage throughout the City is generally from east to west to one of two main existing major stormwater drainage facilities. The city is divided into five main watersheds: Mission Zanja, Reservoir Canyon, Downtown, North Redlands along the Santa Ana River, and South Redlands along the San Timoteo Channel. Sites 1-16A and 24 are located within the South City subwatershed and Sites 17-23 are located within the North City subwatershed. The North City area contains both open channel and subsurface storm drain facilities. The facilities located within the North City generally drain to the Santa Ana River. South City contains both open channel and subsurface storm drain facilities. The facilities generally drain to Mission Creek, south of Citrus Avenue/West State Street.

Approved General Plan Buildout Stormwater Drainage

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Similar to the proposed Project, buildout of the approved General Plan would result in an increase in impervious surface area. Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the General Plan. Implementation of development projects pursuant to the General Plan would increase the intensity of development within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system.

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5. Environmental Impact Analysis

This section focuses on evaluating the potential for significant environmental effects from the proposed Project, which is described in Section 3.0, *Project Description*. This section describes the existing physical environmental setting (also referred to as the “baseline”) for each environmental topic, and the impacts that would result from implementation of proposed Project. Existing federal, State, and local regulations would shape how the proposed Project is implemented, and provide requirements for avoiding and reducing environmental impacts. Thus, a discussion of relevant regulations, plans, programs, and policies pertinent to each environmental issue addressed in each environmental topic section is provided. Additionally, as necessary, feasible mitigation measures are identified to reduce the significant impacts of the proposed Project.

As described in Section 2.0, *Introduction*, the City of Redlands (City) General Plan 2035 was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan EIR included standard regulations and General Plan policies that apply to development projects within the City.

ENVIRONMENTAL TOPICS

The subsections in this chapter analyze the following environmental topics:

- | | |
|------------------------------|---|
| 5.1 Agricultural Resources | 5.8 Population and Housing |
| 5.2 Air Quality | 5.9 Public Services |
| 5.3 Cultural Resources | 5.10 Transportation |
| 5.4 Energy | 5.11 Tribal Cultural Resources |
| 5.5 Greenhouse Gas Emissions | 5.12 Utilities and Service Systems |
| 5.6 Land Use and Planning | 5.13 Mandatory Findings of Significance |
| 5.7 Noise | |

This Programmatic Subsequent EIR evaluates the impacts resulting from buildout pursuant to the proposed Project, as compared to buildout of the General Plan 2035. Under CEQA, EIRs are intended to focus their discussion on significant environmental impacts of a project on the environment and may limit discussion of other impacts to a brief explanation of why the impacts are not significant. The Initial Study and Notice of Preparation (IS/NOP) that was prepared for the proposed Project (included as Appendix A) and the responses received were used to help determine the scope of the environmental issues to be addressed in this Subsequent EIR. Consistent with CEQA Guidelines Section 15128, issues considered potentially significant in the Initial Study are addressed in this Subsequent EIR.

Issues areas that would not be potentially impacted by the proposed Project or where mitigation measures included in the Initial Study would reduce impacts to a less-than-significant level (this includes aesthetics, biological resources, geology & soils, hazards & hazardous materials, hydrology & water quality, mineral resources, recreation, and wildfire), are not addressed beyond the discussion contained in Section 2.4, *Subsequent EIR Scope and Content*, and Section 5.13, *Mandatory Findings of Significance*.

FORMAT OF ENVIRONMENTAL TOPIC SECTIONS

Each environmental topic section generally includes the following main subsections:

- **Regulatory Setting:** This subsection describes applicable federal, State, and local plans, policies, and regulations that the proposed Project must address, and will shape its implementation.

- **Existing Conditions:** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance:** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.”
- **Methodology:** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant or less than significant.
- **Environmental Impacts:** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
 - A statement of the CEQA threshold being analyzed.
 - The EIR’s conclusion as to the significance of the impact.
 - An impact assessment that evaluates the changes to the physical environment that would result from proposed Project.
 - An identification of significance comparing identified impacts of the proposed Project to the significance threshold with implementation of any existing regulations, prior to implementation of any required mitigation.
 - A discussion of potential cumulative impacts that could occur from implementation of the proposed Project and other cumulative projects.
 - A list of any existing regulations that reduce potential impacts.
 - For each impact determined to be potentially significant, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
 - avoid a significant impact;
 - minimize the severity of a significant impact;
 - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
 - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the proposed Project; and/or
 - compensating for the impact by replacing or providing substitute resources or environmental conditions.
 - Actions to be taken to ensure effective implementation of required mitigation measures.

ENVIRONMENTAL SETTING/BASELINE

The environmental setting is normally the existing conditions at the time the CEQA analysis begins (CEQA Guidelines Section 15125). In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA’s standards limiting the scope of subsequent environmental review. (State CEQA Guidelines §15162.) Once an EIR has been certified for a project (such as the General Plan 2035 EIR), the baseline for analyzing proposed changes to that project is adjusted such that the originally approved project is assumed to exist. (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523, 542-543). Here, the previously approved project is buildout of the City of Redlands General Plan 2035 for the Project sites. Therefore, the baseline for analyzing the changes proposed by the RHNA Rezone is buildout of General Plan 2035.

The current (2024) physical setting of the Project site and adjacent lands remains largely the same as those that existed in 2017 when the General Plan EIR was certified. CEQA Guidelines Section 15125 states that “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The

environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives.”

The CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). In some instances, information is presented in the environmental setting that differs from the precise time of the NOP. This information is considered representative of baseline conditions. Furthermore, environmental conditions may vary from year to year, and in some cases, it is necessary to consider conditions over a range of time periods. The intent of this Draft Subsequent EIR is to provide a conservative analysis that identifies the reasonable maximum potential impact. Thus, this Draft Subsequent EIR provides both conditions from buildout pursuant to the General Plan and current conditions for certain topics, such as the 2021-2023 ambient air quality conditions provided in Section 5.2, *Air Quality*. Although the Subsequent EIR describes current conditions for certain topics, the applicable baseline for the Project is buildout pursuant to the existing General Plan designations.

The NOP prepared for the proposed Project was distributed on July 1, 2024, for a 30-day public review and comment period that ended on July 31, 2024. The baseline conditions relevant to the environmental issues being analyzed are described within Section 4.0, *Environmental Setting*, and within each subsection of this section.

THRESHOLDS OF SIGNIFICANCE/SIGNIFICANCE CRITERIA

CEQA Guidelines Section 15382 defines a significant effect on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The “Thresholds of Significance” subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this Subsequent EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be “significant” (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a “significant” effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as “significant,” depending on the nature of the area affected. The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.

IMPACT SIGNIFICANCE CLASSIFICATIONS

The following classifications are used throughout the impact analysis in this Subsequent EIR to describe the level of significance of environmental impacts:

- **Significant Impact:** A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself “shall not be considered a

significant effect on the environment ... [but] may be considered in determining whether the physical change is significant.” As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.

- **No Impact:** No adverse effect on the environment would occur, and mitigation measures are not required.
- **Less than Significant Impact:** The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **Less than Significant Impact with Mitigation Incorporated:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval and applicable plans, programs, and policies, when implemented, will reduce the significant impact to a less-than-significant level.
- **Significant and Unavoidable Impact:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures, standard conditions of approval, and applicable plans, programs, and policies would not reduce the impact to a less-than-significant level, and a significant and unavoidable impact would remain.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve a project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, that outweigh its significant unavoidable effects, and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(a)).

CUMULATIVE IMPACTS

Cumulative impacts refer to the combined effect of the proposed Project’s impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), “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 for the effects attributable to the project alone.” The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed Project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts. According to Section 15355 of the CEQA Guidelines, ‘cumulative impacts’ refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Subsequent EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects.

Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all significant Project impacts that are evaluated within this Subsequent EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, population and housing, public services, transportation, and utilities and service systems relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal") developed by the Southern California Association of Governments (SCAG). The cumulative analyses for other environmental issues use the list of projects approach and identifies the list of past projects which have recently been constructed, present projects which have recently been approved and are under construction, and probable future projects that are under entitlement review that were known of at the time the NOP was published. As described previously, the cumulative project list is part of the environmental setting/baseline that includes past, present and probable future projects for which development applications were submitted to lead agencies prior to publishing of the NOP.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of noise, for which cumulative impacts are limited to the distance of sound travel. Thus, in assessing noise impacts, only development within and immediately adjacent to the Project sites would contribute to a cumulative increase in noise analyzed, whereas cumulative public service impacts are based upon all development within the area serviced. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic. Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by surrounding cities and the City of Redlands, and Figure 5-1 shows the locations.

Table 5-1: Cumulative Project List

No.	Cumulative Project	Location/Address	Description	Project Status
City of Redlands				
1.	Bergamot Specific Plan, SP 64, TTM 20336	NEC Domestic Ave & SR 210	317 single-family residential units	Under Construction
2.	Liberty Lane Apartments, CUP 1045	SWC Lugonia Ave & Texas Street	80 multi-family residential units	Under Construction
3.	Luxview Apartments, CUP 1108, TTM 20244, SPA 45 & 46	1616 Orange Street	328 multi-family residential units	Completed

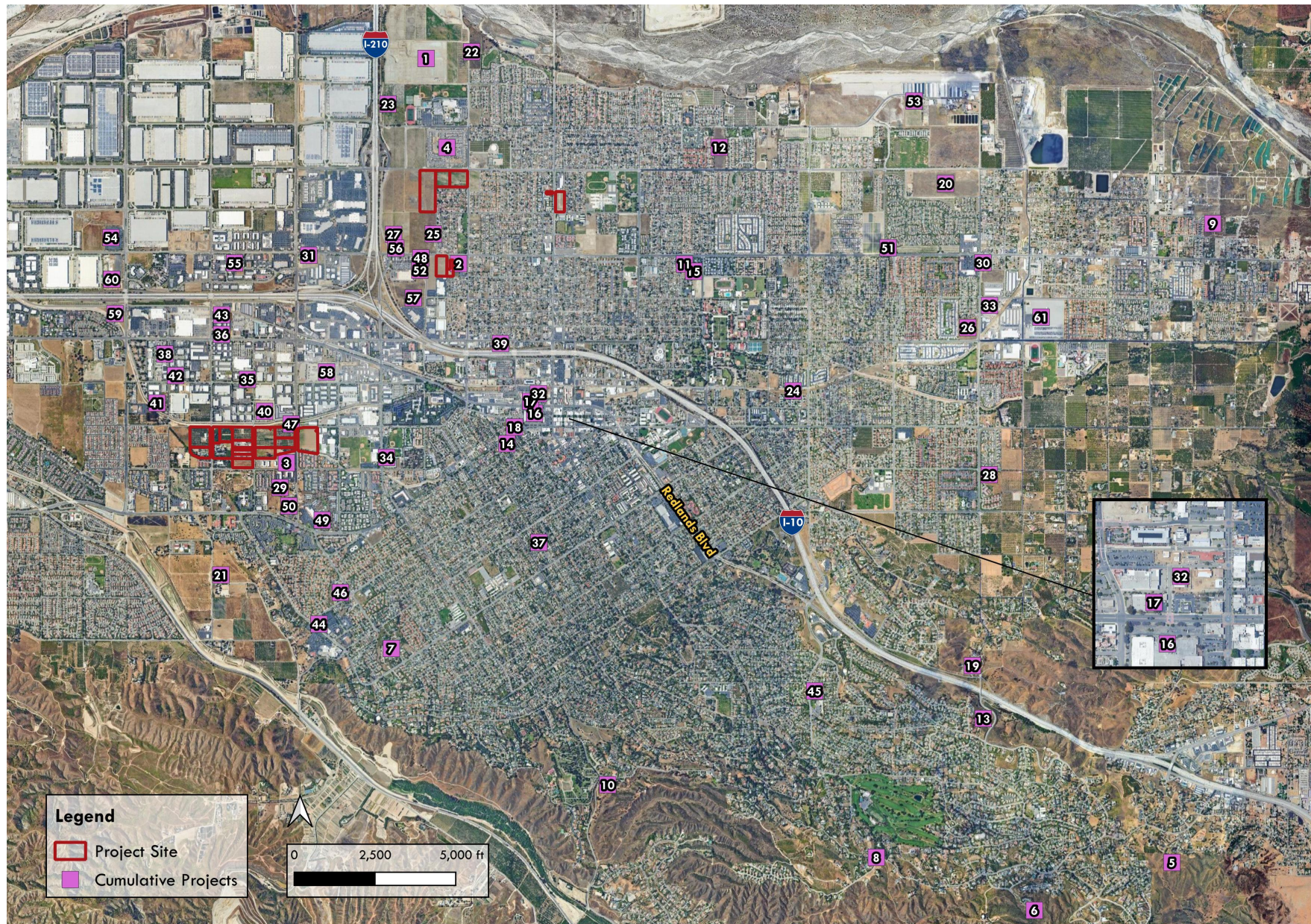
No.	Cumulative Project	Location/Address	Description	Project Status
4.	Heritage Specific Plan, TTM 20257, SP 62, GPA 141	NWC Texas St & W. San Bernardino Avenue	207 single-family residential units	Completed
5.	Tract 18845	South of Highview Ave, East of South Ln	24 single-family residences	Entitled
6.	Tract 17265	Live Oak Canyon	24 single-family residences	Entitled
7.	Tract 17675	Sunnyside Ave & Linda Vista Ave	11 single-family residences	Entitled
8.	Parcel Map 17548	Edgemont Dr & Sunset Dr	3 single-family residences	Entitled
9.	Tract 16402 (Annexation)	Madeira Ave	26 single-family residences	Entitled
10.	Tract 16816	Alessandro St, S of Sunset Dr	10 single-family residences	Entitled
11.	Tract 16287	Occidental Dr	12 single-family residences, 138 multi-family residences	Entitled
12.	Tract 18182	San Bernardino Ave, E of Church St	27 single-family residences	Entitled
13.	Tract 17080	Wabash Ave & Sunset Dr	8 single-family residences	Entitled
14.	Brookside Apartments, CRA 893	317 Brookside Ave	8 multi-family residences	Entitled
15.	Casa Loma Apartments, CUP 1096	1215 N. University St	147 multi-family residences	Entitled
16.	State Street Village, CUP 1155, CRA 933, TTM 20425	SWC Orange St & W. Redlands Blvd	700 multi-family residences, 71,778 SF of ground-floor retail, 12,328 SF of office space, amenity areas, community building, a 1,721 SF rooftop restaurant space with a rooftop deck, and a 14,500 SF drugstore	Entitled
17.	The Grand Apartments, CRA 911	120 W. Redlands Blvd	149 multi-family residences	Entitled
18.	City Center Mixed-Use, CUP 1138, VAR 809, LLA 645	212-216 Brookside Ave	131 multi-family residences, 23,476 SF of amenity space, 10,550 SF of restaurant space	Entitled
19.	TTM 20320, CUP 1148	Wabash Ave. north side I-10	67 single-family residences	Entitled
20.	TTM 20473, CUP 1163	SWC Wabash Ave & E. San Bernardino Ave	98 single-family residences	Entitled
21.	TTM 20402, ZC 468	NEC San Timoteo Canyon Rd & Nevada St	27 single-family residences	Entitled
22.	TTM 20520	Texas St, 500' N of Domestic Ave	35 single-family residences	Entitled
23.	TTM 20528, CRA 945, GPA 145, SPA 49 to EVCSP	1160 W. Pioneer Ave	117 single-family residences	Entitled

No.	Cumulative Project	Location/Address	Description	Project Status
24.	CUP 1169, ZC 472	Between Judson Ave & Grove St, N of E. Central Ave	108 senior apartments	Entitled
25.	Lugonia Village, GPA 143, ZC 469, SPA 48 to EVCSP, TTM 40490 & 40491, TPM 40469, CRAs 940, 941, 942	NEC Tennessee St & W. Lugonia Ave	90 single-family residences, 451 multi-family residences	Entitled
26.	Madera at Citrus Trail, TTM 20571, CRA 965, Specific Plan 66	NWC Wabash Ave & Colton Ave	103 single-family residences	Entitled
27.	CUP 1173, CRA 956, SPA 49 to EVCSP	NEC Tennessee St & W. Lugonia Ave	460 multi-family residences	In Planning
28.	TTM 20378, CUP 926, SPA to SP 54	SEC Wabash Ave & Highland Ave	120 low-income senior single-family residences	In Planning
29.	Luxview Phase 2, CRA 958	SWC Alabama St & Orange Ave	164 multi-family residences with affordable housing	Entitled
30.	Jack In The Box, CUP 1139	1248 N. Wabash Ave	3,000 SF fast food drive-thru	Completed
31.	In-N-Out, CUP 1170	SWC Lugonia Ave & 210 Freeway	3,887 SF fast food restaurant with drive-thru	Completed
32.	MOD Packinghouse, CRA 895	330 N. Third St	14,000 SF food hall	Under Construction
33.	CUP 1168	SEC Wabash Ave & Nice Ave	123,456 SF self-storage facility	Under Construction
34.	CRA 753	130 Tennessee St	1,200 SF school addition	Entitled
35.	CRA 907	1702 W. Park Ave	7,198 SF multi-tenant office/retail building	Entitled
36.	CRA 909	1820 W. Redlands Blvd	Two medical office buildings totaling 16,714 SF	Entitled
37.	CRA 918	606 North Place	12,224 SF senior care facility with 28 beds	Entitled
38.	CRA 921	New Jersey St & Essex Ct	5,588 SF medical/sleep clinic	Entitled
39.	Tru Hotel by Hilton, CRA 931	SEC W. Colton Ave & Columbia St	40,415 SF hotel with 90 rooms	Entitled
40.	CRA 938, CUP 1187	350 Iowa St	181,100 SF warehouse	Entitled
41.	CRA 943	10796 New Jersey St	28,500 SF manufacturing building	Entitled
42.	CRA 949	1980 W. Park Ave	48,079 SF light industrial building	Entitled
43.	CRA 950	1060 Nevada St	4,500 SF RV sales, service facility	Entitled
44.	CRA 968	245 Terracina Blvd	7,364 SF Redlands Community Hospital medical clinic	Entitled
45.	CUP 114, Rev. 3	1505 Ford St	4,300 SF education building at church	Entitled
46.	CUP 343, Rev. 1	168 Bellevue Ave	1,800 SF classroom building	Entitled
47.	CRA 952	Alabama St & W Citrus Ave	8,853 SF medical clinic	Entitled

No.	Cumulative Project	Location/Address	Description	Project Status
48.	CRA 963	SWC Lugonia Ave & New York St	16,027 SF grocery store	Entitled
49.	CUP 480, Rev. 1	1500 Barton Rd	4,052 SF retail & restaurant with drive-thru	Entitled
50.	CUP 606, Rev. No. 1	27240 Alabama St	2,960 SF classrooms, 9,270 SF multipurpose school addition	Entitled
51.	Holy Name of Jesus Church, CUP 1136	NWC E. Lugonia Ave & Dearborn St	60,207 SF new church & parish hall, 101,597 SF new elementary schools	Entitled
52.	CUP 1184 & 1185	SWC Lugonia Ave & New York St	Two fast food restaurants w/ drive-thrus totaling 6,020 SF	Entitled
53.	CRA 947, TTM 20635	1660 Sessums Dr	Six light industrial buildings totaling 263,328 SF	In Planning
54.	CRA 954, Amendment #6 to Concept Plan 1	1301 California St.	Phased development of a 948,000 sq. ft. medical campus including a seven-story hospital.	In Planning
55.	CRA 955	NEC Plum Ln & Idaho St	35,963 SF hotel with 54 rooms	In Planning
56.	CRA 959, CUP 1174, & 1175	NEC Lugonia Ave & Tennessee St	Two fast food restaurants with drive-throughs totaling 13,300 SF and 47,085 SF shopping center with four retail buildings	In Planning
57.	Carmax, CRA 962, CUP 1179, SPA 52 to EVCSP	New York St. at Brockton Ave.	4,958 SF used automobile sales building, 47,085 SF automobile repair	In Planning
58.	CRA 971	10616 Kansas St	38,564 SF Edison office building and 36,666 SF service garages and storage buildings	In Planning
59.	CUP 1200	913 California St	56,515 SF hotel with 90 guest rooms and 5,630 SF fast food restaurant w/ drive-thru and carwash	In Planning
60.	Planned Development No. 7	1101 California Street	357,610 sq. ft. warehouse on 16 acres	Under Construction
County of San Bernardino				
61.	Tract 18952 (In County/Sphere of Influence)	Colton Ave & Opal Ave	131 single-family residences	Entitled

Sources: City of Redlands Planning Division

Cumulative Projects



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5.1 Agricultural Resources

5.1.1 Introduction

This section describes the agricultural resource conditions in the Project region and potential impacts from Project implementation. The analysis in this section is based, in part, on the following documents and resources:

- California Department of Conservation Farmland Mapping and Monitoring Program;
- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017;
- City of Redlands Municipal Code; and
- *Land Evaluation and Site Assessment Model for the Redlands RHNA Rezone Project (LESA Model)*, EPD Solutions, Inc. (Appendix B).

5.1.2 REGULATORY SETTING

5.1.2.1 State Regulations

Farmland Mapping and Monitoring Program

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of important farmland. It divides the State's farmland into different categories based on soil quality and existing agriculture, which are used to identify productive farmland and to analyze impacts on farmland. The various types of farmland identified by FMMP include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, farmland of local importance, and grazing land. The highest rated important farmland is Prime Farmland.

Land Evaluation and Site Assessment (LESA) Model

The California Agricultural Land Evaluation and Site Assessment (LESA) Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in the CEQA environmental process. The LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The Project score becomes the basis for making a determination of a project's potential significance.

5.1.2.2 Local Regulations

City of Redlands General Plan 2035

The City of Redlands General Plan contains the following policies related to agricultural resources that are applicable to the Project:

Distinctive City Element

- Policy 2-P.8** Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.
- Policy 2-P.21** Encourage conservation and preservation of citrus groves and farms, especially those that have cultural or scenic significance. Encourage retention of existing privately owned citrus groves of all sizes.

Livable Community Element

- Policy 4-P.3** Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city.
- Policy 4-P.23** Preserve agricultural land in the Planning Area and protect it from premature development.
- Action 4-A.34** Preserve agricultural land and protect agricultural operations and soils by identifying and designating these lands as Agriculture.
- Action 4-A.35** Preserve connections between agricultural lands with other agricultural lands and supporting uses, and discourage the isolation of agricultural parcels among nonagricultural uses.
- Action 4-A.37** Ensure adequate buffers and transitions between agricultural land and non-agricultural development in order to reduce the potential for land use conflicts.

Vital Environment Element

- Policy 6-P.11** Retain the maximum feasible amount of agricultural land for its contributions to the local economy, lifestyle, air quality, habitat value and sense of Redlands' heritage.
- Action 6-A.23** Permit transfer of development rights (TDR) between agreeable owners to preserve agricultural land and citrus groves. Develop an agricultural land mitigation program to conserve agricultural land through agricultural conservation easements at a ratio of 1:1 or greater.
- Action 6-A.25** Utilize State and non-profit funds for agricultural conservation easements with willing participants
- Action 6-A.26** Ensure that new development adjacent to an agricultural use is compatible with the continuation of the use by requiring appropriate design criteria, such as site layout, landscaping, and buffer areas.

City of Redlands Municipal Code

Policy to Preserve and Foster Agriculture. City of Redlands Municipal Code Section 19.04.120 states that it is declared to be the policy of the City of Redlands to preserve and foster agriculture as a vital industry and a desirable open space use because of our high soil quality, favorable climate, low water costs and economic benefit to our community. It is further declared to be the policy of the city to retain, wherever feasible, agricultural lands in private ownership and to encourage and assist the maintenance and formation of locally owned farms. The City shall forthwith adopt such policies, ordinances and resolutions as may be necessary to achieve these goals, including, but not limited to, the following:

- A. The City shall establish programs to encourage and assist owners in the replanting of dying groves and/or vacant agricultural land, for the installation of water conserving irrigation systems and/or for the protection of agricultural land from theft, vandalism and dumping. Total cost of this assistance shall be borne by those directly benefited;
- B. Plan and implement programs wherever feasible in appropriate areas for recreational opportunities for biking, equestrian and hiking uses, consistent with farming needs, agricultural uses and wildlife protection;
- C. Develop and implement public service and infrastructure standards compatible with and appropriate to agricultural and rural living purposes.

5.1.3 ENVIRONMENTAL SETTING

5.1.3.1 Agricultural Resources

Regional

Natural resources in San Bernardino County and the City of Redlands include agricultural and grazing lands. In 2017, the County had approximately 11,315 acres of Prime Farmland, 5,705 acres of Farmland of Statewide Importance, and 2,585 acres of Unique Farmland (San Bernardino County, 2020). In 2020, the County had approximately 9,805 acres of Prime Farmland, 5,304 acres of Farmland of Statewide Importance, and 2,575 acres of Unique Farmland (DOC, n.d.).

Local

The Redlands General Plan EIR describes that, as of 2014, there were approximately 745 acres of Prime Farmland, 142.9 acres of Farmland of State importance, and 249.3 acres of Unique Farmland within the City (City of Redlands, 2017b, pg. 3.2-2).

Project Site

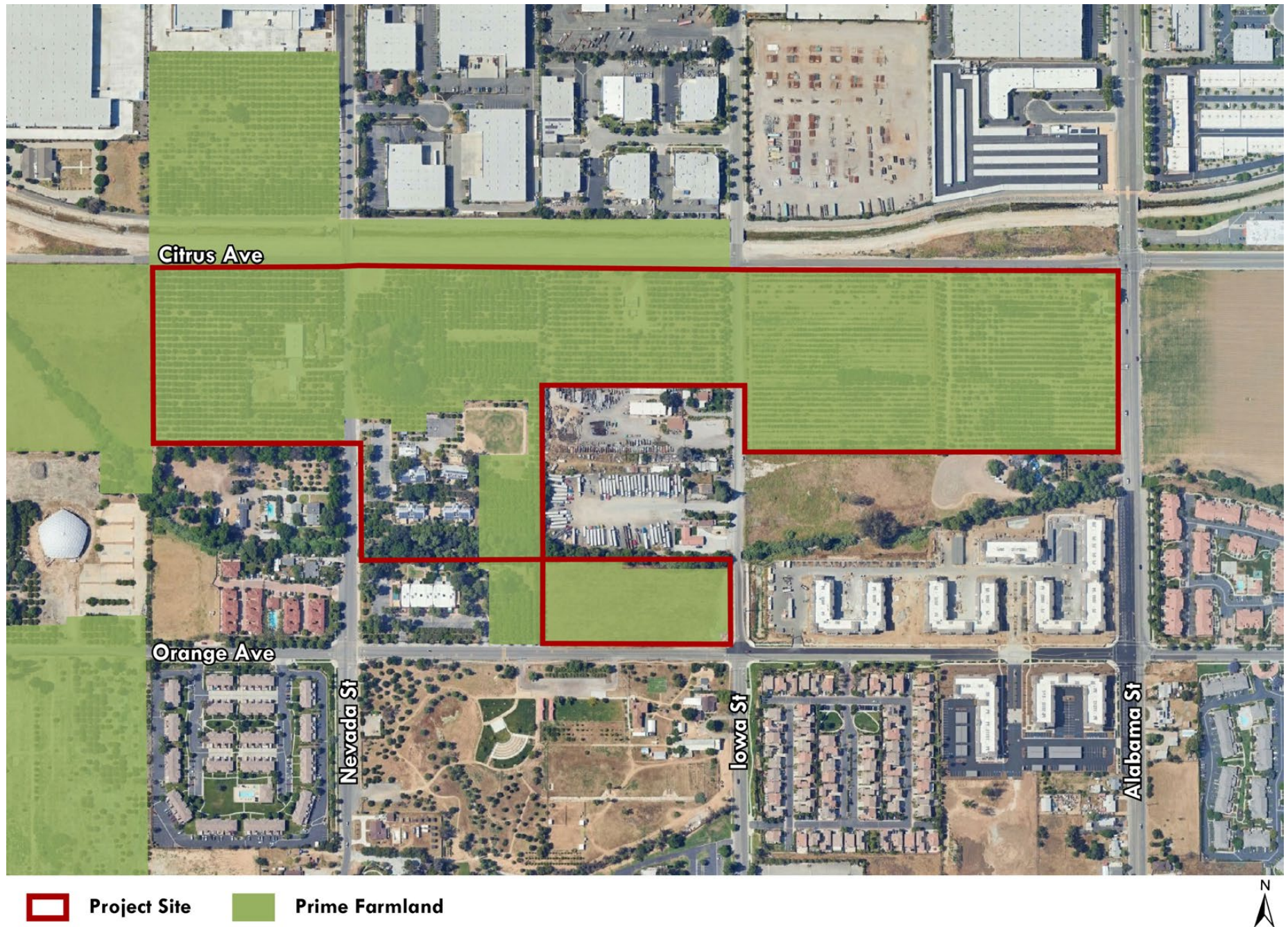
Portions of the Project site are currently utilized for agricultural production that includes orange groves (Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A). The portions of the Project site that are currently utilized for agricultural purposes have an existing General Plan designation of Commercial/Industrial. As shown in Figure 5.1-1, approximately 44.67 acres of the Project site is designated as Prime Farmland. The relevant sites contain some small structures and have existing irrigation infrastructure throughout the sites that are used for the existing agricultural use.

Approved General Plan 2035 Buildout

The Project site is currently planned for either commercial/industrial or residential development. While Site 20 has a zoning designation of Agriculture (A-1), the site has a General Plan Land Use designation of Medium Density Residential (MDR). Thus, all of the parcels included in the proposed Project are planned for future development that would redevelop the existing farmland onsite.

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Farmland Designations



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5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- AG-1 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;
- AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- AG-3 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));
- AG-4 Result in the loss of forest land or conversion of forest land to non-forest use; or
- AG-5 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.

The Initial Study, included in Appendix A, established that the Project would not result in impacts related to Thresholds AG-2, AG-3, and AG-4. No comments were provided regarding agriculture and forestry in the responses to the Notice of Preparation or the Draft Subsequent EIR scoping meeting. No further assessment of these potential impacts is required in this Draft Subsequent EIR.

5.1.5 METHODOLOGY

Agricultural resources were assessed based on the California Department of Conservation's FMMP, which is a biennial report and mapping resource on the conversion of farmland and grazing land, and the California Agricultural LESA Model, included as Appendix B. The analysis within the LESA model mirrors the steps outlined in the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual. The California Agricultural LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The Project score becomes the basis for making a determination of a project's potential significance. Using these sources, the proposed Project was analyzed for potential conversion of important Farmland, conflicts with zoning designations, and changes resulting from the proposed Project that could remove existing farmland from agricultural production.

5.1.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to agricultural resources in Chapter 3.2. Under the General Plan, approximately 200 acres of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland could be impacted by future development. The General Plan EIR projected that continued population growth and areas designated for residential, commercial, and industrial development would result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural land use (City of Redlands, 2017b, pg. 3.2-11). Despite proposed policies and existing State and local regulations that would make the loss of Prime, Important, or Unique Farmland less severe, the General Plan EIR identified the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Impact AG-1)

as a significant and unavoidable impact. The General Plan EIR discussed that 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, the General Plan EIR determined that impacts related to changes in the existing environment which, due to their location or nature, resulting in the conversion of farmland (Impact AG-5) would be less than significant (City of Redlands, 2017b, pg. 3.2-16).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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).

IMPACT AG-1: THE PROJECT WOULD 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.

Significant and Unavoidable Impact. Sites 1, 3, 8, 9, 10, 13, 14, 15, 15A and 24 (50.13 acres) currently contain approximately 44.67 acres of Prime Farmland, as shown on the FMMP and in Figure 5.1-1. Sites 1, 3, 9, 10, 10A, 13, 14, 15 and 15A are all utilized for farming of orange groves. Project implementation would cause the conversion of 44.67 acres of farmland designated as Prime Farmland to non-agricultural uses and would result in a reduction in overall acreage of agricultural lands within the City. In order to assess potential impacts from implementation of the Project and future discontinuation of the existing agricultural uses should redevelopment occur on the aforementioned sites, an agricultural resource evaluation was prepared to determine the value of the land for agricultural production and is included as Appendix B. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. The LESA model only analyzed sites 1, 3, 8, 9, 10, 13, 14, 15 and 15A as they are the only parcels with Farmland present. Onsite soils consist entirely of 50.13 acres of Hanford coarse sandy loam (2 to 9 percent slopes) (Appendix B). The onsite soils are considered good-quality soil for agriculture according to the Department of Conservation FMMP (DOC, 2022). Furthermore, there are no physical barriers to water access onsite as the City of Redlands currently provides irrigation services to the site. Consequently, the site received a LESA score of 67.0 (Land Evaluation Score of 40.75 and a Site Assessment Score of 26.25) out of a 100-point scale. According to the LESA Model significance thresholds, sites receiving a score of between 60 and 70 points are considered significant unless either the Land Evaluation or Site Assessment weighted factor subscore is less than 20 points. Both the Land Evaluation and Site Assessment subscores exceed 20 points. Therefore, the Project's conversion of the site's Farmlands to non-agricultural uses is considered significant.

There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. Retention of onsite agricultural uses would be infeasible as it would prevent the development of future residential buildings, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources offsite would be

infeasible as creation of new farmland-status properties within the City is outside of the City and future applicants' control. Additional offsite mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the Project parcels have no relationship to the loss of agricultural lands within the City or County. There is no available replacement acreage of lower quality farmland within the City or County that could be mitigated to Prime Farmland. Farmland within the City or County is either planned for future development of non-agricultural uses or already designated by the Department of Conservation as Unique Farmland, Farmland of Statewide Importance, or Prime Farmland. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per Department of Conservation requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the Department of Conservation as well as other climate factors such as rainfall. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Therefore, impacts would be significant and unavoidable, consistent with the findings of the General Plan EIR.

IMPACT AG-5: THE PROJECT WOULD INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE.

Significant and Unavoidable Impact. Project implementation would result in the conversion of Farmland onsite to non-agricultural use and could facilitate the conversion of existing Farmland within the vicinity to non-agricultural use. The Project's zone of influence pursuant to the LESA model includes land within a one-quarter mile radius of the Project site. Outside of the Project site, within the Project's zone of influence per the LESA model, approximately 126 acres are designated as Prime Farmland. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production (Appendix B). While these lands are currently utilized for agricultural production, they are designated for future development by the City of Redlands General Plan with land use designations of Commercial/Industrial and Medium Density Residential (City of Redlands, 2017a).

Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas are zoned to be developed with urban uses other than for agricultural purposes as areas to the north, west, and east are currently zoned within the East Valley Corridor Specific Plan (EVCSP) Commercial Industrial (EV/IC) and areas to the south are also within the EVCSP zoned Multiple Family Residential-3000 (EV3000). There is the potential that the Project would influence the conversion of surrounding Farmland to non-agricultural use. As a result, the Project would indirectly cause changes in the environment that would convert other farmland to non-agricultural use. Therefore, impacts related to the conversion of farmland would be significant. As discussed under Impact AG-1, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the loss of Farmland and conversion of Farmland to non-agricultural use. Improving agricultural land elsewhere in the City or County would not be effective in mitigating the impact to the agricultural lands onsite, as they would still be removed. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per Department of Conservation requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the Department of Conservation as well as other climate factors such as rainfall. Therefore, impacts would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to changes in the environment resulting in the conversion of farmland to non-agricultural uses would be less than significant.

5.1.7 CUMULATIVE IMPACTS

The cumulative study area for agricultural resources for this Draft Subsequent EIR is the County of San Bernardino as these resources are regularly assessed on the countywide level as part of the State's FMMP. Throughout the County, numerous development projects exist that would result in the additional conversion of agricultural land, including Prime Farmland and Farmland of Statewide Importance, to non-agricultural uses, such as the proposed Project. As discussed in Section 5.1.3.1, above, agricultural use in the County has declined over the last several decades as the result of urban expansion and economic conditions. Consequently, the County and incorporated cities within the County, such as the City of Redlands, have set forth goals and policies to protect agriculture within their individual General Plans. Notwithstanding, the County and incorporated cities within the County continue to plan for growth, including in the vicinity of the City of Redlands. Continued conversion of agricultural lands to urban uses would substantially reduce overall agricultural productivity in the City and the County. According to the City of Redlands General Plan EIR, approximately 200 acres of Prime, Important, or Unique Farmland could potentially be converted under buildout of the General Plan (City of Redlands, 2017b, pg. 3.2-11). The overall decrease in farmland within the City was identified as a significant cumulative impact in the General Plan EIR. Although the site is designated for non-agricultural uses by the General Plan, implementation of the Project would contribute to the reduction of agricultural uses and Farmland within the region and would cumulatively contribute to the loss of agricultural resources within the County. Although the proposed conversion is consistent with the projected decline in agricultural uses by the General Plan EIR, the Project would result in cumulatively considerable impacts to agricultural resources. Impacts would therefore be cumulatively significant and unavoidable.

5.1.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

City of Redlands Policy to Preserve and Foster Agriculture.

Plans, Programs, or Policies (PPPs)

None.

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

- Impact AG-1: Implementation of the Project would convert Farmland to non-agricultural uses.
- Impact AG-5: Implementation of the Project would involve other changes in the environment that could result in the conversion of Farmland to non-agricultural uses.

5.1.10 MITIGATION MEASURES

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland to non-agricultural use and the loss of Farmland.

5.1.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Farmland. As such, Impacts AG-1 and AG-5 would be significant and unavoidable.

5.1.12 REFERENCES

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- San Bernardino County. (2020). *San Bernardini Countywide Plan Draft Environmental Impact Report*: Retrieved July 2, 2024, from: <https://countywideplan.com/resources/document-download/>
- U.S. Department of Agriculture. (n.d.). Natural Resources Conservation Service (NRCS). *Web Soil Survey*. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

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5.2 Air Quality

5.2.1 INTRODUCTION

This section provides an overview of the existing air quality within the RHNA Rezone area and surrounding region, a summary of applicable regulations, and analyses of potential short-term and long-term air quality impacts from implementation of the proposed Project. Mitigation measures are recommended as necessary to reduce significant air quality impacts. This analysis is based on the following:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- *City of Redlands Municipal Code*; and
- *Regional Housing Needs Assessment Rezone Air Quality Impact Analysis*, Urban Crossroads, September 2024. Included as Appendix C.

5.2.2 REGULATORY SETTING

5.2.2.1 Federal Regulations

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990.

The CAA requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM₁₀ and PM_{2.5}), and lead. Table 5.2-1 shows the NAAQS for these pollutants. The CAA also requires each state to prepare an air quality control plan, referred to as a State Implementation Plan (SIP). The CAA Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee state air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Table 5.2-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and nitrogen oxides (NOx) react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial/industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO₂)	1 hour	0.18 ppm	0.100 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm		
Sulfur Dioxide (SO₂)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.03 ppm		
Respirable Particulate Matter (PM₁₀)	24 hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	---		
Fine Particulate Matter (PM_{2.5})	24 hours	---	35 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³		
Lead (Pb)	30 Day Average	1.5 µg/m ³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m ³		
	Rolling 3-Month Average	---	0.15 µg/m ³		
Hydrogen Sulfide	1 hour	0.03 ppm	...	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal power plants, petroleum production and refining
Sulfates (SO₄)	24 hour	25 µg/m ³	...	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardiopulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	...	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM _{2.5} .

ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter.

Source: Appendix C

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAAA directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). The NESHAPs may differ for major sources than for area sources of HAPs. Major sources are defined as stationary sources with

potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards that were deemed necessary to address risks remaining after implementation of the technology-based NESHAP standards.

The CAAA also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

5.2.2.2 State Regulations

California Air Resources Board

Criteria Air Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, requires CARB to establish the California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. Applicable CAAQS are included in Table 5.2-1, above.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance by local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Toxic Air Contaminants

Air quality regulations also focus on toxic air contaminants (TACs). In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria air pollutants, for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Instead, the USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the MACT or best available control technology (BACT) for toxics and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807 [Chapter 1047, Statutes of 1983]) (Health and Safety Code Section 39650 et seq.) and the Air Toxics Hot

Spots Information and Assessment Act (Hot Spots Act) (AB 2588 [Chapter 1252, Statutes of 1987]) (Health and Safety Code Section 44300 et seq.). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted the USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), which provides guidance concerning land use compatibility with TAC sources. Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way. In addition, CARB has promulgated the following specific rules to limit TAC emissions:

- **CARB Rule 2485** (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **CARB Rule 2480** (13 CCR Chapter 10 Section 2480), Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **CARB Rule 2477** (13 CCR Section 2477 and Article 8), Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to develop fuel economy standards for the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce fuel use and emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy standards for model 2017-2025 vehicles, which are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; and
- Idling necessary to ensure safe operation of the vehicle.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24 Part 11: California Green Building Standards (CALGreen) was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective January 1, 2023.

The 2022 CALGreen standards that reduce air quality emissions and are applicable to the proposed Project include, but are not limited to, the following:

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).
 - New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
 - New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
 - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
 - Operations and maintenance instructions for the following:
 - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
 - Roof and yard drainage, including gutter and downspouts.
 - Space conditioning systems, including condensers and air filters.
 - Landscape irrigation systems.
 - Water reuse systems.

- Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
 - Public transportation and/or carpool options available in the area.
 - Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
 - Information about water-conserving landscape and irrigation design and controllers which conserve water.
 - Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
 - Information about state solar energy and incentive programs available.
 - A copy of all special inspection verifications required by the enforcing agency of this code.
 - Information from CALFIRE on maintenance of defensible space around residential structures.
- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.
 - Paints and coatings. Architectural paints and coatings shall comply with [volatile organic compound] VOC limits in Table 1 of the CARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its glass, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section
- 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled onsite until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWEL0), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

The 2022 CALGreen Building Standards Code has been adopted by the City of Redlands Municipal Code in Chapter 15.16.

5.2.2.3 Regional Regulations

South Coast Air Quality Management District

Criteria Air Pollutants

The South Coast Air Quality Management District (SCAQMD) attains and maintains air quality conditions in the South Coast Air Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of

rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the CAA, CAAA, and CCAA. Air quality plans applicable to the proposed Project are discussed below.

Air Quality Management Plan

The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and State CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin.

The 2012 AQMP was adopted by the SCAQMD Governing Board on December 12, 2012. The purpose of the 2012 AQMP for the Basin is to set forth a comprehensive and integrated program that will lead the region into compliance with the federal 24-hour $PM_{2.5}$ air quality standard, and to provide an update to the Basin's commitment towards meeting the federal 8-hour ozone standards. The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle miles traveled (VMT) emissions offset demonstration. The 2012 AQMP, as approved by CARB, serves as the official SIP submittal for the federal 2006 24-hour $PM_{2.5}$ standard. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The 2012 AQMP set forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, State, and federal.

In March 2017, the SCAQMD finalized the 2016 AQMP, which continues to evaluate integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including updated emission inventory methodologies for various source categories.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x [nitrogen oxides] technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. The SCAQMD proposes a total of 49 control measures for the 2022 AQMP, including control measures focused on widespread deployment of zero emission and low NO_x technologies through a combination of regulatory approaches and incentives.

The RTP/SCS also provides a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and federal CAA requirements, preserve open space areas, improve public health and roadway safety, support vital goods movement industry, and use resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions.

SCAQMD Rules and Regulations

All projects within the South Coast Air Basin are subject to SCAQMD rules and regulations. Specific rules applicable to the proposed Project include the following:

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an offsite nuisance. Applicable Rule 403 dust suppression (and PM₁₀ generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep onsite streets (and offsite streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

5.2.2.4 Local Regulations

City of Redlands 2035 General Plan

The General Plan Healthy Community Element contains the following policies related to air quality that are applicable to the Project:

- Principle 7-P.44** Protect air quality within the city and support efforts for enhanced regional air quality.
- Principle 7-P.49** Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.
- Action 7-A.147** Cooperate with the ongoing efforts of the U.S. Environmental Protection Agency, the South Coast Air Quality Management District, and the State of California Air Resources Board in improving air quality in the regional air basin.
- Action 7-A.149** Ensure that construction and grading projects minimize short-term impacts to air quality.
- Require grading projects to provide a stormwater pollution prevention plan (SWPPP) in compliance with City requirements, which include standards for best management practices (BMPs) that control pollutants from dust generated by construction activities and those related to vehicle and equipment cleaning, fueling, and maintenance;
 - Require grading projects to undertake measures to minimize mono-nitrogen oxides (NO_x) emissions from vehicle and equipment operations; and
 - Monitor all construction to ensure that proper steps are implemented
- Action 7-A.152** Enforce regulations to prevent trucks from excessive idling in residential areas.

- Action 7-A.153** Require applicants for sensitive land uses (e.g. residences, schools, daycare centers, playgrounds, and medical facilities) to site development and/or incorporate design features (e.g. pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) to minimize the potential impacts of air pollution on sensitive receptors.
- Action 7-A.154** Require applicants for sensitive land uses within a Proposition 65 warning contour to conduct a health risk assessment and mitigate any health impacts to a less than significant level.

5.2.3 ENVIRONMENTAL SETTING

5.2.3.1 Climate and Meteorology

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the SCAQMD. The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

5.2.3.2 Criteria Air Pollutants

As described previously, the CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀), fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}), and lead. These pollutants are referred to as "criteria air pollutants" because they are the most prevalent air pollutants known to be injurious to human health. Extensive health-effects criteria documents regarding the effects of

these pollutants on human health and welfare have been prepared over the years.¹ Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal Clean Air Act (CAA). California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (CAAQS) and has adopted air quality standards for some pollutants for which there is no corresponding national standard (NAAQS), such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Ozone

Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air; but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NO_x). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth ("rainout"), or absorption by water molecules in clouds that later fall to earth with rain ("washout").

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide

NO₂ is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x, which are reported as equivalent NO₂. Aside from its contribution to ozone formation, NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

¹ Additional sources of information on the health effects of criteria pollutants can be found at CARB and USEPA's websites at <http://www.arb.ca.gov/research/health/health.htm> and <http://www.epa.gov/air/airpollutants.html>, respectively.

Sulfur Dioxide

SO₂ is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfur trioxide (SO₃). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO₂ aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. Long-term SO₂ exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter

PM₁₀ and PM_{2.5} consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of PM_{2.5} is diesel exhaust emissions.

PM₁₀ consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO₂ and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM₁₀ and PM_{2.5} are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. PM_{2.5} can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH₃), NO_x, and SO_x.

Lead

Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

5.2.3.3 Toxic Air Contaminants

Concentrations of TACs, or in federal parlance, HAPs, are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (diesel particulate matter, or DPM). DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other TACs, no ambient monitoring data are available for DPM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

5.2.3.4 CO Hotspots

An adverse CO concentration, known as a "hot spot" is an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as in attainment, and CO concentrations in the region have steadily declined (Appendix C).

5.2.3.5 Odorous Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. Although unpleasant, offensive odors rarely cause physical harm. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors.

5.2.3.6 Existing Conditions

The SCAQMD maintains monitoring stations within district boundaries, Source/Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The City is located within SRA 35, East San Bernardino. The East San Bernardino monitoring station reports air quality statistics for ozone and PM₁₀. The East San Bernardino Valley monitoring station does not provide information for CO, NO₂, and PM_{2.5}, as such, statistics were obtained from the Central San Bernardino 2 monitoring station. The most recent three years of data are shown in Table 5.2-2, which identifies the number of days ambient air quality standards were exceeded in the area. Additionally, data for SO₂ has been omitted as attainment is regularly met in the Basin and few monitoring stations measure SO₂ concentrations.

In 2023, the federal and State ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone at most monitoring locations. No areas of the Basin exceeded federal or State standards for NO₂, SO₂, CO, sulfates, or lead. See Table 5.2-3, for attainment designations of the Basin.

Table 5.2-2: Air Quality Monitoring Summary 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
Ozone				
Maximum Federal 1-Hour Concentration (ppm)		0.145	0.135	0.143
Maximum Federal 8-Hour Concentration (ppm)		0.119	0.109	0.118
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	74	63	54
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	118	106	83
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.0	1.7	1.6
Maximum Federal 8-Hour Concentration	> 20 ppm	1.6	1.4	1.2
NO ₂				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.053	0.056
Annual Federal Standard Design Value		0.015	0.016	0.014
PM ₁₀				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 150 µg/m ³	44	50	49
Annual Federal Arithmetic Mean (µg/m ³)		23.2	22.0	21.3
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m ³	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m ³	0	0	0
PM _{2.5}				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 35 µg/m ³	57.9	40.1	25.4
Annual Federal Arithmetic Mean (µg/m ³)	> 12 µg/m ³	11.9	11.26	10.16
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m ³	1	2	0

ppm = Parts Per Million

µg/m³ = Microgram per Cubic Meter

Source: Appendix C

Both CARB and the USEPA use this type of monitoring data to designate areas with air quality problems and to initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

Table 5.2-3: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	--
Ozone – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment

Criteria Pollutant	State Designation	Federal Designation
SO ₂	Attainment	Unclassifiable/Attainment
Pb ₃	Attainment	Unclassifiable/Attainment

Source: Appendix C

The Project area consists of approximately 116.19 acres of land that is currently a mix of undeveloped or agricultural use properties, and sites developed with residences and industrial storage. Air quality emissions are currently generated by operation of these existing uses and the related vehicular trips.

5.2.3.7 Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Existing sensitive receptors within and in the vicinity of the RHNA rezone sites consist of existing residences and schools.

5.2.3.8 Approved General Plan 2035 Buildout

The operational emissions from buildout of the existing General Plan land use designations of the 24 rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. This is consistent with the findings of the General Plan EIR.

5.2.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project could have a significant adverse effect on air quality resources if it would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan;
- AQ-2 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;
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations; or
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Initial Study established that the proposed Project would not result in impacts related to Threshold AQ-4; therefore, no further assessment of this impact is required in this EIR.

