

April 2025

# **REDLANDS CLIMATE ACTION PLAN INITIAL STUDY/NEGATIVE DECLARATION**

for the City of Redlands

Prepared for:

City of Redlands

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# 1 Project Description

## 1.1 Proposed Project

The proposed project is the Redlands Climate Action Plan (CAP). The updated CAP will replace the CAP adopted by the City in 2017.

California has adopted a wide variety of regulations aimed at reducing the State's greenhouse gas (GHG) emissions. In addition to the efforts at the State level, local governments have broad influence and, in some cases, exclusive jurisdiction over activities that contribute to significant GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. As a result, many communities throughout the state are taking responsibility for planning to reduce energy use and emissions. Through proactive measures in land use, transportation, energy efficiency, green building, waste diversion, water conservation and more, local governments help residents and businesses save money while improving quality of life and reducing emissions in their communities.

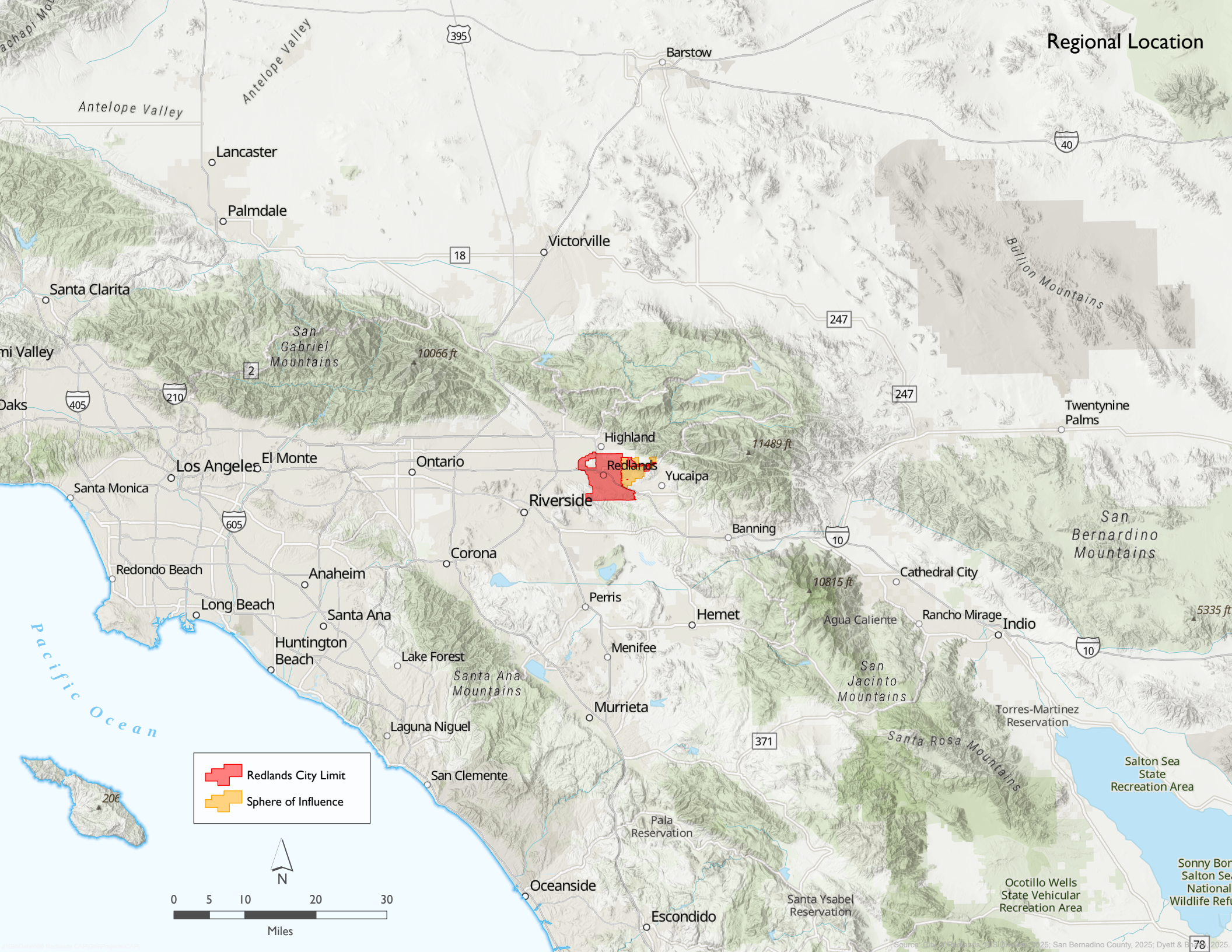
The CAP includes measures to enable the City to meet its targets for GHG emissions consistent with current targets for the State to the year 2050. The updated CAP will replace the present CAP that the City of Redlands adopted in 2017. The updated CAP includes projections of GHG emissions in Redlands through 2050, outlines updated State GHG reduction targets, and includes a GHG Reduction Strategy with measures and quantified GHG reduction targets.