Regional Thresholds

The SCAQMD's most recent regional significance thresholds from April 2019 for regulated pollutants are listed in Table 5.2-4. The SCAQMD's CEQA air quality methodology provides that any projects that result in daily emissions that exceed any of the thresholds in Table 5.2-4 would be considered to have both an individually (project-level) and cumulatively significant air quality impact.

Table 5.2-4: SCAQMD Regional Air Quality Thresholds

Pollutant	Construction	Operations
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Source: Appendix C

Localized Significance Thresholds

SCAQMD developed localized significance thresholds (LSTs) to determine if emissions of NO₂, CO, PM₁₀, or PM_{2.5} generated at a project site would expose sensitive receptors to substantial concentrations of criteria air pollutants. LSTs are the maximum emissions from a project's onsite activities that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. However, an LST analysis can only be conducted at a development project level, as LST thresholds are based on specific project site data points such as graded acres per day and distance to sensitive receptors, and quantification of LSTs is not applicable for this program-level environmental analysis. For informational purposes, Table 5.2-5 provides the LSTs for projects in the Basin.

Table 5.2-5: SCAQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO ₂ Standard (CAAQS)	0.18 ppm
Annual NO ₂ Standard (CAAQS)	0.03 ppm
24-Hour PM ₁₀ Standard – Construction (SCAQMD)	10.4 µg/m ³
24-Hour PM _{2.5} Standard – Construction (SCAQMD)	10.4 µg/m ³
24-Hour PM ₁₀ Standard – Operation (SCAQMD)	2.5 µg/m ³
24-Hour PM _{2.5} Standard – Operation (SCAQMD)	2.5 µg/m ³
Annual Average PM ₁₀ Standard (SCAQMD)	1.0 µg/m ³

Source: Appendix C

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm, which are the thresholds.

5.2.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project, based on comparison of the maximum development assumptions from buildout of the approved General Plan land uses and from buildout of the proposed Project, as outlined in Section 3.0, *Project Description*.

Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally, emissions would be generated from operations of the future residential and institutional uses and from traffic volumes generated by these new uses. The net change in emissions generated by these Project activities and other secondary sources have been quantitatively estimated and compared to those that would occur from buildout of the existing General Plan assumptions and to the applicable thresholds of significance recommended by the SCAQMD.

Although the Project would comply with all of the applicable SCAQMD requirements, it should be noted that emission reductions associated with Rules 402, 1301, 1401, and 2305 cannot be quantified in the California Emissions Estimator Model (CalEEMod) and are therefore not reflected in the emissions presented herein. Conversely, Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) can be modeled in CalEEMod. As such, credit for Rule 403 and Rule 1113 has been taken in the analysis.

AQMP Consistency

The SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed General Plan land use and zoning designation changes) would be consistent with the AQMP:

1. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.
2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecast and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities and counties located within the SCAG region. Therefore, if the level of housing or employment related to the proposed Project are consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP.

Consistency Criterion No. 2 refers to the CAAQS. An impact would occur if the long-term emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds for operation-phase emissions.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors, including mobile- and area-source emissions from the Project, were quantified using the CalEEMod computer model. Area-source emissions were modeled according to the size and type of the land uses proposed. Mass mobile-source emissions were modeled based on the increase in daily vehicle trips that would result from the proposed Project and those that would occur from buildout of the existing General Plan land uses. Predicted long-term operational emissions were compared and also evaluated against applicable SCAQMD thresholds for determination of significance.

To evaluate the approved General Plan buildout, operational emissions from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses were modeled on the Project sites' 116.19 acres. Buildout of the proposed Project would result in 2,436 multi-family dwelling units and 151,048.46 SF of Public/Institutional uses on the 116.19 acres.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels as well as implementation of control technology on industrial facilities, CO concentrations in the Basin and the state have steadily declined. The analysis of CO hotspots compares the volume of traffic that has the potential to generate a CO hotspot and the volume of traffic generated by the proposed Project to determine if the project would exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm.

Summary of Impacts Identified in the General Plan EIR

Air Quality Plan. The General Plan EIR describes that the emissions generated by development projects in addition to existing sources within the City are not considered to cumulatively contribute to the nonattainment designations of the Basin. Buildout of the proposed General Plan would not contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout of the proposed General Plan would not result in a significant air quality impact (City of Redlands, 2017b, p. 3.3-18).

The General Plan EIR describes that individual projects pursuant to the General Plan would be required to undergo subsequent environmental review pursuant to CEQA, and as part of this review effort, projects requiring discretionary approval would be required to demonstrate compliance with the AQMP. Individual projects would also be required to demonstrate compliance with SCAQMD rules and regulations governing air quality, specifically particulate matter. The General Plan EIR also describes that the General Plan principles and actions would help to reduce potential impacts related to conflicts with an applicable air quality plan, and that the General Plan would not conflict with or obstruct the implementation of the applicable air quality plan. Impacts would be less than significant (City of Redlands, 2017b, p. 3.3-20).

Construction. The General Plan EIR describes that it is not possible to determine whether the scale and phasing of individual projects would exceed the SCAQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and the CARB's Airborne Toxic Control Measures), mitigation imposed at the project level may include extension of construction schedules and/or use of special equipment. Existing City policies and regulations and proposed General Plan principles and actions are intended to minimize impacts associated with non-attainment criteria pollutants. While these regulations and policies would reduce impacts associated with construction activities, there is no guarantee emissions would be mitigated below SCAQMD thresholds. Therefore, construction air quality impacts were determined to be significant and unavoidable (City of Redlands, 2017b, p. 3.3-25).

Operation. The General Plan EIR describes that operational emissions from buildout of the General Plan, would exceed the SCAQMD's significance threshold for VOC, NO_x, CO, PM₁₀, and PM_{2.5}; therefore, impacts would be significant. The General Plan EIR details that buildout of the General Plan would be required to comply with the AQMP, SIP, CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and the proposed General Plan principles and actions; however, there is no guarantee that emissions would be mitigated below SCAQMD thresholds. Therefore, the General Plan EIR determined that operational impacts would remain significant and unavoidable (City of Redlands, 2017b, p. 3.3-26).

Sensitive Receptors. The General Plan EIR describes that construction related to implementation of the proposed General Plan is not anticipated to result in a long-term exposure of sensitive receptors to substantial concentration of TACs. Impacts would be less than significant. The General Plan EIR also describes that buildout of the General Plan could allow residential and other sensitive land uses to locate in the vicinity of air pollutant sources such as stationary sources and freeways. Policies in the proposed General Plan would serve to protect new sensitive receptors from exposure to substantial pollutant concentrations. Proposed policies would require applicants for sensitive land uses to minimize the potential for air pollution exposure through siting and design. Proposed policies also would require the development of requirements for retrofitting existing residential buildings within a 500-foot buffer along the freeway to abate air pollution and limit new residential developments within the buffer. The SCAQMD permitting process for new emissions sources and existing sources in the vicinity of new sensitive developments would further help to ensure that substantial exposure to air pollutants would be avoided. Thus, the General Plan EIR determined that impacts to sensitive receptors from operation of the General Plan land uses would be less than significant (City of Redlands, 2017b, p. 3.3-29).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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). As detailed in Section 5.10, *Transportation*, the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

IMPACT AQ-1: THE PROJECT WOULD CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF AN APPLICABLE AIR QUALITY PLAN.

Significant and Unavoidable Impact. The SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project area. Pursuant to Consistency Criterion No. 1, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

As detailed in Section 5.8, *Population and Housing*, buildout of the proposed Project would allow development of 2,436 residential units and 151,048.46 square feet of public/institutional development, representing a population of approximately 6,456 persons and 550 employees at buildout and full

occupancy (maximum impact condition). This would result in an increase of 6,162 residents and a reduction of 1,713 employees compared to the buildout of the area pursuant to the City's General Plan.

Development pursuant to the proposed Project would consist mostly of projects that are market and need dependent. Because the employment generating areas in the Project area are existing, the 550 jobs expected from buildout of the Project are included in the SCAG projections. The SCAG 2020 RTP/SCS projections for the City of Redlands anticipate a 32.2 percent increase in employment in the City between 2016 and 2045 (an increase of 13,700 jobs). The 550 jobs that are anticipated to occur within the Project area would be approximately 4 percent of the anticipated job growth, and within the growth assumptions of the 2020 SCAG AQMP. The SCAG 2024 RTP/SCS projections for the City show a 21.7 percent increase in employment in the City between 2019 and 2050 (an increase of 10,700 jobs). The 550 jobs that are anticipated to occur within the Project area would be approximately 5.1 percent of the anticipated job growth, and within the growth assumptions of the 2024 SCAG RTP/SCS.

The housing added by the Project would help to meet housing demands from projected employment growth in the City while maintaining a healthy vacancy rate. The City of Redlands is jobs rich, with an existing jobs-housing ratio of 1.93. The proposed Project would reduce (improve) the jobs-housing ratio slightly by adding 2,325 residential units compared to buildout pursuant to the General Plan. The proposed Project would provide a regional beneficial effect of providing the opportunity for housing in a jobs-rich area, where employees can easily travel to nearby employment opportunities. Thus, provision of housing within the City would reduce vehicle miles traveled related to employment and the related air quality emissions. In addition, buildout pursuant to the Project would implement infill development, located in an urbanized area with existing infrastructure. This is consistent with the SCAG objective to "Encourage patterns of urban development and land use that reduce costs in infrastructure construction and make better use of existing facilities." Thus, the proposed Project would support AQMP objectives to reduce trips, promote infill development, and balance jobs and housing, and would not conflict with implementation of the AQMP under Consistency Criterion No. 1. As a result, the proposed Project would comply with SCAQMD AQMP Consistency Criterion No. 1.

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations: as described previously, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds for operation-phase emissions. As detailed below under Impact AQ-2, although the proposed Project would result in decreased emissions in comparison to those occurring under buildout of the existing General Plan land uses, the Project would continue to result in regional operational-source emissions that would exceed the thresholds of significance for CO, VOCs, and NO_x emissions after implementation of regulatory requirements and Mitigation Measures AQ-1 and AQ-2. Therefore, the Project would result in an increase in the frequency or severity of existing air quality violations and contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. As a result, the proposed Project would result in an impact related to Consistency Criterion No. 2.

Overall, despite the Project's consistency with SCAG's regional growth forecasts, and reduction in emissions compared to buildout of the existing General Plan land uses, buildout of the Project would lead to regional air quality emissions that would exceed thresholds. Therefore, the proposed Project would result in a conflict with, or obstruct, implementation of the AQMP and impacts would be significant and unavoidable after implementation of the mitigation measures detailed below. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to conflict with the AQMP would be less than significant.

IMPACT AQ-2: THE PROJECT WOULD RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF A CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD.

Construction

Significant and Unavoidable. Construction activities associated with buildout of the Project would result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, grading, and excavation; (2) construction workers traveling to and from the construction area; (3) delivery and hauling of construction supplies to, and debris from, the construction area; (4) fuel combustion by onsite construction equipment; and (5) building construction; application of architectural coatings; and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

As described previously, the timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically over a 10-year period or longer. Because of the uncertainty of the specific timing and methods of construction activities for future site-specific development projects that would occur pursuant to the proposed Project, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process, per CEQA Guidelines Section 15145. Due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours, etc.), it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant air quality impact. Conversely, implementation of the Project has a potential to result in a significant and unavoidable impact with respect to construction activity associated with future development projects particularly if multiple construction projects overlap for emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Thus, Mitigation Measure AQ-1 has been included to require that future projects prepare a technical assessment of potential air quality impacts from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. However, it is possible that emissions from future construction projects could exceed thresholds with implementation of feasible mitigation. Therefore, impacts related to construction air quality would be significant and unavoidable after implementation of mitigation. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to construction emissions would be significant and unavoidable.

Operation

Significant and Unavoidable. Consistent with the existing General Plan land use and zoning of the Project site, development pursuant to the proposed Project would consist of projects that are market and need dependent. Both buildout of the existing land use and zoning designations would generate long-term emissions of criteria air pollutants from area sources generated by vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products, which are typical of residential, commercial/industrial, and office uses.

The operational emissions from buildout of the existing General Plan land use designations of the 24 Rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. This is consistent with the findings of the General Plan EIR.

Table 5.2-6: Existing General Plan Buildout Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile Source	221.10	201.66	1,439.33	3.32	258.06	67.62
Area Source	72.21	2.71	103.10	0.02	0.32	0.28
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	293.77	212.70	1,549.29	3.38	259.01	68.54
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	Yes	Yes
Winter						
Mobile Source	203.24	215.05	1,255.01	3.13	258.06	67.63
Area Source	55.88	1.84	0.78	0.01	0.15	0.15
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	259.58	225.21	1,262.66	3.19	258.84	68.41
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	Yes	Yes

Source: Appendix C

The operational emissions from buildout of the proposed rezoning, which would result in 2,436 multi-family dwelling units and 151,048.46 SF Public/Institutional uses, is shown in Table 5.2-7. As detailed, operation of the proposed land uses at buildout and full occupancy under the proposed Project would generate emissions that would also exceed the applicable SCAQMD thresholds for VOC, CO, and NO_x.

Table 5.2-7: Summary of Project Peak Operational Emissions

Area	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile Source	47.35	40.23	441.68	1.29	131.89	33.93
Area Source	73.20	41.74	162.66	0.26	3.34	3.32
Energy Source	0.45	7.77	3.71	0.05	0.62	0.62
Total Maximum Daily Emissions	121.01	89.74	608.04	1.61	135.85	37.88
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No
Winter						
Mobile Source	45.11	43.17	369.10	1.21	131.89	33.93
Area Source	60.17	40.41	17.20	0.26	3.27	3.27
Energy Source	0.45	7.77	3.71	0.05	0.62	0.62
Total Maximum Daily Emissions	105.73	91.35	390.00	1.52	135.78	37.82
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	No	No	No	No

Source: Appendix C

Table 5.2-8 provides a comparison of emissions from buildout of the existing General Plan land uses (Table 5.2-6) and buildout under the proposed Project (Table 5.2-7). As shown, the proposed Project would result in fewer operational emissions than buildout of the existing General Plan. As such, the proposed Project would not result in any new or more severe impacts to air quality beyond what was disclosed by the 2017 EIR.

Table 5.2-8: Comparison of Operational Emissions

Area	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Proposed Project	121.01	89.74	608.04	1.61	135.85	37.88
Approved General Plan Buildout	293.77	212.70	1549.29	3.38	259.01	68.54
Net Emissions (Proposed – Approved)	-172.76	-122.96	-941.25	-1.78	-123.16	-30.66
Winter						
Proposed Project	105.73	91.35	390.00	1.52	135.78	37.82
Approved General Plan Buildout	259.58	225.21	1262.66	3.19	258.84	68.41
Net Emissions (Proposed – Approved)	-153.85	-133.87	-872.65	-1.67	-123.07	-30.59

Source: Appendix C

Because buildout of the proposed land uses would continue to result in exceedance of the operational SCAQMD thresholds for VOC, CO, and NO_x, Mitigation Measure AQ-2 would be implemented to require developments in the Project area to prepare a technical air quality analysis and include all applicable mitigation measures to reduce operational emissions. However, the details of future proposed projects are unknown, and the volume of emissions that could be reduced through mitigation measures are specific to each proposed development, which are currently unknown. Thus, similar to the analysis presented in the General Plan EIR, even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions have the potential to continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

It is important to note that the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the City cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds.

Additionally, it should be noted that the majority of the Project's CO and NO_x emissions are derived from vehicle usage. Since neither future project applicants nor the City have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to operational emissions would be significant and unavoidable.

Health Impacts of Exceeded Criteria Pollutant Emissions. The Draft EIR identifies a significant and unavoidable impact with respect to CO, NO_x, and VOC emissions, due largely to the use of consumer products and vehicle trips. NO_x is a “criteria” pollutant, a pollutant that is regulated by the US EPA pursuant to the federal Clean Air Act. The potential health impacts of criteria pollutants are analyzed on a regional level, not on a facility/project level. The SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPD), experts in the area of air quality, both recognize that a meaningful, accurate analysis of potential health impacts resulting from criteria pollutants is not currently possible and not likely to yield

substantive information that promotes informed decision making.² The SJVAPD, in its amicus curiae brief for the recent California Supreme Court decision in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, explained that “it is not feasible to conduct a [health impact analysis] for criteria air pollutants because currently available computer modeling tools are not equipped for this task.” The SJVAPD described a project-specific health impact analysis as “not practicable and not likely to yield valid information” because “currently available modeling tools are not well suited for this task.” The SJVAPD further noted that “...the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional” cumulative impacts.

It should also be noted that CO, NO_x, and VOCs are “precursor” pollutants, which makes analysis of potential health impacts even more difficult. CO, NO_x, and VOCs are precursors to ozone, which is formed in the atmosphere from the chemical reaction of CO, NO_x, and VOCs in the presence of sunlight. As explained by the SCAQMD in its amicus curiae brief for *Sierra Club v. County of Fresno*, it takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources.” Given this, “...it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region.” Therefore, SCAQMD opined that while it “may be feasible” for large, regional projects with very high emissions of CO, NO_x, and VOCs to conduct an accurate health impact analysis, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by CO, NO_x, or VOC emissions from relatively small projects.

Thus, the difficulties with preparing potential health impact analysis related to the Project’s CO, NO_x, and VOC emissions are twofold. First, current modeling is not capable of correlating emissions of criteria pollutants to concentrations that can be reasonably linked to specific health impacts. Second, CO, NO_x, and VOCs are precursor emissions and concentrations of CO, NO_x, and VOC are impacted by regional atmospheric conditions. CO, NO_x, and VOCs emitted by the Project may, depending upon interactions with the sun and other emissions, convert to ozone by complex chemical processes. Thus, there is a significant level of unpredictability associated with such conversion to ozone, as noted by the SCAQMD and the SJVAPD. It should also be noted that the EIR does identify health concerns related to CO and NO_x emissions. Table 5.2-1 includes a list of criteria pollutants and summarizes common sources and effects. Furthermore, due to the programmatic nature of the Rezone, modeling of health impacts associated with criteria pollutants would be infeasible due to lack of specific site plans and the speculative nature of future development and its associated traffic distribution. Thus, the EIR’s analysis is reasonable and intended to foster informed decision making.

² In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (“Friant Ranch”) in the review and analysis of development projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in the Friant Ranch case by SJVAPD and SCAQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of development to likely human health impacts from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the court’s advice to explain in a meaningful way why this analysis is infeasible. Since this interim memorandum, SMAQMD has provided methodology to address impacts; however, a similar analysis for projects within SCAQMD jurisdiction is not yet available.

IMPACT AQ-3: THE PROJECT COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.

Localized Air Quality Impacts

Construction

Significant and Unavoidable. As described previously, an LST analysis can only be conducted at a development project level, and quantification of LSTs is not applicable for this program-level environmental analysis. However, implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to LST's. As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development, and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Hence, impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to construction emissions impacting sensitive receptors would be less than significant.

Operational

Less than Significant Impact. According to the SCAQMD LST methodology, LSTs apply to project-related stationary mobile sources. Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational LSTs. Buildout of the proposed Project would result in additional residential and public developments, which do not typically involve vehicles idling or queuing for long periods. Therefore, due to the lack of significant stationary source emissions, impacts related to operational LSTs would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to operational emissions impacting sensitive receptors would be less than significant.

CO Hotspots

Less than Significant Impact. An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the State's one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. The 2003 AQMP estimated traffic volumes that could generate CO concentrations to result in a "hot spot." As shown in Table 5.2-9, according to the 2003 AQMP, the Wilshire-Veteran intersection had a daily traffic volume of approximately 100,000 vehicles per day, and the 1-hour CO concentration was 4.6 ppm. This indicates that, even with a traffic volume of 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not exceed the most stringent 1-hour CO standard (20.0 ppm).³

Table 5.2-9: Traffic Volumes for Intersections Evaluated in 2003 AQMP

Intersection Location	Peak Traffic Volumes (vehicles per hour [vph])				
	Eastbound (a.m./p.m.)	Westbound (a.m./p.m.)	Southbound (a.m./p.m.)	Northbound (a.m./p.m.)	Total (a.m./p.m.)
Wilshire-Veteran	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset-Highland	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374

³ Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

Intersection Location	Peak Traffic Volumes (vehicles per hour [vph])				
	Eastbound (a.m./p.m.)	Westbound (a.m./p.m.)	Southbound (a.m./p.m.)	Northbound (a.m./p.m.)	Total (a.m./p.m.)
La Cienega-Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach-Imperial	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: Appendix C

Operation of the proposed Project at buildout during AM peak hour would result in a total increase of 1,034 trips throughout the Project area and a total decrease of 1,716 trips in the PM peak hour throughout the Project area. These trips distributed throughout the Project area would not result in daily traffic volumes of 100,000 vehicles per day or more. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP; and are not high enough to generate a CO “hot spot.” Therefore, impacts related to CO “hot spots” from operation of the proposed Project would be less than significant.

Toxic Air Contaminants

Less than Significant with Mitigation Incorporated. CARB has issued advisory recommendations for siting new sensitive land uses in proximity to sources associated with Toxic Air Contaminants (TACs) and recommends performing site specific environmental evaluations. However, it is currently unknown what development projects that could include a sensitive receptor would be proposed next to an existing TAC, such as warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day. Therefore, consistent with CARB guidance, Mitigation Measure AQ-3 is included to require a site-specific evaluation prior to approving any sensitive land use in proximity to an existing TAC within the Project area. Implementation of Mitigation Measure AQ-3 would reduce potential impacts related to TACs to a less-than-significant level.

5.2.6 CUMULATIVE IMPACTS

As described previously, per the SCAQMD’s methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD’s thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described under Impact AQ-2 above, emissions from construction of the proposed Project could exceed the SCAQMD’s thresholds after implementation of SCAQMD rules and mitigation measures. Also, emissions from operation of the proposed Project at buildout would exceed SCAQMD’s threshold for CO, VOC, and NO_x after implementation of mitigation measures. Because the large majority of operational-source CO and NO_x emissions (by weight) would be generated by project vehicles, and the VOC emissions would be generated by consumer products that neither future project applicants nor the City have the ability to reduce emissions of. Therefore, similar to the analysis presented in the General Plan EIR, operational-source CO, VOC, and NO_x emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

5.2.7 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)

- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1108: Volatile Organic Compounds
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1143: Paint Thinners and Solvents

Plans, Programs, or Policies

None.

5.2.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact AQ-1: Buildout of the proposed Project would increase the frequency or severity of existing air quality violations, and an impact regarding AQMP Consistency Criterion No. 2 would occur.

Impact AQ-2: Construction and operation associated with buildout of the proposed Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the Basin.

Impact AQ-3: Buildout of the proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors.

5.2.9 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:

- Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards.

- Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes.
- Require the use of “Super-Compliant” low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings.
- The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.
- The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment.
- The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer’s specification. Maintenance records shall be available at the construction site for City verification.

Mitigation Measure AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD’s most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:

- Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized;
- Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC);
- Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insulation (R-8);
- Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF);
- Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.
- Landscaping palette of drought tolerant plants exceeding City requirements;
- Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use);

- U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.

Mitigation Measure AQ-3: Toxic Air Contaminants. Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM₁₀ concentrations exceed 2.5 microgram per cubic meter (µg/m³), PM_{2.5} concentrations exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better).

5.2.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact AQ-1: Land use change of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation. Therefore, the proposed Project would result in a conflict with, or obstruct, implementation of the AQMP and impacts would be **significant and unavoidable**.

Impact AQ-2: Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1.

Emissions from operation of the proposed Project at buildout would exceed SCAQMD's thresholds for CO, VOC, and NO_x after implementation of regulations and Mitigation Measure AQ-2. Because a majority of operational-source CO and NO_x emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NO_x emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be **significant and unavoidable**.

Impact AQ-3: After implementation of Mitigation Measures AQ-1 through AQ-3, localized emissions could exceed the SCAQMD's localized significance threshold for a pollutant. Thus, impacts would be **significant and unavoidable**.

5.2.11 REFERENCES

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(Appendix C)

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5.3 Cultural Resources

5.3.1 INTRODUCTION

This section addresses potential environmental impacts from buildout pursuant to the Redlands RHNA Rezone Project on cultural resources, which include historical and archaeological resources. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

In accordance with Public Resources Code Section 15120(d), certain information and communications that disclose the location of archaeological sites and sacred lands are allowed to be exempt from public disclosure.

Cultural Resources Terminology

- **Archaeological resources** include any material remains of human life or activities that are at least 100 years of age, and that are of scientific interest. A unique or significant archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Cultural resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to the California Environmental Quality Act (CEQA).
- **Historic building or site** is one that is noteworthy for its significance in local, State, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic context** refers to the broad patterns of historical development in a community or its region that is represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.
- **Historic integrity** is defined as “the ability of a property to convey its significance.”
- **Historical resources** are defined as “a resource listed or eligible for listing on the California Register of Historical Resources” (CRHR) (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term “historical resources” includes the following:
 - (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).
 - (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
 - (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific,

economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in California's past;
 - (C) 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; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

5.3.2 REGULATORY SETTING

5.3.2.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria per 36 Code of Federal Regulations Part 60:

- a) Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
- b) Properties that are associated with the lives of persons significant in our past;
- c) Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic "integrity," which is "the ability of a property to convey its significance." The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the NRHP are also eligible for listing in the California Register of Historic Resources, and as such, are considered historical resources for CEQA purposes.

National Register of Historic Places

The National Register of Historic Places (NRHP) was established by the NHPA of 1966 as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A** It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B** It is associated with the lives of persons who are significant in our past;
- Criterion C** It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D** It has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources.

5.3.2.2 State Regulations

California Register of Historical Resources

Eligibility for inclusion in the California Register of Historical Resources (CRHR) is determined by applying the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. It is associated with the lives of persons important in California’s past;
3. 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 value; or
4. It has yielded or is likely to yield information important in prehistory or history. The Register includes properties which are listed or have been formally determined to be eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest (PRC §5024.1).

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Public Resources Code Section 5097.98

Public Resources Code Section 5097.98 provides guidance on the appropriate handling of Native American remains. Once the California Native American Heritage Commission (NAHC) receives notification from the Coroner of a discovery of Native American human remains, the NAHC is required to notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

CEQA Guidelines Section 15064.5

Section 15064.5 provides guidelines for determining the significance of impacts to archaeological and historical resources. The section provides the definition of historical resources, and how to analyze impacts to resources that are designated or eligible for designation as a historical resource. Section 15064.5 additionally provides provisions for the accidental discovery or recognition of human remains in any location other than a dedicated cemetery.

5.3.2.3 Local Regulations

City of Redlands General Plan 2035

The City of Redlands General Plan Distinctive City Element contains the following policies and actions related to historical and archaeological resources that are applicable to the proposed Project:

Principle 2-P.8	Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and
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	rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.
Principle 2-P.9	Provide incentives to protect, preserve, and maintain the City's heritage
Principle 2-P.11	Encourage retention of the character of existing historic structures and urban design elements that define the built environment of the City's older neighborhoods.
Principle 2-P.12	Encourage retention of historic structures in their original use or reversion to their original use where feasible. Encourage sensitive, adaptive reuse where the original use is no longer feasible.
Principle 2-P.14	Coordinate preservation of historic resources with policies designed to preserve neighborhoods and support the affordability of housing in historical structures.
Principle 2-P.15	Balance the preservation of historic resources with the desire of property owners of historic structures to adopt energy efficient strategies.
Action 2-A.25	Require any application that would alter or demolish an undesignated and unsurveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.
Action 2-A.26	Provide development standards and guidelines to encourage conversion of historic structures to alternative uses without compromising the quality of the neighborhood if preservation of the original use is an economic hardship.
Action 2-A.34	<p>Uphold the designation of the following streets within the city as scenic highways, drives, and historic streets. Special development standards have been adopted by Resolution for these streets. The streets are:</p> <ul style="list-style-type: none"> • Brookside Avenue, from Lakeside Avenue to Eureka Street; • Olive Avenue, from Lakeside Avenue to Cajon Street; • Center Street, from Brookside Avenue to Crescent Avenue; • Highland Avenue, from Serpentine Drive to Cajon Street; • Sunset Drive, from Serpentine Drive to Edgemont Drive; • Cajon Street; • Mariposa Drive, between Halsey and Sunset Drive; and • Dwight Street, between Pepper Street and Mariposa Drive. <p>In addition, consider designating the following roads as scenic drives within the community as neighborhood connectors and recreational routes for drivers and bike riders.</p> <ul style="list-style-type: none"> • Riverview Drive along the Santa Ana River Wash; • Like Oak Canyon Road; • San Timoteo Canyon Road; • Sylvan Boulevard; • Nevada Street, from the Orange Blossom Trail to Barton Road; • Pioneer Avenue, from River Bend Drive to Judson Street; and • Rural roads in Crafton.

Action 2-A.37	Maintain and improve City-owned historic buildings and houses in an architecturally and environmentally sensitive manner.
Action 2-A.38	Use exemplary design quality and sensitivity to surrounding historic structures in new City construction, public works, entry ways, and City signs.
Action 2-A.39	Ensure that permanent changes to the exterior or setting of a designated historic resource be done in accordance with the Secretary of the Interior standards for historic properties.
Action 2-A.41	Encourage appropriate adaptive reuse of historic resources in order to prevent disuse, disrepair, and demolition, taking care to protect surrounding neighborhoods from disruptive intrusions.
Action 2-A.42	Should demolition of a designated historic resource occur, endeavor to ensure that a building of equal or greater design quality and/or use of equal or greater benefit to the community be constructed. Require that a report documenting the history of the property and archival-quality drawings and/or photographic records be prepared to document the historic resource.
Action 2-A.43	Institute an architectural salvage program to preserve architectural artifacts from buildings that are demolished.
Action 2-A.48	Establish design review guidelines for historic areas to ensure that new architecture will relate to and respect the historical and environmental context.
Action 2-A.70	Encourage preservation of historic public and private improvements, such as street curbs, street trees, specimen trees, streetlights, hitching posts, masonry walls, unpaved and early paved sidewalks, etc.

City of Redlands Historic and Scenic Preservation Ordinance

The City of Redlands maintains its own local designation program for historic and scenic properties within the city. The Redlands Historic and Scenic Preservation Commission was established in 1986 to make recommendations, decisions, and determinations regarding the designation and protection of the historical, scenic, and cultural resources in Redlands. The Historic and Scenic Preservation Commission also reviews any exterior modifications to a designated historic resource or the demolition of a designated resource or any structure over fifty years old.

Redlands has eight locally-designated historic districts, none of which are located in proximity to the Rezone sites:

- Eureka Street Historic District
- West Highland Avenue Historic and Scenic District
- Early Redlands Historic and Scenic District
- Normandie Court Historic District
- East Fern Avenue Historic and Scenic District
- Garden Hill Historic and Scenic District
- La Verne Street Historic and Scenic District
- Smiley Park Historic and Scenic District

Redlands Historic Architectural Design Guidelines

The City of Redlands adopted an update to the City of Redlands Historic Architectural Design Guidelines on September 3, 2024. The Redlands Historic Architectural Design Guidelines provide historic preservation standards and resources for property owners, design professionals, the City of Redlands Planning Department, and the Historic and Scenic Preservation Committee. The Design Guidelines provide standards for best preservation practices and contextual design when undertaking an exterior alteration or addition, changes to site or accessory features, restoration or rehabilitation of a historic building, or new construction on or adjacent to a historic site, historic and/or scenic district, or Character Category. The Design Guidelines also inform the reviews of demolition permit applications for structures that may be eligible or potentially eligible for local designation or preservation.

East Valley Corridor Specific Plan Preservation Overlay District

The East Valley Corridor Specific Plan provides for a Preservation – Historical/Archaeological Overlay District (“Preservation Overlay District”) in Division 5 of the Specific Plan, which is intended to preserve and protect historical and archaeological resources. The Preservation Overlay District provides development standards for developments within the district that are in addition to those required by the Specific Plan. Within the East Valley Corridor Specific Plan, the Preservation Overlay District is applied to areas approximately 600 feet on either side of the historic alignment of the Mission Zanja irrigation canal and to potential historic structures. The development standards set forth within the Preservation Overlay District set forth requirements for investigation, data recovery, and preservation of archaeological and historic resources (City of Redlands, 2024).

5.3.3 ENVIRONMENTAL SETTING

Historic Setting

An asistencia was established in Redlands in 1819 to help facilitate the Mission San Gabriel Arcángel's control and colonization of the surrounding rancheria. Missionaries instructed Serrano, Gabrieleño, and Cahuilla workers to build the Mill Creek Zanja, a 12-mile-long irrigation ditch routing water from Mill Creek to Guachama Rancheria, which served as the area's first stable water resource. In 1842, the Lugo family, including José del Carmen Lugo, José María Lugo, Vicente Lugo, and Diego Sepulveda, received a land grant, Rancho San Bernardino, which encompassed the San Bernardino and Yucaipa valleys, including present day Redlands.

In 1881, E.G. Judson and Frank E. Brown formed the Redlands Water Company and began construction of a water canal to supply future citrus groves. During the development, the pair noticed the red-colored adobe soil and gave the new town its name, Redlands. Three years later, Brown built the Bear Valley Dam and reservoir, securing a steady supply of water for the town and associated citrus groves. With a stable water source and booming railways, the City of Redlands experienced a development boom with the creation of paved streets, sidewalks, sewage, and electricity systems. The City was officially incorporated in 1888. For 75 years, citrus growing was the main economic source for the City. The citrus industry eventually declined and agricultural areas were replaced with subdivisions.

Archaeological Resources

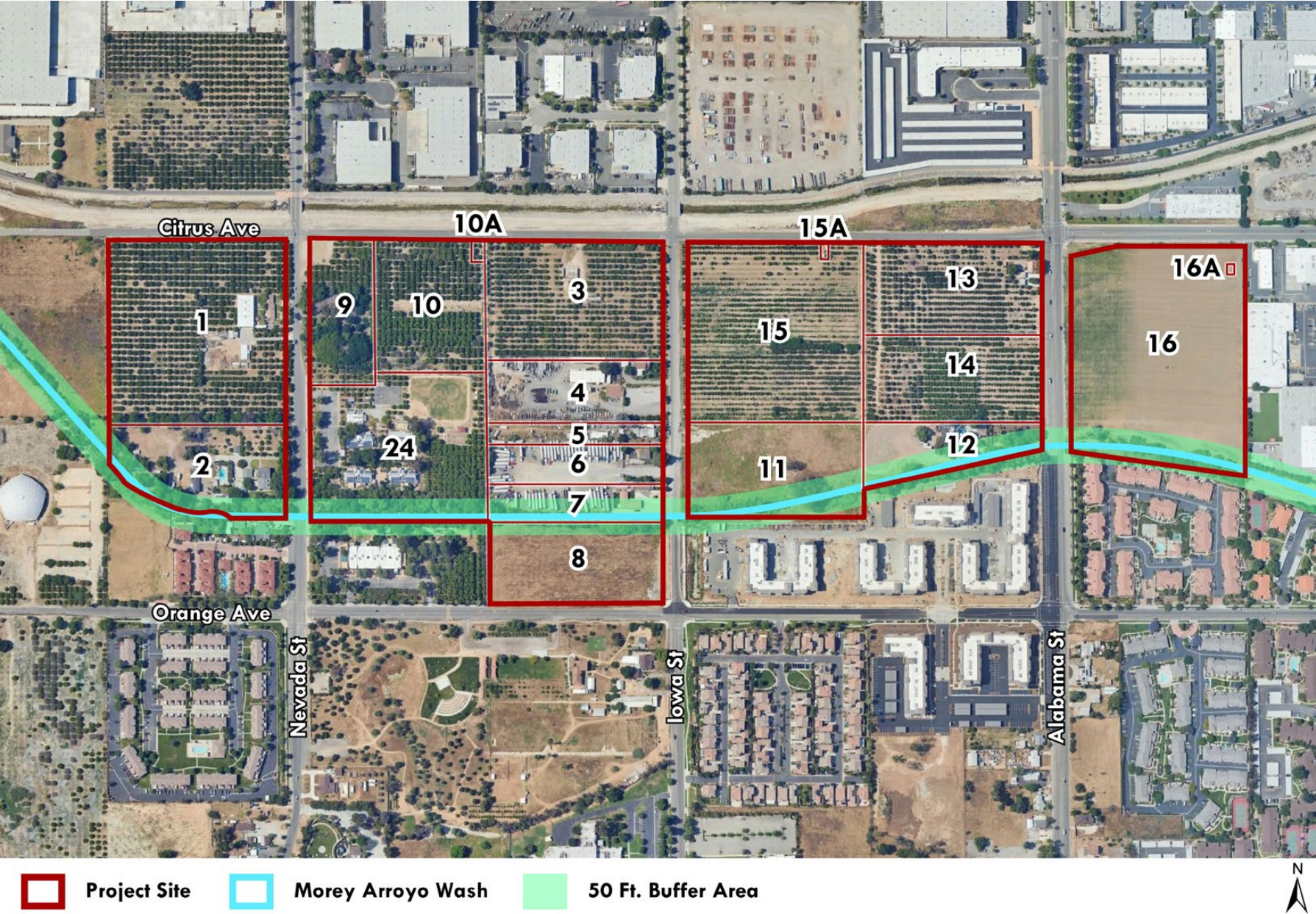
Archaeological sensitivity in the City of Redlands is often related to proximity to the City's numerous waterways, many of which were constructed to serve as storm water ditches in the 1800s. As shown in Figure 5.3-1, multiple Rezone sites are located in close proximity to the Morey Arroyo. The Morey Arroyo borders Sites 2, 24, 7, 12, and 16 to the south and Site 8 to the north. Site 11 contains a portion of the Morey Arroyo

in the southern part of the site, within the property line. The Morey Arroyo is a partially improved natural drainage that has been used as a storm water ditch since the 1800s. A portion of the Morey Arroyo (Site 36-029388) was originally recorded in 2014 and subsequently an additional portion was recorded in 2018 (McKenna, 2015).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources.

Morey Arroyo Buffer Area



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5.3.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- CUL-3 Disturb any human remains, including those interred outside of formal cemeteries.

The Initial Study established that the proposed Project would result in less-than-significant impacts with mitigation related to Threshold CUL-1 and less-than-significant impacts related to Threshold CUL-3, and no further assessment of these impacts is required in this Draft Subsequent EIR. Mitigation Measures CUL-1 and CUL-2 from the Initial Study are included below in Section 5.3.10, *Mitigation Measures*.

5.3.5 METHODOLOGY

In determining whether an archaeological related impact would result from the proposed Project, the programmatic analysis includes consideration of the archaeological sensitivity of the Rezone sites and the past disturbance within the Rezone sites. The analysis combines these factors to identify the potential of construction from implementing projects to impact any unknown archaeological resources. This analysis is partially based on the records search results conducted for the General Plan EIR at the South Central Coastal Information Center (SCCIC), located at the California State University, Fullerton, and at the Eastern Information Center (EIC), located at University of California Riverside.

5.3.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to cultural resources in Chapter 3.8. The General Plan EIR described that future development pursuant to the General Plan could result in impacts on historical and archaeological resources within the city. The EIR describes that policies included in the General Plan would serve to protect cultural resources. In addition, the General Plan EIR describes that future projects would require project-level CEQA analysis, which would identify potential impacts on known or potential historic sites and structures. Therefore, the EIR concluded that implementation of the General Plan would result in less-than-significant impacts to historical resources with adherence to General Plan policies and federal, State, and local regulations. The General Plan EIR discussed that the entire city has not been surveyed for archaeological resources and that there is potential for new archaeological resources to be discovered in the future. Future development pursuant to the General Plan may involve grading, excavation, or other ground-disturbing activities, which could disturb or damage unknown archaeological resources. However, the General Plan EIR concluded that General Plan policies would require that areas identified to contain archaeological resources be evaluated and include mitigation, and impacts would be less than significant. In addition, the General Plan EIR concluded that adherence to Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5 would reduce impacts related to the disturbance of human remains to a less-than-significant level (City of Redlands, 2017b, pp. 3.8-23 – 3.8-24).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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).

IMPACT CUL-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO CEQA GUIDELINES SECTION 15064.5.

Less than Significant with Mitigation Incorporated. The Project site is located in an urbanized or urbanizing area. Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 are heavily disturbed by development, current agricultural activities, or previous agricultural activities and do not contain any known resources that would increase the archaeological sensitivity of the sites. In addition, these sites are already slated for urban development activities pursuant to their respective current General Plan land use and zoning designations, as analyzed in the General Plan EIR. However, future development pursuant to the Redlands RHNA Rezone Project could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources. As such, future development projects within Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 would be required to implement Mitigation Measure CUL-3, which requires preparation of an archaeological resource assessment of the specific site and proposed development in accordance with the California Office of Historic Preservation. On properties where the potential for resources is identified through implementation of Mitigation Measure CUL-3, 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 Measure CUL-4.

In addition, the Morey Arroyo is located adjacent to or partially within Sites 2, 7, 8, 11, 12, 16, and 24. While other segments of the Morey Arroyo were found to not constitute significant archaeological resources, water sources within the City are known to result in increased archaeological sensitivity in the surrounding areas. Therefore, future site-specific development projects pursuant to the Redlands RHNA Rezone Project within proximity to the Morey Arroyo could result in ground disturbing activities in areas highly sensitive for archaeological resources and could result in disturbance of unknown archaeological resources. Therefore, any future development in Sites 2, 7, 8, 11, 12, 16, and 24 that results in ground disturbing activities within 50 feet of the Morey Arroyo would be required to implement Mitigation Measure CUL-4 due to the high archaeological sensitivity.

With implementation of Mitigation Measures CUL-3 and CUL-4, impacts related to a substantial adverse change in the significance of an archaeological resource during buildout pursuant to the Redlands RHNA Rezone Project would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to archaeological resources would be less than significant.

5.3.7 CUMULATIVE IMPACTS

Cumulative impacts on cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic ethnic sites or an industry (e.g., Santa Fe Depot), that

occur within a larger geographic context than a site-specific development project site. Thus, this analysis considers cumulative development within the Valley Region of San Bernardino County, which is identified as sensitive for archaeological resources.

As described above, there is a possibility that ground-disturbing activities during future construction may uncover or disturb unknown archaeological resources. However, implementation of Mitigation Measures CUL-3 and CUL-4 would reduce the potential impact to unknown resources. The likelihood of uncovering multiple currently unknown resources within the previously developed area that is sufficient to create a significant cumulative impact is low given the disturbed nature of the Sites and the few archaeological resources that have been found in the City to date. Thus, the cumulative effects of development on archaeological resources from implementation of the proposed Project with mitigation in combination with other projects would be less than significant.

5.3.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies

PPP CUL-1 The City of Redlands Historic Architectural Design Guidelines shall apply to all projects within the RHNA Rezone area. 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.

5.3.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact CUL-2 would be **potentially significant**.

5.3.10 MITIGATION MEASURES

Initial Study Mitigation Measures

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-1, 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.

EIR Mitigation Measures

MM CUL-3 Archeological Resources Assessment. Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G. Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply.

MM CUL-4 Archaeological Monitoring/Preservation.

- *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling,

pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:

- Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report.
- Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.

If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer)

shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.

A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.

- *Moderately Sensitive Sites:* If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:
 - Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report.
 - Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.

If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer)

shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.

A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.

5.3.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact CUL-2 would be less than significant after mitigation.

5.3.12 REFERENCES

- Architectural Resources Group. (August 2018). *Redlands Historic Architectural Design Guidelines*. Retrieved July 2, 2024, from https://cityofredlands.org/sites/main/files/file-attachments/redlands_design_guidelines_draft_pages_reduced.pdf
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5.4 Energy

5.4.1 INTRODUCTION

This section of the Draft Subsequent EIR assesses the significance of the use of energy, including electricity, natural gas, and gasoline and diesel fuels, that would result from buildout pursuant to the proposed Redlands RHNA Rezone Project. It discusses existing energy use patterns and examines whether the proposed RHNA (including development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner.

Refer to Section 5.5, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 5.12, *Utilities and Service Systems*, for a discussion of water consumption.

This section includes data from the following City documents and reports:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- *City of Redlands Municipal Code*; and
- *Regional Housing Needs Assessment Energy Tables*, Urban Crossroads, September 2024. Appendix D.

5.4.2 REGULATORY SETTING

5.4.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, and promote research for alternative energy, as well as additional research in carbon capture, international energy programs, and the creation of green jobs.

5.4.2.2 State Regulations

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24, Part 6, *California Energy Code*, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24, Part 11, *California Green Building Standards* (CALGreen), was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022

California Green Building Standards that became effective January 1, 2023. The updated 2022 standards include the following:

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).
 - New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
 - New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
 - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
 - Operations and maintenance instructions for the following:
 - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
 - Roof and yard drainage, including gutter and downspouts.
 - Space conditioning systems, including condensers and air filters.
 - Landscape irrigation systems.
 - Water reuse systems.
 - Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
 - Public transportation and/or carpool options available in the area.
 - Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
 - Information about water-conserving landscape and irrigation design and controllers which conserve water.

- Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
- Information about state solar energy and incentive programs available.
- A copy of all special inspection verifications required by the enforcing agency of this code.
- Information from CALFIRE on maintenance of defensible space around residential structures.
- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.
- Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the CARB [California Air Resources Board] Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its gloss, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled onsite until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CALGreen has been adopted by the City of Redlands by reference in Municipal Chapter 15.16.

5.4.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Sustainable Community Element contains the following policies related to energy that are applicable to the Project:

- Principle 8-P.1** Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.
- Action 8-A.8** Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.
- Action 8-A.9** Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.

5.4.3 ENVIRONMENTAL SETTING

Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Redlands. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2023 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut GHG emissions 40 percent below 1990 levels by 2030 and 80 percent from the same baseline by 2050 in order to help achieve carbon neutrality by 2045. It describes that in 2023 approximately 49 percent of power that SCE delivered to customers came from carbon-free resources (SCE, 2023).

The Project site is currently served by the electricity distribution systems that exist along the roadways throughout the Project area.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Redlands and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of 2 percent each year through 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure. The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2040 in its 2024 report (CGEU, 2024).

The Project site is currently served by the natural gas distribution system that exists within the roadways throughout the Project site.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the annual consumption of 4,330,815 gallons of fuel per year from traffic, 31,062,419 kBTU per year, and 19,869,824 kWh per year.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a project could have a significant effect if it were to:

- E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.4.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a proportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of onsite renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.”

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used. Energy usage during project operation would be considered “wasteful, inefficient, and unnecessary” if the project were to violate federal, State, and/or local energy standards, including Title 24 of the California Code of Regulations, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

5.4.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that future development would result in an increased use of energy since there would be an additional demand for electricity and natural gas supply and services. Despite the overall increase in future energy use with implementation of the State’s current and future energy code and the General Plan policies, energy efficient designs in new developments would be ensured. As a result, the General Plan EIR concluded that there is a less-than-significant impact related to development under the General Plan causing a wasteful, inefficient, and unnecessary consumption of energy during construction, operation, and/or maintenance. It was also determined that the General Plan would have a less-than-significant impact related to conflict with the California Energy Efficiency Standards, the California Air Resources Board (CARB) passenger vehicle GHG emission reduction targets for 2020 and 2035, or any other applicable energy conservation regulations.

Proposed Project

As detailed in Section 3.0, *Project Description*, the proposed Project would rezone 24 sites totaling 116.19 acres for the City of Redlands Housing Element Regional Housing Needs Allocation (RHNA). Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses, 111 multi-family dwelling units, to residential uses with an allowed capacity of 2,436 units and 151,048.46 SF of Public/Institutional development. 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). However, the timing of development and operation of the development pursuant to the RHNA rezone would be dependent upon market conditions and development applications for new projects.

IMPACT E-1: THE PROJECT WOULD NOT RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES, DURING PROJECT CONSTRUCTION OR OPERATION.

Construction

Less than Significant Impact. Construction of future new uses pursuant to the proposed zoning would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities pursuant to buildout of the proposed rezoned sites would not involve consumption of natural gas because the construction-related equipment would not be powered by natural gas. Construction activities are not expected to result in demand for fuel greater on a per-unit-of-development basis than either that used to buildout the existing land use and zoning designations and other development projects in Southern California as each project would be reviewed and permitted pursuant to City requirements, including Title 24 and CALGreen. Also, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment.

Construction contractors are required to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Overall, construction activities would be required by City permitting to comply with all existing regulations and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation

Less than Significant Impact. Once operational, the new developments from both the buildout of the existing General Plan land uses and the proposed rezoning provide for urban uses that would generate demand for electricity and natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be used. This use of energy is typical for urban development, and no operational activities or land uses are included that would result in extraordinary energy consumption.

As described above, buildout of the Project site with the existing General Plan land uses would result in development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family residences, whereas buildout of the proposed Project would result in development of 2,436 residential units and 151,048.46 SF of Public/Institutional development. As detailed in Section 5.10, *Transportation*, buildout pursuant to the proposed Project is forecasted to generate a net decrease of 27,450 average daily trips, net increase of 1,034 AM trips, and net decrease of 1,716 PM trips. As such, buildout pursuant to the Project would result in decreased daily vehicle trips compared to buildout pursuant to the existing General Plan. The estimated transportation energy demands from the existing General Plan buildout are summarized in Table 5.4-1.

Table 5.4-1: Existing General Plan Buildout Traffic Annual Fuel Consumption

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)
Approved GP Buildout (All Vehicles)	93,509,476	4,330,815

Source: Appendix D.

As detailed in Table 5.4-2, operation of the proposed Project at buildout is estimated to annually use 2,081,210 gallons of fuel, which is an net decrease of 2,249,606 gallons of fuel compared to buildout of the existing General Plan land uses of the Project sites.

Table 5.4-2: Project-Generated Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT ¹	Estimated Annual Fuel Consumption (gallons)
LDA	39.94	29,560,918	740,041
LDT1	30.29	2,006,017	66,234
LDT2	30.34	14,420,934	475,322
MDV	25.15	9,321,507	370,627
LHD1	23.08	1,667,662	72,259
LHD2	21.02	455,739	21,678
MHD	12.16	1,238,093	101,833
HHD	7.82	1,254,368	160,374
OBUS	8.08	32,700	4,046
UBUS	12.86	17,884	1,391
MCY	43.29	1,214,606	28,060
SBUS	7.28	62,867	8,637
MH	5.98	183,552	30,707
Total (All Vehicles)		61,436,848	2,081,210
Approved GP Buildout (All Vehicles)		93,509,476	4,330,815
Net (Proposed – Approved GP Buildout)		-32,072,628	-2,249,606

Source: Appendix D.

Table 5.4-3 details that operation of the proposed rezoning at buildout would use approximately 30,522,697 thousand British thermal units (kBtu) per year of natural gas and 11,493,948 kWh per year of electricity. The proposed Project would result in an estimated annual net decrease of 539,722 kBtu/year of natural gas and an annual decrease of 8,375,876 kWh/year in electricity compared to operation of the existing General Plan land uses at buildout.

Table 5.4-3: Project Annual Operational Natural Gas and Electricity Demand Summary

Land Use	Natural Gas Demand (kBtu/year)	Electricity Demand (kWh/year)
Multi-family Housing	26,886,569	10,514,171
Day Care Center	3,636,128	979,777
Total Project Energy Demand	30,522,697	11,493,948

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Approved GP Buildout Energy Demand	31,062,419	19,869,824
Net (Proposed – Approved GP Buildout)	-539,722	-8,375,876

Source: Appendix D.

The proposed Project would result in less energy consumption compared to buildout of the existing General Plan. Additionally, because this use of energy is typical for urban development, no operational activities or land uses would occur that would result in extraordinary energy consumption, and through City permitting, assurance would be provided that existing regulations related to energy efficiency and consumption, such as Title 24 regulations, would be implemented. Likewise, many of the future developments would include solar panels on rooftops and over parking areas to provide onsite energy generation. Each future project would be reviewed for inclusion of solar infrastructure as required by CALGreen regulations through the City's development review and permitting process. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources from operational activities would be less than significant.

IMPACT E-2: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

No Impact. As described previously, the development that would occur pursuant to the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of future development projects. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Likewise, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Future buildings pursuant to the proposed zoning would have solar infrastructure as required by CCR Title 24 requirements. Thus, the Project would not obstruct use of renewable energy or energy efficiency. Overall, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR.

5.4.7 CUMULATIVE IMPACTS

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within Southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the Southern California region.

All development projects throughout the region would be required to comply with the energy efficiency standards in Title 24. Additionally, some of the developments would provide for additional reductions in energy consumption by use of solar panels, sky lights, or other types of energy efficiency infrastructure. With implementation of the existing energy conservation regulations, electricity and natural gas consumption would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed zoning would be primarily attributable to transportation, especially vehicular use. However, State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and would be less than cumulatively considerable.

5.4.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

The following standard regulations would reduce potential impacts related to energy:

- California Energy Code (Code of Regulations, Title 24 Part 6).
- CALGreen as included in the City's Municipal Code in Chapter 15.16.

Plans, Programs, or Policies

None.

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts E-1 and E-2 would be less than significant.

5.4.10 MITIGATION MEASURES

Impacts related to energy would be less than significant and no mitigation measures are required.

5.4.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant.

5.4.12 REFERENCES

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5.5 Greenhouse Gases

5.5.1 INTRODUCTION

This section evaluates the potential for implementation of the proposed Project to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, impacts of the proposed Project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing GHG emissions. The analysis within this section is based on the following City documents and technical report prepared for the Project:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- *City of Redlands Municipal Code*; and
- *Regional Housing Needs Assessment Rezone Greenhouse Gas Impact Analysis*, Urban Crossroads, September 2024. Included as Appendix E.

5.5.2 REGULATORY SETTING

5.5.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

5.5.2.2 State Regulations

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted Assembly Bill (AB) 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). In September 2009, CARB adopted amendments to the Pavley Regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway

Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the “Low Emission Vehicle” (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was signed by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), which created a comprehensive, multi-year program to reduce GHG emissions in California to 1990 levels by 2020. This goal has been met.¹ GHGs as defined under AB 32 include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride (NF₃), has also been added to the list of GHGs. CARB is the State agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

“Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.”

Senate Bill 375 (Chapter 728, Statutes of 2008)

In August 2008, the Legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, Senate Bill [SB] 375, which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through

¹ Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 MMTCO₂e (Appendix E). This is less than the 2020 emissions target of 431 MMTCO₂e.

alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375 provides incentives for streamlining CEQA requirements by substantially reducing the requirements for “transit priority projects,” as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State’s 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor’s Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C, the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Senate Bill 32 (Chapter 249, Statutes of 2016)

Senate Bill 32 was signed on September 8, 2016, by Governor Jerry Brown. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. A related bill that was also approved in 2016, AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that ARB is not only responsive to the Governor, but also the Legislature.

Senate Bill 97 (Chapter 185, Statutes of 2007)

SB 97 (Health and Safety Code Section 21083.5) was adopted in 2007 and required the Office of Planning and Research to prepare amendments to the CEQA Guidelines for the mitigation of GHG impacts. The amendments became effective on March 18, 2010. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. A new section, CEQA Guidelines Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. The CEQA Section gives discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. CEQA does not provide guidance to determine whether the project’s estimated GHG emissions are significant or cumulatively considerable.

Also amended were CEQA Guidelines Sections 15126.4 and 15130, which address mitigation measures and cumulative impacts, respectively. However, GHG mitigation measures are referenced in general terms, and no specific measures are identified. Additionally, the revision to the cumulative impact discussion requirement (Section 15130) simply directs agencies to analyze GHG emissions in an EIR when a project’s incremental contribution of emissions may be cumulatively considerable, however it does not answer the question of when emissions are cumulatively considerable.

Section 15183.5 permits programmatic GHG analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support a determination

that a project's cumulative effect is not cumulatively considerable, according to proposed Section 15183.5(b).

California Air Resources Board Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the previous 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation; the regulations that effect this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

“The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution.”

“[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies.”

Under the 2022 Scoping Plan, the 2045 carbon neutrality goal is to be implemented by the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.

- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects; CARB states in Appendix D (page 4) that this section "...focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

California Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24 Part 11: California Green Building Standards (CALGreen) was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective January 1, 2023.

The 2022 CALGreen Building Standards Code has been adopted by the City of Redlands in Section 15.16 of the City's Municipal Code.

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).

- New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
- New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWEL0), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
 - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
 - Operations and maintenance instructions for the following:
 - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
 - Roof and yard drainage, including gutter and downspouts.
 - Space conditioning systems, including condensers and air filters.
 - Landscape irrigation systems.
 - Water reuse systems.
 - Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
 - Public transportation and/or carpool options available in the area.
 - Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
 - Information about water-conserving landscape and irrigation design and controllers which conserve water.
 - Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
 - Information about state solar energy and incentive programs available.
 - A copy of all special inspection verifications required by the enforcing agency of this code.
 - Information from CALFIRE on maintenance of defensible space around residential structures.
- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.

- Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the CARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its gloss, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section
- 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWEL0), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5.5.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Sustainable Community Element contains the following policies related to GHG emissions that are applicable to the Project:

- Principle 8-P.1** Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.
- Action 8-A.8** Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.
- Action 8-A.9** Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.
- Action 8-A.10** Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.
- Principle 8-P.8** Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.

City of Redlands Climate Action Plan

The City of Redlands Climate Action Plan (CAP) was designed to reinforce the City's commitment to reducing GHG emissions and demonstrate compliance with the State's GHG emissions reduction standards. The CAP includes goals and policies to promote energy efficiency, waste reduction, and resource conservation and

recycling. The CAP's GHG emission targets and goals were based on meeting the goals in Executive Order B-30-15 and SB 32 and the 2017 Scoping Plan. The CAP used the 2017 Scoping Plan's recommended Plan Level emissions target of 6.0 MTCO₂e per capita per year for 2030. Based on the CAP analysis, the City of Redlands will achieve the 2030 target based on State actions and existing development standards and would not require any specific measures to reduce GHG emissions. Regardless, the CAP does recommend some actions including encouraging the development of solar photovoltaic systems on residential and non-residential development, increasing energy efficiency 5 percent over standards, increasing the use of high efficiency lighting, and reducing the intensity of GHG emissions associated with water delivery and treatment.

5.5.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potentials, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e. Large emission sources are reported in million metric tons (MMT) of CO₂e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide (CO₂): CO₂ is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane (CH₄): CH₄ is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide (N₂O): N₂O (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride (SF₆): SF₆ is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons (PFCs): PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons (HFCs): HFCs are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years. Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects:

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities, and other equipment used directly by land uses onsite. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal, which produce offsite emissions.

Existing Project Site Conditions

The Project site area consists of about 116.19 acres, which includes 24 sites. Sites 1 through 16A and 24 are located south of Citrus Avenue. Many of these sites are vacant or are being used for agricultural purposes; however, a few sites contain single-family residences, and others are used for industrial storage. Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. These sites are currently vacant and covered with non-native grasses. No activities other than occasional disking occur. The existing GHG emissions from the Project site are limited due to the limited development of the area. The existing primary GHG emissions in the Project site area are from on-road transportation, building energy, and waste.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would generate approximately 46,446.76 MT per year of CO₂e or 18.16 CO₂e per service population.

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- GHG-1 Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- GHG-2 Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4 provides discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant, but recommends that lead agencies consider several factors that may be used in the determination of significance of project related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15130(f) describes that the effects of GHG emissions are by their very nature cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Additionally, CEQA Guidelines Section 15064(h)3 states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lessen the cumulative problem.

The SCAQMD formed a working group to identify greenhouse gas emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO₂e per year
 - Based on land use type:
 - Residential: 3,500 MTCO₂e per year
 - Commercial: 1,400 MTCO₂e per year
 - Mixed use: 3,000 MTCO₂e per year
- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.

- Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
- Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 MTCO_{2e}/SP/year for projects and 6.6 MTCO_{2e}/SP/year for plans.
- Option 3, 2035 Target: 3.0 MTCO_{2e}/SP/year for projects and 4.1 MTCO_{2e}/SP/year for plans.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

The SCAQMD defines the Service Population (SP) used under Tier 4 thresholds as the total residents and employees associated with a project. The origin of the SP is based on CARB's 2008 Scoping Plan. The 2008 Scoping Plan identified that based on the GHG emissions inventories for the State, the people of California generate approximately 14 tons of GHG emissions per capita and would need to reduce annual emissions to approximately 10 tons per capita in order to meet the GHG reduction target of AB 32.

Relevant to the proposed Project, the SCAQMD Tier 4 Option 3 is to utilize an efficiency target. The SCAQMD has proposed targets for project-level and plan-level analysis. At the September 2010 working group meeting the SCAQMD recommended a project-level efficiency target of 4.1 MTCO_{2e}/SP as a 2035 target².

The calculations behind this option are based on a 40 percent reduction by the SB 375 target date of 2020 and the same inventory calculated by CARB. The 2020 4.8 MT/SP target is based on the same statewide 2020 GHG inventory in the CARB *Scoping Plan*. Overall, GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. This 40 percent reduction was applied to the 2020 targets, resulting in an efficiency threshold for plans of 4.1 MTCO_{2e}/yr and an efficiency threshold at the project level of 3.0 MTCO_{2e}/yr.

The SP threshold is widely accepted and used by numerous cities in the basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. The SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

“...the...screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO_{2e}/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their

² It should be noted that SCAQMD identifies a plan-level threshold of 4.1 MTCO_{2e} per SP. As a conservative measure, the Project utilizes the 3.0 MTCO_{2e} per SP as the basis of establishing long-term thresholds for buildout conditions.

overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility.”

Based on the type of programmatic planning project being proposed and the SCAQMD guidance described above, the City has determined that the SCAQMD’s Tier 4, Option 3 project-level efficiency threshold methodology is an appropriate significance criterion by which to determine whether the Project emits a significant amount of GHG due to the threshold’s applicability to programmatic planning projects. As such, based on SCAQMD guidance and to provide a conservative analysis of GHG emissions from buildout of the proposed Project, the SP threshold for the Project’s buildout year of 2035 is 3.0 MTCO_{2e}/yr. The proposed Project would be considered to create a significant cumulative GHG impact if implementation of the Project would exceed this threshold.

5.5.5 METHODOLOGY

The California Emissions Estimator Model (CalEEMod) version 2022.1.1.23 has been used to determine construction and operational GHG emissions for buildout of the proposed Project, based on the maximum development assumptions outlined in Section 3.0, *Project Description* and from buildout of the approved General Plan land uses. The purpose of the CalEEMod model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from measures incorporated into the Project to reduce or minimize GHG emissions. For construction phase Project emissions, GHGs are quantified and, per SCAQMD methodology, the total GHG emissions for construction activities are divided by 30-years, and then added to the annual operational phase of GHG emissions to determine whether the applicable threshold would be exceeded.

In addition, CEQA requires the lead agency consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, this section provides an analysis that details the relevant plans and policies and details whether the Project is consistent or would result in a conflict with the measures designed to reduce GHG emissions.

5.5.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that development under the proposed General Plan would increase GHG emissions. Future development projects and land uses proposed under the proposed General Plan would increase the population and employment in the city, and associated GHG emissions above existing conditions. However, implementation of the General Plan policies aimed at reducing GHG emissions, and the CAP that serves as the implementation tool for GHG monitoring and reporting, the General Plan would serve to implement a number of strategies and measures aimed at reducing GHG emissions. Therefore, future development projects under the General Plan and CAP would, by nature, result in reduced transportation GHG emissions. This achieves the overarching goals of local, regional, and State plans to reduce GHG emissions. As such, the General Plan EIR determined that buildout of the General Plan would result in less-than-significant GHG emissions and would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The General Plan EIR concluded that impacts from implementation of the proposed General Plan and CAP would be less than significant (City of Redlands, 2017b, p. 3.5-38).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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). As detailed in Section 5.10, *Transportation*, the proposed Project is anticipated to generate a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

Service Population (SP)

As detailed in Section 5.8, *Population and Housing*, the buildout of the proposed 2,325 extra residential units under the proposed Project would result in an increase of approximately 6,162 residents and the reduction on non-residential square footage would result in a reduction of approximately 1,713 employees compared to buildout of the existing zoning.

SCAG Connect SoCal Demographics and Growth Forecast information shows that the City had approximately 25,600 households and approximately 49,400 jobs in 2019 (SCAG, 2024). Thus, the City of Redlands has 1.93 jobs for each household. The proposed Project would reduce (improve) the jobs-housing ratio slightly by adding 2,325 residential units and provide a regional beneficial effect of providing the opportunity for housing where employees can easily travel to nearby employment opportunities. Thus, the additional residential units would only result in an increase in residents that would be new to the SP. As shown in Table 5.8-7, *General Plan and Proposed Project Population Growth*, of this Draft Subsequent EIR, the proposed Project would result in an increase of 6,162 residents at buildout, which is the SP that would be generated by the Project.

IMPACT GHG-1: THE PROJECT WOULD GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.

Significant and Unavoidable.

Construction

Construction activities would occur at different sites throughout the Project area pursuant to individual proposed developments. The site-specific development projects that would occur pursuant to the Project would be temporary at any one location, but numerous site-specific development projects are anticipated to occur pursuant to buildout of the proposed rezoning parcels. Construction of site-specific development projects would create new sources of GHGs and could contribute to global climate change. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. As described previously, the timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically over a 10-year period or longer. Because of the uncertainty of the specific timing and methods of construction activities for future site-specific development projects that would occur under the proposed Project, construction-related GHG emissions are speculative and cannot be accurately determined at this stage of the planning process, per CEQA Guidelines Section 15145. Thus, Mitigation Measure AQ-1 has been

included to require that future projects prepare a technical assessment of GHG emissions from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. Due to the variables that must be considered when examining GHG construction emissions, and because SCAQMD methodology includes amortizing construction emissions over 30 years and adding them to the operation of the Project to determine significance, it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant GHG impact. Further, the volume of GHG emissions that could be reduced through mitigation measures are specific to each proposed development, which are currently unknown.

Operation

Long-term operations from both buildout of the existing General Plan land uses and the proposed Project would generate GHG emissions from the following primary sources:

- **Area Source Emissions.** Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping.
- **Energy Source Emissions.** GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.
- **Mobile Source Emissions.** The Project related GHG emissions are derived primarily from vehicle trips generated by the Project, including employee trips to and from the Project area, truck trips associated with the proposed uses, and trips related to residential uses. Trip characteristics from the Project's Trip Generation (Appendix F) were utilized to quantify the GHGs from operation of the Project at buildout.
- **Water Supply, Treatment, and Distribution.** Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required depends on the volume of water as well as the sources of the water. For purposes of analysis, CalEEMod default parameters were used in modeling GHGs from Project water demand.
- **Solid Waste.** The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. For purposes of analysis, CalEEMod default parameters were used in modeling GHGs from Project generation of solid waste.

The operational emissions from buildout of the existing General Plan land use designations of the 24 Project sites, which would include 1,656,699.86 SF of commercial/industrial land uses, 552,340.90 SF of commercial land uses, and 111 multi-family dwellings are shown in Table 5.5-1. As shown, 46,446.76 MTCO₂e per year would be generated by operation of the existing General Plan land uses at buildout, which equates to 18.16 MTCO₂e/SP annually.

Table 5.5-1: Existing General Plan Buildout Operational GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Mobile Source	39,117.93	2.76	2.67	67.32	40,049.49
Area Source	73.21	0.00	0.00	0.00	73.41
Energy Source	4,790.37	0.44	0.04	0.00	4,813.13

Water Usage	455.87	10.67	0.26	0.00	799.25
Waste	203.19	20.31	0.00	0.00	710.90
Refrigerants	0.00	0.00	0.00	0.59	0.59
Total CO₂e (All Sources)	46,446.76				
Service Population (SP)	2,557.00				
Total CO₂e/SP	18.16				

Source: Appendix E

The annual GHG emissions from operation of the proposed Project at buildout are summarized in Table 5.5-2. As shown, operation of the Project at buildout and full occupancy would generate 23,660.41 MTCO₂e per year, which equates to a MTCO₂e/SP of 3.56, which would be substantially less than the emissions generated from buildout of the existing General Plan land uses; but would exceed the threshold of 3.0 MTCO₂e/SP. Thus, operational impacts related to GHG emissions would be significant.

Table 5.5-2: Proposed Project Operational Greenhouse Emissions at Buildout

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Mobile Source	18,890.95	0.73	0.87	10.34	19,180.17
Area Source	626.61	0.01	0.00	0.00	627.37
Energy Source	2,979.17	0.32	0.02	0.00	2,994.18
Water Usage	121.25	3.52	0.08	0.00	234.64
Waste	178.25	17.82	0.00	0.00	623.62
Refrigerants	0.00	0.00	0.00	0.42	0.42
Total CO₂e (All Sources)	23,660.41				
Service Population (SP)	6,637.00				
Total CO₂e/SP	3.56				
Screening Threshold (CO₂e)	3.00				
Threshold Exceeded?	Yes				

Source: Appendix E

Table 5.5-3 provides a comparison of the operational emissions from buildout of the existing General Plan land use designations (Table 5.5-1) and buildout of the proposed Project (Table 5.5-2). As shown on Table 5.5-3, the proposed Project would result in fewer GHG emissions per capita than emissions occurring under buildout of the existing General Plan.

Table 5.5-3: Comparison of Operational Greenhouse Emissions

Emission Source	Emissions (MT/yr)
Proposed Project	3.56
Approved General Plan Buildout	18.16
Net Emissions (Proposed – Approved)	-14.60

Source: Appendix E

However, because buildout of the proposed land uses would result in exceedance of the SP screening threshold, Mitigation Measures AQ-1 and AQ-2 would be implemented to require development projects to prepare a technical GHG analysis and include all applicable mitigation measures to reduce project specific operational emissions. Because the details of future proposed projects are currently unknown, the volume of emissions that could be reduced through mitigation measures are specific to each proposed development

and are also currently unknown. Therefore, even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions could continue to exceed SP screening threshold, and impacts related to GHG emissions would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to GHG emissions would be less than significant.

IMPACT GHG-2: THE PROJECT COULD CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES.

Significant and Unavoidable. The proposed rezoning would be consistent with SCAG strategies to provide infill residential development, as further detailed in Section 5.6, *Land Use and Planning*. The proposed Project would provide for housing near freeways, transit, employment, and commercial uses to plan for projected growth in the City pursuant to the HCD RHNA allocations and the City's Housing Element. Likewise, the proposed Public/Institutional use would complement the future housing, employment, and services. The close location of complementary uses would reduce the need to travel far distances to access amenities and retail/service needs, which would reduce VMT and the related GHG emissions. Providing additional residential within mixed-use areas is consistent with the intent of the AB 32 Scoping Plan and SB 375, which is focused on changing land use patterns and improving transportation alternatives.

The future development pursuant to the proposed Project would be implemented pursuant to the CALGreen Building/Title 24 requirements, included in the Redlands Municipal Code in Section 15.16, that would provide new land uses in a sustainable manner. The City's administration of the Title 24 requirements includes review of proposed energy conservation measures during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment; solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, and solar infrastructure. In complying with the Title 24 standards, the proposed Project would be implementing regulations that reduce GHG emissions.

In addition, the proposed Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions.

- Pavley emissions standard and Low Carbon Fuel Standard: Pavley emissions standards (AB 1493) apply to all new passenger vehicles and the Low Carbon Fuel Standard became effective in 2010 and regulates the transportation fuel used. The second phase of implementation of the Pavley regulations per AB 1493 is referred to as the Advanced Clean Car program, which combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for current model years through 2025. The regulation reduces GHGs from new cars by 34 percent from 2016 levels by 2025. The proposed Project is consistent with these requirements as they apply to all new passenger vehicles and vehicle fuel purchased in California.
- Medium/Heavy-Duty Vehicle Regulations: Medium/heavy-duty vehicle regulations are implemented by the State to reduce emissions from trucks. Since the new development that would occur pursuant to the proposed RHNA rezoning would utilize trucks for construction and some operational purposes, these regulations would aid in reducing GHG emissions. The proposed Project is consistent with this measure and its implementation as medium and heavy-duty vehicles associated with construction and operation would be required to comply with the requirements of this regulation.
- Tractor-Trailer Greenhouse Gas Regulation: Tractor-trailers subject to this State regulation are primarily 53-foot or longer box-type trailers, are required to either use USEPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The proposed Project would be consistent with this regulation, as it applies to specific trucks that are used throughout the state.

- **Renewable Portfolio Standard.** As a customer of Southern California Edison (SCE), the new development that would occur pursuant to the proposed Project would include onsite solar infrastructure and would purchase from an increasing supply of renewable energy sources and more efficient baseload generations, reduce GHG emissions, and be consistent with this requirement.
- **Million Solar Roofs Program:** The proposed Project is consistent with this scoping plan measure as the new development that would occur pursuant to the proposed Project would be required to comply with existing CALGreen/Title 24 standards, including the installation of solar panels.

CARB Scoping Plan

As detailed in the Section 5.5.2, *Regulatory Setting*, the CARB Scoping Plan recommends actions for achieving carbon neutrality through reduced GHG emissions levels. New development pursuant to the proposed RHNA rezoning would include energy-efficient/energy-conserving design features and would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction actions listed in CARB's most recent Scoping Plan (2022), as demonstrated in Table 5.5-4.

Table 5.5-4: Project Consistency with the CARB 2022 Scoping Plan Actions

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40 percent below 1990 levels by 2030.	Consistent. Future development pursuant to the proposed rezoning would comply with the Title 24, Part 6, building energy requirements along with other local and State initiatives that aim to achieve the 40 percent below 1990 levels by 2030 goal. This would be ensured through the City's existing development permitting process. Further, Mitigation Measures AQ-1 and AQ-2 would require project specific GHG emission studies and emissions reduction measures, which would lower GHG emissions from operation of buildout of the proposed rezoning area.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	Consistent. As discussed in Section 5.10, <i>Transportation</i> , in Table 5.10-10, although it is possible that a VMT impact may occur from buildout of three of the sites included in the proposed Project, the cumulative Redlands Citywide VMT/SP with buildout of the entire Project would be 3.1 percent lower than cumulative VMT without the Project. As such, the Project's cumulative impacts related to VMT would be less than significant.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100 percent of LDV sales are ZEV by 2035.	Consistent. Future development Projects would be designed and constructed in accordance with the Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces and charging stations.
Truck ZEVs	
100 percent of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. The new development pursuant to the proposed rezoning would be designed and constructed in accordance with the most updated Title 24 regulations, which includes prewiring for truck ZEV charging stations and/or providing electrical plug-ins at applicable locations.

Action	Consistency
Aviation	
20 percent of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. Development and operation of the proposed rezoning sites would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25 percent of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. Development and operation of the proposed rezoning sites would not utilize any OGVs.
Port Operations	
100 percent of cargo handling equipment is zero-emission by 2037. 100 percent of drayage trucks are zero emission by 2035.	Not Applicable. Development and operation of the proposed rezoning sites would not impact any operations at any ports.
Freight and Passenger Rail	
100 percent of passenger and other locomotive sales are ZEV by 2030. 100 percent of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. Development and operation of the proposed rezoning sites would not involve any rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Not Applicable. The proposed Project would not involve any oil or gas extraction.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MTCO _{2e}) in 2030 and 30 MTCO _{2e} in 2035. Retail sales load coverage of 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The development and operation of the rezoning sites would comply with the Title 24, Part 6 building requirements, including related to renewable energy generation requirements as well as improved insulation reducing energy consumption.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The development and operation of the rezoning sites would comply with the Title 24, Part 6 building energy requirements.
Existing Residential Buildings	
80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The proposed Project does not involve the operation of any existing residential buildings. However, appliances within future residences would comply with the Title 24, Part 6 building energy requirements.

Action	Consistency
Existing Commercial Buildings	
80 percent of appliance sales are electric by 2030, and 100 percent of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The proposed Project does not involve the continued operations of existing commercial buildings. However, appliances within future buildings would comply with the Title 24, Part 6 building energy requirements.
Energy Demand	
7.5 percent of energy demand electrified directly and/or indirectly by 2030; 75 percent by 2045.	Consistent. The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6 building energy requirements, including renewable energy generation requirements, as well as improved insulation reducing energy consumption.
Construction Equipment	
25 percent of energy demand electrified by 2030 and 75 percent electrified by 2045.	Consistent. Through City permitting, the new development pursuant to the proposed rezoning would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25 percent in 2030 and 75 percent in 2045.
Energy Generation	
Electrify 0 percent of boilers by 2030 and 100 percent of boilers by 2045. Hydrogen for 25 percent of process heat by 2035 and 100 percent by 2045. Electrify 100 percent of other energy demand by 2045.	Consistent. The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances, electric outlets for landscape equipment, solar panels, and provision of electric charging stations.
Stone, Clay, Glass, and Cement	
CCS on 40 percent of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Not Applicable. Uses proposed in the rezoning sites do not involve manufacturing or storage of stone, clay, glass, or cement.
Other Industrial Manufacturing	
0 percent energy demand electrified by 2030 and 50 percent by 2045.	Not Applicable. The proposed rezoning does not include industrial manufacturing, but would comply with the Title 24, Part 6, including increases in renewable energy generation requirements as well as improved insulation reducing energy consumption.
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed rezoning does not involve any existing combined heat and power facilities.
25 percent energy demand electrified by 2030 and 75 percent by 2045.	Not Applicable. The proposed rezoning does not involve generation of energy; but future development per the proposed rezoning would comply with the Title 24 renewable energy generation requirements.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed rezoning does not involve any production of biofuels.
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane ¹³⁵ blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7 percent energy (~20 percent by volume),	Not Applicable. The proposed rezoning does not involve any production of fuels for buildings and industry.

Action	Consistency
ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	
Non-combustion Methane Emissions	
<p>Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies.</p> <p>Moderate adoption of enteric strategies by 2030.</p> <p>Divert 75 percent of organic waste from landfills by 2025.</p> <p>Oil and gas fugitive methane emissions reduced 50 percent by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.</p>	Not Applicable. The proposed rezoning does not involve any landfill and/or dairy uses.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Consistent. The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6, building energy requirements, including use of low GWP refrigerants, which would be verified through the City's existing development permitting process.

Scoping Plan Appendix D, Local Actions

The 2022 CARB Scoping Plan includes a set of Local Actions set forth in Appendix D to the Scoping Plan, which aim at providing local jurisdictions with tools to reduce GHG emissions to assist the State in reaching the reduction targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section for evaluating plan-level and project-level alignment with the State's Climate Goals within CEQA GHG analysis. Within this section, CARB identifies multiple recommendations and strategies that should be considered for new development to demonstrate consistency with the 2022 Scoping Plan. Specifically, this section is focused on strategies for residential and mixed-use projects. The document is organized into two categories: examples of plan-level GHG reduction actions that could be implemented by local governments and examples of onsite project design features and mitigation measures that could be applied to individual projects under CEQA.

The future development that would occur pursuant to the proposed rezoning would include a number of example project design features and mitigation measures from the 2022 CARB Scoping Plan for construction and operation. For instance, the Scoping Plan's construction measures include enforcing idling time restrictions on construction vehicles, requiring construction vehicles to operate highest tier engines commercially available, diverting and recycling construction waste, minimizing tree removal, and increased use of electric and renewable fuel powered construction equipment and required renewable diesel fuel where commercially available. These measures are consistent with existing requirements for idling trucks [CCR Title 13, Motor Vehicles, Section 2449(d)(3)].

Appendix D notes that residential and mixed-use projects that include key project attributes are clearly consistent with the State's goals and would accommodate growth in a manner which is consistent with the State's GHG reduction and equity prioritization goals. The Project's consistency with the 2022 CARB Scoping Plan Appendix D, Local Actions is detailed in Table 5.5-5.

Table 5.5-5: Project Consistency with the CARB 2022 Scoping Plan Appendix D, Local Actions

Priority Areas	Key Project Attribute	Proposed Project Consistency with Attribute
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval	Potentially Inconsistent. Future implementing projects in Sites 1 through 24 would be required to include EV charging infrastructure as required by the California Green Building Standards Code; it is unknown if all future development projects would meet the most ambitious voluntary standards. Therefore, the Project has the potential to be inconsistent with this attribute.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	Potentially Inconsistent. Future implementing projects in Sites 1 through 24 would be developed on underdeveloped or underutilized land which may or may not be served by existing infrastructure and public services. Therefore, the Project has the potential to be inconsistent with this attribute.
	Does not result in the loss or conversion of natural and working lands	Potentially Inconsistent. Future implementing projects in Sites 1 through 24 are currently developed or vacant. The Project would have the potential to result in the loss or conversion of natural and working lands. Therefore, the Project has the potential to be inconsistent with this attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS	Potentially Inconsistent. The overall density for future implementing residential projects in Sites 1 through 23 would be 15 to 30 dwelling units per acre; and thus, could be less than the 20 units per acre minimum. Therefore, the Project has the potential to be inconsistent with this attribute.
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or	Potentially Inconsistent. As this is a programmatic analysis, and parking specifics about future implementing projects are not known at this time. As such, the Project would have the potential to be inconsistent with parking reductions provided by the 2022 Scoping Plan.

Priority Areas	Key Project Attribute	Proposed Project Consistency with Attribute
	For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	
	At least 20 percent of units included are affordable to lower-income residents	Potentially Inconsistent. Although the Project's intent is to meet the City's RHNA allocation, including lower income residential units, this is a programmatic analysis, and specifics about future implementing projects are not known at this time. As such, future development under the Project could have the potential to be inconsistent with provision of at least 20 percent of units for lower-income residents.
	Results in no net loss of existing affordable units	Consistent. Sites 1 through 23 are currently underdeveloped or underutilized. The Project's intent is to meet RHNA requirements per the City's 2021-2029 Housing Element, including provision of affordable units. No net loss of affordable units would occur. Therefore, the Project would be consistent with this attribute.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking	Potentially Inconsistent. Future developments pursuant to the proposed rezoning would be required to meet CALGreen energy efficiency standards as included in the Redlands Municipal Code Section 15.16, including installing electrical wiring for all built in appliances, electric outlets for landscape equipment, solar panels, and provision of electric charging stations. Also, Mitigation Measure AQ-2 requires implementation of project specific mitigation measures to reduce GHG emissions. Therefore, the future development that would occur pursuant to the proposed rezoning would be developed in a manner that promotes energy efficiency and minimizes the reliance on fossil fuels. However, it is possible that future development would include natural gas, propane, or other fossil fuels. Therefore, the Project could have the potential to be inconsistent with this attribute.

The proposed Project would implement key residential and related mixed-use attributes included in 2022 Scoping Plan Appendix, *Local Actions*; however, as detailed in Table 5.5-5, the proposed Project would have the potential to be inconsistent with the key project attributes that include: sites presently served by utilities, loss of natural and working lands, residential densities less than 20 units per acre, reduction in parking, and affordable housing guarantees. Due to the potential inconsistency with the 2022 Scoping Plan Appendix D the proposed Project would result in a significant and unavoidable impact regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the GHG emissions.

Redlands CAP

As described previously, the City of Redlands CAP was designed to reinforce the City's commitment to reducing GHG emissions and demonstrate compliance with the State's GHG emissions reduction standards. The CAP used the 2017 Scoping Plan recommended Plan Level emissions target of 6.0 MTCO_{2e} per capita per year for 2030. As described under Impact GHG-1, the Project would result in GHG emissions of 3.56 MTCO_{2e}/SP, which is less than the 6.0 MTCO_{2e} target and therefore would be consistent with the CAP emission goals. Also, the Project would implement energy and water efficiency standards per CALGreen (as included in the Redlands Municipal Code Section 15.16), as verified through the City's permitting process, which include requirements such as solar photovoltaic systems, increased energy and water efficiency.

General Plan

As detailed in Table 5.5-6, the Project would not conflict with the relevant General Plan policies related to GHG emissions.

Table 5.5-6: Project Consistency with the City General Plan Sustainable Community Element Policies

General Plan Policy	Consistency
Principle 8-P.1 Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.	Consistent. As described previously, future development under the proposed rezoning would implement a variety of building, water, and solid waste efficiencies consistent with the most current CALGreen requirements. Therefore, the Project is consistent with Principle 8-P.1.
Action 8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.	Consistent. As described previously, the future development under the proposed rezoning would implement the most current CALGreen requirements per Redlands Municipal Code Section 15.16. Therefore, the proposed Project is consistent with Action 8-A.8.
Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.	Consistent. As described previously, the future development under the proposed rezoning would implement the most current CALGreen requirements per Redlands Municipal Code Section 15.16. This includes use of materials with solar reflectance and thermal emittance required by Title 24. Therefore, the proposed Project is consistent with Action 8-A.9.
Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	Consistent. The future development under the proposed rezoning would include landscaping throughout the public realm and private development areas as required by the City's Municipal Code and development standards. Therefore, the proposed Project is consistent with Action 8-A.10.

General Plan Policy	Consistency
Principle 8-P.8 Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.	Consistent. The pattern of infill residential development that would be implemented by the proposed rezoning would reduce vehicle miles traveled and related GHG emissions while providing for projected growth. Thus, the proposed Project is consistent with Action 8-P.8.

Overall, the future development implemented by the proposed rezoning would be in compliance with State energy standards provided in Title 24 and other statewide standards for fuel and solar use. The Project would also be consistent with the relevant City General Plan policies and the City's Climate Action Plan. However, as detailed in Table 5.5-5, the proposed Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, Local Actions key project attributes. Due to this potential inconsistency, the proposed Project could result in a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to consistency with applicable plan, policies, or regulations for reducing GHG emissions would be less than significant.

5.5.7 CUMULATIVE IMPACTS

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a Project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Executive Order S-3-05, Executive Order B-30-15, AB 32, and SB 32 recognizes that California is the source of substantial amounts of GHG emissions and recognizes the significance of the cumulative impact of GHG emissions from sources throughout the state and sets performance standards for reduction of GHGs.

The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. As described previously, the estimated GHG emissions from development pursuant to the proposed Project at buildout would be substantially less than those from buildout of the existing General Plan land uses but could exceed the service population threshold of 3.0 MTCO₂e per year after implementation of mitigation. Therefore, buildout of the Project would result in a cumulatively considerable significant impact. In addition, the Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, *Local Actions*, key project attributes, which could combine with inconsistencies of potential other/future projects. Therefore, impacts related to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, could be cumulatively considerable, and therefore, significant.

5.5.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Clean Car Standards – Pavley Assembly Bill 1493
- California Executive Order S-3-05
- Assembly Bill 32 (Global Warming Solutions Act of 2006)
- Senate Bill 375
- California Executive Order B-30-15
- Senate Bill 32
- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Local

- City of Redlands Climate Action Plan
- City of Redlands General Plan Sustainable Community Element

Plans, Programs, or Policies

None.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact GHG-1: Buildout of the proposed Project would generate GHG emissions directly and indirectly that would have a potentially significant impact.

Impact GHG-2: Construction and operation associated with buildout of the proposed Project could conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions, and impacts are potentially significant.

5.5.10 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

The mitigation measures listed below are also listed in Section 5.2, *Air Quality*, of this Draft Subsequent EIR.

Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air

pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:

- Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards.
- Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes.
- Require the use of “Super-Compliant” low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings.
- The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.
- The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment.
- The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer’s specification. Maintenance records shall be available at the construction site for City verification.

Mitigation Measure AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD’s most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:

- Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized;
- Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC);
- Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insulation (R-8);
- Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF);
- Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;

- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.
- Landscaping palette of drought tolerant plants exceeding City requirements;
- Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use);
- U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact GHG-1: GHG emissions at buildout of the proposed Project could exceed thresholds after implementation Mitigation Measures AQ-1 and AQ-2. Thus, impacts related to GHG emissions would be **significant and unavoidable** and **cumulatively considerable**.

Impact GHG-2: The proposed Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, Local Actions key project attributes, which could combine with potential inconsistencies of other/future projects. Thus, impacts related to conflict with a policy, plan or regulation adopted for the purpose of reducing GHG emissions would be **significant and unavoidable** and **cumulatively considerable**.

5.5.12 REFERENCES

- City of Redlands. (2017a). *Redlands General Plan 2035*. Retrieved July 2, 2024, from <https://www.cityofredlands.org/post/planning-division-general-plan>
- City of Redlands. (2017b). *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*. Retrieved July 2, 2024 from https://www.cityofredlands.org/sites/main/files/file-attachments/redlands_deir_compiled_lo_071917_0.pdf?1554321669
- City of Redlands. (2024). *City of Redlands Municipal Code*. Retrieved July 2, 2024, from https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1
- Southern California Association of Governments (SCAG). (2024). *Connect SoCal 2024 2019-2050 Demographics and Growth Forecast Technical Report*. <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839>
- Urban Crossroads. (2024). *Regional Housing Needs Assessment Rezone Greenhouse Gas Impact Analysis. (Appendix E)*

5.6 Land Use and Planning

5.6.1 INTRODUCTION

This section provides an analysis of the consistency of the proposed Project with applicable land use plans, policies, and regulations that guide development of the Project site and evaluates the relationship of the Project with surrounding land uses. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035, December 5, 2017;*
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report (General Plan EIR), July 2017; and*
- *City of Redlands Municipal Code.*

5.6.2 REGULATORY SETTING

5.6.2.1 Regional Regulations

SCAG Regional Transportation Plan and Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is designated by federal law as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops transportation and housing strategies for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), which includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Most of the plan's goals are related to regional transportation infrastructure and the efficiency of transportation in the region (SCAG 2020).

The 2024 SCAG Connect SoCal RTP/SCS was officially adopted in April 2024 as the new RTP/SCS for the SCAG jurisdiction. Several updates are reflected within Connect SoCal 2024 plan, including growth projections and forecasting for the region. Connect SoCal 2024 reflects a continuation of the shift toward more efficient resource management. This refers to transportation infrastructure, land resources, and environmental resources. This plan projects that 66 percent of new households and 54 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities.

5.6.2.2 Local Regulations

Redlands General Plan 2035

The City of Redlands adopted the 2035 General Plan on December 5, 2017. The General Plan serves as a policy document or blueprint for future development to guide future growth in Redlands. The seven themes in the 2035 General Plan include the following:

1. **Distinctive City.** This chapter sets policies to preserve and enhance the City's unique architectural, historical, and cultural resources.

2. **Prosperous Economy.** This chapter sets forth principles and actions specific to major sectors of Redlands' economy – including tourism, innovation, and retail, - in order to ensure prosperity and opportunity for all Redlanders.
3. **Livable Community.** This chapter describes the existing land use pattern and growth management framework. Development and other factors impacting quality of life – including public facilities, public safety, and education – are guided so as to retain the community's character.
4. **Connected City.** This chapter includes policies, programs, and standards to maintain efficient circulation for all modes of travel. It identifies future street and traffic improvements, and addresses walking, biking, transit, and parking to enable a multi-model circulation system.
5. **Vital Environment.** Redlands is renowned for its natural beauty. This chapter sets forth policies regarding land conservation, open space, agriculture, and water supply, in order to protect the Planning Area's natural environment.
6. **Healthy Community.** This chapter shapes policy specific to health outcomes of Redlanders. Topics addressed include recreational activity, public health, safety, and air quality.
7. **Sustainable Community.** This chapter outlines strategies to preserve Redlands' natural resources for the benefit of future Redlanders. This chapter incorporates innovative strategies to minimize the environmental footprint associated with water, energy, and resource consumption.

City of Redlands Municipal Code

Chapter 18.16, Districts and Zoning Map

The City's Code of Ordinances Chapter 18.16, *Districts and Zoning Maps*, establishes the zoning districts and boundaries of those districts within the City.

5.9.3 ENVIRONMENTAL SETTING

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 the cities of 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 the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change 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. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project ("proposed Project", or "Project"). The 24 sites are 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 the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just 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 View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

5.6.3 ENVIRONMENTAL SETTING

Existing General Plan

The City of Redlands General Plan currently designates the Rezone 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.

Existing Zoning

The Rezone 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, *Existing Zoning*, and 3-5b, *Existing Zoning*, show the existing zoning designations for the Rezone Sites. 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.

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- LU-1 Physically divide an established community; or
- LU-2 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.

The Initial Study established that the proposed Project would result in less-than-significant impacts related to Threshold LU-1; thus, no further assessment of this impact is required in this Draft Subsequent EIR.

5.6.5 METHODOLOGY

This analysis of land use consistency impacts considers whether the proposed Project would be inconsistent with (or conflict with) regional and local plans, policies, and regulations that are applicable to the proposed Project and Rezone sites, including the SCAG RTP/SCS, the City of Redlands General Plan, and the City's Municipal Code. Consistent with the scope and purpose of this Draft EIR, this discussion primarily focuses on those goals and policies that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. Thus, a project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (as defined by CEQA Guidelines Section 15382).

CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. A project need not be consistent with each and every policy and objective in a planning document. Rather, a project is considered consistent with the provisions of the identified regional

and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary goals of the land use plan or policy.

5.6.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that the General Plan would not physically divide an established community since it does not propose the development of highways or infrastructure that would physically divide the community, thus there would be no impact. Additionally, the General Plan EIR found that there would be no impact related to applicable land use plans, policies, or regulations. The General Plan proposed an increase of housing units from 30,200 to 36,600 by 2035 specifically focusing on infill development; thus, the General Plan would not displace substantial numbers of existing housing or people. If residents were to be displaced, they would be able to find housing elsewhere since buildout of the General Plan would result in additional housing units and impacts would be less than significant (City of Redlands, 2017, p.3.10-11 through 3.10-16).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses, and 111 multi-family dwelling units, to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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).

IMPACT LU-2: THE PROJECT WOULD NOT 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.

Less than Significant Impact.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS goals that are relevant to the proposed Project focus largely on maximizing mobility, encouraging development patterns and densities that reduce infrastructure costs, and provide for efficiency. The proposed Project would be consistent with the applicable 2020 and 2024 RTP/SCS goals, as detailed below in Table 5.6-1 and Table 5.6-2. Therefore, implementation of the proposed Project would not result in conflict with RTP/SCS goals.

Table 5.6-1: 2020 SCAG RTP/SCS Consistency Analysis

RTP/SCS Goal Statements	Project Consistency Discussion
1. Encourage regional economic prosperity and global competitiveness.	Consistent. As discussed in Section 5.8, <i>Population and Housing</i> , the proposed Project would bring more housing to the City to assist with the jobs and housing balance.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with applicable roadway standards.

RTP/SCS Goal Statements	Project Consistency Discussion
3. Enhance the preservation, security, and resilience of the regional transportation system.	Consistent. As a Rezone, the proposed Project is limited in its ability to ensure security and resilience of the regional transportation system. There are no components of the proposed Project that would result in the deterioration of the transportation system. However, as a measure to safeguard security, the proposed Project would comply with applicable policies included in the City of Redlands Hazards Element, including development outside 100-year flood zones, dam inundation areas, Alquist-Piolo earthquake fault zones, and very high fire severity zones.
4. Increase person and goods movement and travel choices within the transportation system.	Consistent. As a RHNA Rezone, the proposed Project is limited in its ability to maximize the goods movement and travel choices within the SCAG region. The proposed Project would not create substantial traffic impediments and would provide infill residential development in the City of Redlands.
5. Reduce greenhouse gas emissions and improve air quality.	Consistent. The Proposed Project would not prevent SCAG from implementing actions that would improve air quality within the region. As discussed in Section 5.2, <i>Air Quality</i> , and Section 5.5, <i>Greenhouse Gas Emissions</i> , implementing projects would incorporate various measures related to building design, landscaping, and energy systems to promote the efficient use of energy, pursuant to Title 24 CALGreen Code and Building Energy Efficiency Standards.
6. Support healthy and equitable communities.	Consistent. Implementing projects would be required to comply with the City of Redlands Health Community Element goals and policies to support healthy and equitable communities, which are listed in Table 5.6-3. Additionally, implementing projects would construct frontage improvements, including landscaping which would not hinder pedestrian access near the proposed Project area.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Consistent. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Proposed Project would not conflict with this goal.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options	Consistent. The RHNA Rezone Project would result in the development of infill residential which would comply with the Municipal Code design standards. The development of infill residential would also assist in the growth of Redlands.

RTP/SCS Goal Statements	Project Consistency Discussion
10. Promote conservation of natural and agricultural lands and restoration of habitats	Consistent. The Project would be consistent with goals and policies of the General Plan. Although the Project would result in the loss of agricultural land, the existing farming uses on the Project site are lawful nonconforming uses that would otherwise not be permitted under the site's General Plan or zoning designations which include Commercial and Industrial uses. This loss of agricultural land was already accounted for within the 2017 General Plan EIR as a significant and unavoidable impact, and therefore does not represent a conflict. In addition, Initial Study (Appendix A) Mitigation Measures BIO-1 and BIO-2 would reduce potential impacts associated with biological resources. The Project would not conflict with this goal.

Table 5.6-2: 2024 SCAG RTP/SCS Consistency Analysis

Goals	Project Consistency
Transit and Multimodal Integration	
Increase multimodal connectivity (e.g., first/last mile transit and airport connections), which includes planning for and developing mobility hubs throughout the SCAG region	Consistent. As discussed in Section 5.10, <i>Transportation</i> , The Project would develop infill residential units which are of close proximity to a variety of public transit access points. The Project site is served by Omnitrans and the San Bernardino County Transportation Authority (SBCTA) and there are two bus stops within one mile of the Project site. Furthermore, specific infrastructure improvements required to support future residential would be required to fund transit facilities as deemed necessary.
Through land use planning, support residential development along high-frequency transit corridors and around transit/rail facilities and centers	
Expand the region's networks of bicycle and pedestrian facilities. This includes creating more low stress facilities, such as separated bikeways and bike paths, slow streets, and open streets	Consistent. As discussed in Section 5.10, <i>Transportation</i> , potential future projects would be required, if deemed necessary, to provide bicycle facilities, as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
Safety	
Work with local, state and federal partners to advance safer roadways, including reduced speeds to achieve zero deaths and reduce GHGs	Consistent. As discussed in Section 5.10, <i>Transportation</i> , future development implemented pursuant to the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
15-Minute Communities	
Develop technical-assistance resources and research that support 15-minute communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access to neighborhood amenities, open space and urban greening, job centers and multimodal mobility options	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the Project would develop underutilized properties and create infill residential units. The site has two bus stops within one mile and is surrounded by a variety of open spaces including Heritage Park, Texonia Park, and Orange Blossom Trail.

Goals	Project Consistency
Sustainable Development	
Research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure	Consistent. As discussed in Section 5.4, <i>Energy</i> , the proposed Project would comply with CALGreen/Title 24 requirements to implement energy conservation measures and water efficient plumbing.
Air Quality	
Coordinate with local, regional, state and federal partners to meet federal and state ambient air-quality standards and improve public health	Consistent. As described in Section 5.2, <i>Air Quality</i> , the proposed Project would result in cumulatively considerable impact and would be required to comply with all relevant State, regional, and local regulations and policies for reducing particulate emissions.
Clean Transportation	
Facilitate development of EV charging infrastructure through public-private partnerships	Consistent. As discussed in Section 5.4, <i>Energy</i> , future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Support the deployment of clean transit and technologies to reduce greenhouse gas emissions as part of the CARB innovative clean technology (ICT) rule	Consistent. The Project would not conflict with this measure and future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Natural and Agricultural Lands Preservation	
Work with implementation agencies to support, establish or supplement voluntary regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process	Consistent. As discussed in Section 5.10, <i>Transportation</i> , future developments under the proposed Project would be required, if deemed necessary, to fund transit facilities, pedestrian facilities, and bicycle facilities as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. Since Sites 20, 21 and 23 could have a potentially significant VMT impact, future developments on these sites would be required to conduct project-specific VMT screening analysis to determine if the development would screen out of a VMT analysis.
Continue efforts to support partners in identifying priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection	Consistent. As discussed in the Initial Study (Appendix A), the Rezone sites are located in an urbanized and developed area, with some vacant sites. Mitigation Measure BIO-1 would be implemented to require future projects within the area to have a biologist evaluate the site prior to any ground disturbing activities.
Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts	
Climate Resilience	
Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives	Consistent. As discussed in Section 5.12, <i>Utilities and Service Systems</i> , the proposed Project would be required to implement the CALGreen requirements for efficient use of water. Additionally, as discussed in the Initial Study, included as Appendix A, development and construction of the Project site would require preparation and adherence to SWPPP and WQMP. Therefore, development of the site would not deplete or pollute groundwater resources.
Collaborate with partners to foster adoption of systems and technologies that can reduce water demand and/or increase water supply, such as alternative groundwater recharge technologies, stormwater capture systems, urban cooling infrastructure and greywater usage systems	

City of Redlands General Plan 2035

Table 5.6-3 lists the policies from the City of Redlands General Plan that are relevant to the proposed rezone. For each topic of the General Plan, the General Plan established policies that consist of principles and actions that form the supporting policies for the goal. As shown in Table 5.6-3 below, the Project would be consistent with the actions and policies of the City's General Plan.