## 1.2 Plan Location and Setting

The proposed CAP applies to all of the City of Redlands. Redlands is located at the base of the San Bernardino Mountains in San Bernardino County, 60 miles northeast of Los Angeles and 45 miles west of Palm Springs. **Figure 1** shows the location of Redlands in a regional context. Redlands lies along the Interstate 10 (I-10) freeway corridor, which links the city with the cities of San Bernardino, Ontario, and Los Angeles to the west and Palm Springs to the east. State Route 210 (SR 210) or the Foothill Freeway originates in Redlands, traverses the northwest part of the city, and heads west towards Pasadena. **Figures 1** and **2** show the regional location and local project area, respectively.

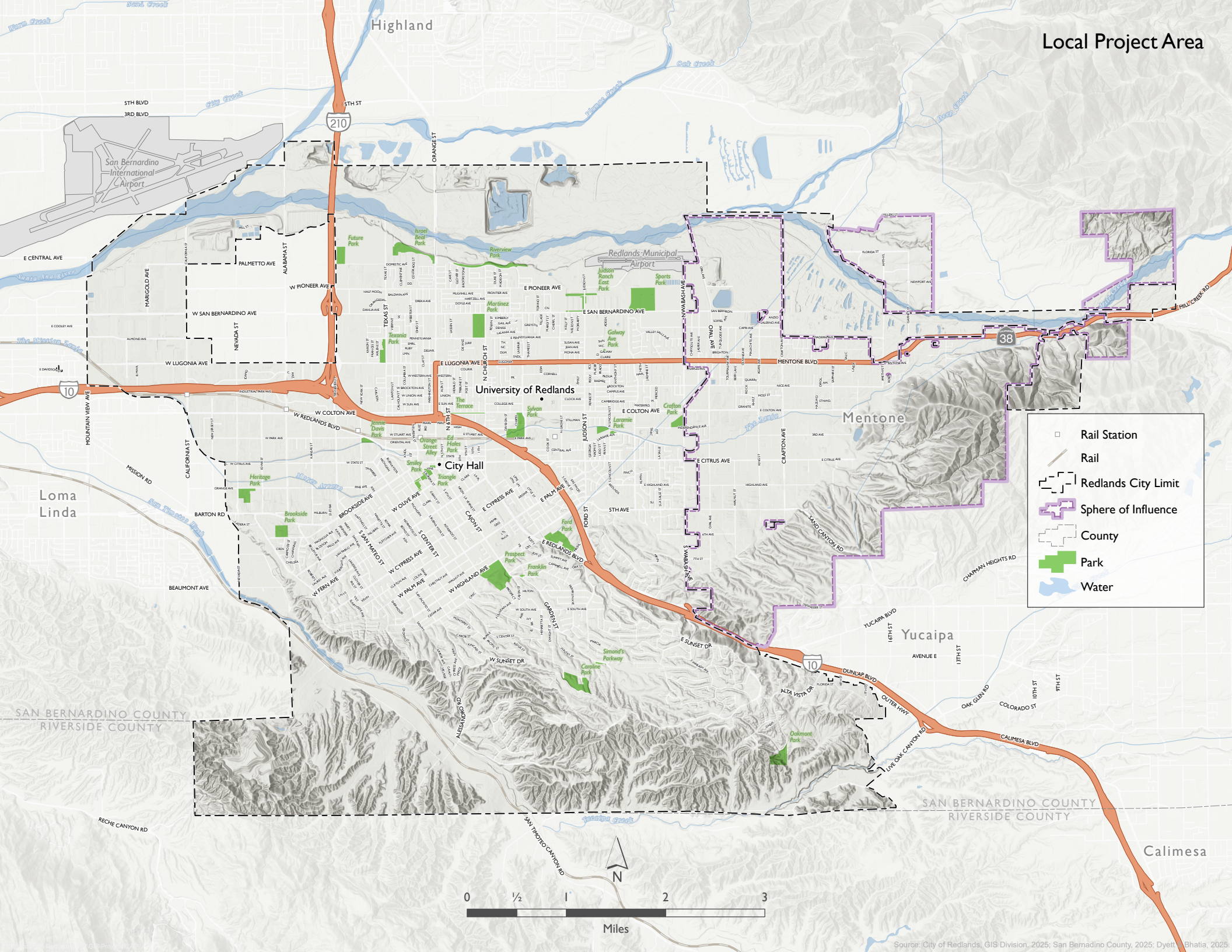


## Regional Location





Local Project Area





## 1.3 Planning Area Characteristics

The Planning Area consists of all land located within the incorporated limits of the City of Redlands. The Planning Area is bounded on the north by the Santa Ana River Wash, the City of Highland, and the San Bernardino mountains; on the east by unincorporated San Bernardino County (community of Mentone and the Crafton Hills) and the City of Yucaipa; on the south by the northern boundary of Riverside County; and on the west by the cities of Loma Linda and San Bernardino. Of the total 36.24 square miles identified in the Livable Community Element of the City's General Plan, the leading land use in the Planning Area is residential, followed by vacant land; parks, open space, and recreation; and agriculture.<sup>1</sup>

## 1.4 Project Background

State law requires local jurisdictions to address climate vulnerability and incorporate climate adaptation policies into their planning. Many jurisdictions also develop greenhouse gas mitigation or climate action plans to achieve local, regional, and State emission reduction goals. In 2017, Redlands adopted its first CAP, which focused on reinforcing the City's commitment to reducing GHG emissions, and demonstrating how the City planned to comply with State of California GHG emission reduction standards.