Table 5.6-3: Project Consistency with Applicable General Plan Principles, Actions and Policies

General Plan Policy	Proposed Project
Principle 2-P.2 Embrace the unique identities of individual neighborhoods in Redlands and encourage the celebration and enhancement of characteristics that make each neighborhood distinct.	Consistent. While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Action 2-A.4 Maintain continuity in streetscape design along major streets and avenues that traverse north and south – California, Nevada, Alabama, Tennessee, Orange, Church, University, Judson, and Wabash; and those that traverse east and west – Pioneer, San Bernardino, Lugonia, Redlands Boulevard, and Citrus.	Consistent. While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with applicable roadway standards.
Action 2-A.8 Insist on high-quality development and revitalization in older neighborhoods, such as the Orange Street and Colton Avenue commercial corridors, that is sensitive to historic architecture, and provides a broad range of retail, restaurants, professional services, and offices that meet the community's needs. Build a sense of community in these commercial areas.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the General Plan designated some of the Project sites as Industrial and Commercial and this Project is proposing a zone change to Residential for these sites. The proposed General Plan Amendment and zone changes would preserve the sense of community within the respective commercial areas in comparison to the original land use and zoning designations.
Action 2-A.10 Permit densities, design, and uses that will help preserve the character and amenities of existing neighborhoods.	Consistent. While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Action 2-A.13 Maintain continuity in land uses, including commercial and residential uses, across barriers such as I-10 and Highway 210. These barriers should not be seen as "walls" that define completely different neighborhoods or divide the city by land use.	Consistent. All developments within the RHNA Rezone Project area would be consistent with the surrounding area and land uses.
Action 2-A.14 Use development standards to ensure smooth transitions for neighborhoods that border one another so that neighborhoods maintain their unique qualities while being compatible with one another.	Consistent. While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Policy 2-P.8 Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.	Consistent. The RHNA Rezone area includes the development of infill residential which would comply with the Municipal Code design standards. The development of infill residential would also assist in the growth of Redlands unique community and enable future tenants to enjoy the local history.
Policy 2-P.9 Provide incentives to protect, preserve, and maintain the city's heritage.	Consistent. As discussed in the Initial Study (Appendix A), there are no structures in the Project site that are considered historic resources. However, Mitigation Measures CUL-1 and CUL-2 are included to require proper evaluation of
Policy 2-P.11 Encourage retention of the character of existing historic structures and urban design elements that	

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define the built environment of the city's older neighborhoods.	historic resources for future projects developed pursuant to the RHNA Rezone.
Policy 2-P.12 Encourage retention of historic structures in their original use or reconversion to their original use where feasible. Encourage sensitive, adaptive reuse where the original use is no longer feasible.	
Policy 2-P.13 Encourage preservation of and public access to defined and established significant scenic vistas, viewpoints, and view corridors.	Consistent. As discussed in the Initial Study (Appendix A), the Project area consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the RHNA Rezone are in or near already developed areas of the City and coincide with areas designated for development under the General Plan.
Policy 2-P.14 Coordinate preservation of historic resources with policies designed to preserve neighborhoods and support the affordability of housing in historical structures.	Consistent. As discussed in the Initial Study (Appendix A), there are no structures in the Project site that are considered historic resources. However, Mitigation Measures CUL-1 and CUL-2 are included to require proper evaluation of historic resources for future Projects developed pursuant to the RHNA Rezone.
Policy 2-P.15 Balance the preservation of historic resources with the desire of property owners of historic structures to adopt energy efficient strategies.	
Policy 2-P.16 Work with local paleontologists to identify significant non-renewable paleontological resources.	Consistent. As discussed in the Initial Study (Appendix A), the proposed Project area is in an urban environment that has been previously disturbed. Future projects would also be required to adhere to Mitigation Measure PAL-1 and PAL-2 which would require proper analysis and management of paleontological resources.
Policy 2-P.17 Protect archaeological and paleontological resources for their aesthetic, scientific, educational, and cultural values.	Consistent. As discussed in Section 5.3, <i>Cultural Resources</i> , the Project sites are located in urbanized areas. Many of the sites have been disturbed by agricultural activities and are not known to contain any archeological or paleontological resources. Future development projects within the RHNA Rezone Project area would be required to implement Mitigation Measure CUL-3 which requires an archeological resource assessment prior to ground disturbing activities. If resources are discovered Mitigation Measure CUL-4, would require a mitigation plan be prepared. Mitigation Measure CUL-4 will be required for any ground disturbing activities with 50 feet of the Morey Arroyo due to the areas of high archeological sensitivity.
Action 2-A.25 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.	Consistent. As discussed in the Initial Study, included as Appendix A, implementing developments could impact historic structures. However, the proposed Project would require evaluation of potential historic resources for implementing projects that could potentially impact a building or structure in excess of 45 years of age as included as Mitigation Measure CUL-1.
Action 2-A.26 Provide development standards and guidelines to encourage conversion of historic structures to alternative uses without compromising the quality of the neighborhood if preservation of the original use is an economic hardship.	Consistent. As discussed above, any future development within the RHNA Rezone area would be required to adhere to Mitigation Measure CUL-1 which requires evaluation of potential historical buildings. If a structure is identified as a historical resource, then Mitigation Measure CUL-2 would be required. Mitigation Measure CUL-2 requires modification of identified historical resources to meet the Secretary of the Interior's Professional Qualification

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	Standards to ensure compliance with Standards for Rehabilitation.
Action 2-A.39 Ensure that permanent changes to the exterior or setting of a designated historic resource be done in accordance with the Secretary of the Interior standards for historic properties.	Consistent. As discussed in the Initial Study (Appendix A) all rehabilitations and additions to historic buildings shall conform to the recommendations of the Secretary of the Interior's <i>Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Structures and/or the Redlands Historic Architectural Design Guidelines</i> .
Action 2-A.49 Encourage compatibility of new land uses and new construction adjacent to historical buildings. Encourage construction that is physically and aesthetically complementary to the historic buildings in architectural features and relationship to adjoining structures.	Consistent. As discussed in the Initial Study (Appendix A) new development and redevelopment would be visually compatible with the surrounding environment.
Action 2-A.51 Encourage new construction that ties the new with the old in a harmonious fashion, enhancing the historic pattern.	
Action 2-A.66 Promote neighborhood preservation and stabilization.	Consistent. The new residential developments would help preserve the livelihood of preexisting neighborhoods and add to the value of the area.
Action 2-A.67 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	Consistent. Future residential developments within the RHNA Rezone site would be within the permitted densities of the site. As stated above the new developments and redevelopments would be visually compatible with the surrounding environment.
Action 2-A.68 Discourage changes in residential areas that would disturb the character or clearly have a destabilizing effect on the neighborhood.	
Action 2-A.69 Encourage shared parking or in-lieu parking in older neighborhoods.	Consistent. Future development designs would receive approval from the City and in compliance with parking requirements.
Action 2-A.71 Using an annually updated Archaeological Resource Sensitivity Map, review proposed development projects to determine whether a site contains known prehistoric or historic cultural resources and/or to determine the potential for discovery of additional cultural resources.	Consistent. As discussed in Section 5.3, <i>Cultural Resources</i> , the Rezone sites are located in urbanized areas. Many of the sites have been disturbed by agricultural activities and do not contain any known archeological or paleontological resources. Future development projects within the RHNA Rezone Project area would be required to implement Mitigation Measure CUL-3 which requires an archeological resource assessment prior to ground disturbing activities. If resources are discovered Mitigation Measure CUL-4 would require a mitigation plan be prepared. Mitigation Measure CUL-4 will also be required for any ground disturbing activities with 50 feet of the Morey Arroyo due to the areas of known high archeological sensitivity.
Action 2-A.72 Require that applicants for projects identified by the South Coastal Information Center as potentially affecting sensitive resource sites hire a consulting archaeologist to develop an archaeological resource mitigation plan and to monitor the project to ensure that mitigation measures are implemented.	
Action 2-A.73 Require that areas found during construction to contain significant historic or prehistoric archaeological artifacts be examined by a qualified consulting archaeologist (RPA certified) or historian for appropriate protection and preservation.	
Action 2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.	

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<p>Action 2-A.75 Require, as a standard condition of approval, that project applicants provide an assessment as to whether grading for the proposed project would impact underlying soil units or geologic formations that have a moderate to high potential to yield fossiliferous materials, prior to issuance of a grading permit. If the potential for fossil discovery is moderate to high, require applicants to provide a paleontological monitor during rough grading of the project.</p>	
<p>Action 2-A.76 Establish a procedure for the management of paleontological materials found onsite during a development, including the following provisions: If materials are found onsite during grading, require that work be halted until a qualified professional evaluates the find to determine if it represents a significant paleontological resource.</p> <p>If the resource is determined to be significant, the paleontologist shall supervise removal of the material and determine the most appropriate archival storage of the material.</p> <p>Appropriate materials shall be prepared, catalogued, and archived at the applicant's expense and shall be retained within San Bernardino County if feasible.</p>	
<p>Principle 2-P.18 Reinforce Redlands' identity as a "Tree City" through cohesive streetscapes that enhance its sense of place and its heritage, and that promote pedestrian comfort.</p>	<p>Consistent. The RHNA Rezone area would comply with the municipal code design standards and receive approval from the City prior to buildout.</p>
<p>Action 2-A.79 Avoid sound walls as a standard on arterial streets in residential areas.</p>	
<p>Principal 2-P.21 Encourage conservation and preservation of citrus groves and farms, especially those that have cultural or scenic significance. Encourage retention of existing privately-owned citrus groves of all sizes.</p>	<p>Consistent. There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.</p>
<p>Principal 2-P.23 Incorporate citrus trees, in groves of sufficient size and depth to be a viable grove, as part of streetscapes and scenic views, and encourage their conservation in historic neighborhoods.</p>	
<p>Action 2-A.86 Take advantage of desirable environments, such as the Crafton subarea, that can provide citrus groves and agricultural land that otherwise would be subject to strong development pressures. Encourage or incentivize homeowners to maintain the groves.</p>	
<p>Action 2-A.93 Preserve historic buildings and sites while permitting sensitive adaptive reuse.</p>	<p>Consistent. As discussed previously, all rehabilitations and additions to historic buildings shall conform to the recommendations of the Secretary of the Interior's <i>Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Structures and/or the Redlands Historic Architectural Design Guidelines</i>.</p>
<p>Principal 4-P.1 Promote a balanced rate and distribution of development and uses pursuant to the</p>	<p>Consistent. Future residential developments within the RHNA Rezone sites would be within the permitted densities of the site. As stated above, the new developments and</p>

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standards identified in Measure U and compatible with the fabric of the existing community.	redevelopments would be visually compatible with the surrounding environment.
Principal 4-P.2 Provide for the expansion of housing and employment opportunities while ensuring that a high quality of life is maintained in Redlands.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the Project would rezone 23 sites for future residential development. The RHNA Rezone would expand the available housing within the City of Redlands.
Principal 4-P.3 Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the sites within the RHNA Rezone Project are located in infill areas. While some sites contain orange groves, these sites are already designated by the Redlands General Plan for industrial or commercial development. The City has land designated for farming on the fringes of the City but these sites are not within those areas.
Action 4-A.1 Promote the orderly development and growth of urban areas in infill areas and the city center while encouraging the ongoing cultivation of agricultural land and the preservation of rural living areas in the canyons, Crafton, and Mentone.	
Action 4-A.3 Ensure that infill development complements existing development in use, design, and scale, and that it supports the cohesion and integration of the city's development pattern.	Consistent. As discussed in the Initial Study, included herein as Appendix A, new development and redevelopment would be visually compatible with the surrounding environment.
<p>Principle 1.A.20 Development within the planning area and sphere of influence of the City of Redlands shall conform to development standards within the City.</p> <p>Development Agreements- All development agreements entered into by the City and developers pursuant to California Government Code Sections 65864 et. seq., - after the Effective Date of this initiative measure as defined in Section 3 hereof, shall conform to the policies contained in the Redlands General Plan.</p> <p>Extension of Public Utilities Outside the City Limits - No extension of City provided utility services to areas outside the City limits shall occur until such areas are properly annexed to the City, except that utility services may be extended to areas outside the City limits without prior annexation if all of the following conditions are met:</p> <p>The area to be served is not contiguous to the City of Redlands; and</p> <p>The City and the land owner have entered into a properly recorded and binding pre-annexation agreement establishing covenants running with the land that assure full compliance with all development standards of the City of Redlands, payment of all capital improvement and other development fees which would be applicable to the property if it were within the City limits at the time of extension of such services, and immediate processing of annexation to the City at the City's request; and;</p> <p>Impacts of New Development on Public Schools Shall Be Mitigated - A mandatory component of the socio-economic cost/benefit studies shall be an analysis of the effect of the proposed development on public schools facilities and resources, and shall include proposed measures to mitigate any identified adverse impacts on school facilities to the greatest extent permitted under California law.</p>	Consistent. Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City.

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<p>Principle 1.A.30 Land use classifications set forth in the Redlands General Plan provide for an appropriate range of densities for residential development and intensity of commercial and industrial development in the City of Redlands.</p> <p>a) Number of Land Use Classifications and Density Standards Shall Not Be Increased -The density standards set forth in Paragraph 4.40, Residential Land Use Classifications, of Section 4.0, Land Use Element, of the Redlands General Plan shall not be increased, and no new residential land use classification shall be added, without a vote of the people.</p> <p>b) Prohibition on Transfers of Density - In order to assure that development occurs in a rational way, no transfer of residential development rights from lands other than those designated for single family residential shall be permitted, and then such transfers of single family residential density shall only be permitted to create or preserve agricultural, open space, school or park uses.</p>	<p>Consistent. The future developments within the Redlands RHNA Rezone area would be consistent with the Redlands General Plan, based on the proposed General Plan Amendment, and all residential developments would be within the appropriate density allowed under the Municipal Code. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Rezone sites and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial and industrial development.</p>
<p>Principle 1.A.40 Agricultural uses of land are important to the culture, economy and stability of the City of Redlands and shall be preserved to the greatest extent possible consistent with the will of the people as expressed in Proposition R and Measure N, and consistent with the policies of the State of California set forth in Government Code Section 51220.</p>	<p>Consistent. There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.</p>
<p>Policy 4.40s No land undeveloped as of March 1, 1997 and designated in whole or in part as “Urban Reserve” or “Urban Reserve (Agricultural)” in the Redlands general plan in effect as of June 1, 1987, and/or any land parcel that was in active agricultural production on November 3, 1986 regardless of zoning, shall be re-designated or rezoned to permit residential density greater than the Estate Residential (R-E) classification, as the same existed on June 1, 1987, in the Redlands City Zoning Ordinance, unless the following mandatory findings are made and the re-designation or rezoning is approved by four-fifths (4/5) vote of the total authorized membership of the City Council. Land designated by the General Plan as Urban Reserve as of June 1, 1987, shall not exceed a density higher than permitted by the R-E zone designation unless otherwise approved by a 4/5 vote of the City Council.</p> <ol style="list-style-type: none"> 1. There are substantial and overriding economic or social benefits to the City and its residents and taxpayers from the proposed density increase. 2. The proposed density increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly. 3. The proposed density increase will not convert viable agricultural land to nonagricultural uses. 4. The proposed density increase will not have a growth-inducing effect on other property. 	<p>Consistent. None of the Rezone sites are designated as Urban Reserve or Urban Reserve (Agricultural). As certain Rezone sites were in active agricultural production in 1986, the City Council must make the applicable findings to allow the rezone.</p>

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<p>5. The resulting use will be compatible with uses on adjacent land.</p> <p>6. The proposed density increase will not require substantial expansion of public infrastructure, facilities or services.</p>	
<p>Principle 4-P.9 Locate medium- and high-density development near regional access routes, transit stations, employment centers, shopping areas, and public services.</p>	<p>Consistent. Future development pursuant to the Project would be urban and of high densities. As stated in Section 5.10, <i>Transportation</i>, the Project site is served by Omnitrans and SBCTA, which would allow for high-density development near transit routes. Furthermore, the Rezone sites are located in the vicinity of employment centers, shopping areas, and public services.</p>
<p>Principle 4-P.10 Ensure that the scale and character of new development is appropriate for surrounding terrain and the character of existing development.</p>	<p>Consistent. As discussed in the Initial Study (Appendix A), new development and redevelopment would be visually compatible with the surrounding environment.</p>
<p>Principle 4-P.15 Preserve existing residential neighborhoods, particularly older neighborhoods.</p>	
<p>Principle 4-P.16 Promote a variety of housing types to serve the diverse needs of the community.</p>	<p>Consistent. Future development pursuant to the Project would develop a variety of different medium to high density housing throughout the City. The Project would provide a variety of housing options to the community of Redlands.</p>
<p>Principle 4-P.17 Limit negative impacts to residential neighborhoods from incompatible uses.</p>	<p>Consistent. The RHNA Rezone Project would only rezone sites for residential uses therefore there would be no result in incompatible uses to residential neighborhoods. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Rezone sites and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial and industrial development.</p>
<p>Principle 4-P.23 Preserve agricultural land in the Planning Area and protect it from premature development.</p>	<p>Consistent. There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.</p>
<p>Action 4-A.7 Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.</p>	<p>Consistent. The Redlands RHNA Rezone would provide additional residential capacity in the City that would be favorable for a variety of different housing types.</p>
<p>Action 4-A.8 Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.</p>	
<p>Action 4-A.10 Promote availability of senior and independent assisted living facilities to meet the needs of the community's aging population, distributed equitably throughout the community.</p>	
<p>Action 4-A.11 Ensure that opportunities exist for the development of housing types that are affordable to all segments of the Redlands community and are distributed equitably throughout the community.</p>	

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Action 4-A.13 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	Consistent. As discussed in the Initial Study (Appendix A), new development and redevelopment would be visually compatible with the surrounding environment. The future developments would also be within the permitted density for each site.
Action 4-A.14 Discourage changes in residential areas that would disturb the character of or clearly have a destabilizing effect on the neighborhood.	Consistent. As discussed above, the new development and redevelopment within the Redlands RHNA Rezone Project would be visually compatible with the surrounding environment.
Action 4-A.34 Preserve agricultural land and protect agricultural operations and soils by identifying and designating these lands as Agriculture.	Consistent. The Project site does not include any parcels that are designated for agricultural uses.
Action 4-A.35 Preserve connections between agricultural lands with other agricultural lands and supporting uses.	Consistent. The sites within the Project area that currently contain agricultural uses are surrounded by developed areas. These agricultural sites are also zoned for industrial and commercial uses.
Action 4-A.37 Ensure adequate buffers and transitions between agricultural land and non-agricultural development in order to reduce the potential for land use conflicts.	Consistent. The Project sites proposed zoning would be consistent with the surrounding area and the site plans would be subject to approval prior to groundbreaking activities.
Principle 4-A.51 Promote the development of land uses that reduce the number and length of vehicle trips in the East Valley Corridor.	Consistent. The Project would increase residential development within the East Valley Corridor. As a result, this would increase the walkability within the corridor for these residents. These residential developments could also help attract major business to the area due to the growing population and further the walkability of the community.
Principle 4-A.52 Improve access and movement of all modes of transportation in the East Valley Corridor and enhance linkages to transit.	Consistent. As discussed in Section 5.10, <i>Transportation</i> , specific infrastructure improvements required to support future residential uses are not known at this time. However, if necessary, potential future projects would fund transit facilities as ensured and verified City during the plan check and permitting process.
Principle 4-A.53 Maintain development standards to implement the goals and policies of the EVCSP.	Consistent. All future potential projects within the RHNA Rezone area would be required to be consistent with development standards, which would be verified by the City during the plan check and permitting process prior to obtaining building permits.
Principle 4-A.54 Create a visually aesthetic appearance for the East Valley Corridor from the freeways as well as from the Planning Area.	Consistent. The potential infill developments within the Project site would improve the value of the area. These potential developments would make each site more visually consistent with the surrounding uses and provide amenities to the developing area.
Principle 4-A.55 Enhance the beauty of the East Valley Corridor and the overall quality of life for users and residents of the area.	
Principle 4-A.56 Create buffers and appropriate transitions between the East Valley Corridor industrial and commercial areas and adjacent residential neighborhoods.	
Action 4-A.95 Promote infill development to create a continuous corridor of mixed-use and commercial activity.	
Action 4-A.96 Encourage site designs that create an active street frontage and screen parking from the Colton Avenue and Orange Street frontages.	Consistent. All future potential projects within the RHNA Rezone area would be required to be consistent with design standards which would be verified by the City during the

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	plan check and permitting process prior to obtaining building permits.
Action 4-A.141 Regulate land uses within safety and noise compatibility zones in accordance with the Airport Land Use Compatibility Plan.	Consistent. As stated in the Initial Study, included as Appendix A, Site 23 is the only site within an airport compatibility zone; however, it is not within the modeled noise contours of neighboring airport.
Action 4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.	Consistent. Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.
Principle 5-P.1 Maintain a cohesive circulation system through a "layered network" approach promoting complete streets and mobility for all modes while emphasizing specific transportation modes for specific corridors and geographic areas.	Consistent. As stated in Section 5.10, <i>Transportation</i> , future projects under the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices.
Principle 5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.	Consistent. Implementing development projects would be required to construct or pay their fair share toward street, pedestrian infrastructure, and bicycle infrastructure improvements upon review of project designs by the City.
Policy 5-A.77 Encourage developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less.	Consistent. Future projects within the Project would be required to meet the minimum parking requirements for the lot and would be subject to approval by the City prior to receiving building permits.
Action 6-A.1 Preserve as open space those areas that contain unique habitats, natural resources, and visual amenities such as citrus groves, hillsides, canyons, and waterways. These areas provide natural contrast with the urban cityscape.	Consistent. All of the sites that require rezoning within the RHNA Rezone are currently zoned for industrial uses so the proposed Project would not alter any sites that were previously preserved for the protection of natural resources.
Action 6-A.10 Maintain and enhance Redlands' network of urban forest and street trees.	Consistent. Future developments within the Project site would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Principle 6-P.7 Protect environmentally sensitive lands, wildlife habitats, and rare, threatened, or endangered plant and animal communities.	Consistent. As discussed in the Initial Study, included as Appendix A, future projects would be subject to Mitigation Measure BIO-1 which requires a survey by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur onsite.
Principle 6-P.8 Minimize disruption of wildlife and valued habitat throughout the Planning Area and emphasize that open space is for more than just human use, but also serves as habitat for biological resources.	
Principle 6-P.10 Landscape public areas using native vegetation where practical.	
Action 6-A.11 Require a biological assessment of any proposed project site within the Planning Area where species that are State or federally listed as rare, threatened, or endangered are identified as potentially present.	Consistent. Future developments within the Project site would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
	Consistent. As discussed in the Initial Study, included as Appendix A, future projects would be subject to Mitigation Measure BIO-1 which requires a survey by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur on-site.

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Action 6-A.15 Enhance the Mill Creek Zanja and Morey Arroyo and tributary drainages as riparian corridors, where feasible, to provide habitat as well as recreational and aesthetic value consistent with an overall master plan for habitat preservation.	Consistent. As discussed in the Initial Study (Appendix A), there are no sites located within the Mill Creek Zanja. As for the sites located near the Morey Arroyo, if jurisdictional waters are present, the project would be subject to jurisdictional assessment pursuant to Mitigation Measure BIO-2.
Principle 6-P.11 Retain the maximum feasible amount of agricultural land for its contributions to the local economy, lifestyle, air quality, habitat value and sense of Redlands' heritage.	Consistent. All of the sites within the Project area are designated for urban uses including industrial, commercial, and residential uses. The rezone would not affect the land that is being preserved for agricultural uses within the city of Redlands.
Action 6-A.23 Permit transfer of development rights (TDR) between agreeable owners to preserve agricultural land and citrus groves. Develop an agricultural land mitigation program to conserve agricultural land through agricultural conservation easements at a ratio of 1:1 or greater.	
Action 6-A.26 Ensure that new development adjacent to an agricultural use is compatible with the continuation of the use by requiring appropriate design criteria, such as site layout, landscaping, and buffer areas.	
Principle 6-P.19 Promote the protection of waterways in Redlands from pollution and degradation as a result of urban activities.	Consistent. As discussed in the Initial Study (Appendix A), implementing developments would be required to prepare a Water Quality Management Plan that includes post-development BMPs and a Stormwater Pollution Prevention Plan that includes construction BMPs in order to ensure that implementing projects would not result in any water quality issues.
Principle 6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.	
Action 6-A.35 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.36 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.37 Protect and, where feasible, enhance or restore the city's waterways, including zanjias and ditches, preventing erosion along the banks, removing litter and debris, and promoting riparian vegetation and buffers.	
Action 6-A.39 Require that new development provides landscaping and re-vegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants.	Consistent. All projects within the Project site would be required to landscape and they would be subject to design approval by the City prior to being granted building permits.
Action 6-A.43 Ensure that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate. Dry weather runoff from new development must not exceed the pre-development baseline flow rate to receiving waterbodies.	Consistent. As discussed in the Initial Study, included as Appendix A, the Project would not result in increased flows compared to the current potential buildout. Proposed developments would also be required to be consistent with the City's drainage plan. Any increase in onsite runoff flows would be required to be addressed via direct storm drain

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	improvements or payment of a storm drain impact development fee.
<p>Action 7-P.1 Promote active lifestyles and community health by furthering access to trails, parks, public open space, and other recreational opportunities.</p>	<p>Consistent. As discussed in Section 5.10, <i>Transportation</i>, Potential future development facilitated by the Project may include sidewalk improvements. Specific sidewalk improvements required to support residential or school development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits.</p>
<p>Principle 7-P.10 Equitably share the cost of parkland creation and maintenance between existing and new residents, businesses, and property owners</p>	<p>Consistent. Implementing projects would be required to pay all development impact fees in order to ensure that the City can continue to provide adequate recreational facilities.</p>
<p>Action 7-A.3 Provide 5 acres of park area for each 1,000 Planning Area residents, and additional parkland for specialized, and low-use park acreage.</p>	
<p>Principle 7-P.16 Ensure that all Redlands residents have access to a variety of transportation and physical activity options that enhance health and that work for diverse lifestyles, incomes, and abilities</p>	<p>Consistent. As discussed previously, potential future development facilitated by the Project may include sidewalk improvements. Specific sidewalk improvements required to support residential or school development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.</p>
<p>Principle 7-P.17 Achieve more walkable, livable neighborhoods by expanding the multimodal transportation system and creating a safe, pedestrian-oriented environment</p>	
<p>Action 7-A.35 Implement street design features that facilitate walking and biking in both new and established areas. Require a minimum standard of these features for all new developments.</p>	
<p>Action 7-A.39 Install appropriate facilities along streets and at roadway intersections to improve and ensure pedestrian safety.</p>	
<p>Action 7-A.89 Require adherence to applicable buildings codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code.</p>	<p>Consistent. Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.</p>
<p>Action 7-A.93 Require that new development minimizes risks to life and property from fire hazard through:</p> <ul style="list-style-type: none"> Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.; Siting and designing development to avoid hazardous locations; Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent; 	

General Plan Policy	Proposed Project
<ul style="list-style-type: none"> • Using appropriate building materials and design features to ensure the minimum amount of required fuel modification; and • Using fire-retardant, native plant species in landscaping. 	
<p>Action 7-A.95 Coordinate with the Redlands Fire Department and other fire prevention agencies to review all applications for new development. The Fire Department's review should ensure compliance with fire safety regulations and assess potential impacts to existing fire protection services and the need for additional and expanded services</p>	
<p>Principle 7-P.41 Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure as a criterion in land use planning</p>	<p>Consistent. As discussed in Section 5.7, <i>Noise</i>, new development would be required to be compatible with the existing noise environment through implementation of noise Mitigation Measures NOI-1 and NOI-2. Implementing developments within areas where projected noise levels are higher would be required to submit an acoustical analysis demonstrating that the project would meet the applicable noise standards.</p>
<p>Action 7-A.136 Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10.</p>	
<p>Action 7-A.137 For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.</p>	
<p>Action 7-A.138 Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.</p>	<p>Consistent. As discussed in Section 5.7, <i>Noise</i>, new development would be required to be compatible with the existing noise environment through implementation of Mitigation Measures NOI-1 and NOI-2. Implementing non-residential developments would be required to prepare a noise analysis in order to ensure that the proposed project would not result in impacts to sensitive receptors.</p>
<p>Action 9.0w Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary</p>	<p>Consistent. As discussed in Section 5.7, <i>Noise</i>, new development would be constructed pursuant to the Redlands Municipal Code, which limits hours of construction.</p>
<p>Principle 7-P.49 Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.</p>	<p>Consistent. As discussed in Section 5.2, <i>Air Quality</i>, Mitigation Measures AQ-1 and AQ-2 are included, which requires development projects to provide modeling of the regional and the localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development; and requires grading activity to be limited to ensure that there would be no impacts to sensitive receptors.</p>
<p>Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.</p>	<p>Consistent. Implementing projects pursuant to the RHNA Rezone would be required to adhere to the California Building Code.</p>

General Plan Policy	Proposed Project
Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	Consistent. The future projects within the RHNA Rezone Project would be required to be in line with City Municipal Code standards and would contain landscaping throughout the sites.
Action 8-A.37 Promote design in new development that incorporates space for recycling containers and other waste diversion facilities	Consistent. Implementing projects pursuant to the RHNA Rezone would be required to provide for recycling, in line with City Municipal Code standards.
Action 8-A.39 Continue implementation and enforcement of the California Building and Energy codes to promote energy efficient building design and construction.	Consistent. Implementing projects pursuant to the RHNA Rezone would be required to adhere to the California Building Code, Title 24, and the California Energy Code.
Action 8-A.40 Promote the Leadership in Energy and Environmental Design (LEED) certification program for the design, operation, and construction of high-performance green buildings.	

City of Redlands Municipal Code

Upon adoption of the proposed Project, the development regulations and design criteria within the new zoning designations would apply to the Project area. Future development projects pursuant to the proposed Project would be required to adhere to City Municipal Code standards, which would be verified through the City's review process. As such, the proposed rezone would not result in conflicts with the City of Redlands zoning code, and impacts would be less than significant.

Overall, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts would be less than significant.

5.6.7 CUMULATIVE IMPACTS

The geographic context for this cumulative analysis includes the City of Redlands in relation to the City's General Plan. Cumulative development could result in intensity increases to existing land use patterns through implementation of mixed-use, infill and redevelopment. Cumulative development would also be subject to site-specific environmental and planning reviews that would address consistency with adopted General Plan goals, objectives, and policies, as well as with the City's Zoning Code. As part of environmental review, projects would be required to provide mitigation for any inconsistencies with the General Plan and environmental policies that would result in adverse physical environmental effects. The cumulative projects as a whole, would result in a more intensely developed built environment than currently exists, and would be required to be consistent with local General Plan policies.

While cumulative projects could include General Plan amendments and/or zone changes, modifications to existing land uses that require such amendments do not necessarily represent an inherent negative effect on the environment, particularly if the proposed changes involve changes in types and intensity of uses, rather than eliminating application of policies that were specifically adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would not occur.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- City of Redlands Municipal Code
- City of Redlands General Plan

Plans, Programs, or Policies

None.

5.6.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact LU-2 would be less than significant.

5.6.9 MITIGATION MEASURES

No mitigation measures are required.

5.6.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Existing regulatory programs would reduce potential impacts associated with land use and planning to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to land use and planning would occur.

5.6.11 REFERENCES

City of Redlands. (2017a). *Redlands General Plan 2035*. Retrieved August 8, 2024, from <https://www.cityofredlands.org/post/planning-division-general-plan>

City of Redlands. (2017b). *Redlands General Plan Environmental Impact Report*. Retrieved August 8, 2024, from <https://www.cityofredlands.org/post/planning-division-general-plan>

City of Redlands. (2022). *City of Redlands Zoning Map*. Retrieved August 8, 2024, from <https://www.cityofredlands.org/sites/main/files/file-attachments/zoning.pdf?1633557844>

SCAG. (2024). *Regional Transportation Plan and Sustainable Communities Strategy*. Retrieved July 11, 2024, from <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-social-2024-final-complete-040424.pdf?1714175547>

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5.7 Noise

5.7.1 INTRODUCTION

This Draft Subsequent EIR section evaluates the potential noise and vibration impacts that would result from buildout pursuant to the proposed Project. It discusses the existing noise environment within and around the proposed rezone areas as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during future demolition, construction, and operational activities that would occur from buildout pursuant to the proposed rezoning, and evaluates the proposed Project's noise effects for consistency with relevant local agency noise policies and regulations. This section includes data from the following:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017; and
- City of Redlands Municipal Code.

Noise and Vibration Terminology

Various noise descriptors are utilized in this EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Ambient noise level: the background noise level associated with a given environment at a specified time; usually a composite of sound from many sources from many directions.

Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3 dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over hard surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.7.2 REGULATORY SETTING

5.7.2.1 Federal Regulations

Federal Highway Administration

Proposed federal or federal-aid highway construction projects at a new location, or the physical alteration of an existing highway that significantly changes either the horizontal or vertical alignment, or increases the number of through-traffic lanes, requires an assessment of noise and consideration of noise abatement per 23 CFR Part 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise." The Federal Highway Administration (FHWA) has adopted noise abatement criteria (NAC) for sensitive receivers such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals when "worst-hour" noise levels approach or exceed 67 dBA Leq. Caltrans has further defined approaching the NAC to be 1 dBA below the NAC for noise-sensitive receivers identified as Category B activity areas (i.e., 66 dBA Leq is considered approaching the NAC).

US Environmental Protection Agency

In addition to FHWA standards, the United States Environmental Protection Agency (EPA) has identified the relationship between noise levels and human response. The EPA has determined that over a 24-hour period, an Leq of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at an Leq of 55 dBA and interior levels at or below 45 dBA. While these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community.

The EPA also set 55 dBA Ldn as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well as difficulty of actually achieving a goal of 55 dBA Ldn, have settled on the 65 dBA Ldn level as their standard. At 65 dBA Ldn, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA). Such limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is therefore not addressed further in this analysis.

US Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) has set a goal of 65 dBA Ldn as a desirable maximum exterior standard for residential units developed under HUD funding. (This level is also generally accepted within the State of California.) While HUD does not specify acceptable interior noise levels, standard construction of residential dwellings typically provides in excess of 20 dBA of attenuation with the windows closed. Based on this premise, the interior Ldn should not exceed 45 dBA.

5.7.2.2 State Regulations

Title 24, California Building Code

State regulations related to noise include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

The mandatory measures for non-residential buildings states that new construction shall provide an interior noise level that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation. Title 24 standards are included in the City's Municipal Code in Chapter 15 and are enforced through the City's development permitting process.

5.7.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Healthy Community Element contains the following policies related to noise that are applicable to the Project:

- Principle 7-P.40** Protect public health and welfare by eliminating existing noise problems where feasible and by preventing significant degradation of the future acoustic environment.
- Principle 7-P.41** Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure as a criterion in land use planning.
- Action 7-A.135** Use the noise and land use compatibility matrix (Table 7-10) and Future Noise Contours map (Figure 7-9) as criteria to determine the acceptability of a given land use, including the improvement/construction of streets, railroads, freeways, and highways. Do not permit new noise-sensitive uses—including schools, hospitals, places of worship, and homes—where noise levels are “normally unacceptable” or higher, if alternative locations are available for the uses in the city.
- Action 7-A.136** Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than “clearly” or “normally compatible” as specified in Table 7-10.
- Action 7-A.137** For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building’s openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.
- Action 7-A.138** Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.
- Action 7-A.141** Require all future developments within the city that fall within the required noise screening distances, as specified in the Federal Transit Authority (FTA) Noise and Vibration Manual, of the Union Pacific railroad in San Timoteo Canyon to conduct a detailed noise analysis.

Table 7-10 of the General Plan Healthy Community Element (included as Table 5.7-1 of this Draft Subsequent EIR) identifies the specific criteria to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Healthy Community Element identifies schools, hospitals, places of worship, and homes as a noise-sensitive land use.

Also, as shown in Table 5.7-2, the City of Redlands General Plan has an exterior (outdoor) noise standard of 60 dBA CNEL related to private yards of single-family residences as measured at the property line; multifamily private patios or balconies which is served by a means of exit from inside; mobile home parks; hospital patios; park picnic areas; school playgrounds; hotel and recreational areas.

- Measure U** The City of Redlands General Plan incorporates the implementing noise policies from Measure U. Measure U was certified by The City of Redlands in 1997 to address impacts from growth. The measure includes Project applicable provisions related to potential noise impacts and mitigation, as listed below.
- Measure U 9.0e** Use the criteria specified in General Plan Table 9.1 [Table 5.7-1] to assess the compatibility of proposed land uses with the projected noise environment and apply the noise standards in General Plan Table 9.2 [Table 5.7-2], which prescribe interior and exterior noise standards in relation to specific land uses. Do not approve projects that would not comply with the standards in General Plan Table 9.2 [Table 5.7-2]. These

tables are the primary tools which allow the City to ensure noise-integrated planning for compatibility between land uses and outdoor noise.

- Measure U 9.0f** Require a noise impact evaluation based on noise measurements at the site for all projects in Noise Referral Zones (B, C, or D) as shown on General Plan Table 9.1 [Table 5.7-1] and on General Plan Figure 9.1 [Table 5.7-2] or as determined from tables in the Appendix, as part of the project review process. Should measurements indicate that unacceptable noise levels will be created or experienced, require mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years' experience in acoustics).
- Measure U 9.0i** Require construction of barriers to mitigate sound emissions where necessary or where feasible and encourage use of walls and berms to protect residential or other noise sensitive land uses that are adjacent to major roads, commercial, or industrial areas.
- Measure U 9.0t** Require proposed commercial projects near existing residential land use to demonstrate compliance with the Community Noise Ordinance prior to approval of the project.
- Measure U 9.0u** Require all new residential projects or replacement dwellings to be constructed near existing sources of non-transportation noise (including but not limited to commercial facilities or public parks with sports activities) to demonstrate via an acoustical study conducted by a Registered Engineer that the indoor noise levels will be consistent with the limits contained in the Community Noise Ordinance.
- Measure U 9.0v** Consider the following impacts as possibly "significant":
- An increase in exposure of four or more dB if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in General Plan Table 9.1 [Table 5.7-1] and General Plan Table 9.2 [Table 5.7-2];
 - Any increase of six dB or more, due to the potential for adverse community response.
- Measure U 9.0w** Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary.
- Measure U 9.0y** Minimize impacts of loud trucks by requiring that maximum noise levels due to single events be controlled to 50 dB in bedrooms and 55 dB in other habitable spaces.

Table 5.7-1: City of Redlands General Plan Noise/Land Use Compatibility Matrix

Land Use Categories		Community Noise Equivalent Level (CNEL)							
Categories	Uses	<	60	65	70	75	80	85	>
RESIDENTIAL	Single Family, Duplex Multiple Family	A	C	C	C	D	D	D	
RESIDENTIAL	Mobile Homes	A	C	C	C	D	D	D	
COMMERCIAL Regional, District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D	
COMMERCIAL Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A	B	B	C	
COMMERCIAL INDUSTRIAL INSTITUTIONAL	Office Building, Research & Dev., Professional Offices, City Office Building	A	A	A	B	B	C	D	
COMMERCIAL Recreation INSTITUTIONAL Civic Center	Amphitheater, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D	
COMMERCIAL Recreation	Childrens Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	A	B	B	B	
COMMERCIAL General, Special INDUSTRIAL, INSTITUTIONAL	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B	
INSTITUTIONAL General	Hospital, Church, Library, Schools Classroom	A	A	B	C	C	D	D	
OPEN SPACE	Parks	A	A	A	B	C	D	D	
OPEN SPACE	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C	
AGRICULTURE	Agriculture	A	A	A	A	A	A	A	
Zone A CLEARLY COMPATIBLE		Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.							
ZONE B NORMALLY COMPATIBLE		New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.							
ZONE C NORMALLY INCOMPATIBLE		New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.							
ZONE D CLEARLY INCOMPATIBLE		New construction or development should generally not be undertaken.							

Source: City of Redlands General Plan Noise Element, Chapter 7 Healthy Community, Section 7.5 Noise, Table 7-10.

Table 5.7-2: City of Redlands General Plan Interior and Exterior Noise Standards

Land Use Categories		Community Noise Equivalent Level (CNEL) Energy Average CNEL	
Uses		Interior ¹	Exterior ²
RESIDENTIAL			
Single Family, Duplex, Multiple Family		45 ³	60
Mobile Home		---	60 ⁴
COMMERCIAL, INDUSTRIAL, INSTITUTIONAL			
Hotel, Motel, Transient Lodging		45	65 ⁵
Commercial Retail, Bank Restaurant		55	---
Office Building, Research & Development, Professional Offices, City Office Building		50	---
Amphitheater, Concert Hall, Auditorium, Meeting Hall		45	---
Gymnasium (Multipurpose)		50	---
Sports Club		55	---
Manufacturing, Warehousing, Wholesale, Utilities		60	---
Movie Theaters		45	---
INSTITUTIONAL			
Hospital, Schools classrooms		45	60
OPEN SPACE			
Parks		---	60
Notes: * CNEL (Community Noise Equivalent Level) - The average equivalent A-weighted sound level during a 24 hour day, obtained after addition of approximately five decibels to sound levels in the evening from 7 pm to 10 pm and ten decibels to sound levels at night after 10 pm and before 7 am. 1. Indoor environment excluding bathrooms, toilets, closets, corridors. 2. Outdoor environment limited to private yard of single family as measured at the property line; multifamily private patio or balcony which is served by a means of exit from inside; mobile home park; hospital patio; park picnic area; school playground; hotel and recreational area. 3. Noise level requirement with open windows, if they are used to meet natural ventilation requirement. 4. Exterior noise level should be such that interior level will not exceed 45 CNEL. 5. Except those areas affected by aircraft noise. See also Policy 9.0s			
Source: Mestres Greve Associates.			

Source: City of Redlands General Plan Noise Element, Chapter 7 Healthy Community, Section 7.5 Noise, Table 7-11.

City of Redlands Municipal Code

The City of Redlands Municipal Code Chapter 8.06 establishes noise standards by land use. For the noise-sensitive residential uses, Municipal Code Section 8.06.070[A] identifies the base exterior noise level standard of 60 dBA Leq during the daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dBA Leq during the

nighttime (10:00 p.m. to 7:00 a.m.) hours. As shown in Table 5.7-3, higher noise levels are allowed for shorter periods of time.

Table 5.7-3: City of Redlands Operational Noise Standards

Land Use	Time Period	Exterior Noise Level Standards (dBA)				
		L ₅₀ (30 mins)	L ₂₅ (15 mins)	L ₈ (5 mins)	L ₂ (1 min)	L _{max} (0 min)
Residential	Daytime	60	65	70	75	80
	Nighttime	50	55	60	65	70
Commercial	Daytime	65	70	75	80	85
	Nighttime	60	65	70	75	80
Industrial	Anytime	75	80	85	90	95

Source: City of Redlands Municipal Code, Section 8.06.070 [A]-Table 1. Section 8.06.070[C] states that if the measured ambient level exceeds the allowable noise exposure standard within any of the first four noise limit categories above, the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to encompass or reflect said ambient noise level. The percent noise level is the level exceeded "n" percent of the time during the measurement period. L₅₀ is the noise level exceeded 50% of the time. "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

In addition, Municipal Code Section 8.06.080 identifies the maximum permissible interior noise levels. For noise-sensitive residential uses, Municipal Code Section 8.06.080[B] identifies the interior noise level standard of 45 dBA. For commercial uses, Municipal Code Section 8.06.080[B] identifies the interior noise level standard of 50 dBA.

In addition, Municipal Code Section 8.06.070[B] provides noise standards based on the volume of noise and the period of time of the noise, as listed below:

1. The exterior noise standard of the applicable land use category for a cumulative period of 30 minutes in any hour (L₅₀); or
2. The exterior noise standard of the applicable land use category, plus 5 dBA, for a cumulative period of more than 15 minutes in any hour (L₂₅); or
3. The exterior noise standard of the applicable land use category, plus 10 dBA, for a cumulative period of more than 5 minutes in any hour (L₈); or
4. The exterior noise standard of the applicable land use category, plus 15 dBA, for a cumulative period of more than 1 minute in any hour (L₂).
5. The exterior noise standard for the applicable land use category, plus 20 dBA, or the maximum measured ambient noise level, for any period of time (L_{max}).

In addition, Section 8.06.070[C] states that *if the measured ambient level exceeds the allowable noise exposure standard within any of the first four noise limit categories above, the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to encompass or reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.* In effect, when the ambient noise levels exceed the base exterior noise level limits, the noise level standard shall be adjusted as appropriate to encompass or reflect the ambient noise level.

Municipal Code Section 8.06.090(F) states that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays.

Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS.

5.7.3 ENVIRONMENTAL SETTING

Sensitive Receptors

Noise sensitive receptors 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: residences, schools, and recreation areas. Sensitive receptors are located throughout and adjacent to the Rezone sites.

Existing Noise

Major noise sources within proximity to the Rezone sites include traffic noise and stationary noise. The background ambient noise levels in the areas surrounding the Rezone sites are dominated by the transportation-related noise associated with surface streets. The volume of noise is dependent on the traffic volumes and structures, such as walls, that are located between streets and receptors. Estimated roadway noise volumes are depicted in Figure 3.12-1, *Existing Noise Contours (2017)*, of the City of Redlands General Plan EIR (City of Redlands, 2017b, p. 3.12-19).

Airports

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 (City of Redlands, 2017b, p. 3.7-2). None of the proposed sites are within the modeled noise contours for the Redlands Municipal Airport (City of Redlands, 2017b, Figure 3.12-3) or San Bernardino International Airport according to the County of San Bernardino General Plan Figure HZ-9, *Airport Safety and Planning Areas* (San Bernardino County, 2020). Thus, the proposed Rezone sites are not subject to excessive noise levels from airport operations.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the proposed Rezone sites, other sources of groundborne vibration include heavy-duty trucks on area roadways related to the existing urban uses throughout the City. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, construction activity would be required to comply with Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. As discussed in General Plan EIR, buildout of the General Plan would result in a 1.2 dBA increase from roadway noise, which is barely perceptible. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed

General Plan would be subject to the City's noise ordinance. The General Plan EIR determined that compliance with the City's noise ordinance in the Municipal Code in Sections 8.06.070 and 8.06.080.

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in:

- NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- NOI-2 Generation of excessive groundborne vibration or groundborne noise levels;
- NOI-3 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, expose people residing or working in the project area to excessive noise levels.

The Initial Study established that the proposed Project would result in less-than-significant impacts related to Threshold NOI-3. Thus, no further assessment of this impact is required in this Draft Subsequent EIR.

Construction Noise and Vibration

A significant construction noise or vibration related impact would occur under the following conditions:

- If Project related construction activities:
 - Occur between the hours of 6:00 p.m. and 7:00 a.m. of the next day, on Sundays or federal holidays (Municipal Code Section 8.06.090(F)); or
 - Create noise levels which exceed the 80 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations (FTA, 2006).
- If Project-related construction activities generate vibration levels which exceed the Municipal Code, Section 8.06.020, vibration threshold of 0.1 in/sec RMS at receiver locations.

Operational Noise

A significant operational noise impact would occur under the following conditions:

- If Project related operational increase in ambient noise levels result in:
 - An increase in exposure of 4 or more dB, if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in General Plan Table 9.1 [EIR Table 5.7-1] and General Plan Table 9.2 [EIR Table 5.7-2];
 - Any increase of 6 dB or more, due to the potential for adverse community response (Measure U Policy 9.0v).

5.7.5 METHODOLOGY

Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed for typical construction

projects were analyzed through comparison of construction noise levels to the thresholds to assess the level of significance associated with temporary construction noise level impacts. The City's Municipal Code limits construction hours to reduce noise. The FTA considers a daytime exterior construction noise level of 80 dBA Leq and a nighttime exterior construction noise level of 70 dBA Leq as a reasonable threshold for noise sensitive residential land use. The construction noise levels are compared against the FTA's threshold to assess the level of significance associated with temporary construction noise level impacts.

Operational Noise

The primary source of noise associated with the operation of buildout pursuant to the Project would be from vehicular trips and new stationary sources (such as heating, ventilation, and air conditioning units) associated with the new site-specific development that would occur under the proposed zoning. The increase in noise levels generated by these activities has been estimated and compared to the applicable noise standards listed previously.

Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of future uses pursuant to the proposed zoning by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the construction sites. The potential ground-borne vibration levels resulting from construction activities were estimated by data published by the FTA. Thus, the groundborne vibration levels generated by these sources have also been estimated and compared to the applicable thresholds of significance listed previously.

5.7.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

Construction Noise. The General Plan EIR describes that the exact location of projects and construction activities that would be implemented under the General Plan are not known, though it is likely that construction activities would take place within the vicinity of sensitive receptors. The City regulates noise associated with construction equipment and activities through its Noise Control Ordinance in the Municipal Code. Thus, compliance with the City's Noise Control Ordinance in the Municipal Code in Section 8.06.090 would be required for any future construction. Therefore, the General Plan EIR determined the noise impact from construction activities associated with implementation of the proposed General Plan would be less than significant (City of Redlands, 2017b, p. 3.12-34).

Traffic Noise. The General Plan EIR describes that buildout of the General Plan update would generate traffic, which would increase traffic noise levels along existing and future roadways. Draft EIR Table 3.12-8 shows that traffic noise would increase by up to 1.2 dBA, which is normally not perceptible by the human ear in an outdoor environment. Therefore, the General Plan EIR determined that potential traffic noise impacts associated with buildout of the General Plan land uses would be less than significant (City of Redlands, 2017b, p. 3.12-35).

Stationary Noise. The General Plan EIR describes that buildout of the General Plan update could expose existing and/or new sensitive uses to stationary noise sources, such as industrial and/or commercial uses. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed General Plan would be subject to the City's noise ordinance. The General Plan EIR determined that compliance with the City's noise ordinance in the Municipal

Code in Sections 8.06.070 and 8.06.080 would result in less than significant noise impact (City of Redlands, 2017 p. 3.12-49).

Vibration. The General Plan EIR describes that during construction activities related to buildout of the General Plan, the use of large bulldozers and trucks would generate the highest groundborne vibration levels of 0.089 PPV in/sec and 0.076 PPV in/sec, respectively, when measured at 25 feet. General Plan EIR Table 3.12-10 shows that for fragile structures located within 19 feet, residential structures constructed with non-engineered timber located within 12 feet, and modern industrial/commercial structures constructed with engineered concrete and masonry located within 8 feet of construction activity, the use of a large bulldozer would potentially damage the structure. The General Plan EIR determined that construction activities with the use of a large bulldozer would not likely occur within the structure type and their corresponding distance mentioned above. Therefore, vibration levels generated during construction were determined to be less than significant. Also, the General Plan EIR determined that groundborne vibration impacts generated by vehicles from buildout of the General Plan land uses would be less than significant (City of Redlands, 2017, p. 3.12-53).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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). As detailed in Section 5.10, *Transportation*, the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

IMPACT NOI-1: THE PROJECT WOULD NOT GENERATE A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

Construction

Less than Significant with Mitigation Incorporated. The timing of development and various construction activities pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically and include different development-specific construction activities.

Noise generated by construction equipment could include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. Construction projects are generally expected to occur in the following stages: demolition, excavation, and grading, building construction, architectural coating, and paving. Combined noise levels generated by heavy construction equipment range from approximately 77 dBA (Lmax) to 83 dBA (Lmax) at 50 feet from the noise source, as shown in Table 5.7-4.

Table 5.7-4: Construction Reference Noise Levels

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq}) ¹	Combined Noise Level (dBA L _{eq}) ²	Combined Sound Power Level (PWL) ³
Demolition	Demolition Equipment	82	83	115
	Backhoes	74		
	Hauling Trucks	72		
Site Preparation	Crawler Tractors	78	80	112
	Hauling Trucks	72		
	Rubber Tired Dozers	75		
Grading	Graders	81	83	115
	Excavators	77		
	Compactors	76		
Building Construction	Cranes	73	81	113
	Tractors	80		
	Welders	70		
Paving	Pavers	74	83	115
	Paving Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77	109
	Air Compressors	74		
	Generator Sets	70		

¹ FHWA Roadway Construction Noise Model (RCNM).

² Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.

³ Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the CadnaA noise model at the reference distance to the noise source.

Hard site conditions are used in this construction noise analysis which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e., construction equipment). For example, a noise level of 83 dBA measured at 50 feet from the noise source to the receiver would be reduced to 77 dBA at 100 feet from the source to the receiver and would be further reduced to 71 dBA at 200 feet from the source to the receiver.

Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. Therefore, in order to determine if construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria threshold detailed above has been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at a sensitive receiver, such as a residence.

Because buildout pursuant to the proposed Project could result in construction in proximity to existing or future sensitive receptors, temporary intermittent construction noise impacts could occur. Therefore, Mitigation Measures NOI-1 and NOI-2 have been included to provide construction measures to reduce potential construction noise impacts to a less-than-significant level.

Operation

Less than Significant Impact.

Increase in Roadway Noise

Buildout pursuant to the proposed Project would result in new residential development and an overall decrease in nonresidential development compared to buildout under the existing General Plan and zoning designations. The primary source of noise impacts related to the new development would be from traffic-related noise from vehicle and truck trips.

As described in Section 3.0, *Project Description*, 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 additional capacity of 2,325 compared to the existing General Plan land uses. As detailed in Section 5.10, *Transportation*, the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily trips, including a reduction of 1,716 p.m. peak hour trips compared to buildout of the existing zoning. As the Project would result in a reduction in daily trips compared to buildout of the existing General Plan land uses, impacts related to increased traffic noise from implementation of the proposed Project would be less than significant.

Roadway Noise Compatibility

As described previously, the General Plan EIR determined that buildout of the General Plan update would generate traffic, which would increase traffic noise levels by up to 1.2 dBA, which is normally not perceptible by the human ear in an outdoor environment; therefore, it was determined to be less than significant. (City of Redlands, 2017b, p. 3.12-35)

With implementation of the proposed Project, it is possible that new noise sensitive land uses adjacent to arterial roadways could experience future unmitigated exterior noise levels greater than 65 dBA CNEL, which is normally incompatible for residential uses based on the General Plan Noise/Land Use Compatibility Matrix (Table 5.7-1). Therefore, based on the proximity of future noise sensitive land uses, traffic-related noise impacts at future residential uses within the Project area would be potentially significant. However, this would be dependent upon the specific location and design of future projects. Thus, existing General Plan policies would be implemented to protect future uses. As listed previously, General Plan Healthy Community Element Action 7-A.136 requires a noise analysis be conducted for all development proposals located where projected noise exposure would be other than “clearly” or “normally compatible” and Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Likewise, Measure U 9.0e requires noise level compliance for new projects, Measures U 9.0f, U 9.0u, and U 9.0v require noise studies or other verification that impacts would not occur, and Measure U 9.0i requires noise barriers. Therefore, with implementation of existing General Plan policies, impacts related to future residences within traffic noise impacted areas would be less than significant.

Noise from New Land Use Operations

Buildout pursuant to the proposed Project would result in development of new residential and public/institutional uses that would generate a combination of noise sources that include air conditioning units, parking lots, trash enclosures, and outdoor activities in park and recreation areas. These Project-related noise sources are consistent with existing noise sources throughout the City of Redlands and consistent with or less intensive than the noise sources that would occur from development of the existing zoning. Although, operation of new uses developed pursuant to the proposed Project could result in a substantial increase the ambient noise levels at sensitive receptors if not designed appropriately, the City’s review and development permitting process ensures future project compliance with Municipal Code Section 8.06.090(F). As described previously, the General Plan Healthy Community Element Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Through implementation of the City’s existing General

Plan and Municipal Code regulations that would be verified through the City's development review and permitting process, impacts would be less than significant.

As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to noise would be less than significant.

IMPACT NOI-2: THE PROJECT WOULD NOT GENERATE EXCESSIVE GROUND-BORNE VIBRATION OR GROUND-BORNE NOISE LEVELS.

Construction

Less than Significant with Mitigation Incorporated. Construction activities for the infill and redevelopment projects that would occur pursuant to the proposed Project are anticipated to include demolition, site preparation, grading, building construction, paving, and application of architectural coatings. Vibration impacts from these construction activities would typically be created from the operation of heavy off-road equipment. Because the proposed Project could result in development of residential and public/institutional uses and existing residential units and historic structure that are potentially fragile are located throughout the Project area, construction could occur adjacent to sensitive receptors.

As described previously, Section 8.06.090(F) of the City's Municipal Code limits construction to occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, which also limits the time that construction vibration could occur. Also, Municipal Code Section 8.06.020 identifies the vibration threshold as 0.01 in/sec RMS.

Ground vibration levels associated with various types of construction equipment are summarized in Table 5.7-5. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate construction vibration levels using the following vibration assessment methods defined by the FTA. To describe the human response (annoyance) associated with vibration impacts, the FTA provides the following equation: $PPV_{equip} = PPV_{ref} \times (25/D)$.

Table 5.7-5: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

The primary source of vibration during infill and redevelopment construction would be from the operation of a bulldozer. As shown in Table 5.7-5, a large bulldozer would create a vibration level of 0.089 in/sec PPV at 25 feet. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020), describes that fragile historic buildings have the potential to be impacted at a 0.08 in/sec PPV.

To describe the RMS vibration level and demonstrate compliance with the Municipal Code perceptible vibration threshold of 0.01 in/sec RMS, PPV velocities are converted to RMS vibration levels based on the Caltrans *Transportation and Construction Vibration Guidance Manual* conversion factor of 0.71 and are listed in Table 5.7-6 at distances ranging from 25 to 150 feet from construction activity. As shown, construction vibration levels would range from 0.004 to 0.063 in/sec RMS, and would exceed the perceptible vibration threshold of 0.01 in/sec RMS at distances of 100 feet or less. Therefore, Mitigation Measures NOI-3 is included to ensure that vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses, and that other equipment be used to reduce potential vibration impacts to below the vibration threshold of 0.01 in/sec RMS, which would reduce impacts to a less-than-significant level. In addition, Mitigation Measure NOI-4 is included to require an assessment of fragile historic

buildings within 25 feet of construction to ensure that construction vibration from implementation of the proposed Project would not damage any historic structures. With implementation of these mitigation measures, potential impacts related to construction vibration would be less than significant.

Table 5.7-6: Construction Equipment Vibration Levels

Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV					Velocity Levels (in/sec) RMS	Threshold (in/sec) RMS	Threshold Exceeded?
	Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
25	0.0030	0.0350	0.0760	0.0890	0.0890	0.063	0.01	Yes
50	0.0011	0.0124	0.0269	0.0315	0.0315	0.022	0.01	Yes
100	0.0004	0.0044	0.0095	0.0111	0.0111	0.008	0.01	No
125	0.0003	0.0031	0.0068	0.0080	0.0080	0.006	0.01	No
150	0.0002	0.0024	0.0052	0.0061	0.0061	0.004	0.01	No

Source: Caltrans, 2020

Operation

Less than Significant Impact. The proposed Project would consist of infill and redevelopment of sites with new residential and public/institutional uses instead of commercial and industrial uses as currently planned for under the existing General Plan land use designations. The operation of residential and public/institutional land uses would not include the operation of any vibration sources other than typical onsite vehicle and truck operations, which result in negligible vibration levels. Therefore, impacts related to operational vibration from buildout pursuant to the proposed Project would be less than significant.

As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to vibration would be less than significant.

5.7.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development pursuant to the proposed Project in combination with ambient growth and other development projects within the vicinity of the RHNA Rezone sites. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the activities of future developments pursuant to the proposed Project to result in cumulative noise impacts.

Buildout of the proposed Project in combination with surrounding cumulative projects through the year 2035 would result in an increase in construction-related and traffic-related noise. However, Municipal Code Section 8.06.090(F) requires construction activities to not occur within the hours of 6:00 p.m. and 7:00 a.m. on weekdays or anytime on Sundays and federal holidays. Also, construction noise and vibration are localized in nature and decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise and vibration levels, more than one source emitting high levels of construction noise would need to be in close proximity to the Rezone sites with construction activity. As the timing of development and various construction activities pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects, construction activities associated with buildout pursuant to the rezoning would occur sporadically through the year 2035. Thus, it is currently unknown if future construction projects would occur adjacent to one another. As shown in Figure 5-1, *Cumulative Projects*, there are several existing cumulative projects within the general vicinity of the Rezone sites, which are listed in Table 5.7-7. As detailed, several projects are completed, entitled, and in planning, and one project is under construction.

Table 5.7-7: Existing Cumulative Projects Related to Noise and Vibration

No.	Cumulative Project	Location/Address	Description	Project Status
City of Redlands				
2.	Liberty Lane Apartments, CUP 1045	SWC Lugonia Ave & Texas Street	80 multi-family residential units	Under Construction
3.	Luxview Apartments, CUP 1108, TTM 20244, SPA 45 & 46	1616 Orange Street	328 multi-family residential units	Completed
4.	Heritage Specific Plan, TTM 20257, SP 62, GPA 141	NWC Texas St & W. San Bernardino Avenue	207 single-family residential units	Completed
25.	Lugonia Village, GPA 143, ZC 469, SPA 48 to EVCSP, TTM 40490 & 40491, TPM 40469, CRAs 940, 941, 942	NEC Tennessee St & W. Lugonia Ave	90 single-family residences, 451 multi-family residences	Entitled
29.	Luxview Phase 2, CRA 958	SWC Alabama St & Orange Ave	164 multi-family residences with affordable housing	In Planning
31.	CRA 912	10797 & 10843 New Jersey St	179,400 SF warehouse building	Completed
36.	CRA 928	10756 Nevada St	88,400 SF warehouse building	Completed
49.	CRA 938, CUP 1187	350 Iowa St	181,100 SF warehouse	Entitled
56.	CRA 952	Alabama St & W. Citrus Ave	8,853 SF medical clinic	Entitled
57.	CRA 963	SWC Lugonia Ave & New York St	16,027 SF grocery store	Entitled
61.	CUP 1184 & 1185	SWC Lugonia Ave & New York St	Two fast food restaurants w/ drive-thrus totaling 6,020 SF	Entitled
65.	CRA 959, CUP 1174, & 1175	NEC Lugonia Ave & Tennessee St	Two fast food restaurants with drive-thrus totaling 13,300 SF and 47,085 SF shopping center with four retail buildings	In Planning
66.	Carmax, CRA 962, CUP 1179, SPA 52 to EVCSP	New York St. at Brockton Ave.	4,958 SF used automobile sales building, 47,085 SF automobile repair	In Planning

Source: Section 5.0, Table 5-1.

Due to the unknown timing of future developments under the proposed zoning, it is unknown what construction activities would concurrently within proximity to each other. However, implementation of construction Mitigation Measures NOI-1 and NOI-2 and vibration Mitigation Measures NOI-3 and NOI-4 provided herein would reduce the potential of noise and vibration levels from different construction projects combining to become cumulatively considerable to a less than significant level. Therefore, with implementation of mitigation, cumulative noise and vibration impacts associated with construction activities would be less than significant.

Development resulting from approval of the proposed Project in combination with other projects could result in an increase in ambient noise. However, all development projects would be subject to the operational noise standards established by the General Plan and Municipal Code, which would ensure that noise from new uses would stay below City standards, and therefore, not combine with other development projects to be cumulatively significant. Thus, operational noise from new land in combination with buildout pursuant to the proposed Project would result in less-than-significant cumulative noise impacts.

5.7.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Code of Regulations, Title 24 included in the City's Municipal Code in Chapter 18.
- City's Municipal Code Section 8.06.090(F), all construction activities shall be limited to the daytime hours of between 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays
- City's Municipal Code Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS.
- City of Redlands General Plan Healthy Community Element Action 7-A.136 and Action 7-A.137.
- City of Redlands Measure U 9.0, et al.

Plans, Programs, or Policies

None.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact NOI-1: Buildout of the proposed zoning could generate of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance.

Impact NOI-2: Buildout of the proposed zoning could generate excessive groundborne vibration or groundborne noise levels.

5.7.10 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

Mitigation Measure NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors:

- Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity.
- Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.

Mitigation Measure NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall:

- Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;
- Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and
- Be removed and the site appropriately restored upon the conclusion of the construction activity.

Mitigation Measure NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.

Mitigation Measure NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact NOI-1: After implementation of Mitigation Measures NOI-1 and NOI-2, buildout pursuant to the proposed Project would not result in a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. Thus, impacts would be less than significant.

Impact NOI-2: After implementation of Mitigation Measures NOI-3 and NOI-4, buildout pursuant to the proposed Project would not result in excessive groundborne vibration or groundborne noise levels. Thus, impacts would be less than significant.

Therefore, no significant unavoidable adverse impacts related to noise or vibration would occur.

5.7.12 REFERENCES

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5.8 Population and Housing

5.8.1 INTRODUCTION

This section examines the existing population, housing, and employment conditions in the City of Redlands and assesses the Project's environmental impacts related to direct and indirect growth. The demographic data and analysis in this section is based, in part, on the following documents and resources:

- *Connect SoCal, The 2020-20545 Regional Transportation Plan/Sustainable Communities Strategy*, SCAG, April 2024
- *Local Profiles Report 2019, Profile of the City of Redlands*, SCAG, May 2019
- *Population Estimates for Cities, Counties, and the State*, California Department of Finance (DOF), 2024
- *City of Redlands General Plan 2035*, December 5, 2017; and
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017.

Although evaluation of population, housing, and employment typically involves economic and social, rather than physical environmental issues, population, housing, and employment growth are often precursors to physical environmental impacts. According to Section 15382 of the CEQA Guidelines, “[a]n economic or social change by itself shall not be considered a significant impact on the environment.” Socioeconomic characteristics should be considered in an EIR only to the extent that they create adverse impacts on the physical environment.

5.8.2 REGULATORY SETTING

5.8.2.1 State Regulations

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the State level, the California Department of Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth that would occur in each county based on Department of Finance (DOF) population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, HCD provides the RHNA to the council. Such is the case for the City of Redlands, which is a member of SCAG. The council, in this case Southern California Association of Governments (SCAG), then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the State's projected housing need.

Southern California Association of Governments

SCAG is a council of governments representing Orange, Imperial, Los Angeles, Riverside, San Bernardino, and Ventura counties. It is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. SCAG actions in San Bernardino County are partially the

result of input from the San Bernardino County Council of Governments (SBCOG), which offers recommendations regarding SCAG's initiatives.

Regional Housing Needs Allocation

The Regional Housing Needs Assessment (RHNA) is mandated by the California housing law (described previously) as part of the periodic process of updating housing elements of local general plans. State law requires that housing elements identify RHNA targets set by HCD to encourage each jurisdiction in the State to provide its fair share of very low-, low-, moderate-, and upper-income housing. The RHNA is intended to provide a long-term outline for housing within the context of local and regional trends and housing production goals.

SCAG determines total housing need for each community in southern California based on three general factors: (1) the number of housing units needed to accommodate future population and employment growth; (2) the number of additional units needed to allow for housing vacancies; and (3) the number of very low, low, moderate, and above-moderate income households needed. All cities are required to ensure that sufficient sites are planned and zoned for housing, such that area would be available to accommodate the projected housing needs, and to implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

For the 2021–2029 planning period, SCAG determined that the City of Redlands RHNA allocation is 3,516 housing units (City of Redlands, 2022). As shown in Table 5.8-1, 45 percent are identified for extremely low through low income housing and 55 percent for moderate and above moderate income housing.

Table 5.8-1: City of Redlands SCAG Regional Housing Needs Allocation, 2021-2029

Category	Percent of County Median	2021 Household Income	2021-2029 Housing Need
Extremely Low-Income	Less than 30%	Less than \$26,500	483 (14%)
Very Low-Income	30-50%	\$26,500 - \$39,500	484 (14%)
Low-Income	50-80%	\$39,500 - \$63,200	615 (17%)
Moderate Income	80-120%	\$63,200 - \$93,000	652 (19%)
Above Moderate Income	Over 120%	More than \$93,000	1,282 (36%)
Total	--	--	3,516

Source: City of Redlands 2021-2029 Housing Element

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is designated by federal law as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops transportation and housing strategies for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), which includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans

for the region. Most of the Plan's goals are related to regional transportation infrastructure and the efficiency of transportation in the region.

On April 4, 2024, SCAG adopted "Connect SoCal," the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The California Air Resources Board (CARB) has yet to approve of the technical methodology contained in the 2024-2050 RTP/SCS. This section will provide analysis showing consistency with both the 2020 and the 2024 SCAG RTP/SCS. Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with State greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. The RTP/SCS is updated every four years as required by federal and State regulations.

According to the RTP/SCS (Connect SoCal 2020), by 2045, the population of Southern California is projected to increase by 3.7 million people, with an increase of 1.6 million housing units and 1.6 million jobs. However, growth is not expected to be uniform across the region's counties or cities. The RTP/SCS states that during that time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. The determination of each city's and county's share of regional housing needs (RHNA as described previously) that is required by law to be reflected in municipal general plan housing elements is based on the growth projections of the RTP/SCS.

SCAG Regional Growth Projections

SCAG is responsible for producing socioeconomic forecasts and developing, refining, and maintaining macro and small-scale forecasting models. The forecasts are developed in five-year increments. The current SCAG projections are provided in the Connect SoCal 2020 through the year 2045. Consistency with the growth forecast, at the sub-regional level, is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans.

2020 SCAG Connect SoCal projects that the number of local employment opportunities in the City of Redlands will increase from 42,600 in 2016 (Based on SCAG's most recent data which is from 2016) to 56,300 in 2045. Additionally, SCAG projects the City's households will increase from 24,400 in 2016 to 30,800 in 2045 (SCAG, 2020).

2024 SCAG Connect SoCal projects that the number of local employment opportunities in the City of Redlands will increase from 49,400 in 2019 (Based on SCAG's most recent data which is from 2019) to 60,100 in 2050. Additionally, SCAG projects the City's households will increase from 25,600 in 2019 to 31,200 in 2050 (SCAG, 2024).

5.8.2.2 Regional/Local Regulations

City of Redlands General Plan

Livable Community Element

The Livable Community Element provides for managed, balanced and quality growth in keeping with the city's scale, services, and environment and include the following policies related to population and housing and the Project:

- Policy 4-P.2** Provide for the expansion of housing and employment opportunities while ensuring that a high quality of life is maintained in Redlands.
- Policy 4-P.16** Promote a variety of housing types to serve the diverse needs of the community.
- Policy 4-A.7** Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.
- Policy 4-A.8** Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.

City of Redlands 2021-2029 General Plan Housing Element

The Housing Element include the following policies related to population and housing and the Project:

- Policy 1.1** Provide adequate capacity to meet the Sites Inventory for Regional Housing Needs Assessment (RHNA).
- Policy 1.3** Provide housing capacity near public services.
- Policy 1.6** Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.
- Policy 1.7** Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

5.8.3 ENVIRONMENTAL SETTING

The Project site includes approximately 116 acres of land that is divided into two general areas (Sites 1-16A and 24, and Sites 17-23). The City of Redlands General Plan 2035 designates the Project site with a mix of land uses including: Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a and 3-4b, *Existing General Plan Land Use*, in Section 3.0, *Project Description*, show the existing General Plan land use designations for the Project site.

Sites 1-16A and 24 consists of non-residential land use designations except for the medium density residential designation for Site 8. Sites 17-23 are also primarily non-residential, with medium and high density residential allowed at sites 20, 21, and 23. There are a number of vacant parcels located within the Project area, including all of Sites 17-23. Figures 3-5a and 3-5b, *Existing Zoning*, in Section 3.0, *Project Description*, show the existing zoning designation of the Project site.

Population

The California Department of Finance (DOF) estimates that as of 2024, the City of Redlands has a population of 72,696, representing approximately 3.3 percent of the County's total population (DOF, 2024). SCAG estimates that the City will have a population increase of 16.2 percent between 2016 and 2045¹, and the County will have population growth rate of 31.5 percent over the same period. Table 5.8-2 provides population figures for the City of Redlands and the County in 2016, and SCAG projections for year 2045

and Table 5.8-3 provides population figures for the City of Redlands and the County in 2019, and SCAG projections for year 2050.

Table 5.8-2: SCAG Population Estimates and Projections, 2016–2045

	2016	2045 Projection	2016-2045 Change
City of Redlands	69,500	80,800	16.2%
San Bernardino County	2,141,000	2,815,000	31.5%

Source: (SCAG, 2020)

Table 5.8-3: SCAG Population Estimates and Projections, 2019–2050

	2019	2050 Projection	2019-2050 Change
City of Redlands	72,800	85,874	18.0%
San Bernardino County	2,175,000	2,623,000	20.6%

Source: (SCAG, 2024)

Housing and Households

The California DOF estimates that there were 28,139 housing units in Redlands in 2024, which is 3.7 percent of the County total. The City's housing stock is about 64 percent single-family residential and is estimated to be 94.9 percent occupied, as shown in Table 5.8-4. The DOF estimates persons per household to be 2.62.

Table 5.8-4: City of Redlands Existing Housing Stock, 2024

Residence Type	Number	Percentage
Single-Family Detached	17,975	63.9%
Single-Family Attached	1,282	4.6%
Two to Four Units	3,122	11.1%
Five Plus	4,411	15.7%
Mobile Homes	1,049	3.7%
Total	28,139	100%
Occupied	26,693	94.9%
Vacancy	1,446	5.1%

California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2024.

According to SCAG's Connect SoCal 2020-2045 RTP/SCS, the City of Redlands is projected to add approximately 6,400 households by 2045 (Table 5.8-5). This averages approximately 221 new households annually through 2045.

Table 5.8-5: SCAG Household Projections, 2016–2045

	2016 Households	2045 Households	2016-2045 Increase
City of Redlands	24,400	30,800	26.2%
San Bernardino County	630,000	875,000	38.9%

Source: (SCAG, 2024)

According to SCAG's Connect SoCal 2024-2050 RTP/SCS, the City of Redlands is projected to add approximately 5,600 households by 2050 (Table 5.8-6). This averages approximately 224 new households annually through 2050.

Table 5.8-6: SCAG Household Projections, 2019–2050

	2019 Households	2050 Households	2019-2050 Increase
City of Redlands	25,600	31,200	21.9%
San Bernardino County	657,000	953,000	45.1%

Source: (SCAG, 2024)

Employment

According to SCAG's 2020-2045 RTP/SCS, the number of jobs within the City is projected to increase from 42,600 jobs in 2016 to 56,300 jobs in 2045 (Table 5.8-7). This represents an increase of over 32 percent, and an average of 472 jobs annually through the year 2045.

Table 5.8-7: SCAG Projected Employment Trends, 2016-2045

	2016	2045	2016 – 2045 Increase
City of Redlands	42,600	56,300	13,700 (32.2%)
San Bernardino County	791,000	1,064,000	273,000 (34.5%)

Source: (SCAG, 2024)

According to SCAG's 2024-2050 RTP/SCS, the number of jobs within the City is projected to increase from 49,400 jobs in 2019 to 60,100 jobs in 2050 (Table 5.8-8). This represents an increase of over 21 percent, and an average of 345 jobs annually through the year 2050.

Table 5.8-8: SCAG Projected Employment Trends, 2019-2050

	2019	2050	2019 – 2050 Increase
City of Redlands	49,400	60,100	10,700 (21.7%)
San Bernardino County	860,000	1,145,000	285,000 (33.1%)

Source: (SCAG, 2024)

The SCAG 2019 Local Profile for Redlands identifies that 22.5 percent of Redlands residents work and live in the City, while 77.5 percent commute to other places (Southern California Association of Governments, 2019). Of the commuters residing in Redlands, the largest percentage commute to the City of San Bernardino (15.3 percent), Loma Linda (7.5 percent), Riverside (5.6 percent), and Los Angeles (3.8 percent).

Jobs – Housing Balance

The jobs-housing ratio is a general measure of the “balance” between the number of jobs and number of housing units within a geographic area, without regard to economic constraints or individual preferences. The ratio expresses quantitatively the relationship between the number of people working and number of dwelling units housing the people living in a given area. Additionally, a well-balanced ratio of jobs and housing reduces commuting trips because more employment opportunities are closer to residential areas. Such a reduction in vehicle trips lowers air pollutant emissions (including lower greenhouse gas emissions) and

causes less congestion on area roadways and intersections. A major focus of SCAG's regional planning efforts has been to improve this balance. SCAG defines the jobs-housing balance as follows:

Jobs and housing are in balance when an area has enough employment opportunities for most of the people who live there and enough housing opportunities for most of the people who work there. The region as a whole is, by definition, balanced.... Job-rich subregions have ratios greater than the regional average; housing-rich subregions have ratios lower than the regional average. Ideally, job-housing balance would... assure not only a numerical match of jobs and housing but also an economic match in type of jobs and housing.

There is no ideal ratio adopted in State, regional, or City policies. However, the American Planning Association recommends a target ratio of 1.5 jobs per housing unit; communities with more than 1.5 jobs per dwelling unit are considered "jobs rich," meaning that more employment opportunities are provided than housing in the area, and those with fewer than 1.5 are "housing rich," meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A job-housing imbalance can indicate potential air quality and traffic problems associated with commuting. Table 5.8-9 provides the projected jobs-to-housing ratios for the City, based on SCAG's 2020-2045 RTP/SCS.

As described above and shown in Table 5.8-6, the City had approximately 24,400 households and approximately 42,600 jobs in 2016, which results in a jobs-to-housing ratio of 1.75 jobs per household (SCAG, 2020). SCAG projects a jobs-to-housing ratio of 1.83 in 2045, which indicates that employees would be commuting into the City for employment, and that additional housing would improve the jobs to housing balance within the City. The City is projected to have a higher percentage of jobs to households in comparison to the County, which is projected to have a jobs to housing ratio of 1.22 in 2045. That indicates that since the City of Redlands is a jobs rich community, it is possible that people employed in the City are commuting from elsewhere. Table 5.8-6 provides the existing and projected jobs-to-housing ratios for the City and the County from 2016 and 2045.

Table 5.8-9: Existing and Projected Jobs - Housing Balance in the City and County (2016-2045)

	Year	Employment	Households	Jobs-Housing Ratio
City of Redlands	2016	42,600	24,400	1.75
	2045	56,300	30,800	1.83
San Bernardino County	2016	791,000	630,000	1.26
	2045	1,064,000	875,000	1.22

Source: (SCAG, 2024)

As described above and shown in Table 5.8-10, the City had approximately 25,600 households and approximately 49,400 jobs in 2019, which results in a jobs-to-housing ratio of 1.93 jobs per household (SCAG, 2024). SCAG projects a jobs-to-housing ratio of 1.93 in 2050, which indicates that employees would be commuting into the City for employment, and that additional housing would improve the jobs to housing balance within the City. The City is projected to have a higher percentage of jobs to households in comparison to the County, which is projected to have a jobs to housing ratio of 1.20 in 2050. That indicates that since the City of Redlands is a jobs rich community, it is possible that people employed in the City are commuting from elsewhere. Table 5.8-10 provides the existing and projected jobs-to-housing ratios for the City and the County from 2019 and 2050.

Table 5.8-10: Existing and Projected Jobs - Housing Balance in the City and County (2019-2045)

	Year	Employment	Households	Jobs-Housing Ratio
City of Redlands	2019	49,400	25,600	1.93
	2050	60,100	31,200	1.93
San Bernardino County	2019	860,000	657,000	1.31
	2050	1,145,000	953,000	1.20

Source: (SCAG, 2024)

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the generation of 2,263 jobs and 294 residents according to the General Plan EIR growth induction rate shown on Table 2.3-6 (City of Redlands, 2008).

5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- POP-1 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); or
- POP-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Initial Study established that the proposed Project would not result in impacts related to Threshold POP-2; thus, no further assessment of this impact is required in this SEIR.

5.8.5 METHODOLOGY

State CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. Additionally, CEQA Guidelines Appendix G indicates that a project could have a significant effect if it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Therefore, population impacts are considered potentially significant if growth associated with a project would exceed projections for the area and if such an exceedance would have the potential to create a significant adverse physical change to the environment.

The methodology used to determine population, housing, and employment impacts includes data collection of population and housing trends, which was obtained from DOF, the General Plan, and SCAG. The determination of impacts is based on an analysis of the number of residents and employees anticipated at buildout of the proposed Project. The scale of population at buildout is then compared with General Plan buildout and growth forecasts for the Project area. Growth is considered in the context of local and regional plans that include population projections for the City and the County. The SCAG population projections are used to prepare the Connect SoCal 2024 RTP/SCS. If projected growth within the Project area from

implementation of the Project would exceed SCAG growth projections, RHNA housing requirements, and/or the City's General Plan, a significant impact may result.

5.8.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to population and housing in Chapter 3.10. The 20-year buildout projected in the proposed General Plan assumes the majority of development would 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. The General Plan EIR determined that redevelopment of existing uses would likely occur; however, such development would take place over time as the market allows and would result in a net increase in residential units. Though it is impossible to guarantee residents would 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 (City of Redlands, 2017a, pg. 3.10-11).

Proposed Project

As detailed in Section 3.0, *Project Description*, the proposed Project would rezone 24 sites to allow for the development of a total of 2,436 residential dwelling units and approximately 151,048.46 square feet (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 compared to the buildout of the existing General Plan. The timing of development and operation of the development pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects.

IMPACT POP-1: THE PROJECT WOULD NOT INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH IN AN AREA, EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE THROUGH THE EXTENSION OF ROADS OR OTHER INFRASTRUCTURE).

Less Than Significant Impact. The proposed Project provides for infill development, redevelopment, and development of a number of vacant parcels located within the Project area under a different urban zoning designation. The maximum development that would occur from buildout of the proposed Project is 2,436 residential units and 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 compared to buildout of the existing General Plan.

Using the Redlands General Plan EIR growth induction rate of 2.65 people per household, buildout of the proposed residential units would generate up to 6,456 residents. Employee generation for the proposed Project was calculated using Table 2.3-6, *Projected Non-Residential Buildout (2035)*, from the Redlands General Plan using the projected Public/Institutional square feet of development and projected jobs creation, which results in a generation of 550 jobs.

Table 5.8-11 lays out the growth of buildout of the approved General Plan compared to growth induced from the proposed Project. As shown, compared to the existing General Plan buildout, the proposed Project would result in a reduction of 1,713 employees and an increase of 6,162 residents.

Table 5.8-11: General Plan and Proposed Project Population Growth

	Approved General Plan	Proposed Project	Difference (Proposed Project – approved General Plan)
Employees	2,263	550	-1,713
Residents	294	6,456	6,162

As shown previously in Table 5.8-2, *SCAG Population Estimates and Projections, 2016–45*, population in the City of Redlands is expected to increase by 11,300 persons between 2016 and 2045. As shown previously in Table 5.8-5, *SCAG Household Projections, 2020–2045*, housing stock in the City is expected to increase by 6,400 dwelling units between 2016 and 2045. Based on these growth projections, full buildout of the Project would represent approximately 54.5 percent of the projected population growth and 36.3 percent of the projected housing stock growth in the City if built out and at full capacity in 2045. In addition, according to the population estimates and projections provided in the 2024-2050 SCAG RTP/SCS which has not yet been approved by CARB, the proposed Project would result in approximately 47.1% of the anticipated population growth and approximately 41.5% of the project housing stock growth in the City by 2050 (SCAG, 2024). Thus, while the Project would result in an increase in population and housing units in an area not previously planned for housing, the increase in population and number of housing units that would result from the proposed Project would not exceed projections for the City through the Project and General Plan buildout year of 2035.

Further, as reflected in Table 5.8-1, *City of Redlands SCAG Regional Housing Needs Allocation, 2021-2029*, SCAG determined the City needs to provide a total of 3,516 housing units by 2029 to meet their RHNA. The City's 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of additional housing units for the City to meet its estimated housing growth needs identified in the SCAG's RHNA allocation (Redlands, 2022). Of the Housing Element inventory sites, 23 of them were identified as necessary for rezoning under Housing Element Program 1.1-1 to allow for high and medium density residential development. Thus, while the proposed Project would result in an increase of population, the Project would in part satisfy the State requirements to provide new housing opportunities to increase housing supply. Additionally, the proposed Project supports goals and policies of the Housing Element (see page 5.8-3) aimed to support a variety of housing types and densities. Thus, the proposed Project would not induce substantial unplanned population growth in the area.

Employment Growth: As described in Section 3.0, *Project Description*, the Project anticipates a future nonresidential capacity buildout of 151,048.46 SF within the portion of the Project site that allows non-residential development. However, buildout of the proposed Project would result in the loss of 2,057,992.20 SF of nonresidential development and a reduction of 1,713 employees in the area. Since the Project would result in a net loss of future employment opportunities, the Project would not result in any unplanned employment growth.

Jobs-Housing Balance. Effects of the proposed Project on jobs-housing balance are evaluated by adding project-generated jobs and housing units to forecasts of employment and housing. As described previously, the City of Redlands is jobs rich, with an existing jobs-housing ratio of 1.75. The proposed Project would reduce (improve) the jobs-housing ratio slightly by adding 2,325 residential units and reducing the employment square footage of the Project area at buildout. The proposed Project would provide a beneficial effect of providing the opportunity for housing in a jobs-rich area, where employees can easily travel to nearby employment opportunities.

In addition, because the area is jobs-rich, the addition of residential units in the area would not require additional jobs that could result in growth. Conversely, the new residents would fill the need for employees that are anticipated by SCAG projections. Thus, the additional residential units would not indirectly result in

the need for additional employment opportunities, which could result in growth. Therefore, this indirect impact related to growth would be less than significant.

Construction. A specific development project is not proposed as part of this Project; however, construction of future residential uses from buildout of the proposed RHNA zoning would result in a temporary increased demand for construction workers. Construction workers are anticipated to come from the City and surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be de minimis, relative to the total number of construction workers in the region. According to the U.S. Census Bureau, 1,322 individuals are employed in the construction industry in the City of Redlands and 80,351 individuals are employed in the construction industry in San Bernardino County as a whole (United States Census Bureau, 2024). In addition, buildout of the proposed Project would not occur all at one time; developments would occur one project at a time in response to market conditions and would not result in a constraint on the construction workforce. Therefore, implementation of the Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Impacts would be less than significant.

Infrastructure. Future buildout of the proposed zoning may require expansion of infrastructure to serve the proposed uses, including installation of new storm drains, wastewater, water (potable and reclaimed), and dry utilities that would connect to existing facilities. However, as outlined in Section 3.0, *Project Description*, specific infrastructure improvements required to support residential development within the proposed rezone sites are not known at this time and would not be known until development projects are proposed. Future development associated with allowed uses in accordance with the proposed zoning would be required to undergo project-level environmental review under CEQA on a case-by-case basis. As such, future development projects would be required to analyze project-specific needs related to infrastructure improvements. Overall, the Project does not provide for infrastructure improvements that could lead to substantial unplanned growth.

As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to population and housing would be less than significant.

5.8.7 CUMULATIVE IMPACTS

Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As detailed previously, buildout of the proposed zoning would represent approximately 47.1 percent of projected employment growth and 41.5 percent of projected housing growth in the City through 2050, and is consistent with SCAG RHNA allocation needs and the City's Housing Element. Thus, the Project is within the regional and local growth projections, and would not result in an exceedance that could become cumulatively considerable. Therefore, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

5.8.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

California Government Code Sections 65300, 65580–65589

Plans, Programs, or Policies

None.

5.8.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact POP-1 would be less than significant.

5.8.10 MITIGATION MEASURES

No mitigation measures are required.

5.8.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to population and housing would be less than significant.

5.8.12 REFERENCES

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- SCAG. (2019). *Profile of the City of Redlands*. https://scag.ca.gov/sites/main/files/file-attachments/redlands_localprofile.pdf?1606014831
- United States Census Bureau. (2024). *Industry by Sex for the Full-Time, Year-Round Civilian Employed Population 16 Years and Over. American Community Survey, ACS 1-Year Estimates Subject Tables, Table S2404*.
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- Weitz, J. (2003). American Planning Association. *Planning Advisory Service Report Number 516: Jobs-Housing Balance*.

5.9 Public Services

5.9.1 INTRODUCTION

This section of the Draft Subsequent EIR addresses impacts of the Project to public services, including fire protection and emergency services, police protection, and school services. This section addresses whether there would be physical environmental effects of new or expanded public facilities that would necessary to maintain acceptable service levels as a result of the proposed Project. An increase in staffing associated with public services or an increase in calls for services would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

The Initial Study, included in Appendix A, established that the proposed Project would not result in impacts related to parks or other public services; thus, only fire protection, police protection, and school services are evaluated in this section.

5.9.2 REGULATORY SETTING

5.9.2.1 Federal Regulations

There are no Federal regulations pertaining to public services that would be applicable to the Project.

5.9.2.2 State Regulations

California Building Code

The California Building Code (CBC) includes fire safety requirements, including the installation of sprinklers in all commercial and residential buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 (2016 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023)..

The Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended

to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. Development under the Project would be subject to applicable regulations of the California Fire Code.

California Government Code (Section 65995(b)) and Education Code (Section 17620)

California Senate Bill 50 (SB 50), which passed in 1998, amended California Government Code Sections 65995.5 through 65998, which contains limitations on Education Code Section 17620. The statute authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments.

According to California Government Code Section 65995(3)(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Mitigation Fee Act (California Government Code Sections 66000 et seq.)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency, such as the City of Redlands to establish, increase, or impose an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development Project on which it is to be levied. This Act became enforceable on January 1, 1989 (California Legislative Information, n.d.).

5.9.2.3 Local Regulations

Fire Protection and Emergency Services

City of Redlands General Plan

The Livable Community Element, Connected City Element, and Healthy Community Element of the General Plan set forth the following actions and principles for fire protection and emergency services:

- Principle 4-P.30** Require that new development adheres to safety standards to protect against property damage, injury, or loss of life from fire or geological hazards.
- Action 4-A.153** Ensure that the Police and Fire departments have modern facilities and equipment needed to perform their duties.
- Action 4-A.157** Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.
- Principle 5-P.7** Minimize emergency vehicle response time and improve emergency access.
- Action 5-A.3** Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices. This could be accomplished through:
 - Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate;

- Short block lengths, reduced street widths, and/or traffic calming measures; and
 - Providing pedestrians and bicyclists with options where motorized transportation is prohibited.
- Action 5-A.15** Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.
- Policy 7-P.12** Create and maintain a system of trails serving both recreational and emergency access needs.
- Action 7-A.89** Require adherence to applicable buildings codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code.
- Action 7-A.96** Require that new development minimizes risks to life and property from fire hazard through:
- Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.;
 - Siting and designing development to avoid hazardous locations;
 - Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent;
 - Using appropriate building materials and design features to ensure the minimum amount of required fuel modification; and
 - Using fire-retardant, native plant species in landscaping.
- Action 7-A.95** Coordinate with the Redlands Fire Department and other fire prevention agencies to review all applications for new development. The Fire Department's review should ensure compliance with fire safety regulations and assess potential impacts to existing fire protection services and the need for additional and expanded services.
- Action 7-A.96** Ensure that all-weather access is provided for all new development, with adequate clearance for emergency vehicles, designed in accordance with the California Fire Code, and ensure that all roads, streets, and major public buildings are identified in a manner that is clearly visible to fire protection and other emergency vehicles.

City of Redlands Public Facilities Fees

The Project is required to comply with the provisions of the City of Redlands Public Facility Fee (Municipal Code Chapter 3.60) which requires a fee payment for any developments requiring permitting that the City applies to the funding of such civic center, corporate yard, fire and police required public facilities and related improvements.

Police Services

City of Redlands General Plan

The Livable Community Element of the General Plan sets forth the following actions and principles for police services:

- Principle 4-P.60** Locate police and fire resources where they can best serve the community.

- Principle 4-P.61** Support community partnership and community-based policing strategies to enhance the relationship between the Redlands Police Department and neighborhoods throughout the city.
- Action 4-A.153** Ensure that the Police and Fire departments have modern facilities and equipment needed to perform their duties.
- Action 4-A.154** Support and expand neighborhood watch organizations and citizen volunteer patrols to assist the police in deterring crime.
- Action 4-A.155** Continue to enact mutual aid agreements with neighboring police and fire jurisdictions as well as state agencies.
- Action 4-A.156** Encourage the use of police substations throughout the city to increase the police presence in the neighborhoods.
- Action 4-A.157** Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.

School Services

City of Redlands General Plan

The Livable Community Element of the General Plan sets forth the following actions and principles promoting park and recreation facilities and programs:

Principle 4-P.58. Coordinate with the Redlands Unified School District to ensure that facilities and services are provided at a high quality and consistent with the population's needs.

5.9.3 ENVIRONMENTAL SETTING

5.9.3.1 Redlands Fire Department

The Redlands Fire Department (RFD) provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response to the city of Redlands including the Project area.

According to the Redlands General Plan EIR, the RFD recognizes two response time standards. The first is from the National Fire Protection Association (NFPA), which recommends that the first unit arrive within four minutes 90 percent of the time. The second is a more lenient goal of arriving within seven minutes 90 percent of the time, as recommended by the 2008 High-Level Fire Department Review for the RFD. According to the City of Redlands, the current 90 percent response time is eight and a half minutes, which is over twice the NFPA standard and one and a half minutes slower than the more lenient guideline. In 2023, the RFD received 14,757 calls for service and had 71,776 residents, which results in 0.21 calls per resident (California Department of Finance, 2024a).

The Project area would be served by four fire stations as shown in Table 5.9-1 below, and on Figure 5.9-1. The City currently has plans to relocate Station 264 based on the annual increase in calls for service and location of service needed. RFD is also in the beginning stages of a planned capital improvement project that would include the construction of two new fire stations within the City. The specifications and locations of those stations are not known at this time (Appendix I).

Table 5.9-1: Fire Station Serving the Project Sites

Fire Station	Location	Equipment	Staffing
Station 261	525 East Citrus Avenue	Engine 261 Truck 261 Battalion Chief Incident Support Unit	(1) Battalion Chief (2) Fire Captains (3) Engineers (4) Firefighter-Medics
Station 262	1690 Garden Street	Engine 262	(1) Fire Captain (1) Engineer (1) Firefighter-Medic
Station 263	10 West Pennsylvania Avenue	Engine 263	(1) Fire Captain (1) Engineer (1) Firefighter-Medics
Station 264	1270 West Park Avenue	Engine 264 Medic Squad 264	(1) Fire Captain (1) Engineer (3) Firefighter-Medics

Source: (Appendix I)

5.9.3.2 Redlands Police Department

Public safety services in the City, including for the Project sites, are provided by the Redlands Police Department (RPD). The RPD's main police station is located at 1270 West Park Avenue within the boundaries of the New York Street/Esri Transit Village. The RPD personnel is made up of approximately 46 sworn officers and 5 part-time civilians, resulting in a service level of 0.54 officers per 1,000 residents (Appendix I).

Based on existing staffing levels, RPD estimates response times to Sites 1 through 16A and Site 24 are 13 minutes and 47 seconds for Priority 1 police service calls and 9 minutes and 44 seconds for Priority 2 police service calls. The RPD estimates a response time of 11 minutes and 22 seconds for Priority 1 police service calls and 14 minutes and 21 seconds for Priority 2 police service calls for Sites 17 through 23. Although there are no industry standards for response time to emergency calls, according to the RPD, a response time below the national response time average of 8 to 12 minutes for Priority 1 calls is desirable (Appendix I). The location and staffing descriptions of the RPD stations within the City are listed below in Table 5.9-2 and shown in Figure 5.9-1.

Table 5.9-2: Police Stations

Location	Staffing Description
1270 W. Park Avenue	Patrol, Custody, Dispatch Records
30 Cajon Street	Administration, Investigations, MET, Traffic/Special Events, Crime Analysis, Community Policing, Property/Evidence
1150 Brookside Avenue	Records Processing

Source: (Appendix I)

5.9.3.3 School Services

The City, including the Project site, is within the Redlands Unified School District (RUSD). The RUSD has 16 elementary school (grades K-5), four middle schools (grades 6-8), three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, a home education learning program, and a K-12 online academy (City of Redlands, 2017b, pg. 5.13-9). Current enrollment is approximately 19,773 students with an excess capacity of 1,676 students (RUSD, n.d., a).

Table 5.9-3: RUSD School Serving the Project site

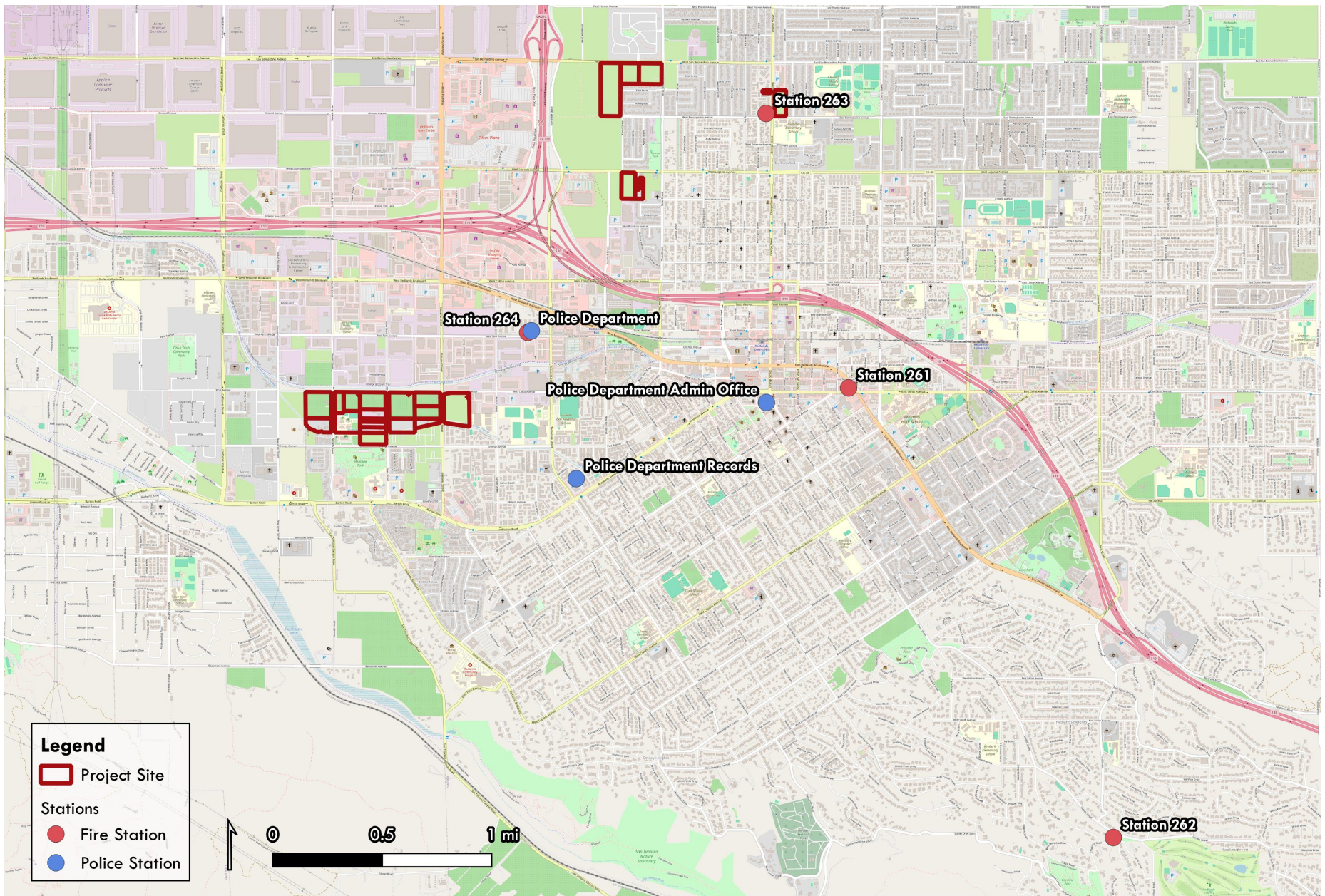
School Type (Grades)	School Name	Location (in Redlands)
Elementary School ¹ (K-5)	Lugonia	202 E. Pennsylvania Ave.
	Kingsbury	600 Cajon St.
	Mission	10568 California St
	Smiley	1210 W. Cypress Ave.
Middle School (6-8) ²	Clement	501 E. Pennsylvania Ave.
	Cope	1000 W. Cypress Ave.
High School (9-12) ³	Redlands	840 E. Citrus Ave.
	Citrus Valley	800 W. Pioneer Ave.

¹(RUSD, n.d., b)²(RUSD, n.d., c)³(RUSD, n.d., d)

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. As discussed in Section 5.8, *Population and Housing*, this would result in the generation of 2,263 employees and 294 new residences in the City. Similar to the proposed Project, implementing projects of the General Plan would be required to pay Development Impacts Fees which would go towards the maintenance and expansion of service facilities such as police and fire stations to ensure that acceptable levels of service are met.

City of Redlands Emergency Services Stations



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5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a project could have a significant effect if it were to 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:

PS-1 – Fire protection

PS-2 – Police protection

PS 3 – Schools

PS 4 – Parks

PS 5 – Other public facilities

The Initial Study (see Appendix A) established that the proposed Project would not result in impacts related to Threshold PS-4 and PS-5; and no further assessment of this impact is required in this Draft Subsequent EIR.

5.9.5 METHODOLOGY

The evaluation of impacts to public services is based on whether the existing public services can meet the demands of the Project based on established thresholds, including maintaining acceptable service ratios, staffing levels, adequate equipment, response times, or other performance objectives that may result in the need for new or expanded services and facilities.

5.9.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to public services in Chapter 3.13. 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 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 timely 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 (Redlands, 2017b, pg. 3.13-18).

IMPACT PS-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF FIRE PROTECTION FACILITIES.

Less than Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 square feet (SF) of nonresidential development. While there would be an increase in 6,162 residents compared to the existing General Plan Buildout, which may increase the demand for fire protection and emergency medical services, the Project would also result in a large decrease in non-residential development which would lead to a decrease in demand for fire and emergency services for those uses. Thus, the proposed Project is not expected to result in a large increase in demand for fire and emergency services compared to the buildout of the approved General Plan.

Future development within the Rezone sites would be installed with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent

waterless fire suppression systems pursuant to the California Fire Code, adopted as Chapter 15.20 of the Redlands Municipal Code, the CBC, and other existing regulations regarding fire safety. Site access would be reviewed by City planning and the RFD to ensure that the proposed improvements would have adequate access for large fire trucks and vehicles. The nearest fire station to Sites 1 through 16A and Site 24 would be Station 264, which is located approximately 0.60 miles east of the Rezone sites. The nearest station to Sites 17 through 23 would be Station 263, which is located approximately 0.58 miles east of the sites. Future development within the Project sites would be required to meet fire and life safety standards, including smoke and carbon monoxide detectors, fire alarms, and residential fire sprinklers, among other building requirements. Development plans would be reviewed by the City planning and fire department to ensure that State and local codes and requirements are implemented.

The General Plan EIR described that the RFD has stated the needs for expansion in order to accommodate continued increase in population. The RFD is currently considering relocating Station 264 to the east side of Alabama Street just south of Orange Avenue. This new station would be approximately 0.25 miles south of Site 1 through 16A and 24 and would serve those sites. The Fire Department is also considering the expansion of Station 263 to provide expanded services to the northern portion of the City. Development Impact Fees, included as PPP PS-1 in Section 5.9.8 below, would serve to ensure the maintenance of existing facilities and the timely provision of new facilities as needed. Each implementing project would be required to pay these fees which are proportional to the increased needs for service. Thus, while implementation of the proposed Project would result in increased needs for fire services, the payment of Development Impact Fees would ensure that RFD has adequate facilities to serve the City as the City continues to expand. As stated above, the City is also in the initial stage of a long range capital improvement project that includes the construction of new and expansion of existing fire stations. The specifics about the stations, including the locations, are not known at this time. As discussed above, the City's current response times do not meet the City's requirements, thus the payment of fees would assist RFD in the future expansions and purchasing of additional equipment to improve response times. The fees collected by each implementing project would ensure that fire protection service levels are maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of additional facilities, if needed in the future.

Whether the City chooses to construct new fire stations in the future is too speculative to be considered as a Project-related impact. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Therefore, with the payment of development fees included as PPP PS-1, Project impacts to fire services would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

IMPACT PS-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES.

Less than Significant Impact. The service ratio for the City of Redlands is 0.54 officers per 1,000 residents. According to the RPD, the City would need to hire approximately 10 new officers to maintain the service ratio in the City to accommodate the proposed Project (A. Colerick, Redlands Police Department, email, April 18, 2024). The increased residential population from the buildout of the proposed Project could increase the frequency of emergency and non-emergency calls to the RPD, as compared to existing conditions. However, implementation of the proposed Project would result in a decrease of approximately 2,057,992.20 SF of nonresidential development and would thus result in a decrease in calls related to those types of uses. Thus, compared to the buildout of the existing General Plan which includes significantly more non-residential development, buildout of the proposed Project's residential uses is not expected to generate an increase in the frequency of emergency and non-emergency calls to the RPD. Buildout of the proposed

Project is not expected to increase demand for police protection to the extent that new facilities would be required beyond what has already been planned for. Currently, the RPD is in the development of an additional police station to meet future demand. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Payment of development impact fees included as PPP PS-1 would serve to ensure the maintenance of existing facilities. In addition, property tax revenue generated by development of the Project would provide funding for police services and would help to offset the Project's increase in the demand for services. Therefore, impacts to police protection facilities would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

IMPACT PS-3 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES.

Less than Significant Impact. As discussed in Section 5.8, *Population and Housing*, full buildout of the Project site would result in the generation of up to 6,162 additional residents compared to buildout of the approved General Plan. According to the Department of Finance, San Bernardino's school aged (5-17 years old) population would be 14.7% by 2035 (Department of Finance, 2024b). Thus, the proposed Project is expected to generate 906 school aged children by full buildout in 2035. As discussed above, the Project site is located within the RUSD and is served by four elementary schools, two middle schools, and two high schools. According to the RUSD, the school district currently has an enrollment of 19,773 students with an excess capacity of 1,676 students (RUSD, n.d., a).

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impact on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the RUSD has instituted school facility fees that would apply to future developments pursuant to the future developments pursuant to the Project, specifically fees for new residential construction based on square footage. Accordingly, future project applicants would be required to pay school fees to the RUSD to offset the impact of additional student enrollment at schools serving the individual development project site.

Pursuant to State law, payment of the school fees established by the RUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed Project's impacts on schools' facilities. Therefore, impacts to school facilities would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

5.9.7 CUMULATIVE IMPACTS

The Project would not significantly increase the need for public services in Redlands, cities surrounding Redlands, or the region. As discussed above, the Project applicant would pay the required City development

impact fees included as PPP PS-1. Additionally, as discussed above, the Project is not anticipated to impact acceptable service ratios, staffing levels, adequate equipment, response times, or other performance objectives to the extent that new or expanded government services and facilities would be needed. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees. Therefore, the proposed Project would not contribute to a cumulative impact related to the provision of public services.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies

PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the Project site, 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 Chapter 3.60 and/or adopted fee schedules.

5.9.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts PS-1, PS-2, and PS-3 would be less than significant.

5.9.10 MITIGATION MEASURES

No mitigation measures are required.

5.9.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with regulatory programs would reduce potential impacts related to public services to less than significant.

5.9.12 REFERENCES

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5.10 Transportation

5.10.1 INTRODUCTION

This section addresses potential transportation impacts that may result from implementation of the Redlands RHNA Rezone Project. The following discussion addresses the existing transportation conditions in the Project area, identifies applicable regulations, evaluates the proposed Project's consistency with applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Project. The analysis in this section is based on the following resources:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- City of Redlands Municipal Code;
- City of Redlands CEQA Assessment VMT Analysis Guidelines; and
- *Redlands RHNA Rezone Project VMT Analysis*, EPD Solutions, July 2024. Included as Appendix F.

Transportation Terminology

- **Traffic Analysis Zone (TAZ).** Traffic Analysis Zone (TAZ) refers to the geographic unit used for traffic analysis within transportation planning models, such as the San Bernardino County Transportation Authority's vehicle miles traveled (VMT) screening tool model. A TAZ is a special area delineated by State and/or local transportation officials for tabulating traffic-related data especially journey-to-work and place-of-work statistics. A TAZ usually consists of one or more census blocks, block groups, or census tracts.
- **Transit Priority Area (TPA).** As defined by SB 743, a Transit Priority Area (TPA) is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in the applicable regional transportation plan.
- **Low VMT Area.** Low VMT areas are defined as TAZs with a total daily VMT/service population (employment plus population) that is 15 percent less than the baseline level for the County.

5.10.2 REGULATORY SETTING

5.10.2.1 State Regulations

Senate Bill 743 (Steinberg, 2013)

On September 27, 2013, Senate Bill (SB) 743 was signed into State law. The California legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

SB 743 requires the California Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation impacts under CEQA. Particularly within areas served by transit, SB 743 requires the alternative criteria to promote the reduction of GHG emissions, development of multimodal transportation networks, and diversity

of land uses. The alternative metric for transportation impacts detailed in the State CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020, to adopt and begin implementing VMT thresholds for traffic analysis.

AB 1358: California Complete Streets Act

The California Complete Streets Act was implemented on January 1, 2011, which required circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must “meet the needs of all users...in a manner suitable to the rural, suburban, or urban context of the general plan.” This bill requires a circulation element to plan for all modes of transportation where appropriate—including walking, biking, car travel, and transit. The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and people with disabilities.

5.10.2.2 Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, which was adopted in April 2024. The California Air Resources Board (CARB) has yet to approve of the technical methodology contained in the 2024-2050 RTP/SCS. The RTP/SCS integrates transportation planning with economic development and sustainability planning and aims to comply with State GHG emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates, in the RTP/SCS, that the six-county region will have to accommodate 20,909,000 residents by 2050 while also meeting the GHG emissions reduction targets set by the California Air Resources Board (CARB). SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region’s counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

5.10.2.3 Local Regulations

City of Redlands General Plan 2035

The General Plan Healthy Community Element contains the following policies related to transportation that are applicable to the Project:

- | | |
|------------------------|--|
| Principle 5-P.1 | Maintain a cohesive circulation system through a “layered network” approach promoting complete streets and mobility for all modes while emphasizing specific transportation modes for specific corridors and geographic areas. |
| Principle 5-P.2 | Use the layered network approach to identify, schedule, and implement roadway improvements as development occurs in the future, and as a standard against which to evaluate future development and roadway improvement plans. |
| Principle 5-P.4 | Support transportation infrastructure improvements such as safer street crossings and attractive streetscapes to encourage bicyclists, walkers, and users of mobility devices. |

Principle 5-P.5	Manage the city's transportation system to minimize traffic congestion, improve flow, and improve air quality.
Principle 5-P.7	Minimize emergency vehicle response time and improve emergency access.
Principle 5-P.8	Ensure the safety of the transportation network by preventing excessive speeding of vehicular traffic and promoting safe sharing of the network by all transportation modes.
Principle 5-P.10	Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.
Principle 5-P.11	Implement standards for pavement design and roadway and intersection striping so streets are accessible by all users and all modes, and safety is improved.
Principle 5-P.13	Ensure streets are designed to accommodate bicyclists per the Bicycle Master Plan.
Principle 5-P.14	Design streets to accommodate various modes according to roadway classification and reduce conflicts and safety risks between modes per Figure 5-4.
Action 5-A.3	<p>Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices. This could be accomplished through:</p> <ul style="list-style-type: none"> • Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate; • Short block lengths, reduced street widths, and/or traffic calming measures; and • Providing pedestrians and bicyclists with options where motorized transportation is prohibited.
Action 5-A.6	Add bike and pedestrian facilities on roads with excess capacity where such facilities do not exist, using supporting transportation plans as guidance. Excess capacity includes street right-of-ways or pavement widths beyond the standards, or excess capacity in roadways based on actual vehicular travel versus design capacity.
Action 5-A.15	Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.
Action 5-A.20	Provide pedestrian routes between offices, neighborhoods, Downtown, and Transit Villages. Plan for direct connections from the interiors of residential tracts to neighboring parks, schools, retail, and other services using sidewalks, trails, and paseos.
Action 5-A.25	Implement bicycle and trail improvements that provide strong east-west connections between Transit Villages and in the city's wider bicycle network. Routes would include the Orange Blossom Trail, the Mission Creek Zanja Trail routes on Colton Avenue and Citrus Avenue, Santa Ana River Trail, and the San Timoteo Canyon Trail.

- Action 5-A.26** Implement bicycle and trail improvements that provide strong north-south connections, especially with major east-west trails, including routes on Mountain View Avenue, California Street, Nevada Street, Alabama Street, Texas Street, New York Street, Orange Street, Church Street, Dearborn Street, and Wabash Avenue.
- Action 5-A.27** Implement safety improvements in mid-block areas that allow for bicycles to safely cross heavily traveled roads. Improvements can include stop signs for cyclists, warning beacons, and illuminated signs initiated by pedestrians and cyclists.
- Action 5-A.68** Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.

5.10.3 ENVIRONMENTAL SETTING

Table 5.10-1, *Existing Major Roadway Characteristics Within the Project Area*, lists the roadway characteristics that are observed within the Project area.

Table 5.10-1: Existing Major Roadway Characteristics Within the Project Area

Roadway	Classification	Number of Lanes	Bike Lane
Citrus Avenue (E/W)	Collector	2-lane divided with painted median east of Alabama Street; 2-lane undivided west of Alabama Street	Existing Class I west of Alabama Street
Nevada Street (N/S)	Minor Arterial	2-lane divided with painted median south of Orange Avenue; 2-lane undivided between Orange Avenue and Citrus Avenue; 2-Lane divided with painted median north of Citrus Avenue	None existing; proposed General Plan bicycle route
Orange Avenue (E/W)	Collector	2-lane divided with painted median east of Nevada Street; 2-lane undivided west of Nevada Street	None existing; proposed General Plan bicycle route
Iowa Street (N/S)	Collector	3-lane divided with painted median south of Orange Avenue; 2-lane undivided north of Orange Avenue	None
Alabama Street (N/S)	Major Arterial	4-lane divided with painted median	Existing Class II
Orange Street (N/S)	Minor Arterial north of West Sun Avenue and south of I-10; Boulevard south of West Sun Avenue to I-10	4-lane divided with painted median directly south of San Bernardino Road; 2-lane divided with painted median between San Bernardino Avenue and Colton Avenue; and 4-lane divided with painted median south of West Colton Avenue	None existing; proposed General Plan bicycle route
Texas Street (N/S)	Minor Arterial	2-lane divided with painted median between I-10 and San Bernardino Avenue; 3-lane divided with painted median north of San Bernardino Avenue	None existing; proposed General Plan bicycle route
New York Street (N/S)	Collector	2-lane divided with painted median	None existing; proposed General Plan bicycle route

Roadway	Classification	Number of Lanes	Bike Lane
Pennsylvania Avenue (E/W)	Collector	2-lane divided with painted median	Existing Class III between North University Street and Judson Street
Lugonia Avenue (E/W)	Major Arterial (between I-210 and Orange Street); Minor Arterial east of Orange Street	3-lane divided with painted median west of Texas Street; 4-Lane divided with painted median between Texas Street and Clay Street; 3-lane divided with painted median between Clay Street and Orange Street; 3-lane divided with raised median east of Orange Street	None existing; proposed General Plan bicycle route
San Bernardino Avenue (E/W)	Major Arterial (between I-210 and Orange Street); Minor Arterial east of Orange Street	2-lane divided with painted median west of Clay Street; 3-lane divided with painted median between Clay Street and Orange Street; 2-lane divided with painted median east of Orange Street	Existing Class II east of Texas Street

Existing Transit Service

The Project area is served by bus service via Omnitrans, which serves the San Bernardino Valley. Omnitrans Route 8 connects the cities of San Bernardino and Yucaipa through the cities of Loma Linda, Redlands (including the Project area), and Mentone, with buses running every 60 minutes Monday through Sunday, and has stops along Redlands Boulevard and Lugonia Avenue. Omnitrans Route 15 connects the cities of Fontana and Redlands (including the Project area) through the cities of San Bernardino and Rialto, with buses running every 60 minutes Monday through Sunday, and has stops along Orange Street, Redlands Boulevard, and Eureka Street. Omnitrans Route 19 provides service between Fontana, the San Bernardino Transit Center, and Yucaipa. Route 19 has stops at the Redlands Mall and has buses running every 60 minutes, Monday through Sunday.

Additionally, the San Bernardino County Transportation Authority's (SBCTA) Arrow line connects the City of Redlands to the City of San Bernardino and provides further direct rail trips once a day to the City of Los Angeles. During morning and afternoon peak commute hours, trains operate every 30 minutes. During non-commute or off-peak hours, trains operate every 60 minutes. Services start at 5 a.m. and run until 10 p.m. In addition to standard passenger rail service, the Metrolink Express train serves the Redlands – Downtown Station with limited stop service from Los Angeles during peak commute hours.

Existing Bicycle and Pedestrian Facilities

As listed in Table 5.10-1, within the Project site area, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue contain bicycle lanes. The Orange Blossom Trail, a paved walking and cycling path, is located approximately 150 feet north of Sites-16 along the northern edge of the drainage channel just north of Citrus Avenue.

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Buildout according to the General Plan would result in approximately 45,792 trips.

5.10.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- TR-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- TR-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- TR-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- TR-4 Result in inadequate emergency access.

The Initial Study, included in Appendix A, established that the proposed Project would result in less-than-significant impacts related to Thresholds TR-3 and TR-4. No further assessment of these impacts is required in this Draft EIR.

Vehicle Miles Traveled Significance Criteria

State CEQA Guidelines Section 15064.3(b)(1) provides that for land use projects:

VMT traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The City of Redlands' VMT Guidelines provides VMT screening thresholds to identify projects that would be considered to have a less-than-significant impact on VMT and therefore could be screened out from further analysis. Pursuant to the City VMT Guidelines, if a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. The project is in a Transit Priority Area (TPA).
2. The project is in a low VMT area.
3. The project is one of the following land uses:
 - Local serving K-12 school
 - Local park
 - Daycare center
 - Local-serving gas station
 - Local-serving bank
 - Local-serving hotel (e.g., non-destination hotel)
 - Student housing project on or adjacent to a college campus
 - Local-serving assembly use (place of worship, community organization)
 - Community institution (public library, fire station, local government)

- Local-serving community college that is consistent with the assumptions noted in the RTP/SCS
 - Affordable or supportive housing
 - Assisted living facility
 - Senior housing (as defined by the Federal Department of Housing and Urban Development)
4. The project generates less than 3,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year. This includes:
- Single family residential – 167 dwelling units (DU) or fewer
 - Multifamily residential (low-rise) – 232 DU or fewer
 - Multifamily residential (mid-rise) – 299 DU or fewer
 - Office – 59,100 square feet (SF) or less
 - Local-serving retail – 112,400 SF or less (no stores larger than 50,000 SF)
 - Warehousing – 463,600 SF or less
 - Light industrial – 74,600 SF or less

With regards to criterion 2, as described in Section 5.10.1, *Introduction*, a low VMT area is defined as a TAZ with a total daily VMT/SP that is 15 percent below the baseline level for the County. Based on the San Bernardino County average VMT/SP, the VMT/SP baseline for Project Base Year 2024 is 35.63 VMT/SP and the 2050 baseline is 39.03 VMT/SP. Therefore, the City's threshold of significance for Baseline 2024 is 30.29 VMT/SP, 15 percent below the 35.63 VMT/SP baseline, and the City's threshold of significance for Cumulative Year 2050 is 33.18 VMT/SP, 15 percent below the 39.03 VMT/SP baseline.

5.10.5 METHODOLOGY

As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, in order to comply with CEQA Guidelines Section 15064.3, impacts associated with automobile delay are not analyzed in this Draft Subsequent EIR.

Vehicle Miles Traveled Analysis Methodology

The applicability of each City of Redlands VMT Guidelines screening criterion was analyzed in relation to the potential land uses, location, and proximity to transit that could occur under buildout pursuant to the Project. If the Project meets one of the screening criteria set forth in the City of Redlands VMT Guidelines, it can be presumed that the Project would result in a less-than-significant impact. As specific future development is unknown at this time, a full VMT analysis was prepared using the San Bernardino Transportation Analysis Model (SBTAM). SBTAM was run for the Base Year 2019 and Cumulative Year 2050 without and with Project conditions. The total Origin-Destination (OD) VMT of each TAZ was evaluated using the SBTAM+ VMT post-processor from the SBTAM Base Year (2019) and Cumulative Year (2050) with-Project Model runs. To determine VMT/SP, the total OD VMT of the TAZs is divided by the service population (SP) of the TAZs. The 2024 VMT/SP was interpolated using linear interpolation between the 2019 and 2050 Model outputs.

The San Bernardino County VMT/SP for Project Baseline Year 2024 was calculated from the SBCTA VMT web map results for Base Year (2019) and Cumulative Year (2050) using linear interpolation.

The VMT/SP within the City of Redlands under the with-Project conditions for Cumulative Year (2050) was obtained using the with-Project model run. The VMT/SP within the City of Redlands under the no Project conditions for Cumulative Year (2050) was obtained using the without-Project Model run. To determine VMT/SP, the total boundary VMT of the City is divided by the SP of the City.

5.10.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan FEIR

The General Plan EIR addressed impacts related to transportation in Chapter 3.15. The General Plan EIR described that implementation of the General Plan was anticipated to increase traffic volumes on intersections, roadway segments, and freeway segments through 2035. The General Plan EIR concluded that buildout pursuant to the General Plan would result in significant and unavoidable impacts related to worsening LOS despite the inclusion of multiple roadway and intersection improvements. The General Plan EIR discussed that the General Plan establishes policies and programs to expand the alternative transportation system and the General Plan would not conflict with the circulation network or policies. In addition, the EIR concluded that transportation policies in the General Plan would reduce design hazards and conflicts between incompatible land uses. Furthermore, the General Plan EIR discussed that implementation of regulations, combined with General Plan policies, would reduce impacts related to emergency access routes and impacts would be less than significant.

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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).

IMPACT TR-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

Less than Significant Impact. The following analysis has been prepared pursuant to SB 743, which requires that VMT thresholds be utilized for traffic analysis, and State CEQA Guidelines Section 15064.3 that states that a project's effect on automobile delay shall not constitute a significant environmental impact.

Project Trip Generation

Vehicle trip estimates for buildout of the proposed Project compared to existing General Plan land use designations were generated by using trip rates from the Institute of Transportation Engineers, *Trip Generation 11th Edition*, 2021. Existing General Plan buildout conditions (Baseline) were assessed using trip rates for Land Use Code 150 (Warehouse), 221 (Multi-Family Housing), 820 (Retail), and 710 (Office). Based on the density of the proposed housing, trip rates for Land Use Code 221 (Multifamily Housing (Mid-Rise)) were used.

Table 5.10-2 identifies the trips generated by buildout pursuant to the existing General Plan land use designations of the rezone sites and compares it to the buildout of the proposed Project to determine the net increase in vehicle trips. As detailed, buildout pursuant to the Project is forecasted to generate a net decrease of 27,450 average daily trips, net increase of 1,034 AM trips, and net decrease of 1,716 PM trips. As such, buildout pursuant to the Project would result in decreased daily vehicle trips in the City of Redlands compared to buildout pursuant to the existing General Plan.

Table 5.10-2: Proposed Project Trip Generation Comparison

Scenario	Land Use	ITE Code	Unit	ITE Daily Trip Rate/Unit	Project Size (KSF or DU)	Project ADTs	ITE AM Trip Rate/Unit	Project AM Trips	ITE PM Trip Rate/Unit	Project PM Trips
Buildout of the Existing General Plan Land Uses	Warehouse (Sites 1-7, 9-16, 24)	150	KSF	1.71	828.34993	1,416	0.17	141	0.18	149
	Retail (Sites 1-7, 9-16, 24)	820	KSF	37.01	828.34993	30,657	0.84	696	3.40	2,816
	Multi-Family Housing (Sites 8, 20-23)	221	DU	4.54	111	504	0.37	41	0.39	43
	Office (Sites 17-19)	710	KSF	10.84	276.1704	2,994	1.52	420	1.44	398
	Retail (Sites 17-19)	820	KSF	37.01	276.1704	10,221	0.84	232	3.40	939
Existing General Plan TOTAL TRIPS						45,792		1,529		4,345
Buildout of the Proposed RHNA Rezoning (Project)	Proposed Multi-Family Housing	221	DU	4.54	2,436	11,059	0.37	901	0.39	950
	Daycare Center ¹	565	KSF	47.62	151.04846	7,193	11.00	1,662	11.12	1,680
Proposed Project TOTAL TRIPS						18,252		2,563		2,630
NET TOTAL TRIPS						-27,540		1,034		-1,716

¹ Site 24 is owned by Montessori and the majority of buildings onsite are operated as a preschool. One building is leased by the Grove School, a high school. Therefore, ITE Code 565 accurately represents the trips from Site 24.

Notes: ADT = Average Daily Trips

DU = Dwelling Unit

ITE = Institute of Transportation Engineers Trip Generation Manual 11th Edition, 2021

KSF = Thousand Square Feet

Retail = Shopping Center greater than 150,000 SF

Source: Appendix F

Roadway, Transit, Bicycle, and Pedestrian Facilities

Roadway

Regional access to the Project site is provided by I-10 and I-210. Local access to the site is provided via Alabama Street, Nevada Street, Iowa Street, Citrus Avenue, Orange Avenue, Pennsylvania Avenue, San Bernardino Avenue, Texas Street, Lugonia Avenue, and Orange Street. Each roadway is described above and in Table 5.10-1. The proposed Project would continue to provide vehicular access to the proposed rezoning parcels from the adjacent roadways and there would be no changes to the roadway access points. Any future development under the proposed rezoning may include driveway and roadway improvements. Specific roadway improvements required to support future development within the Project site are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. The proposed Project would not conflict with existing facilities and would provide additional facilities as needed. Thus, impacts related to roadway facilities would not occur.

Transit Services

As described previously, the Project vicinity is served by Omnitrans and SBCTA. There are three bus routes that currently serve the Project area, and there are various Omnitrans bus stops throughout the Project area. This existing transit service would continue to serve its ridership and new riders from implementation of future development under the proposed rezoning. Buildout of the proposed rezoning would be incremental in response to market needs and within the area currently served by Omnitrans and SBCTA. Therefore, the proposed Project would not conflict with an existing program related to transit facilities, and impacts would not occur.

Bicycle Facilities

As detailed previously and shown in Table 5.10-1, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue currently contain bicycle lanes. In addition, the City's General Plan Figure 5-3, *Bicycle Facilities*, identifies Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue as planned bicycle routes. This existing bicycle lane infrastructure would be used by future residents and employees of new uses under the proposed RHNA rezone. As no specific development project is proposed, specific bicycle lane improvements required to support future development within the Project site are not known at this time and will not be known until a development project is proposed. However, the General Plan has new facilities along Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue; and future projects would be required, as deemed necessary, to construct these planned bicycle facilities as part of driveway and infrastructure improvements. This would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. Therefore, the proposed Project would not alter or conflict with existing bicycle facilities, and impacts related to bicycle facilities would not occur.

Pedestrian Facilities

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks. The Project does not propose a specific development or any demolition, including sidewalks; however, future development facilitated by the Project may be required to include sidewalk improvements. Specific sidewalk

improvements required to support development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits. Additionally future development is subject to compliance with applicable accessibility requirements of the American Disabilities Act, Title 24 of the Uniform Building Code as locally amended, and the Department of Housing and Urban Development's Fair Housing Accessibility Guidelines. Therefore, the proposed Project would not conflict with pedestrian facilities. Thus, impacts related to pedestrian facilities would not occur.

Policies

Section 5.6, *Land Use and Planning*, includes a list of applicable goals and policies related to the Project. Tables 5.6-1 and 5.6-2 include analysis of the Project's consistency with the SCAG Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy and City of Redlands General Plan, respectively. As discussed in Section 5.6, the Project would be consistent with all applicable goals and policies. Thus, impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system of the Project site and surrounding area would not occur. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to circulation systems would be less than significant.

IMPACT TR-2: THE PROJECT WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) REGARDING VEHICLE MILES TRAVELED.

Site VMT Screening

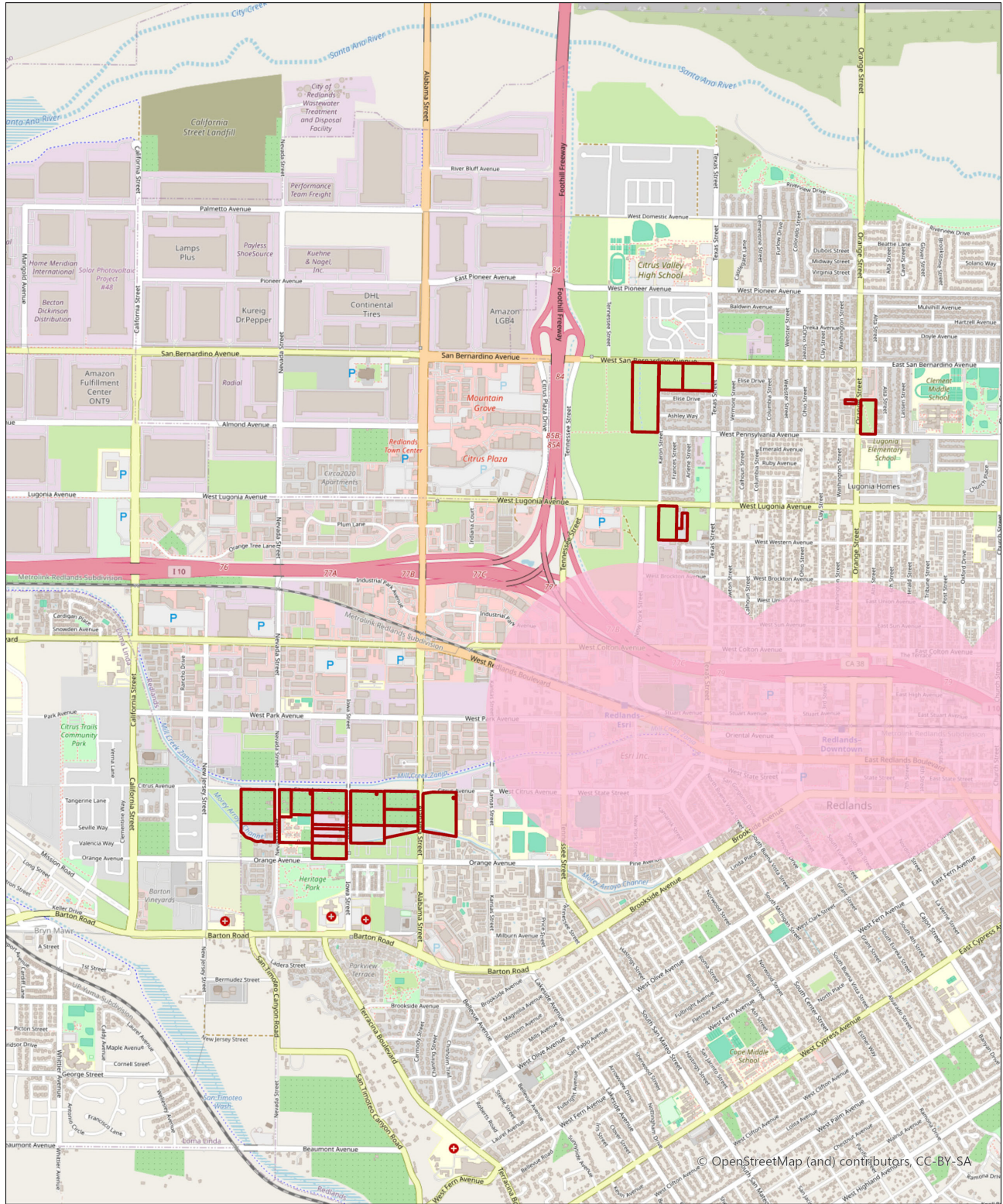
As described previously, State CEQA Guidelines Section 15064.3(b) focus on determining the significance of VMT-related transportation impacts. The proposed Project was analyzed in comparison to the City of Redlands VMT Guidelines. As discussed in the City of Redlands VMT Guidelines, if a project meets the screening criteria set forth in the guidelines, then it would be considered to have a less-than-significant impact on VMT. The applicability of each screening criteria, in comparison to each Site of the proposed Project (Sites 1 through 24) is discussed below. The Project is located within TAZs 53827208 (Sites 1 and 2), 53827403 (Sites 3-15, 24), 53827501 (Site 16), 53836401 (Sites 17-19), 53835402 (Sites 20-21), 53836402 (Site 22), and 53835101 (Site 23).

Screening Criterion 1 – TPA

According to the City's guidelines, projects within one-half mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor are within a transit priority area (TPA). The TAZs within the proposed Rezone area and within a TPA may be presumed to have a less-than-significant VMT impact so long as developments have a floor area ratio of 0.75 or more, provide less parking than required by the City of Redlands, are consistent with the applicable Sustainable Communities Strategy, and do not replace affordable units with a smaller number of moderate- or high-income residential units. As shown in Figure 5.10-1, *Transit Priority Areas & Rezone Sites*, none of the proposed Rezone sites are located within a TPA. Therefore, the Project does not meet the requirements of Screening Criterion 1.

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Transit Priority Areas & Rezone Sites



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Screening Criterion 2 – Low VMT Area

The City's guidelines include a screening threshold for projects located in a low-VMT generating area, which is defined as TAZs with a total daily VMT/SP that is 15 percent less than the baseline level for the county. For projects that are inconsistent with the land use assumptions coded into the projects' TAZ, this screening criteria would not be appropriate, and the project would not satisfy the requirements of Screening Criterion 2.

The proposed zoning designations for 19 of the 24 proposed Rezoning sites are inconsistent with the existing General Plan land use designations and would therefore not satisfy Screening Criteria 2. The proposed zoning designations and buildout of Site 8 and Sites 20 through 23 would be consistent with the existing General Plan land use designations and would meet Screening Criterion 2 if their respective TAZs are 15 percent below the County's OD VMT/SP baseline. Based on the SBCTA VMT Screening Tool, Site 22 is located in a low VMT area and future buildout in Site 22 would satisfy Screening Criterion 2. Therefore, buildout of future projects within Site 22 would result in a less-than-significant impact to VMT.

However, Sites 8, 20, 21, and 23 are not located in a low VMT generating area. Therefore, future development projects within Sites 8, 20, 21, and 23 would not meet Screening Criterion 2.

Screening Criterion 3 – Land Use Type

If any implementing projects within the proposed Rezoning area consist of a local serving K-12 school, local park, daycare center, local-serving gas station, local-serving bank, local-serving hotel, student housing project on or adjacent to a college campus, local-serving assembly use, community institution, local-serving community college, affordable housing, assisted living facility, or senior housing, the implementing projects would screen out of further VMT analysis. Further, if an implementing project generates less than 3,000 MTCO_{2e}, such as a project that proposes 167 single-family dwelling units or fewer, 232 low-rise multi-family dwelling units or fewer, 299 mid-rise multi-family dwelling units or fewer, 59,100 SF or less of office space, 112,400 SF or less (with no stores larger than 50,000 SF) of local-serving retail uses, 463,600 SF or less of warehousing uses, or 74,600 SF or less of light industrial uses, the project would screen out of further VMT analysis. Implementing projects that generate less than 3,000 MTCO_{2e} per year would be presumed to have a less-than-significant impact on VMT pursuant to Screening Criterion 3.

Implementing projects within Sites 1 through 24 pursuant to the new zoning designations could potentially consist of the type of developments that would screen out via Screening Criteria 3; however, specific implementing developments are unknown at this time. Given the proposed General Plan designation of Public/Institutional for Site 24, future development pursuant to the proposed General Plan and zoning designations would result in a land use that constitutes a local serving use, such as a government office or educational facility. Therefore, future development within Site 24 can be presumed to have a less-than-significant impact on VMT.

Sites 1-23 could propose an individual development that generates less than 3,000 MTCO_{2e} (299 Multifamily Housing (Mid-Rise) units), propose affordable housing, or propose Senior housing, and could therefore be presumed to have a less-than-significant VMT impact. However, given that the size of residential development resulting from buildout within Sites 1-23 is unknown, it cannot be determined that VMT impacts would be less than significant. Overall, since the totality of the buildout of the proposed zoning does not meet the requirements of Screening Criterion 3, and future development project specifics are not known at this time to determine if the land uses meet the requirements for Screening Criteria 3, it is determined that Screening Criterion 3 has not been met.

VMT Analysis for Sites 1 through 24

As Screening Criteria 1 through 3 would not be met for all Project sites, a full VMT analysis has been prepared for the Project. The VMT analysis results from SBTAM for TAZs 53827208, 53827403, 53827501, 53836401, 53835402, and 53835101 (which encompass Sites 1 through 24) are provided below in Tables 5.10-3 through 5.10-9.

Sites 1 through 19, 22, & 24

Less than Significant Impact. As discussed above, Site 22 is located in a low VMT area and future buildout in Site 22 would satisfy Screening Criterion 2. Therefore, buildout of future projects within Site 22 would result in a less-than-significant impact to VMT.

As shown in Table 5.10-3, the Project VMT/SP for TAZ 53827208 (Sites 1 and 2) would be 39.6 percent below the threshold under Project Baseline 2024 conditions and 22 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 1 and 2 pursuant to the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-3: VMT Analysis of Sites 1-2 (TAZ 53827208)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	13,913	793	17.5	-	-	-
Project Baseline (2024)	14,513	793	18.3	30.29	-39.6%	No
Model Cumulative Year (2050)	17,639	794	22.2	33.18	-33.0%	No

Source: Appendix F

As shown in Table 5.10-4, the Project VMT/SP for TAZ 53827403 (Sites 3-7, 9-15, and 24) would be 23.4 percent below the threshold under Project Baseline 2024 conditions and 25.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 3 through 7, 9 through 15, and 24 under the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-4: VMT Analysis of Sites 3-7, 9-15 and 24 (TAZ 53827403)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	96,137	4,198	22.9	-	-	-
Project Baseline (2024)	97,984	4,223	23.2	30.29	-23.4%	No
Model Cumulative Year (2050)	107,586	4,353	24.7	33.18	-25.5%	No

Source: Appendix F

As shown in Table 5.10-5, the Project VMT/SP for TAZ 53827493 (Site 8) would be 23.4 percent below the threshold under Project Baseline 2024 conditions. Additionally, since the Project is consistent with the General

Plan land use designation, the Project would not require a cumulative year analysis. Therefore, buildout of Site 8 under the proposed Project would result in a less-than-significant VMT impact.

Table 5.10-5: VMT Analysis of Site 8 (TAZ 53827403)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	96,137	4,198	22.9	-	-	-
Project Baseline (2024)	97,984	4,223	23.2	30.29	-23.4%	No
Model Cumulative Year (2050)	107,586	4,353	24.7	-	-	-

Source: Appendix F

As shown in Table 5.10-6, the Project VMT/SP for TAZ 53827501 (Site 16) would be 34.7 percent below the threshold under Project Baseline 2024 conditions and 44.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Site 16 pursuant to the proposed zoning designation would result in a less-than-significant VMT impact.

Table 5.10-6: VMT Analysis of Site 16 (TAZ 53827501)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	91,664	4,571	20.1	-	-	-
Project Baseline (2024)	90,786	4,589	19.8	30.29	-34.7%	No
Model Cumulative Year (2050)	86,221	4,682	18.4	33.18	-44.5%	No

Source: Appendix F

As shown in Table 5.10-7, the Project VMT/SP for TAZ 53836401 (Sites 17-19) would be 17.6 percent below the threshold under Project Baseline 2024 conditions and 9.6 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 17-19 under the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-7: VMT Analysis of Sites 17-19 (TAZ 53836401)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	42,151	1,762	23.9	-	-	-
Project Baseline (2024)	44,527	1,764	25.0	30.29	-17.6%	No

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Cumulative Year (2050)	56,879	1,896	30.0	33.18	-9.6%	No

Source: Appendix F

Sites 20, 21, & 23

Significant and Unavoidable Impact. As shown in Table 5.10-8, the Project VMT/SP for TAZ 53835402 (Sites 20 and 21) would be 85.1 percent above the threshold under Project Baseline 2024 conditions. However, since buildout of the site would be consistent with the existing General Plan land use designation, this site would not require a cumulative year analysis.

Additionally, as shown in Table 5.10-9, the Project VMT/SP for TAZ 53835101 (Site 23) would be 8.1 percent above the threshold under Project Baseline 2024 conditions. Since buildout of the site would be consistent with the existing General Plan land use designation, this site would also not require a cumulative year analysis.

Table 5.10-8: VMT Analysis of Sites 20-21 (TAZ 53835402)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	52,628	945	56.7	-	-	-
Project Baseline (2024)	55,702	993	56.1	30.29	85.1%	Yes
Model Cumulative Year (2050)	66,487	1,245	53.4	-	-	-

Source: Appendix F

Table 5.10-9: VMT Analysis of Site 23 (TAZ 53835101)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	43,164	1,337	32.3	-	-	-
Project Baseline (2024)	43,760	1,337	32.7	30.29	8.1%	Yes
Model Cumulative Year (2050)	46,859	1,337	35.0	-	-	-

Source: Appendix F

Therefore, buildout of Sites 20, 21, and 23 pursuant to the proposed zoning designations would result in a potentially significant VMT impact. As such, future development projects within Sites 20, 21, and 23 would be required to conduct a Project-specific VMT screening analysis to determine whether the future proposed development would screen out of a full VMT analysis pursuant to Mitigation Measure T-1. Should the future

proposed development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project-level VMT impact. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which did not analyze VMT impacts.

5.10.7 CUMULATIVE IMPACTS

Roadway, Transit, Bicycle, and Pedestrian Networks

The evaluation of Impact TRA-1 concluded that the proposed Project would not result in significant impacts related to alternative transportation or policies addressing the circulation system. Cumulative development in the City and surrounding jurisdictions, as shown on Table 5-1, would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would not allow potential cumulatively considerable impacts related to alternative transportation. Therefore, the Project would not cumulatively combine with other projects to result in impacts related to alternative transportation. The Project would be consistent with all applicable plans and policies. Therefore, the Project would not contribute to a cumulatively considerable impact associated with conflict with a program, plan, ordinance, or policy addressing the circulation system including roadway, transit, bicycle, or pedestrian networks.

Vehicle Miles Traveled

The cumulative traffic study area for the proposed Project includes the City of Redlands. As discussed in the City of Redlands CEQA Assessment VMT Analysis Guidelines, projects that are inconsistent with the Redlands General Plan 2035 would not have a cumulative impact so long as the project's citywide boundary VMT/SP is lower than the no project scenario under cumulative conditions. As shown in Table 5.10-10, with buildout of the Project, the cumulative Redlands Citywide boundary VMT/SP would be 3.1 percent lower than cumulative VMT without the Project. As such, the Project's impact on citywide VMT would be less than significant and cumulative impacts related to VMT would be less than significant.

Table 5.10-10: Project's Effect on Citywide VMT

	Cumulative 2050
Citywide Boundary VMT with Project	3,268,701
Citywide Service Population with Project	147,175
With Project Citywide Boundary VMT/SP	22.21
Citywide Boundary VMT No Project	3,238,348
Citywide Service Population No Project	141,337
No Project Citywide Boundary VMT/SP	22.91
Percent Above/Below Threshold	-3.1%
Impact?	No

5.10.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

SCAG 2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy

Plans, Programs, or Policies

None.

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact TR-1 would be **less than significant**.

Regarding Impact TR-2, implementing projects within Sites 1-19, 22, and 24 would result in a **less-than-significant** VMT impact.

Implementing projects within Sites 20, 21, and 23 would be **potentially significant**.

5.10.10 MITIGATION MEASURES

Mitigation Measure TR-1: VMT Screening & Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines.

If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to:

- *Increase Residential Density:* Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT.
- *Integrate Affordable and Below Market Rate Housing:* Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project.
- *Implement Commute Trip Reduction Marketing:* Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA).
- *Provide Ridesharing Program:* Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA.
- *Implement Subsidized or Discounted Transit Program:* Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA.
- *Limit Residential Parking Supply:* The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional

time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project.

- *Unbundle Residential Parking Costs from Property Cost:* Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT.
- *Provide Pedestrian Network Improvement:* Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.
- *Construct or Improve Bike Facility:* Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT.
- *Construct or Improve Bike Boulevard:* Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT.
- *Expand Bikeway Network:* Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT.
- *Implement Conventional Carshare Program:* Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT.
- *Implement Electric Carshare Program:* Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions.
- *Implement Pedal (Non-Electric) Bikesare Program:* Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT.
- *Implement Electric Bikesare Program:* Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT.
- *Implement Scooter Share Program:* Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT.
- *Provide Community-Based Travel Planning (CBTP):* CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA.
- *Implement Market Price Public Parking (On-Street):* Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas.
- *Implement Transit-Supportive Roadway Treatments:* Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.

5.10.1.1 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact TR-2: Implementing projects within Sites 20, 21, and 23 have the potential to result in significant VMT impacts after implementation of Mitigation Measure TR-1. Implementing projects within the sites that do not meet Screening Criterion 1, 2, 3, or 4 could result in VMT levels where potential VMT reductions associated

with TDM measures would not be large enough to guarantee that significant impacts could be fully mitigated. Therefore, Impact TR-2 for Sites 20, 21, and 23 would be significant and unavoidable.

5.10.12 REFERENCES

- City of Redlands. (2017a). *Redlands General Plan 2035*. Retrieved July 2, 2024, from <https://www.cityofredlands.org/post/planning-division-general-plan>
- City of Redlands. (2017b). *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*. https://www.cityofredlands.org/sites/main/files/file-attachments/redlands_deir_compiled_lo_071917_0.pdf?1554321669. Accessed July 2, 2024.
- City of Redlands. (2024). *City of Redlands Municipal Code*. Retrieved July 2, 2024, from https://codelibrary.amlegal.com/codes/redlandscalatest/redlands_ca/0-0-0-1
- EPD Solutions, Inc. (July 2024). *Redlands RHNA Rezone Project VMT Analysis*. (**Appendix F**)

5.11 Tribal Cultural Resources

5.11.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources (TCRs) associated with implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report (General Plan EIR)*, July 2017; and
- City of Redlands Municipal Code.

Additionally, part of this analysis is based upon Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project site.

5.11.2 REGULATORY SETTING

5.11.2.1 Federal Regulations

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; and required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources (NPS, 2018).

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated tribes.

5.11.2.2 State Regulations

California Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with California Native American tribes identified by the California Native American Heritage Commission (NAHC) to aid in the protection of TCRs. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning to protect, or mitigate impacts on, TCRs. The *Tribal Consultation Guidelines: Supplement to General Plan Guidelines* (OPR, 2005), identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land

within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).

- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Because the proposed Project includes a General Plan Amendment, it is subject to the statutory requirements of SB 18 Tribal Consultation Guidelines.

California Assembly Bill 52

Assembly Bill 52 (AB 52) established a requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Public Resources Code (PRC) Section 21074(a) defines "tribal cultural resources" (TCRs) as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either "[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources" or "in a local register of historical resources." Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered TCRs. PRC Section 21074(b), (c). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a notice of preparation for a Draft EIR was filed on or after July 1, 2015, are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section 21080.3.1(b) defines "consultation" as "the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement." Consultation must "be conducted in a way that is mutually respectful of each party's sovereignty [and] recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance." The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.
2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency's determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe's request for consultation on a project.
5. Consultations are complete when the lead agencies and California Native tribes participating have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC Sections 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

California Public Resources Code, Sections 5097.9 to 5097.991

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the NAHC. These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

5.11.2.3 Local Regulations

City of Redlands General Plan 2035

The General Plan 2035 Distinctive City Element contains the following policies and actions related to TCRs that are applicable to the proposed Project:

Action 2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.

East Valley Corridor Specific Plan Preservation Overlay District

The East Valley Corridor Specific Plan provides for a Preservation – Historical/Archaeological Overlay District (“Preservation Overlay District”) in Division 5 of the Specific Plan, which is intended to preserve and protect historical and archaeological resources. The Preservation Overlay District provides development standards for developments within the district that are in addition to those required by the Specific Plan. Within the East Valley Corridor Specific Plan, the Preservation Overlay District is applied to areas approximately 600 feet on either side of the historic alignment of the Mission Zanja irrigation canal and to potential historic structures. The development standards set forth within the Preservation Overlay District set forth requirements for investigation, data recovery, and preservation of archaeological and historic resources (County of San Bernardino, 1988).

5.11.3 ENVIRONMENTAL SETTING

Native American Tribes

The Project site is within a region where the traditional use territories of the Serrano, Cahuilla, and Gabrieleño tribes meet. These three cultural groups spoke languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock.

Serrano

Since time immemorial, Native people have lived and gathered in the mountains, valley, and foothills of the San Gabriel and San Bernardino Mountains. This area provided plentiful resources to the Native communities whose ancestral lands encompass the Redlands area, such as the Maara'yam (Serrano) people.

Archaeological evidence of the Serrano people has been found in and around Redlands. Grinding holes provide proof of resource processing and communal living; non-local shells and obsidian tools reflect a healthy trade and well-traveled culture. The Serrano people were renowned for their sophisticated basketry made of grasses and fibers that illustrate practical yet artistic designs.

The Serrano lived in dome-shaped structures called *kiič*. They were generally made of willow poles and long sticks to create a frame, then covered with brush and yucca fiber. They were often dug about two feet into the ground to combat extreme temperatures. The homes of several families, along with granaries, sweatshouses, and ceremonial buildings, were clustered together, forming communities.

Historical evidence of Serrano people inhabiting the Redlands area comes from the San Gabriel Missions, specifically the mission's *estancia*, known as the Asistencia today, which was established in 1819. The Asistencia held many Serrano people as well as other indigenous people from nearby regions, using them as labor for mission support. One notable feat was the building of the Mill Creek Zanja, a massive irrigation system that extends from the base of the San Bernardino Mountains through Mentone, Redlands, and Loma Linda. This feature supported agriculture across the region and is listed on the National Register of Historic Places with the notation that it was built by Serrano men.

From the Mission Era onward, Native people have been forcibly removed from their traditional homelands. Despite these hardships, the Serrano people were able to maintain their identity as sovereign nations, including the San Manuel Band of Mission Indians. Tribes maintain a connection to their ancestral lands by stewarding cultural and natural resources.

Cahuilla

The eastern portion of the Valley Region, the southeastern part of the Mountain Region, and the southern portion of the East Desert Region of San Bernardino County were once home to the Cahuilla people. It is thought that the Cahuilla migrated to southern California approximately 2,000 to 3,000 years ago with related sociolinguistic groups, most likely from the southern Sierra Nevada Mountain ranges. The Cahuilla settled in a territory that extended from the present-day city of Riverside to the central portion of the Salton Sea in the Colorado Desert, and from the San Jacinto Valley to the San Bernardino Mountains (City of Redlands, 2017b).

Gabrieleño

The Gabrieleño historically occupied the southwestern portion of San Bernardino County, including the Valley Region. The name Gabrieleño denotes the people who were under the control of the Spanish from Mission San Gabriel, which included people from the Gabrieleño proper as well as other social groups. Many contemporary Gabrieleño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and use the native term Tongva. Historic-era Tongva settlements in the San Bernardino Valley were primarily located at the base of the foothills and along perennial watercourses (City of Redlands, 2017b).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried tribal cultural resources.

5.11.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to 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:

- TCR-1 Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
- TCR-2 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.11.5 METHODOLOGY

The analysis within this Draft Subsequent EIR section is based on the sacred lands record search from the NAHC requested by the City. The NAHC responded on January 19, 2024, that there are known sacred lands within one-half mile of the Project boundaries.

In compliance with SB 18 and AB 52, on January 29, 2024, the City sent letters to Native American groups or individuals that may have knowledge regarding tribal cultural places in the Project area. Responses were received from two tribes. The Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) responded on February 5, 2024, and the Yuhaaviatam of San Manuel Nation (San Manuel) responded on March 5, 2024.

An AB 52/SB 18 consultation was requested by San Manuel. San Manuel considers the Project area sensitive for TCRs. Additionally, SB 18 consultation was requested by the Kizh Nation, which consulted with the City and considers the area sensitive for cultural resources. Furthermore, due to the presence of tribal cultural resources within the Project area, the Kizh Nation described that there is a potential of encountering historic and prehistoric resources. As such, the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented TCRs during construction.

5.11.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to TCRs in Chapter 3.8. The Certified EIR found that there are no known TCRs 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 TCRs. Thus, implementation of the General Plan was determined to result in less-than-significant impacts to TCRs (City of Redlands, 2017b, p. 3.8-17).

IMPACT TCR-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE THAT IS LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K).

Less than Significant with Mitigation Incorporated. SB 18 and AB 52 require meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs. As described above, TCRs 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 (PRC Section 21074). As outlined above, the NAHC's Sacred Lands File search was positive for sacred lands within one-half mile of the Project area, and the City sent letters to Native American Tribes notifying them of the proposed Project in accordance with SB 18 and AB 52. In response, the Kizh Nation and San Manuel requested consultation and met with the City. The Morrey Arroyo was identified as a potential site for TCRs. Due to the presence of portions of the Morrey Arroyo within the Project site, the Kizh Nation described that there is a potential of encountering historic and prehistoric resources during ground disturbing activities. No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for Tribal Cultural Resources to occur in the Project area (other than the known Morrey Arroyo), and therefore, impacts are expected to be less than significant. However, the City has agreed to implement Mitigation Measure TCR-1 in the event of any inadvertent discovery of TCRs

Implementation of the proposed Project would not directly result in physical construction that could impact TCRs. However, development and redevelopment projects pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb unknown buried TCRs. Thus, Initial Study Mitigation Measures CUL-3, CUL-4, and DSEIR Mitigation Measure TCR-1 are required for implementing projects and would reduce the potential for TCRs to be impacted during earthmoving activities and provides for preservation of any identified resources.

With implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to tribal cultural resources would be less than significant.

IMPACT TCR-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL 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 THE PUBLIC RESOURCES CODE SECTION 5024.1.

Less than Significant with Mitigation Incorporated. As described in Section 5.3, *Cultural Resources*, the Project site is located in an urbanized area; however, future site-specific development projects pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb buried archaeological resources, including TCRs. No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for Tribal Cultural Resources to occur in the Project area (other than the known Morrey Arroyo), and therefore, impacts are expected to be

less than significant. However, the City has agreed to implement mitigation measures in the event of any inadvertent discovery of TCRs. Thus, Mitigation Measures CUL-3 and CUL-4 are included to reduce the potential for archaeological resources, including TCRs, to be impacted during earthmoving activities and provides for preservation of any identified resources. Furthermore, as a result of SB 18 and AB 52 tribal consultation, Mitigation Measure TCR-1 is included in the case if an incidental discovery of a TCR during ground disturbing activity. With implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to tribal cultural resources would be less than significant.

5.11.7 CUMULATIVE IMPACTS

The cumulative study area for TCRs includes the Southern California region, which contains the same general tribal historic setting of the Gabrieleño, Cahuilla, and Serrano, as detailed previously in Section 5.11.3, *Environmental Setting*.

Similar to future projects implemented pursuant to the proposed Project, other projects in the vicinity of the Project site could involve ground-disturbing activities in native soils that may uncover or disturb unknown TCRs. However, the Project has included Mitigation Measure CUL-1, CUL-2, and TCR-1 that would reduce the potential impact to unknown resources. Cumulative development would also be required to undergo environmental review to establish requirements for avoidance or mitigation of impacts to potential resources. Thus, the Project would not contribute to cumulative impacts, and cumulative effects of development on TCRs from implementation of the proposed Project in combination with other projects would be less than significant.

5.11.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5
- California Public Resources Code Sections 21073 et seq. (AB 52)

Plans, Programs, or Policies

None.

5.11.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts TCR-1 and TCR-2 would be **potentially significant**.

5.11.10 MITIGATION MEASURES

Mitigation Measure CUL-3 and **Mitigation Measure CUL-4** related to archaeological resources and human remains discussed in Section 5.3, *Cultural Resources*, apply. In addition, the following mitigation measure would apply to all future implementing projects. Other mitigation may also be required for future projects as determined through the tribal consultation process.

Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall

have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance.
- B. If avoidance is not feasible, Preservation in place.
- C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
- D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

5.11.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts TCR-1 and TCR-2 would be less than significant after mitigation.

5.11.12 REFERENCES

- City of Redlands. (July 2017a). *Redlands General Plan 2035*. Retrieved July 2, 2024, from <https://www.cityofredlands.org/post/planning-division-general-plan>
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5.1 2 Utilities and Service Systems

5.12.1 INTRODUCTION

This section of the Draft Subsequent EIR evaluates the potential effects on utilities and service systems from implementation of the proposed Project, identifying anticipated demand and existing and planned utility availability. This includes water supply and infrastructure, wastewater, and stormwater drainage. Electric power, natural gas, telecommunications, and renewable energy resources are described in Section 5.4, *Energy*. The Initial Study (included as EIR Appendix A) established that the proposed Project would not result in potentially significant impacts to solid waste, so solid waste utilities are not discussed further in this section.

Information in this section is based on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017;
- City of Redlands Municipal Code;
- *Upper Santa Ana River Watershed Integrated Regional Water Management Plan* (IRUWMP), San Bernardino Valley Water Conservation District, May 2021;
- *Redlands RHNA Rezone Water Supply Assessment*, Fuscoe Engineering, Inc., July 19, 2024, Appendix G; and
- *Redlands RHNA Rezone Proposed Conditions Infrastructure Report for Water and Sewer*, Fuscoe Engineering, Inc., July 19, 2024, Appendix H.

Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand for water, wastewater, and stormwater utilities would result from implementation of the proposed Project that would result in significant adverse physical environmental effects. For example, an increase in wastewater generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact under CEQA.

5.12.2 REGULATORY SETTING

5.12.2.1 Federal Regulation

Clean Water Act

The Clean Water Act (CWA) was enacted by Congress in 1972 and is the primary federal law regulating water quality in the United States. The objective of the CWA is to reduce or eliminate water pollution in the nation's rivers, streams, lakes, and coastal waters. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint source discharge programs, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of CWA portions to State and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with

the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

5.12.2.2 State Regulations

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies (Urban Water Management Plans [UWMPs]) to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents that should be contained in the UWMPs as well as methods for urban water suppliers to adopt and implement the plans.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. It further requires the public water system to prepare a specified Water Supply Assessment (WSA) for projects that meet the following criteria:

- a) A proposed residential development of more than 500 dwelling units;
- b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 square feet (SF) of floor space;
- c) A commercial office building employing more than 1,000 persons or having more than 250,000 SF of floor space;
- d) A hotel or motel, or both, with more than 500 rooms;
- e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 SF of floor area; and
- f) A mixed-use project that includes one or more of the projects above.

The components of a WSA include existing water demand, future water demand by the project, and must ensure that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The WSA must also describe whether the project's water demand is accounted for in the water supplier's UWMP. Supplies of water for future water supply must be documented in the WSA.

CALGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Standards (CALGreen). The CALGreen Code is updated every three years. It was recently updated in 2022, effective January 1, 2023. CALGreen sets forth water efficiency standards (e.g., maximum flow rates) for all new plumbing and irrigation fittings and fixtures

5.12.2.3 Local and Regional Regulations

City of Redlands Drainage Master Plan

In June 2014, the City of Redlands adopted a Drainage Master Plan specifically devoted to its storm drain system. The Master Plan consolidates studies from multiple local and regional agencies, identifies infrastructure necessary to help protect the city from a major storm, provides long-range planning for the implementation and development of citywide drainage facilities, and determines the cost of implementing the facilities to add capacity to the existing stormwater drainage infrastructure. The Plan proposes improvements for each of the city's drainage areas, including replacement of existing storm drainage facilities, and provides cost estimates for each.

City of Redlands 2035 General Plan

The following goals and policies from the Livable Community and Vital Environment chapters of the City of Redlands General Plan 2035, adopted December 2017, are relevant to the proposed Project:

Livable Community Element

- Principle 4-P.56** Ensure that public facilities and services are provided in a timely manner to adequately serve new and existing development.
- Action 4-A.145** Coordinate future development with the City's Capital Improvement Program to ensure adequate funding and planning for needed public services and facilities.
- Action 4-A.146** Encourage the development of programs that enable concurrent provision of necessary public services and facilities prior to the approval of development projects that would require those services.
- Action 4-A.148** Ensure that all utilities and public facilities are designed and constructed to preserve and enhance the perceived natural and historic character of the area, particularly on hillsides and in the canyon areas.

Vital Environment Element

- Policy 6-P.20** Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.
- Policy 6-P.21** Work with regional organizations to manage groundwater resources of the Bunker Hill Basin.
- Policy 6-A.38** Encourage development that reflects an integrated approach to building design, civil engineering, and landscape architecture that maximizes rainwater harvesting and stormwater retention for landscape irrigation.
- Policy 6-A.39** Require that new development provides landscaping and re-vegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants.

City of Redlands Municipal Code Requirements

City of Redlands Water Efficient Landscape Requirements

Chapter 15.54 of the Redlands Municipal Code establishes the City's Water Efficient Landscape Requirements to promote the benefits provided by landscapes while recognizing the need to use water as

efficiently as possible. The chapter requires applicable landscaping projects to submit a landscape documentation package that contains project information, hydrozone information table, water budget calculations, soil management report, and landscape, irrigation, and grading design plans. The chapter establishes requirements for irrigation scheduling, maintenance, and audits to ensure efficient use of water. The requirements also include provisions for non-potable water irrigation systems and encourage stormwater best management practices to increase onsite retention and infiltration.

Section 13.54, *Storm Drains*, of the City's Municipal Code provides regulation of discharges into the Redlands storm drain system. This is achieved by elimination of all nonpermitted discharges to Redlands separate storm sewers; control discharges to the Redlands separate storm sewers through prohibition of spills, dumping, or disposal of materials other than stormwater; and reduction of pollutants in stormwater discharges to the maximum extent practicable. City dischargers are required to comply with the applicable NPDES permit and follow the City's standard best management practices.

Additionally, the City's Pretreatment and Regulation of Wastes Ordinance, codified under Section 13.52 of the City Municipal Code, further protects water quality in the City through uniform requirements for all users of the City's publicly owned treatment works. The ordinance enables the City to comply with all applicable State and federal laws, including the Clean Water Act (33 United States Code [USC] Section 1251 et seq.) and the general pretreatment regulations (40 Code of Federal Regulations [CFR] part 403).

5.12.3 ENVIRONMENTAL SETTING

5.12.3.1 Water

The Project site is located within the water service area of the City of Redlands Municipal Utilities and Engineering Department (MUED), which provides retail water service to the majority of the City of Redlands, a portion of the City of Loma Linda, and unincorporated areas of the Donut Hole (an area in unincorporated San Bernardino County surrounded by Redlands), Mentone, and most of Crafton.

The City of Redlands participates in the Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (IRUWMP). This IRUWMP is a tool that provides a summary of anticipated supplies and demands for the years 2020 to 2045 within the Valley Region of San Bernardino County, including various incorporated cities such as the City of Redlands.

MUED Water Supply and Demand

The MUED utilizes four primary sources for water supply: groundwater, surface water, imported water, and recycled water. The MUED's water supply is a combination of groundwater from the Bunker Hill Subbasin; groundwater from the Yucaipa Subbasin; surface water from the Santa Ana River; surface water from Mill Creek; imported water from the State Water Project (SWP); and recycled water. As shown on Table 5.12-1, in 2020, the MUED obtained the greatest percentage of its water supply from the Bunker Hill Subbasin.

Table 5.12-1: MUED Water Supply 2020

Water Supply	Source	Water Quality	Volume (acre-feet)	Percentage
Groundwater	Bunker Hill	Drinking Water	12,088	43%
Groundwater	Bunker Hill	Non-Potable	1,531	5.4%
Groundwater	Yucaipa	Non-Potable	297	1.1%
Surface Water	Santa Ana River	Drinking Water	5,796	20.6%

Water Supply	Source	Water Quality	Volume (acre-feet)	Percentage
Surface Water	Mill Creek	Drinking Water	6,045	21.5%
Purchased or Imported Water	SWP-Direct Deliveries	Drinking Water	535	1.9%
Recycled	Recycled Water-Direct	Recycled Water	1,806	6.5%
Total			28,098	100%

Source: San Bernardino Valley Water Conservation District, 2021.

As shown in Table 5.12-2, the 2020 IRUWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of surface water, groundwater, and purchased or imported water. The 2020 IRUWMP anticipates that the MUED's water supply will increase from 31,039 acre feet (AF) in 2025 to 35,544 AF in 2045 (increase of 4,505 AF) to meet MUED's anticipated growth in water demands.

Table 5.12-2: MUED Projected Water Supply (AF)

Water Supply	Source	2025	2030	2035	2040	2045	2035 Percentage
Groundwater	Bunker Hill	12,973	13,922	14,861	15,677	16,484	46.4%
Groundwater	Bunker Hill	3,766	4,015	4,275	4,513	4,760	13.4%
Groundwater	Yucaipa	1,000	1,000	1,000	1,000	1,000	2.8%
Surface Water	Santa Ana River	5,000	5,000	5,000	5,000	5,000	14.1%
Surface Water	Mill Creek	5,500	5,500	5,500	5,500	5,500	15.5%
Purchased or Imported Water	SWP-Direct Deliveries	700	700	700	700	700	1.9%
Recycled	Recycled Water-Direct	2,100	2,100	2,100	2,100	2,100	5.9%
Total		31,039	32,238	33,436	34,490	35,544	100%

Source: San Bernardino Valley Water Conservation District, 2021

The 2035 projections anticipate that 62.6 percent of supply would be from the groundwater sources, 29.6 percent from surface water, 1.9 percent from imported/purchased sources, and 5.9 percent from recycled water. The IRUWMP also describes that there has been a historical trend associated with drier years and an increase in water use among agencies. Conservation efforts have proven to be effective in decreasing water use in dry years. Additionally, according to the IRUWMP, MUED has adequate supplies to serve 100 percent of its customers during normal, dry year, and multiple dry year demand through 2045 with projected population increases and accompanying increases in water demand (San Bernardino Valley Water Conservation District, 2021).

Groundwater: Redlands MUED extracts groundwater from the Bunker Hill Subbasin (also known as San Bernardino Basin or SBB) and Yucaipa Subbasin. Extractions from both basins include potable and non-potable water. In 2020, Redlands MUED extracted 13,619 AF of groundwater from the Bunker Hill Subbasin and 297 AF from the Yucaipa Subbasin. The City of Redlands uses 15 wells to obtain water from these sources that pump directly into the water system or into reservoirs (San Bernardino Valley Water Conservation District, 2021).

Purchased or Imported Water: Imported water from the SWP is available for the MUED to purchase from Valley District when needed. The MUED has purchased supplemental water from the SWP only in years when surface water flows have not been able to meet demands and on occasion when surface water supplies are turbid and require blending or for other operational purposes. The MUED contributes to regional efforts to

recharge the Bunker Hill groundwater basin with SWP water and local surface water in wet years when available so that storage is available for use in dry years when other supplies may be limited (San Bernardino Valley Water Conservation District, 2021).

Surface Water: The MUED receives water from the Mill Creek watershed and the Santa Ana River watershed. Water from the Mill Creek watershed is treated at Henry Tate Surface Water Treatment Plant. Water from the Santa Ana River watershed is treated at the Horace P. Hinckley Surface Water Treatment Plant. The MUED has ownership in a variety of private and mutual water companies to supply water to the City's Tate and Hinckley Surface Water Treatment Plants (San Bernardino Valley Water Conservation District, 2021).

Recycled Water: The City's Wastewater Treatment Plant has the capability of treating 7.2 million gallons per day (mgd) of wastewater to a Title 22 Recycled Water level (San Bernardino Valley Water Conservation District, 2021). The City's recycled water customers include Southern California Edison, a landfill, and recycled/non-potable water customers. Southern California Edison uses recycled water for its Mountain View Power Plant and recycled water customers use recycled water for irrigation.

Water Infrastructure

The City's water treatment plants include the Henry Tate Water Treatment Plant and the Horace Hinckley Surface Water Treatment Plant. The Henry Tate Water Treatment Plant is a conventional water treatment plant built in 1967. These facilities treat surface water and groundwater to meet drinking water standards. The design capacity of the Tate plant is 20 mgd. The City added enhancements to the Tate WTP to provide more water supply reliability by allowing State Water Project water to be mixed with Mill Creek water for treatment. The Horace Hinckley Surface Water Treatment Plant started operation in 1987 and has a permitted capacity of 14.5 mgd. The 10-year average flow (up to and including 2016) is 6,363 AF at the Henry Tate Plant, and 6,697 AF at the Horace Hinckley Plant. Roads adjacent to the Project site contain a network of water lines from 1 to 36-inches in diameter, which operate within capacity for existing development within the Project area. The City of Redlands maintains approximately 400 miles of pipeline with over 21,500 metered connections that serve potable water (MUED, 2022).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Appendix G).

5.12.3.2 Wastewater

Wastewater Infrastructure

Sewer service on the Project site is provided by the City of Redlands. The City's Wastewater Treatment Plant (WWTP) is located on the south side of the Santa Ana River Wash at Nevada Street. The City's WWTP has the capacity to treat up to 9.5 mgd. The City's WWTP includes two treatment systems: a membrane bioreactor with a capacity of 6.0 mgd for producing recycled water, and an activated sludge process with a capacity of 3.5 mgd. The WWTP's total permitted annual average flow is 9.5 mgd and it has an average daily flow around 6 mgd. (Appendix H).

In 2020, 6,620 AF of wastewater was treated at the City's WWTP. In 2020, 3,813 AF were treated to a secondary level and released to spreading basins east of the City's WWTP for percolation into the Bunker

Hill groundwater basin, while 1,806 AF were treated to a tertiary level and distributed as recycled water (San Bernardino Valley Water Conservation District, 2021).

The wastewater system has one lift station that serves the western-most portion of the city, south of Interstate 10 (I-10). The collections system in the City of Redlands consists of approximately 245 miles of pipelines. Wastewater pipelines range from 6-inches to 48-inches in diameter (Appendix H).

Approved General Plan Buildout Wastewater Generation

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Buildout of the Project area according to the current General Plan would have an annual wastewater generation of approximately 358 AFY (Appendix H).

5.12.3.3 Stormwater

Stormwater Infrastructure

The City of Redlands' stormwater drainage system serves an area of approximately 37 square miles. Stormwater runoff from the City's drainage systems flows by gravity into the Mission Channel, Morrey Arroyo Creek, and San Timoteo Canyon, and discharges to the Santa Ana River (City of Redlands, 2017a).

Drainage throughout the City is generally from east to west to one of two main existing major stormwater drainage facilities. The City is divided into five main watersheds: Mission Zanja, Reservoir Canyon, Downtown, North Redlands along the Santa Ana River, and South Redlands along the San Timoteo Channel. Sites 1-16A and 24 are located within the South City subwatershed and Sites 17-23 are located within the North City subwatershed. The North City subwatershed contains both open channel and subsurface storm drain facilities. The facilities located within the North City generally drain to the Santa Ana River. The South City subwatershed contains both open channel and subsurface storm drain facilities. The facilities generally drain to Mission Creek, south of Citrus Avenue/West State Street (RBF Consulting, 2014).

Approved General Plan Buildout Stormwater Drainage

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Similar to the proposed Project, buildout of the approved General Plan would result in an increase in impervious surface area. Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the General Plan. Implementation of development projects pursuant to the General Plan would increase the intensity of development within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system.

5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- UT-1 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.
- UT-2 Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

- UT-3 Result in a determination by the wastewater treatment provider that would serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- UT-4 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.
- UT-5 Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The Initial Study (included as EIR Appendix A) established that the proposed Project would not result in potentially significant impacts related to Thresholds UT-4 and UT-5; therefore, no further assessment of these thresholds is required in this Draft EIR. As discussed at the beginning of this section, energy related facilities such as electric power, natural gas, and telecommunications facilities are evaluated in Section 5.4, *Energy*, of this Draft SEIR; therefore, Impact UT-1 in this section evaluates water, wastewater treatment, and stormwater drainage facilities.

5.12.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the demand for utilities and services due to implementation of the proposed Project, based on comparison of the maximum development assumptions from buildout of the approved General Plan land uses and from buildout of the proposed Project, as outlined in Section 3.0, *Project Description*. The WSA prepared for the proposed Project estimated the Project's water demands using the developed acreage attributed to each use type (including landscape irrigation and parking area requirements). The total developed area was prorated based on the building square footage for each use type. Water demands were then estimated for the Project using land use-based water demand factors from the City of Redlands' "Water and Sewer Demands Spreadsheet." The land use demand factors are applied to gross estimated acreage for each land use. The evaluation of utilities identifies if utility demand from the proposed Project would be accommodated via existing utility infrastructure available to the proposed Project. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.12.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The Certified General Plan EIR addressed impacts related to utilities and service systems in Chapter 3.14. 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 water and wastewater regulations and the proposed General Plan policies would reduce potential impacts on water and wastewater service needs and infrastructure needs to less-than-significant levels. The General Plan EIR concluded that compliance with the City's current grading, drainage, and stormwater regulations would ensure that any new facilities required to manage stormwater in the Planning Area would have a less-than-significant impact on the environment (City of Redlands, 2017b, pg. 3.14-19).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to

residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. 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).

IMPACT UT-1: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT, OR STORM WATER DRAINAGE FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact.

Water

The proposed Project would rezone the approximately 116-acre Project site with residential and public/institutional uses, on sites which are currently served by MUED's water infrastructure. As discussed above, roadways surrounding the Rezone sites contain multiple water pipelines ranging in size from 1 inch to 36 inches in diameter. These water pipelines currently provide water supplies to the Project site and surrounding adjacent areas.

As discussed below under impact UT-2, the water facilities currently serving the Rezone sites would likely be sufficient to accommodate the additional residential development proposed by the Project. However, future developments proposed under the Project could necessitate further water infrastructure, including new water connections, water pumps, and other improvements to water utilities within the Rezone sites and within adjacent utility rights-of-way. Local improvements are anticipated; however, extensive offsite utility improvements are not anticipated to be required for buildout pursuant to the proposed Project.

The new onsite water systems would convey potable and non-potable water supplies to the proposed residential uses, public/institutional uses, and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Plumbing Code for efficient use of water and with Municipal Code Chapter 15.54.

Implementation of development projects pursuant to the proposed Project would increase the intensity of residential land uses within the Project area, and future site-specific development projects would install on-site water infrastructure and new connections to the water system that could include improvements to aged water pipelines and other connecting infrastructure. Such improvements would be required to be sized to accommodate the water demand of such new developments.

Under the City's development review procedures for site-specific development projects, the City determines water system design requirements and the needs for any improvements to existing infrastructure that would be required by the General Plan and Water Master Plans. Needed improvements would be referenced directly in the design plans for the proposed development to assure adequate capacity. The water design specifications for each site-specific development project would be required to comply with City standards (per the California Building Code) regarding requirements for design and operation of water distribution facilities.

The construction of any needed water system improvements as part of future site-specific development projects under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures listed throughout this document. These requirements would ensure that construction related impacts remain less than significant. As a result, buildout of the proposed Project would not result in construction of new or expanded wastewater facilities that could result in a significant environmental effect, and impacts would be less than significant. As such, Project impacts would be consistent

with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

Wastewater

The proposed Project would rezone the approximately 116-acre Project site with residential and public/institutional uses, on sites which are currently served by the City's WWTP. As discussed above, the collections system in the City of Redlands consists of approximately 245 miles of pipelines with pipes ranging from 6-inches to 48-inches in diameter (Appendix H). These sewer pipelines currently provide sewer services to the Project site and surrounding adjacent areas.

As compared to the existing General Plan buildout, the proposed development of the proposed Project would result in minor increases in the wastewater amount to the City's existing sewer systems, as shown below on Table 5.12-3. As shown, buildout pursuant to the proposed Project would result in an increase in wastewater generation of approximately 0.172, which is equivalent to 0.32 cubic feet per second (cfs). Further, using the peaking factor of the City's Sewer System Standard Plans the net peak flow would be 0.27×3.2 , which is 1.0 cfs (Appendix H).

Table 5.12-3: Net Change in Wastewater Generation for Project Site

	Gallons per Day	Million Gallons per Day	Acre Feet per Year
Proposed Project Demand	339,938	0.34	381
Existing GPU Buildout Demand	167,708	0.17	188
Net Change	30,585	0.172	193

Source: Appendix H

Based on the sewer systems standards, sewer pipes larger than 12-inches in diameter are designed to flow up to 75%-full. Therefore, since most of the existing sewer systems are flowing at or less than 50%-full, there is additional capacity to handle an increase in wastewater (Appendix H). Table 5.12-4 below shows the City's available wastewater capacity and illustrates that the existing wastewater infrastructure would be sufficient to serve the proposed Project.

Table 5.12-4: Available Wastewater Capacity in the City of Redlands

Existing Sewer Reach	Additional Peak Capacity
21-Inch VCP (Nevada Street, San Bernardino Avenue)	2.29 CFS
24-inch VCP (Nevada Street)	2.99 CFS
30-inch VCP (Nevada Street)	4.55 CFS
Net Increase in Peak Flow	1.0 CFS (0.54 mgd)

Therefore, based on the nominal net increase in average sewer flow of 0.172 mgd, and increase in peak sewer flow of 0.54 mgd (1.0 cfs), it is expected that the proposed Project would not adversely affect the City's WWTP.

Further, under the City's development review procedures for site-specific development projects, the City determines sewer system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity. The sewer design specifications for each site-specific development project would be required to comply with City standards (per the California Building Code) regarding requirements for design and operation of sewer collection facilities.

The construction of any needed wastewater system improvements as part of future site-specific developments under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures throughout this document. These requirements would ensure that construction related impacts remain less than significant. As a result, potential impacts related to the buildout of the proposed Project would not result in construction of new or expanded wastewater facilities that could result in a significant environmental effect, and impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

Stormwater

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 individual RHNA Rezone sites are 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.

Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the proposed Project. Implementation of development projects pursuant to the proposed Project would increase the intensity of residential land uses within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system. Such improvements would be required to be sized to accommodate the stormwater generation of such new development.

Under the City's development review procedures for site-specific development projects, the City determines stormwater system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity. The stormwater system design specifications for each site-specific development project would be required to comply with City standards and implementing projects would be required to prepare a Water Quality Management Plan (WQMP).

The construction of any needed drainage system improvements as part of future site-specific development projects under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way. Additional, large-scale stormwater drainage improvements pursuant to the 2017 Redlands Master Plan of Drainage and implementing project site-specific stormwater drainage improvements would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures, which would ensure that impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

IMPACT UT-2: THE PROJECT WOULD HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE DEVELOPMENT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS.

Less than 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. As shown in Table 5.12-5 the proposed Project would result in a total demand of 457 AFY, which would be a 231 AFY increase in comparison to water demands associated with the buildout of the approved General Plan within the Project area.

Table 5.12-5: Net Change in Water Demands for Project Site

	Gallons per Day	Acre Feet per year
Proposed Project Demand	407,817	457
Existing GPU Buildout Demand	201,249	225
Net Change	206,568	231

Source: Appendix G

The MUED's 2020 IRUWMP assumed that the MUED's total water supply would increase from 28,098 AF in 2020 to 33,436 AF in 2035, which constitutes an increase of 5,338 AF. Additionally, as shown in Table 5.12-6, the projected MUED normal year water demand would increase from 26,866 AF in 2020 to 29,075 AF in 2035.

Table 5.12-6: Projected MUED Water Demand (AF)

	2020	2025	2030	2035	2040	2045
Potable and Raw Water	25,892	25,818	26,860	27,902	28,818	29,735
Recycled Water	994	1,173	1,173	1,173	1,173	1,173
Total Water Demand	26,866	26,991	28,033	29,075	29,991	30,908

Source: San Bernardino Valley Water Conservation District, 2021

The IRUWMP assessed the projected water demand and supply in the service area and concluded that MUED has an adequate water supply to meet all demands within its service area to 2045 under varying drought conditions. The Project's additional demands of 231 AFY, as listed in Table 5.12-5, is less than the assumed increase in demands in the IRUWMP; therefore, the Project's relatively small increase in water demand would not cause demand to exceed the 2035 or 2045 projected demands for the MUED. Additionally, implementing projects would be required to implement California Green Building Code policies regarding water efficiency standards for all new plumbing and irrigation fittings and fixtures.

Based on the above, it is anticipated that existing and future water entitlements from groundwater, surface water, purchased or imported water sources, and recycled water would be sufficient to meet the Project's demand at buildout, in addition to forecast demand for MUED's entire service area. Thus, impacts related to the need for new or expanded water supplies and entitlements would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

IMPACT UT-3: THE PROJECT WOULD NOT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER THAT WOULD SERVE THE PROJECT THAT IT DOES NOT HAVE ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS.

Less than Significant Impact. Future buildout of the proposed Project would result in increased wastewater generation from Rezone sites. Based on Table 5.12-3, *Net Change in Wastewater Generation for Project Site*, above, the proposed Project would result in a net increase of 30,585 gallons per day (0.031 mgd) or 34 AFY compared to the buildout of the existing General Plan.

Wastewater from the Project Site is treated at the WWTP, which has a treatment capacity of 9.5 mgd (City of Redlands, 2017a). In 2020, the WWTP collected 6,620 AF (5.8 mgd) for treatment (San Bernardino Valley Water Conservation District, 2021). Therefore, the WWTP has a residual capacity of 3.7 mgd.

The amount of additional wastewater that would be generated by the proposed Project is less than one percent of WWTP's total remaining daily treatment capacity. As a result, the WWTP serving the Project

would have adequate capacity to serve the demand resulting from buildout pursuant to the proposed Project in addition to existing service commitments, and impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

5.12.7 CUMULATIVE IMPACTS

Water

Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary sources of water that include groundwater, surface water, purchased or imported water, and recycled water.

As described previously, during buildout of the proposed Project, water lines would be installed as needed to serve implemented projects. The continued regular assessment, maintenance, and upgrades of the water system by the Redlands MUED pursuant to the City's Water Master Plans would reduce the potential of development projects to result in a cumulatively substantial increase in water such that new or expanded facilities would be required.

As discussed above, buildout pursuant to the proposed Project would result in an increase in water demand of 231 AFY. It is anticipated that existing and future water entitlements from groundwater, surface water, purchased or imported water sources, and recycled water, plus water conservation methods included in Title 24, would be sufficient to meet the proposed Project's demand at buildout, in addition to forecast demand for MUED's entire service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require new or expanded entitlements, and cumulative impacts would be less than significant.

Wastewater

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes the City's WWTP and sewer system that serves the Project site.

As described previously, the existing sewer system and WWTP would have sufficient capacity to handle the flows resulting from implementation of the proposed Project. The continued regular assessment, maintenance, and upgrades of the sewer system by the City would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less-than-significant cumulative impact.

Stormwater

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. Unless a project is within a hydromodification exemption area, State and regional regulations require development projects to maintain pre-project hydrology, such that no net increase of off-site stormwater flows would occur. Santa Ana RWQCB permit conditions require a hydrology/drainage study to demonstrate that proposed storm drain systems are able to detain a minimum "Design Capture Volume," which is dependent on the specific characteristics of each site. As a result, increases in runoff from cumulative projects that could combine to impact stormwater drainage capacity would be minimized, and cumulative impacts related to drainage infrastructure would be less than significant.

5.12.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

The following standard regulations would reduce potential impacts related to water supplies:

- California Code of Regulations Title 24, Part 11; the California Green Building Code
- Chapter 15.54 of the Redlands Municipal Code

Plans, Programs, or Policies

None.

5.12.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts UT-1, UT-2 and UT-3 would be less than significant.

5.12.10 MITIGATION MEASURES

None.

5.12.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to utilities and service systems would be less than significant.

5.12.12 REFERENCES

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5.13 Mandatory Findings of Significance

5.13.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” As described in detail in Section 5.0 of this Draft EIR, implementation of the Project would result in environmental impacts that cannot be reduced to a level below significance after implementation of project design features, regulatory requirements, Plans, Programs, and Policies (PPPs), and feasible mitigation measures for the below topics.

Agriculture and Forestry

Impact AG-1, Conversion of Significant Farmland. The Project site contains approximately 44.67 acres of Prime Farmland. The Project would result in conversion of the Prime Farmland to non-agricultural uses. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Impact AG-5, Other Changes Resulting in Conversion of Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural use. Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas to the north, east, and west are proposed to be developed with uses other than for agricultural purposes. Nevertheless, the areas currently under agricultural production are privately owned and development of the site could result in an increased development pressure on the surrounding agricultural sites. Therefore, the Project would indirectly cause changes in the environment that would convert Farmland not within the Project site to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Air Quality

Impact AQ-1, Conflict with AQMP (Project, Cumulative). As detailed in Section 5.2, *Air Quality*, due to the uncertainty of the timing and methods of construction activities related to RHNA Rezone development projects, a significant impact could occur related to construction emissions of VOCs and NO_x, despite implementation of South Coast Air Quality Management District (SCAQMD) rules and mitigation measures. In addition, operation of the proposed Project at buildout would result in exceedance of the applicable SCAQMD thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5} after implementation of mitigation. There is no guarantee that emissions for construction and operation would be mitigated below SCAQMD thresholds, therefore, emissions generated from implementation of the proposed RHNA Rezone would be significant and unavoidable. Also, because the emissions would exceed thresholds, the Project would result in a conflict with implementation of the AQMP and impacts related to the AQMP would also be significant and unavoidable.

Impact AQ-2, Regional Construction & Operational Emissions (Project, Cumulative). Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1. Emissions from operation of the proposed Project at buildout would exceed SCAQMD’s thresholds for CO, VOC, and NO_x after implementation of regulations and Mitigation Measure AQ-2 because a majority of operational-source CO and NO_x emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NO_x emissions from implementation of the

proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Impact AQ-3, Localized Construction Emissions (Project, Cumulative). Implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to localized significance thresholds (LSTs). As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development; and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1.

Greenhouse Gas Emissions

Impact GHG-1, Greenhouse Gas Emissions (Project, Cumulative). As described in Section 5.5, *Greenhouse Gas Emissions*, operation of the Project at buildout and full occupancy would generate 23,660.41 MTCO_{2e} per year, which equates to a CO_{2e} per service population of 3.56. This would be substantially less than the emissions generated from buildout of the existing General Plan land uses, but would continue to exceed the threshold of 3.0. Thus, operational impacts would be significant. Even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions would continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

Impact GHG-2, Conflict with GHG Reduction Plan (Project, Cumulative). The proposed Project would have the potential to be inconsistent with key project attributes from the 2022 Scoping Plan Appendix D, *Local Actions*, which could combine with potential inconsistencies from other/future projects. Thus, impacts related to conflict with a policy, plan, or regulation adopted for the purpose of reducing GHG emissions would be significant and unavoidable and cumulatively considerable.

Transportation

Impact TR-2, Vehicle Miles Traveled (Project). As detailed in Section 5.10, *Transportation*, all TAZs within the Project Site are either within a TPA or a low-VMT area or would meet Criteria 3 based on local serving uses, except for TAZs 53835402 and 53835101, which include Sites 20, 21, and 23. As such, implementing development pursuant to the proposed Project in all TAZs except Sites 20, 21, and 23 would be less than significant. However, future development projects within Sites 20, 21, and 23 would be required to conduct a project-specific VMT screening analysis to determine whether the development would screen out of a further VMT analysis pursuant to Mitigation Measure T-1. Should the development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement further VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project level VMT impact.

5.13.2 GROWTH INDUCEMENT

This section analyzes the growth inducement potential of the proposed Project and the associated secondary effects of growth the Project might permit. As required by CEQA Guidelines Section 15126.2(d), an EIR must:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Thus, based on CEQA, a project could have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities;
- Remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or would add substantial capacity that could accommodate additional unplanned growth;
- Remove obstacles to growth through changes in existing regulations pertaining to land development;
- Result in the need to expand one or more public service facilities to maintain desired levels of service; or
- Involve some other action that could encourage and facilitate other activities that could significantly affect the environment.

As CEQA Guidelines Section 15126.2(d) states that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment, the following information is provided as additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of developing the land use concepts examined in the preceding sections of this Draft Subsequent EIR.

Establish substantial new permanent employment opportunities or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities

The proposed RHNA Rezone Project would rezone 23 sites within the City to allow for increased residential development, Site 24 would be rezoned to Public/Institutional zoning in order to achieve compatibility with the sites existing uses. SCAG estimates that employment in the City will increase from 49,900 jobs in 2019 to 60,100 in 2050, which is an increase of over 21 percent (SCAG, 2024b). The employment anticipated by the proposed Project would generate approximately 550 new employees (see Section 5.8, *Population and Housing*), which represents about 5 percent of the estimated job growth by 2050. The 550 jobs expected in the Project area are included in SCAG projections because the employment-generating land uses within the Project area is existing pursuant to current General Plan land use designations and is decreasing with implementation of the Project. Thus, the employment that would occur within the Project area would be less than significant.

The new Project would accommodate the forecasted employment in an environmentally sustainable manner by providing for additional housing to maintain the jobs to housing balance, which would reduce citywide VMT. Also, as listed below, the City of Redlands has had recent unemployment rates ranging between 3.1 and 7.6 percent (EDD, 2024).

Table 5.13-1: City of Redlands Unemployment Rates

Date	Unemployment Rate Percent
June 2024	4.0 percent
2023 Annual Average	4.4. percent
2022 Annual Average	3.1 percent
2021 Annual Average	5.5 percent
2020 Annual Average	7.6 percent
2019 Annual Average	3.1 percent

Source: EDD, 2024

The City of Redlands is estimated by SCAG to have a population increase of 18.0 percent between 2019 and 2050¹, and San Bernardino County is estimated to have a population growth rate of 20.6 percent over the same period of time (SCAG, 2024b). Buildout of the proposed Project would contribute to approximately 49.4 percent of the projected population growth, approximately 79.96 percent of the projected housing stock growth, and approximately 5 percent of the projected employment growth in the City. Thus, while the Project would result in an increase in population and housing units in an area not previously planned for housing, the increase in population and number of housing units that would result from the proposed Project would not exceed projections for the City. Additionally, the projected employment growth that would occur from buildout of the Project would not exceed employment growth projections for the City.

Further, SCAG determined the City needs to provide a total of 3,516 housing units to meet their RHNA. Thus, the Project would contribute to the City's fair share of housing and, in part, satisfy the State requirements to provide new housing opportunities to increase housing supply. Additionally, the proposed Project implements goals and policies of the Redlands Housing Element that support a variety of housing types and densities. Therefore, the economic effects of the proposed Project would not result in the need for additional development to support the proposed Project and would not result in a substantial impact on the environment.

Remove Obstacles to Growth, e.g., Through the Construction or Extension of Major Infrastructure Facilities that do not Presently Exist in the Project Area or Would Add Substantial Capacity that Could Accommodate Additional Unplanned Growth.

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

The RHNA Rezone area is a developed urban area that is connected to the City's existing infrastructure system. Water, sewer, drainage, and roadway infrastructure currently provides service to all of the areas within the Project. As described in Section 5.12, *Utilities and Service Systems*, development projects pursuant to the RHNA Rezone would include potential installation of onsite infrastructure and new connections to the existing infrastructure systems, which include improvements to existing aged infrastructure such as increasing the size of water and sewer lines. However, these improvements would be sized to accommodate individual developments and would not provide excess capacity. As described in Section 5.12, *Utilities and Service Systems*, future projects pursuant to the RHNA Rezone Project would not require extension of utilities into undeveloped areas. Furthermore, buildout pursuant to the Project would not result in the extension of any

¹ The 2050 population estimate was derived using the methodology presented in Section 4.5 of the SCAG Demographics & Growth Forecast which states an estimate of the future City-level population based on Connect SoCal's household forecast can be derived using a county-level Population:Housing ratio from Table 12 and applying it to the City's future household growth (SCAG, 2024b).

roadways into undeveloped areas as the rezone sites are surrounded by existing roadways. Therefore, the infrastructure improvements implemented by the Project would not result in unplanned growth.

Remove Obstacles to Growth Through Changes in Existing Regulations Pertaining to Land Development

A project could directly induce growth if it would remove barriers to population growth such as changes to a jurisdiction's general plan and zoning code, which allows new development to occur in underutilized areas. The proposed Project includes amending the City of Redlands General Plan to change the land use designations of 23 sites to allow for additional residential development and a Specific Plan Amendment to remove 15 of the Rezone sites out of the East Valley Corridor Specific Plan (EVCSP). However, pursuant to the RHNA prepared by the California Department of Housing and Community Development (HCD), the City of Redlands must increase their residential zoning capacity to accommodate their 0.26% share that is 3,516 units of the RHNA (City of Redlands, 2022, P.2).

Additionally, SCAG household growth projections estimate that between 2019 and 2050 the number of housing units within the City will grow by 17.9 percent (5,600 units). Assuming that the maximum number of residential units allowed by the proposed Project are developed and occupied (no vacancy), the 2,325 additional housing units in the Project area would consist of a 9.1 percent increase of housing units citywide, which is within the SCAG anticipated growth of both the City and the County (SCAG, 2020b). Therefore, impacts related to growth from changes in existing regulations pertaining to land development would not occur.

Result in the Need to Expand One or More Public Service Facilities to Maintain Desired Levels of Service

The proposed Project is expected to incrementally increase the demand for fire protection and emergency response, police protection, and school services. However, as detailed in Section 5.9, *Public Services*, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service. Based on service ratios and buildout projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities or plans. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not result in significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Involve Some Other Action that Could Encourage and Facilitate Other Activities that Could Significantly Affect the Environment

The proposed Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The development implemented pursuant to the proposed Project would be required to comply with all applicable City plans, policies, and ordinances. In addition, mitigation measures have been identified within this Draft EIR to ensure that the Project minimizes environmental impacts. The Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

Environmental Impacts of Induced Growth

All physical environmental effects from construction of buildout pursuant to the proposed Project have been analyzed in the technical sections of this Draft Subsequent EIR and the Initial Study prepared for this Project (included as Appendix A). For example, activities such as excavation, grading, and construction as required for the buildout of the Project have been evaluated herein. Also, all operational aspects of future development pursuant to the Project have been analyzed in this Draft Subsequent EIR and through implementation of existing regulations, including the General Plan and zoning ordinance, would not create an environmental impact of induced growth.

5.13.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

Agriculture

The Project site contains approximately 44.67 acres of Prime Farmland. The Project could result in conversion of the Prime Farmland to non-agricultural uses with buildout pursuant to the proposed rezoning. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion of this farmland to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Project implementation would result in the conversion of existing 44.67 acres of Farmland at the Project site to nonagricultural use and could facilitate the conversion of Farmland within the vicinity to nonagricultural use. Development of the Project site could result in increased development pressure on the surrounding agricultural sites. Therefore, the Project could indirectly cause changes in the environment that could convert other farmland to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Construction Impacts

Construction of implementing development projects pursuant to the proposed Project would result in the consumption of building materials, including lumber, sand, and gravel for construction. Depletion of non-renewable resources that supply building materials would represent an irreversible environmental change.

5.13.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment.” However, CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The following environmental issue areas would not be potentially impacted by the proposed Project, as detailed below and in the Initial Study prepared for the Project, which is included as Draft EIR Appendix A.

Aesthetics

The Rezone sites are in developed areas 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 does not contain scenic vistas and potential future developments would be within the heights of existing developed areas to be consistent with views presently found in the area.

Additionally, there are currently no designated State scenic highways within the vicinity of the Project site. Future projects would also 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.

Biological Resources

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. Furthermore, while it is not expected that the Rezone sites 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 Initial Study Mitigation Measure BIO-1 (included as Appendix A to this DSEIR). If rare plants/wildlife are identified and cannot be avoided, the project-level biological survey report shall justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less-than-significant level.

Several Project 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 Rezone sites shall require a biological survey for jurisdictional features prior to the approval of any development applications, as outlined in Initial Study Mitigation Measure BIO-2 (included as Appendix A to this DSEIR). 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 the applicable consulting and permitting process. With implementation of Initial Study Mitigation Measure BIO-2 (included as Appendix A to this DSEIR), impacts to federally protected wetlands would be less than significant.

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 City requires that all projects comply with the Migratory Bird Treaty Act of 1918 (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. With adherence to the MBTA requirements, less than significant impacts would occur.

Implementation of the Project is not anticipated to conflict with the provisions of Redland's Street Tree Policy and Protection Guidelines Manual and the tree protection ordinance codified as Redlands Municipal Chapter 12.52. 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. Furthermore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan.

Geology and Soils

No known fault lines or Alquist-Priolo Fault Zones traverse the proposed Rezone sites or are within 500 feet of any potential future development as part of the proposed Project (City of Redlands, 2017b, 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.

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 (City of Redlands, 2017b). 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. Therefore, the potential impact related to seismically related ground failure including liquefaction would be less than significant.

The Rezone sites and the surrounding areas consist of relatively flat terrain. 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 related to landslides.

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. 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. 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 and the implementation of a stormwater pollution prevention plan (SWPPP) (and included as PPP HYD-1). Therefore, the potential for adverse soil erosion and topsoil loss would be less than significant.

The proposed sites are within a generally flat area that are 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 also not identified as being located on a geologic unit or soil that is unstable, or that would become unstable because of development activities. 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.

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 related to unstable geologic units or soil.

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 California Building Code (CBC) requirements which minimize the risk associated with soils hazards. Therefore, compliance with the requirements of the CBC would reduce potential impacts related to expansive soil to a less than significant level.

Future projects would be required to adhere to Initial Study Mitigation Measure PAL-1 (included as Appendix A to this DSEIR), 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. Initial Study Mitigation Measure PAL-2 (included as Appendix A to this DSEIR) 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.

Hazards and Hazardous Materials

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. As a result, routine transport and use of hazardous materials during construction would be consistent with applicable regulations and impacts would be less than significant.

The Project would 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 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. All future development which would disturb more than 1-acre resulting from the implementation of proposed Project would be required to develop and implement a SWPPP with best management practices (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. Additionally, the Project would decrease nonresidential development. Therefore, construction and operation of future development would result in a less-than-significant impact relating to foreseeable upset and accident conditions involving the release of hazardous materials into the environment and a less-than-significant impact related to accidental release near a school.

None of the Rezone 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. 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 related to applicable Airport Land Use Compatibility Plans. Relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan, 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 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. The proposed sites are located in an urbanized environment that does

not contain wildlands. The Rezone sites would comply with Chapter 15.04 of the Redlands Municipal Code that requires all development to adhere to safety standards provided in the CBC as well as Chapter 15.20 which adopts the California Fire Code. The 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.

Hydrology and Water Quality

As discussed in the Initial Study, included as Appendix A, demolition of existing structures, grading, stockpiling or materials, excavation, the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality. However, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES General Construction Permit and included as PPP HYD-1 of the Initial Study, included as Appendix A to the Draft Subsequent EIR. (NPDES/SWPPP) would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a qualified SWPPP developer (QSD) is required to be included in the SWPPP for the Project. Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, included as PPP HYD-1, which would be verified during the County's construction permitting process, would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

The proposed Project would result in the operation of additional residential uses on the site that could generate pollutants such as, suspended solids, nutrients, bacteria/viruses/pathogens, pesticides, oil and grease, trash and debris. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the Project would be required to comply with the NPDES permit requirements, that would limit the potential for pollutants to discharge from the site. In compliance with the NPDES Permit, development projects are required to prepare a Low Impact Development (LID) report, included as PPP HYD-2. The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit. In addition, the County's permitting process would ensure that all BMPs in the LID report would be implemented during construction and operation. Overall, implementation of the LID report pursuant to the existing regulations (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

As discussed in the Initial Study, included as Appendix A, 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 supply of water would be sufficient during both normal years and multiple dry year conditions to meet all of the service area's estimated needs, including the proposed Project. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. Furthermore, as discussed

previously, the project would comply with required LID standards, which would ensure the Project would not significantly decrease groundwater infiltration onsite. Thus, impacts related to groundwater supplies would be less than significant.

The Project site does not include, and is not adjacent to, a stream or river, or within a floodplain. The Project site and surrounding area is urban and developed. The Project would implement existing regulations and BMPs that would reduce any potential erosion or siltation. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in substantial erosion or siltation would be less than significant.

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. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in the substantial increase or depth of surface runoff resulting in flooding would be less than significant.

As discussed in the Initial Study, Included as Appendix A, according to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency, the Project area contains areas of flood risk. Proposed developments pursuant to the proposed Project would be required to be consistent with the City's drainage plans and incorporate the Redlands Flood Damage Prevention Measures. Drainage improvements would be implemented by the City as regional drainage improvements and future developments would be required to manage any increase of onsite runoff flows through storm drain improvements or payment of storm drain management fees. Additionally, 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 operation and construction would be less than significant.

The City is approximately 50 miles inland from the Pacific Ocean; therefore, the proposed Project is not at risk of inundation from a tsunami. Also, the proposed Project is not located adjacent to any water retention facilities, lakes, or other bodies of water. Therefore, the Project would have a less than significant impact related to tsunamis and seiching. Development of the proposed Project would comply with applicable NPDES permits as well as the Municipal Code therefore the implementation of the Project would not conflict with or obstruct implementation of a water quality control plan.

Mineral Resources

The Project area has not historically included mineral extraction, nor does the Project area currently support mineral extraction or have identified mineral resources. Thus, implementation of the Project would not result in the loss of availability of a known mineral resource of value to the region and State or delineated on the General Plan, a specific plan, or other land use plan, and no impacts would occur.

Recreation

Individual future development projects under the proposed Project would be subject to the payment of development impact fees to the City. 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 City's parkland/recreational space standard of 5.0 acres per 1000 residents. However, with a total of 79,152 residents upon buildout of the Project, the City of Redlands would need 391.53 acres of parkland based on

this standard, which is 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, and impacts would be less than significant.

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 the Initial Study and this Subsequent EIR. Adherence to existing regulations and mitigation measures included in the Initial Study and this 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.

Wildfire

The Project area is an urbanized environment with moderate fire threat level and does not include, nor is it around, wildlands or areas of high fire hazard terrain or vegetation. Implementation of the Project would not exacerbate wildfire risks nor expose occupants to risk of pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. The Project area is also not located in or near a state responsibility area, and the Project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. The project would not require installation of infrastructure that could exacerbate fire risks and would not expose people to downstream flooding related to post fire slope instability. Therefore, implementation of the Project would not result in any impacts related to wildfire.

5.13.5 REFERENCES

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6. Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the Draft Subsequent EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

6.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to *CEQA Guidelines* Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the Project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. *CEQA Guidelines* Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, *CEQA Guidelines* Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to *CEQA Guidelines* Section 15126.6(d), discussion of each alternative presented in this Draft Subsequent EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the Draft Subsequent EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (*CEQA Guidelines* Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (*CEQA Guidelines* Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this Draft Subsequent EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of the *CEQA Guidelines* to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute, the *CEQA Guidelines*, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (*CEQA Guidelines* 15126(f)).

6.2 ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures.

The analysis in Section 5.0 of this Draft Subsequent EIR determined that buildout of the proposed Project would result in the following significant and unavoidable impacts.

Agricultural and Forestry Resources

Impact AG-1, Conversion of Significant Farmland. The Project site contains approximately 44.67 acres of Prime Farmland. The Project would result in the conversion of the Prime Farmland to non-agricultural uses. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Impact AG-5, Other Changes Resulting in Conversion of Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural use. Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas to the north, east, and west are proposed to be developed with uses other than for agricultural purposes. Nevertheless, the areas currently under agricultural production are privately owned and development of the site could result in increased development pressure on the surrounding agricultural sites. Therefore, the Project would indirectly cause changes in the environment that would convert Farmland not within the Project site to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project’s conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Air Quality

Impact AQ-1, Conflict with AQMP (Project, Cumulative). As detailed in Section 5.2, *Air Quality*, due to the uncertainty of the timing and methods of construction activities related to RHNA Rezone development projects, a significant impact could occur related to construction emissions of VOCs and NO_x, despite implementation of South Coast Air Quality Management District (SCAQMD) rules and mitigation measures. In addition, operation of the proposed Project at buildout would result in exceedance of the applicable SCAQMD thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5} after implementation of mitigation. There is no guarantee that emissions for construction and operation would be mitigated below SCAQMD thresholds, therefore, emissions generated from implementation of the proposed RHNA Rezone would be significant and unavoidable. Also, because the emissions would exceed thresholds, the Project would result in a conflict with implementation of the AQMP and impacts related to the AQMP would also be significant and unavoidable.

Impact AQ-2, Regional Construction & Operational Emissions (Project, Cumulative). Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1. Emissions from operation of

the proposed Project at buildout would exceed SCAQMD's thresholds for CO, VOC, and NO_x after implementation of regulations and Mitigation Measure AQ-2 because a majority of operational-source CO and NO_x emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NO_x emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Impact AQ-3, Localized Construction Emissions (Project, Cumulative). Implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to localized significance thresholds (LSTs). As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development; and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1.

Greenhouse Gas Emissions

Impact GHG-1, Greenhouse Gas Emissions (Project, Cumulative). As described in Section 5.5, *Greenhouse Gas Emissions*, operation of the Project at buildout and full occupancy would generate 23,660.41 MTCO_{2e} per year, which equates to a CO_{2e} per service population of 3.56. This would be substantially less than the emissions generated from buildout of the existing General Plan land uses, but would continue to exceed the threshold of 3.0. Thus, operational impacts would be significant. Even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions would continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

Impact GHG-2, Conflict with GHG Reduction Plan (Project, Cumulative). The proposed Project would have the potential to be inconsistent with key project attributes from the 2022 Scoping Plan Appendix D, *Local Actions*, which could combine with potential inconsistencies from other/future projects. Thus, impacts related to conflict with a policy, plan, or regulation adopted for the purpose of reducing GHG emissions would be significant and unavoidable and cumulatively considerable.

Transportation

Impact TR-2, Vehicle Miles Traveled (Project). As detailed in Section 5.10, *Transportation*, all TAZs within the Project Site are either within a TPA or a low-VMT area or would meet Criteria 3 based on local serving uses, except for TAZs 53835402 and 53835101, which include Sites 20, 21, and 23. As such, implementing development pursuant to the proposed Project in all TAZs except Sites 20, 21, and 23 would be less than significant. However, future development projects within Sites 20, 21, and 23 would be required to conduct a project-specific VMT screening analysis to determine whether the development would screen out of a further VMT analysis pursuant to Mitigation Measure T-1. Should the development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement further VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project level VMT impact.

6.3 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

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.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft Subsequent EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

Alternate Site Alternative: An alternate site for the Project was eliminated from further consideration. Any alternate site would need to occur within the City of Redlands. The City is required by State law to rezone housing shortfall sites according to what has been approved under the certified Housing Element (Government Code § 65583.2, Senate Bill 197). The site identified within the City's 2021-2029 Housing Element includes the Project site, and an alternate site would fail to meet most of the Project objectives, would be infeasible, and would not be compliant with State law regarding rezoning pursuant to the City's Housing Element. Additionally, if the Project were to occur on an alternate site and rezoning were conducted within different parcels in the City, similar impacts would result and comparable mitigation would be required; therefore, impacts would not be reduced under this alternative. Therefore, this alternative has been determined infeasible.

6.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Four alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a planning and development perspective. These alternatives have been developed based on the criteria identified in Section 6.1, and are described below:

Alternative 1: No Project/No Development Alternative. This alternative consists of the Project not being approved, and the Project site would remain in the conditions that existed at the time the Notice of Preparation was published with no additional development occurring within the Rezone sites (July 1, 2024).

Alternative 2: No Project/Buildout of Existing Land Use Alternative. Under this alternative, buildout of the residential and nonresidential uses would occur as permitted under the existing General Plan land use

designations, and the Project site would not be rezoned to allow for additional residential uses. Buildout of this Alternative would result in up to 2,209,040.26 square feet of non-residential uses and 111 units of residential development.

Alternative 3: Reduced Project Site Alternative. The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the allowed area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located on the Morrey Arroyo Creek (Sites 2, 7, 8, 11, 12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24¹. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

Alternative 4: Reduced Project Development Intensity Alternative. The Reduced Project Development Intensity Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, potential buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,948 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling-unit deficit in meeting their State mandated RHNA fair share.

6.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft EIR is required to “discuss the existing conditions at the time the Notice of Preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the Project site were to be left in its existing conditions for the foreseeable future. Under the existing conditions, Rezone sites are either currently vacant or developed with single-family residences, agricultural uses, and industrial storage facilities. See Section 4.0, *Environmental Setting*, for additional details and figures regarding the existing conditions of the Rezone sites.

6.6.1 Environmental Impacts

Aesthetics

Under this alternative, the Project site would remain in its existing condition, which includes undeveloped, disturbed, and some developed conditions. The visual character and quality of the site would be maintained, and no new structures or landscaping would be introduced. This alternative would not result in a change in

¹ While full buildout of Site 24 under the proposed Public/Institutional Land Use was analyzed for this Draft SEIR, no development is or would be proposed as an implementing project.

the visual height, scale, and mass of development on the sites. This alternative would not create new sources of light and glare. However, landscaping would not be added to the sites and landscaping and screening along the roadways would not be improved. Overall, the No Project/No Development Alternative would result in no impacts to aesthetics, less than the proposed Project.

Agriculture and Forestry

Under this alternative no new development would occur in the Project site, and as such, development would not impact the Farmland onsite. Sites 1, 3, 9, 10, 13, 14, 15, and 15A would continue to be used for agricultural purposes and no rezoning would occur which could put development pressure on surrounding agricultural uses. This Alternative would avoid the significant and unavoidable impact to Farmland from the Project. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Air Quality

Under this alternative no new development would occur in the Project site, and as such, no new stationary or mobile sources of air pollution would be introduced. Since buildout pursuant to the proposed Project would result in an exceedance of 2022 AQMP thresholds, this Alternative's emissions would be greatly reduced with no construction or additional trips introduced to the Project site. In addition, the Alternative would result in no increase in emissions of criteria pollutants or diesel particulate matter (DPM) over existing conditions. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Biological Resources

Under this alternative, periodic disturbances related to discing fallow fields for weed abatement are expected to occur at the Project site, as well as other routine maintenance activities for property upkeep. While periodic disturbances could potentially impact biological resources, no grading would occur and there would be no potential impacts to special status plants, animals, or sensitive vegetation communities in the Project site. As such, existing vegetation communities within the Project site would remain in their existing conditions minus impacts related to periodic disturbances. Although mitigation measures required of the Project would reduce biological resource impacts to less than significant levels, this alternative would generate less impacts to biological resources as compared with the Project and would not require mitigation.

Cultural Resources

Under this alternative, no disturbances would occur to the Rezone sites due to buildout based on the proposed rezoning. No grading for construction would occur and there would be no potential impacts to historical resources or to archaeological resources that may be buried below ground, as the current environment would remain. No historical structures would be removed or altered as well. Although mitigation measures required for the Project would reduce cultural resource impacts to less-than-significant levels, this alternative would avoid impacts to cultural resources associated with the Project and would result in less impacts than the proposed Project.

Energy

No construction activities would occur at the Project site or operation of new structures that would increase consumption of energy sources under this alternative. Existing agricultural, single-family residences, and industrial storage yards within the Rezone sites would continue standard operation. Electricity, gasoline, and diesel fuel usage would all be lower for the existing uses than for the Project. While this Draft Subsequent EIR determined the Project's impacts to energy would be less than significant, energy use associated with this

alternative would be less. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Geology and Soils

No new construction activities, including grading, would occur under this alternative. Thus, there would be no potential for additional workers, buildings, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site. Additionally, as no grading activities would occur under this alternative, potential impacts from erosion, loss of topsoil, or to paleontological resources would not occur. While the Project's impacts would be less than significant with mitigation incorporated, this alternative would result in less impacts and no mitigation measures are required.

Greenhouse Gas Emissions

No new construction activities would occur at the Project site or operation of new structures that would generate GHGs under this alternative. Under this alternative, no additional vehicle trips would be introduced to the Project site, which is the source of most of the greenhouse gas emissions of the proposed Project, as discussed in Section 5.5, *Greenhouse Gases*. This alternative would be consistent with all applicable GHG reduction plans and would avoid the Project's significant and unavoidable impact regarding the generation of greenhouse gas emissions. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Hazards and Hazardous Materials

No new construction activities would occur at the Project site or any new residences that result in transport of hazardous materials. There would be no new operation onsite that would generate hazardous materials. The No Project/No Development Alternative would not include major construction activities that would use typical construction-related hazardous materials. Thus, potential impacts related to use, disposal, and transport of hazardous materials would be avoided by this alternative. While the Initial Study, included as Appendix A, determined that the Project's impacts related to hazards and hazardous materials would be less than significant, this alternative would result in less impacts since no grading or construction would occur.

Hydrology and Water Quality

No changes to existing hydrology and drainage conditions would occur under this alternative. There are currently no existing stormwater drainage facilities within the Project site and no stormwater improvements would be constructed. Additionally, under this alternative, the stormwater leaving the Rezone sites would not be treated to minimize waterborne pollutants and would continue to contain sediment and other potential pollutants, as occurs under existing conditions. However, this alternative would generate fewer sources of potential water-borne pollutants due to lack of onsite buildings and number of vehicles onsite. Overall, hydrology and water quality impacts of the No Project/No Build Alternative would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

This alternative would not result in new development, and as such, there would be no potential for land uses to be introduced that would indirectly result in environmental impacts due to a conflict with an existing land use plan. While the current agricultural and residential uses do not align with the Commercial/Industrial designation for sites 1-16A (excluding site 8), the existing uses would continue to be allowed to operate, and no new land uses would be introduced to the site. Under this alternative no General Plan Amendment

would be required. Overall, this alternative would result in no impacts to land use and planning, and therefore, would be less than the Project's impacts.

Noise

Under this alternative, no development would occur onsite, and no new sources of noise would be introduced at the Rezone sites. Since no new development would occur and no traffic trips would be generated, this alternative would not contribute to any increase in existing area-wide traffic noise levels. In addition, this alternative would not result in construction onsite and no construction noise or vibration would occur. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Population and Housing

This alternative would not result in new development, and as such, would not result in induced growth or displacement affecting population and housing. However, this alternative would also not result in the benefit of adding new housing opportunities and the City would not reach their RHNA goals. Therefore, the No Project/Development Alternative's impacts would be neutral compared to the proposed Project.

Public Services

This alternative would not result in new development, and as such, would not result in increased demand for public services such as fire and sheriff services, school services, library services, or health services that require the new construction of public facilities. However, this alternative would also not result in the payment of the City's development impact fees. Therefore, while the Project's impacts would be less than significant through compliance with regulatory programs, this alternative would result in less impacts.

Recreation

This alternative would not result in new development, and as such would not result in any new residences that would potentially impact nearby parks or require the development of additional park resources. However, this alternative would also not result in the payment of the City's development impact fees. Therefore, the No Project/Development Alternative's impacts would be neutral compared to the proposed Project.

Transportation

This alternative would not result in new development, and as such, would not result in any trips, traffic, or Vehicle Miles Traveled (VMT) related to operation of the Project site beyond existing vehicle trips associated with agricultural, residential, and industrial storage operations. This alternative would not impact existing transit service and alternative transportation facilities within the Project site. The proposed Project would result in less-than-significant impacts related to geometric hazards and emergency access; however, the Project would result in significant and unavoidable impacts related to VMT. As the Rezone sites would not be developed and trips would not be generated, the No Project/No Development Alternative would result in no impact on transportation. As such, this alternative would avoid the Project's significant and unavoidable VMT impact. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. No grading would occur and there would be no potential impacts to tribal cultural resources that may be buried below ground. Although the Project would result in less-than-significant impacts on tribal cultural resources with

incorporation of mitigation, this alternative would avoid all potential impacts to tribal cultural resources. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, or telecommunication facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. Selection of this alternative would result in no impact on utilities and service system providers. While the Project would result in less than significant impacts, this alternative would result in less impacts due to no change in demand of these service systems. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Wildfire

Under this alternative, existing conditions would remain, and no new development would occur. There would be no construction or operation activities that would exacerbate the potential fire risks at the site or obstruct any evacuation routes. The Project site would continue to not be located near Moderate to Very High Fire Hazard Safety Zones. However, with this alternative there would be no additional occupants onsite that would be exposed to any fire hazards. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

6.6.2 Conclusion

Ability to Reduce Impacts

The No Project/No Development Alternative would result in continuation of the existing uses within the Rezone sites, and the potential buildout of additional residential units based on the proposed rezoning would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5.0 of this Draft Subsequent EIR, which include measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, and VMT. This alternative would result in lessened impacts to all 20 of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3).

However, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands. Further, the alternative would not meet the required additional residential units, which are legally required under the City's Housing Element pursuant to State housing regulations.

Ability to Achieve Project Objectives

As shown in Table 6-4, below, the No Project/No Development Alternative would not meet any of the Project objectives. The No Project/No Development Alternative would not introduce any additional housing within the City and the City would not be able to meet their RHNA per the 2021-2029 Housing Element. Additionally, under this alternative the City would not be able to address land use conflicts within the City.

6.7 ALTERNATIVE 2: NO PROJECT/BUILDOUT OF EXISTING LAND USE ALTERNATIVE

Under this alternative, buildout of residential and nonresidential uses would occur as permitted under the existing General Plan land use designations, and the Project site would not be rezoned to allow for additional residential uses. All 24 sites would be built according to their existing General Plan land use designation. Existing General Plan land use designations within the site include Commercial/Industrial uses, Commercial/Administrative Professional, Medium Density Residential, and High Density Residential. Buildout would result in up to 2,209,040.26 square feet of non-residential uses and 111 units of residential development.

6.7.1 Environmental Impacts

Aesthetics

Under this alternative, the Project site would be developed according to the existing General Plan land use designation for each parcel. Development under the No Project/Build out of Existing Land Use Alternative would result in more industrial density throughout the Rezone sites as opposed to residential development. This alternative would introduce new buildings and landscaping into the Rezone sites. The alternative would result in increased parking areas and setbacks and a smaller percentage of landscaped areas than what would be developed under implementing developments under the RHNA Rezone Project. This alternative would introduce new sources of light and glare as increased industrial and commercial development would occur but would be similarly subject to the Redlands Municipal Code. Overall, this alternative would result in similar less than significant impacts related to aesthetics.

Agriculture and Forestry

Under this alternative, the Rezone sites would be developed according to the existing General Plan land use designation for each parcel. Development under the No Project/Buildout of Existing General Plan Land Use Alternative would result in the same loss of Prime Farmland as would occur under the proposed Project and would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in the same significant and unavoidable impacts related to agriculture resources as the proposed Project.

Air Quality

Under this alternative, the Project site would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Since the buildout pursuant to the proposed Project would result in an exceedance of 2022 AQMP thresholds, this alternative's emissions would result in similar impacts related to construction emissions. As discussed in the VMT Screening Analysis included as Appendix F, buildout pursuant to the existing General Plan would result in 45,792 trips compared to the proposed Project which would result in 18,252 trips. Due to the increase in trips generated by the existing General Plan Buildout, impacts would remain significant and unavoidable and would be increased compared to the proposed Project. In addition, the alternative would result in an increase in emissions of criteria pollutants or diesel particulate matter (DPM) as it would result in significantly more truck trips. As shown below on Table 6-1, operation of this alternative would result in the exceedance of five different criteria pollutants. Therefore, the No Project/No Development Alternative would result in more severe impacts than the proposed Project, and would remain significant and unavoidable.

Table 6-1: Existing General Plan Buildout Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile Source	221.10	201.66	1,439.33	3.32	258.06	67.62
Area Source	72.21	2.71	103.10	0.02	0.32	0.28
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	293.77	212.70	1,549.29	3.38	259.01	68.54
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	Yes	Yes
Winter						
Mobile Source	203.24	215.05	1,255.01	3.13	258.06	67.63
Area Source	55.88	1.84	0.78	0.01	0.15	0.15
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	259.58	225.21	1,262.66	3.19	258.84	68.41
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	Yes	Yes

Source: Appendix C

Biological Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project and require the same mitigation measures. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less than significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. As such, the No Project/Buildout of Existing Land Use Alternative would result in the same potential to adversely affect any historic or undiscovered archeological resources as the proposed Project as this alternative would redevelop the same area as the proposed Project and would require the implementation of Mitigation Measures CUL-3 and CUL-4. This alternative would have a similar impact on historic structures within the Project site. Similar to the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less than significant level. Therefore, impacts to cultural resources from the No Project/Buildout of Existing Land Use Alternative would be the same as those associated with the proposed Project.

Energy

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, a similar volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing

projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the No Project/Buildout of Existing Land Use Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Potential impacts related to the potential for additional workers, buildings, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project; however, fewer residents would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative as the same area would be redeveloped. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, a similar volume of construction activities and the related greenhouse gas production would occur. As stated above, buildout of this alternative would result in an increase in 27,540 trips compared to the proposed Project. Further, given that this alternative would include industrial development, a larger percentage of the trips occurring would include truck trips. As shown below on Table 6-2, total CO₂ emissions per service population (CO₂e/SP) from this alternative would be 18.16, while the proposed Project would result in 3.56 CO₂e/SP. Thus, operational greenhouse gas emissions are expected to increase and would remain significant and unavoidable with implementation of the proposed mitigation measures.

Table 6-2: Existing General Plan Buildout Operational GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Mobile Source	39,117.93	2.76	2.67	67.32	40,049.49
Area Source	73.21	0.00	0.00	0.00	73.41
Energy Source	4,790.37	0.44	0.04	0.00	4,813.13
Water Usage	455.87	10.67	0.26	0.00	799.25
Waste	203.19	20.31	0.00	0.00	710.90
Refrigerants	0.00	0.00	0.00	0.59	0.59
Total CO₂e (All Sources)	46,446.76				
Service Population (SP)	2,557.00				
Total CO₂e/SP	18.16				

Source: Appendix E

Hazards and Hazardous Materials

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous

materials. While the operation of this alternative would require a higher volume of hazardous materials, use of such materials would similarly be required to adhere to state and local guidelines regarding the handling of hazardous materials. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in residents onsite, the alternative would not pose a safety hazard to the people residing in the area. This alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Due to the likely increase in parking surfaces required for this alternative, it is anticipated that development of this alternative would result in an increase in impermeable surfaces compared to those required for development pursuant to the Project. Construction of the alternative would still be required to implement drainage infrastructure improvements. In addition, preparation of a SWPPP and WQMP would be required for future development under this alternative. Therefore, this alternative would result in similar less than significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, no General Plan Amendment would be required. The No Project/Build out of Existing Land Use Alternative would be consistent with goals and policies of the Redlands General Plan and the SCAG 2020-2045 RTP/SCS. With implementation of measures to address other environmental issues (e.g., biological resources, cultural resources, etc.), potential impacts due to land use compatibility under both the Project and this alternative would remain less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the No Project/Buildout of Existing Land Use Alternative would be less than significant, and therefore, would be consistent with the Project's impacts.

Noise

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at similar intensity. Construction noise impacts would remain less than significant, similar to the proposed Project and would also be required to implement the same mitigation measures due to the proximity to nearby sensitive receptors. Operational impacts would result in an increase in trips as well as an increase in heavy trucks trips which would result in higher roadway volumes. Buildout of this alternative would result in industrial uses, which would result in a greater increase in onsite operational noise levels in proximity to sensitive receptors compared to the proposed Project. Due to the increase in vehicle trips going to and from the site under this alternative, and the buildout of industrial uses near sensitive receptors, impacts would be greater under the No Project/Buildout of Existing Land Use Alternative as compared to the Project and would require implementation of the same mitigation measures and General Plan policies in order to reduce impacts to a less than significant level.

Population and Housing

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. This would reduce the number of residents at buildout from 6,456 to 294 and would increase the number of employees from 550 to 2,263. The decrease in population that

would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The No Project/Buildout of Existing Land Use Alternative and the proposed Project would result in similar less than significant impacts related to population and housing.

Public Services

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. The No Project/Buildout of Existing Land Use Alternative would result in fewer residents at full buildout of the alternative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services, would be slightly reduced compared to the proposed Project. Like the proposed Project, the No Project/Buildout of Existing Land Use Alternative would contribute development impact fees to the City which would result in a less than significant impact and would be similar to those associated with the proposed Project.

Recreation

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Construction of this alternative would result in generally similar impacts, if not a slightly decreased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. As discussed in the VMT Screening Analysis, included as Appendix F, buildout pursuant to the existing General Plan would result in 45,792 trips compared to the proposed Project which would result in 18,252 trips. As discussed in Section 5.10, *Transportation*, all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the No Project/Buildout of Existing Land Use Alternative, the same sites would not screen out from further VMT analysis. Because this alternative would result in an overall increase in trips, impacts would remain significant and unavoidable. Thus, the alternative would be required to include the same mitigation included for the proposed Project. As such, impacts would increase in comparison to the proposed Project under the No Project/Buildout of Existing Land Use Alternative, and impacts would remain significant and unavoidable.

Tribal Cultural Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. A similar amount of ground disturbance is proposed under this alternative compared to the proposed Project. Thus, the No Project/Buildout of Existing Land Use Alternative would result in a similar potential to adversely affect any historic or undiscovered archeological resources as the proposed Project. Similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the No Project/Buildout of Existing Land Use Alternative would be consistent with those associated with the proposed Project.

Utilities and Service Systems

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Similar to the proposed Project, under this alternative, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future development. As discussed in Section 5.12, *Utilities and Service Systems*, buildout of the existing General Plan land uses would result in a slight decrease in water use and wastewater generation compared to the proposed Project. Therefore, the No Project/Buildout of Existing Land Use Alternative would result in similar impacts as the proposed Project.

Wildfire

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the No Project/Build out of Existing Land Use Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Overall, this alternative would also result in less than significant impacts related to wildfires, similar to the proposed Project.

6.7.2 Conclusion

Ability to Reduce Impacts

The No Project/Buildout of Existing Land Use Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. This alternative would not result in lessened impacts to any of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3).

The environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands. Further, the alternative would not meet the required additional residential units, which are legally required under the City's Housing Element pursuant to State housing regulations.

Ability to Achieve Project Objectives

As shown in Table 6-4, below, the No Project/No Development Alternative would not meet any of the Project objectives. The No Project/Buildout of Existing Land Use Alternative would not introduce enough additional housing within the City to able to meet their RHNA per the 2021-2029 Housing Element. Additionally, under this alternative the City would not be able to address land use conflicts within the City.

6.8 ALTERNATIVE 3: REDUCED PROJECT SITE ALTERNATIVE

The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located adjacent to the Morrey Arroyo Creek (Sites 2, 7, 8, 11, 12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site

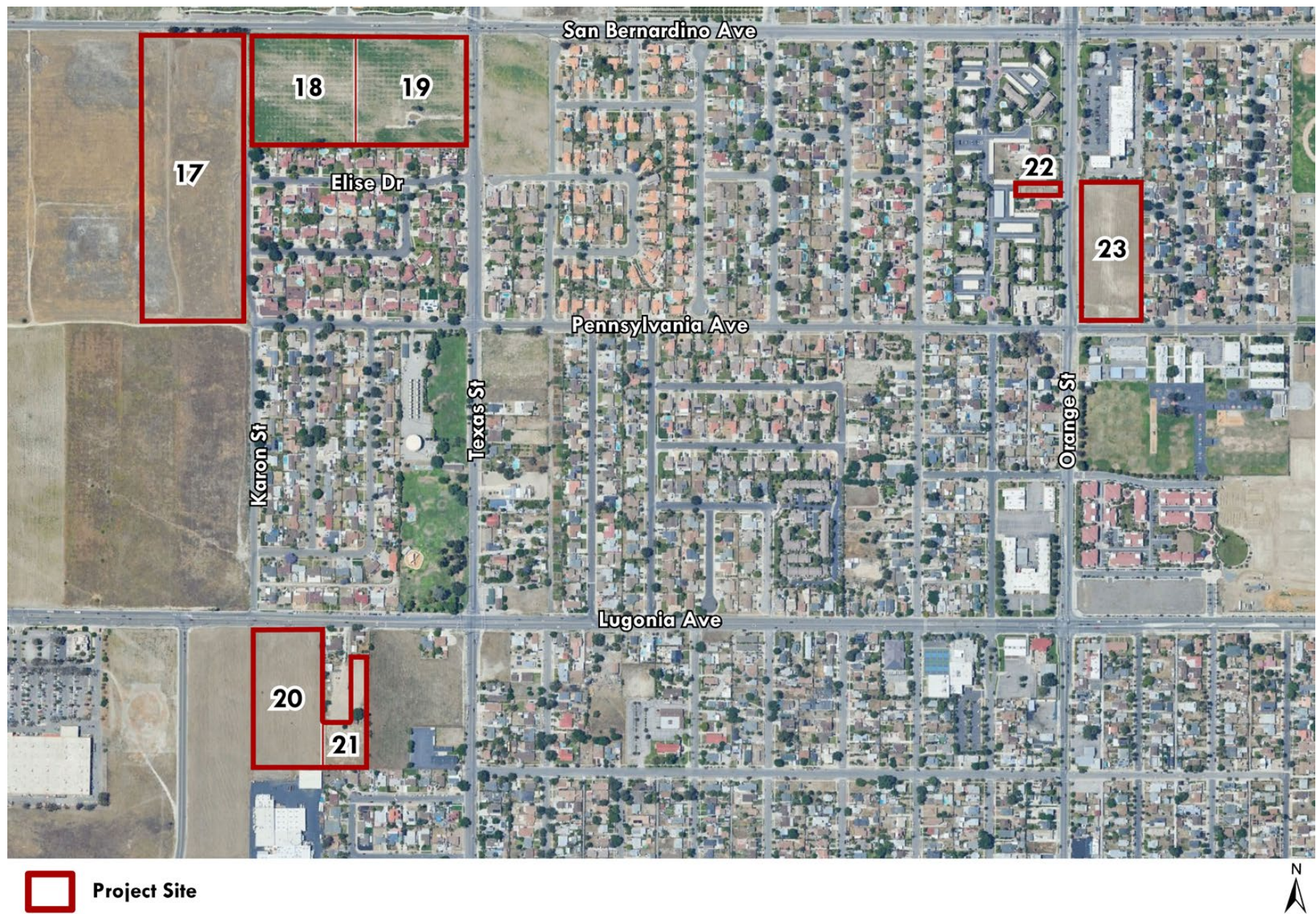
Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

Alternative 3 Area



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Alternative 3 Area



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6.8.1 Environmental Impacts

Aesthetics

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. This alternative would lead to increased density within the proposed sites which would result in a decrease in landscaping and decreased setbacks. However, the visual character and quality of sites located along the Morey Arroyo would be maintained, and no new structures or landscaping would be introduced. This alternative would introduce new sources of light and glare but would be similarly subject to the Redlands Municipal Code. Therefore, aesthetic impacts would be neutral compared to the proposed Project.

Agriculture and Forestry

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Development under the Reduced Project Site Alternative would result in the loss of 40.6 acres of Prime Farmland. While this alternative would avoid impacting the 4.07-acres of Prime Farmland located on Site 8, it would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in the same significant and unavoidable impacts related to agriculture and forest resources.

Air Quality

The Reduced Project Site Alternative would result in a potential future buildout of three additional dwelling units, and none of the 151,048.46 square feet of Public/Institutional land compared to the Project. Therefore, a slightly reduced overall volume of construction activities and the related emissions would occur. Under the Reduced Project Site Alternative, it is possible that a combination of developments could occur, such that daily construction emissions would still exceed this threshold. Thus, construction air quality impacts would remain significant and unavoidable.

In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment and less traffic associated air emissions than the proposed Project. Therefore, overall air quality impacts would be reduced in comparison to the proposed Project. However, the volume of VOC, NO_x, and CO emissions from operational vehicular emissions generated by the Reduced Project Site Alternative would remain significant and unavoidable due to the volume of vehicular trips that would occur from operation of the alternative. As described in Section 5.2, *Air Quality*, operations from implementing projects under the proposed Project would generate up to 121.01 lbs/day of VOC emissions, which is substantially above the threshold of 55 lbs/day; 89.74 lbs/day of NO_x, which is above the threshold of 55 lbs/day; and 608.04 lbs/day of CO, which is above the threshold of 550 lbs/day during peak summer operations. Under the Reduced Project Site Alternative, the daily VOC, NO_x, and CO emissions related to residential operations would be similar to the proposed Project, but overall emissions would be slightly reduced as it would not include the additional emissions from the proposed Public/Institutional land use on Site 24. Therefore, although less emissions would occur, significant and unavoidable impacts would still occur from the Reduced Project Site Alternative.

Biological Resources

Under this alternative, a 81.32-acre portion of the Project site would be developed with residential units and off-site improvements. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project

and require the same mitigation measures, however a smaller area would be impacted. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less-than-significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under the Reduced Project Site Alternative, a slightly increased density of development would occur within a reduced Project site. As such, the Reduced Project Site Alternative would result in a decreased potential to adversely affect any historic or undiscovered archeological resources as the proposed Project, as this alternative would avoid development near the Morey Arroyo, which has a greater potential to contain buried archeological resources. However, mitigation measures CUL-3 and CUL-4 would still be applicable to any ground disturbing activities related to this alternative. This alternative would have a similar impact on historic structures within the Project site. However, like the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less than significant level. Therefore, impacts to cultural resources from the Reduced Project Site Alternative would be less than those associated with the proposed Project.

Energy

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Under this alternative, a slightly reduced overall volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the Reduced Project Site Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under the Reduced Project Site Alternative, buildout of Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would result in a potential future buildout of three additional dwelling units, and none of the 151,048.46 square feet of Public/Institutional land compared to the Project. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project, however fewer people would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Therefore, a slightly reduced volume of construction activities and related production of GHG emissions would occur. In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment onsite, and less traffic-associated GHG emissions than the proposed Project with the exclusion of the Public/Institutional uses on Site 24. However, development and operation of 2,439 multifamily dwelling units would result in significant GHG emissions and would require the implementation of the same mitigation measures that are

required for the proposed Project. Therefore, although the Reduced Project Site Alternative would result in a slight decrease in GHG emissions, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this alternative would likely require the same utilization of hazardous materials during operation as the proposed Project. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in building square footage and employees and students onsite, the alternative would not pose a safety hazard to the people working in the area. This alternative would result in less-than-significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Due to the increased density of development on a smaller site, it is likely that development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would still construct the identified stormwater drainage system as the Project but would likely require a smaller sized basin. In addition, preparation of a Stormwater Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) would be required for development of this alternative. Therefore, this alternative would result in similar less-than-significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under the Reduced Project Site Alternative, a GPA, SPA and Zone Change would still be required to accommodate residential uses within the Alternative site and increase allowed density within the General Plan. This alternative would be similar in that it would be consistent with all applicable plans and policies and would result in similar development as the Project and meet all applicable Project initiatives. The Reduced Project Site Alternative would be subject to the same goals, policies, programs, and regulations as the Project. Therefore, the Reduced Project Site Alternative would result in similar less than significant impacts as the proposed Project.

Noise

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. However, this alternative would not include development of Site 24. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at a greater density. Construction activities under this alternative would be required to implement the same mitigation measures as the proposed Project and construction noise impacts would remain less than significant.

Operational noise would be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the removal of public/institutional uses on Site 24. Additionally, the Reduced Project Site Alternative would result in slightly fewer surrounding residents that could be exposed to noise

from surrounding development and roadways. Overall, operational noise impacts from the Reduced Project Site Alternative would be similar to the impacts associated with the proposed Project and would likely require the same mitigation.

Population and Housing

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. This would increase the number of residents at buildout from 6,456 to 6,464 and would no longer provide 550 employment opportunities within the public/institutional designation. The increase in population that would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The Reduced Project Site Alternative and the proposed Project would result in similar less-than-significant impacts related to population and housing.

Public Services

The Reduced Project Site Alternative would result in a slight increase of development within the Project site over a slightly reduced area. As such, the Reduced Project Site Alternative would result in eight additional residents and 550 fewer employees at full buildout of the Alternative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services would be slightly reduced compared to the proposed Project. However, like the proposed Project, the Reduced Project Site Alternative would contribute development impact fees to the City which would result in a less than significant impact and would be similar to those associated with the proposed Project.

Recreation

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Construction of this alternative would result in generally similar impacts, if not a slightly increased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. As discussed in Section 5.10, *Transportation*, all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the Reduced Project Site Alternative, the same sites would not screen out from further VMT analysis as they would be developed with increased intensity. Because Sites 20 and 21 are more than 80 percent over the threshold for the proposed Project, it is expected that the Reduced Site Alternative would also result in significant and unavoidable impacts at those sites. Thus, the alternative would be required to include the mitigation included for the proposed Project. As such, impacts would be similar in comparison to the proposed project under the Reduced Project Site Alternative, and impacts would be significant and unavoidable.

Tribal Cultural Resources

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. As such, the Reduced Project Site Alternative would result in a decreased potential to adversely affect any historic or undiscovered archeological resources as the

proposed Project, as this alternative would avoid development near the Morey Arroyo, which has a greater potential to contain buried tribal cultural resources. However, like the proposed Project, similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the Reduced Project Site Alternative would be consistent with those associated with the proposed Project.

Utilities and Service Systems

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Similar to the proposed Project, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future residential development under this alternative. Additionally, this alternative would result in increased demand for solid waste collection and disposal and electricity, natural gas and telecommunication services. Therefore, the Reduced Project Site Alternative would result in similar impacts as the proposed Project.

Wildfire

The level of development onsite would be decreased under this alternative as compared to the proposed Project as buildout of Site 24 would not occur. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the Reduced Project Site Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Sites 2, 7, 8, 11, 12, and 16 would remain undeveloped and would not expose any additional occupants to fire hazards. Overall, this alternative would also result in less-than-significant impacts related to wildfires and would result in similar impacts in comparison to the proposed Project.

6.8.2 Conclusion

Ability to Reduce Impacts

The Reduced Project Site Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, air quality, GHG emissions, and VMT that would occur from implementation of the proposed Project, as buildout under this alternative would be only slightly reduced in comparison to that allowed under the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise.

Overall, although the volume of impacts would be less under the Reduced Project Site Alternative, the Reduced Project Site Alternative would not eliminate any of the significant and unavoidable impacts that would result from buildout of the proposed Project.

Ability to Achieve Project Objectives

Implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4 as it would introduce additional residential units in the City to help reach the City's RHNA goals. The Reduced Project Site Alternative would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses to allow for less intense development more similar to its surrounding proposed residential uses.

6.9 ALTERNATIVE 4: REDUCED PROJECT DEVELOPMENT ALTERNATIVE

The Reduced Project Development Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, Project buildout would be reduced by 55 percent; thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF of nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,096 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling unit deficit in meeting their State mandated RHNA fair share.

6.9.1 Environmental Impacts

Aesthetics

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF of nonresidential uses. This alternative would lead to decreased density within the proposed Rezone sites which would result in an increase in landscaping and setbacks. This alternative would introduce new sources of light and glare but would be similarly subject to the requirements of the Redlands Municipal Code. Therefore, aesthetic impacts would be neutral compared to the proposed Project.

Agriculture and Forestry

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Development under the Reduced Project Site Alternative would result in the same loss of Prime Farmland as with the proposed Project and would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in significant and unavoidable impacts related to agriculture resources similar to the proposed Project.

Air Quality

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Therefore, a reduced overall volume of construction activities and the related emissions would occur. Under the Reduced Project Development Alternative, it is possible that a combination of developments could occur, such that daily construction emissions would still exceed this threshold. Thus, construction air quality impacts would remain significant and unavoidable.

In addition, the reduced amount of development by this alternative would result in less stationary source emissions from equipment and less traffic associated air emissions than the proposed Project. Therefore, overall air quality impacts would be reduced in comparison to the proposed Project. The volume of VOC, NO_x, and CO emissions from operational vehicular emissions generated by the Reduced Project Development Alternative would be reduced to a less-than-significant level due to the 55 percent decrease in volume of vehicular trips that would occur from operation of the alternative. As described in Section 5.2, *Air Quality*, operations from implementing projects under the proposed Project would generate up to 121.01 lbs/day of VOC emissions, which is substantially above the threshold of 55 lbs/day; 89.74 lbs/day of NO_x, which is above the threshold of 55 lbs/day; and 608.04 lbs/day of CO, which is above the threshold of 550 lbs/day during peak summer operations. Under the Reduced Project Development Alternative, the maximum daily VOC, NO_x, and CO emissions related to residential operations would similarly be reduced

by 55 percent, resulting in 54 lbs/day of VOC emissions, 41 lbs/day of NO_x emissions, and 274 lbs/day of CO emissions. Therefore, although significant and unavoidable construction impacts may still occur with this Alternative, impacts related to operational emissions would be reduced to a less-than-significant level.

Biological Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project and require the same mitigation measures. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less-than-significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. As such, the Reduced Project Development Alternative would result in the same potential to adversely affect any historic or undiscovered archeological resources as the proposed Project as this alternative would redevelop the same area as the proposed Project, just with less density and would require the implementation of Mitigation Measures CUL-3 and CUL-4. This alternative would have a similar impact on historic structures within the Project site. Similar to the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less-than-significant level. Therefore, impacts to cultural resources from the Reduced Project Development Alternative would be the same as those associated with the proposed Project.

Energy

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Under this alternative, a slightly reduced overall volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the Reduced Project Site Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project, however fewer people would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Therefore, a slightly reduced volume of construction activities and related production of GHG emissions would occur. In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment onsite, and less traffic-associated GHG emissions than the proposed Project with the exclusion of the Public/Institutional uses on Site 24. However, because the Draft EIR utilizes a total CO₂ per service population threshold, the reduction in development would equal the reduction in population resulting from the alternative and result in similar emissions per service population as the proposed Project. Thus, the Reduced Project Development Alternative would require the implementation of the same mitigation measures that are required for the proposed Project and impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this alternative would likely require the same utilization of hazardous materials during operation as the proposed Project. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in building square footage and residents onsite, the alternative would not pose a safety hazard to the people working in the area. This alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Due to the decrease in units and parking spaces needed, it is likely that development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would still be required to implement drainage infrastructure improvements. In addition, preparation of a SWPPP and WQMP would be required for future development under this alternative. Therefore, this alternative would result in similar less-than-significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under the Reduced Project Development Alternative, a GPA, SPA and Zone Change would still be required to accommodate residential uses within the Alternative site. This alternative would be similar in that it would be consistent with all applicable plans and policies and would result in similar development as the Project and meet all applicable Project initiatives. The Reduced Project Development Alternative would be subject to the same goals, policies, programs, and regulations as the Project. Therefore, the Reduced Project Development Alternative would result in similar less-than-significant impacts as the proposed Project.

Noise

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of

67,971.81 SF nonresidential uses. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at similar intensity. Construction noise impacts would remain less than significant, similar to the proposed Project and would also be required to implement the same mitigation measures due to the proximity to nearby sensitive receptors.

Operational noise would be slightly reduced under this alternative due to the decrease in residents and associated traffic. Similar to the proposed Project, impacts would be reduced to a less-than-significant impact with the implementation of mitigation measures.

Population and Housing

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. This would reduce the number of residents at buildout from 6,456 to 2,905. The decrease in population that would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The Reduced Project Development Alternative and the proposed Project would result in similar less-than-significant impacts related to population and housing.

Public Services

The Reduced Project Development Alternative would result in a 55 percent decrease of development over the same area as the Project. As such, the Reduced Project Development Alternative would result in fewer residents at full buildout of the Alternative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services would be slightly reduced compared to the proposed Project. The Reduced Project Development Alternative would result in a less-than-significant impact and would be similar to those associated with the proposed Project.

Recreation

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Construction of this alternative would result in generally similar impacts, if not a slightly decreased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. As discussed in Section 5.10, *Transportation*, all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the Reduced Project Development Alternative, the same sites would not screen out from further VMT analysis. Because Sites 20 and 21 are more than 80 percent over the threshold for the proposed Project, it is expected that even with the Reduced Development Alternative, impacts would remain significant and unavoidable. Thus, the alternative would be required to include the mitigation included for the proposed Project. As such, impacts would be similar in comparison to the proposed Project under the Reduced Project Development Alternative, and impacts would be significant and unavoidable.

Tribal Cultural Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. As such, the Reduced Project Development Alternative would result in a similar potential to adversely affect any historic or undiscovered archeological resources as the proposed Project. However, like the proposed Project, similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the Reduced Project Site Alternative would be consistent with those associated with the proposed Project.

Utilities and Service Systems

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Similar to the proposed Project, under this alternative, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future residential development. Additionally, this alternative would result in increased demand for solid waste collection and disposal and electricity, natural gas and telecommunication services. Therefore, the Reduced Project Development Alternative would result in similar impacts as the proposed Project.

Wildfire

The level of development onsite would be decreased under this alternative as compared to the proposed Project. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the Reduced Project Development Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Overall, this alternative would also result in less-than-significant impacts related to wildfires and would result in similar impacts in comparison to the proposed Project.

6.9.2 Conclusion

Ability to Reduce Impacts

The Reduced Project Development Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, construction air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. However, this alternative would avoid the significant and unavoidable impact related to operation air quality emissions.

Overall, although the volume of impacts would be less under the Reduced Project Development Alternative, the Reduced Project Development Alternative would not eliminate most of the significant and unavoidable impacts that would result from buildout of the proposed Project.

Ability to Achieve Project Objectives

The Reduced Project Development Alternative would meet Objective 4, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would be rezoned to Public/Institutional uses to allow for less intense development more similar to

its surrounding proposed residential uses. The Alternative would not meet Objectives 1, 2, or 3 as the amount of housing proposed by this Alternative would not be enough for the City to meet their RHNA goals as discussed in the certified Housing Element for the 2021-2029 housing cycle and would not provide enough housing to accommodate all income groups as allocated by RHNA.

6.10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for this Project would be Alternative 1, No Project/No Development. The No Project/No Development Alternative would avoid the implementation of the mitigation measures that are identified in Section 5.0 of this Draft Subsequent EIR that are related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, transportation, and tribal cultural resources.

Additionally, State CEQA Guidelines Section 15126.6(3)(1) states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Emphasis added.)

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be Alternative 3, Reduced Project Site Alternative, which would involve rezoning Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 to be developed with 2,439 multifamily residential units. This alternative would result in lessened impacts on five of the environmental topics. However, this alternative would be required to implement applicable mitigation measures regarding air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources, similar to the Project. Moreover, implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4, but would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses from Commercial/Industrial to allow for less intense development more similar to its surrounding proposed residential uses.

Table 6-3: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
Aesthetics	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Agricultural Resources	Significant and Unavoidable	Less than proposed Project, no impact	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable
Air Quality	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Less than proposed Project, significant and unavoidable	Less than proposed Project, significant and unavoidable
Biological Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Cultural Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Less than proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Energy	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Less than proposed Project, less than significant	Less than proposed Project, less than significant
Geology and Soils	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Greenhouse Gas Emissions	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Less than proposed Project, significant and unavoidable	Less than Project, significant and unavoidable
Hazards and Hazardous Materials	Less than significant	Less than proposed Project, no impact	Same as proposed Project;	Same as proposed Project; less than significant	Same as proposed Project;

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
			less than significant		less than significant
Hydrology and Water Quality	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Land Use and Planning	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Noise	Less than significant with mitigation	Less than proposed Project, no impact	More than proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Population and Housing	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Public Services	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Recreation	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Transportation	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable
Tribal Cultural Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Less than proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Utilities and Service Systems	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
Wildfire	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Reduce Impacts of the Project?		Yes	No	Yes	Yes
Areas of Reduced Impacts Compared to the Project		19	0	5	3

Table 6-4: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives

	Proposed Project	Alternative 1: No Project/ No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
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.	Yes	No	No	Yes	No
2. Maintain adequate housing sites for all income groups throughout the eight-year planning period.	Yes	No	No	Yes	No
3. Minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning.	Yes	No	No	No	Yes
4. 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.	Yes	No	No	Yes	No

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