However, since the 2017 CAP was prepared, conditions in the city have evolved, and the State has passed new laws that require a more aggressive GHG reduction trajectory than was previously outlined in EO S-03-05. Assembly Bill (AB) 1279 codifies the goal set in EO B-55-18 to achieve statewide carbon neutrality no later than 2045, translating to statewide GHG emissions reductions to at least 85 percent below 1990 levels by 2045. The 2017 CAP also had a horizon year to 2035.

As such, the purpose of the Redlands Climate Action Plan 2050 is to outline practical, innovative, and cost-effective methods of achieving targets that support the State's latest GHG reduction objectives (discussed further in Section 1.3). This updated CAP also reflects the latest climate science with updated baseline and forecasted GHG emissions inventories, as well as aligns with new City and State targets for 2030 and 2045.

## 1.5 Project Objectives

To enable streamlining, this Project fulfills the requirements for a CAP that is compliant with the California Environmental Quality Act (CEQA) and supports the State's GHG and vehicle-miles traveled (VMT) reduction goals. The following chapters of the CAP meet the criteria for a CEQA-qualified plan:

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<sup>1</sup> City of Redlands. 2017. General Plan 2035. Available at <https://www.cityofredlands.org/post/planning-division-general-plan>. Accessed March 13, 2025.

- **Chapter 2** quantifies GHG emissions, both existing and projected over a specific period, resulting from activities within the City of Redlands. This section also identifies and analyzes the GHG emissions resulting from specific actions or categories of actions anticipated within the City of Redlands.
- **Chapter 3** establishes a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the General Plan would not be cumulatively considerable.
- **Chapter 4** specifies the measures and performance standards, that would collectively achieve the specified emissions level (i.e., GHG reduction targets established in Section 3.1), as demonstrated by substantial evidence, if implemented on a project-by-project basis.
- **Chapter 5** includes a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels.

## 1.6 Project Description

This update to the Redlands CAP presents the City's progress toward the GHG reduction targets established in the 2017 CAP and forecasts GHG emissions through 2050 to assess the City's capacity to support recent adjustments to the State's climate objectives, including an ambitious goal of carbon neutrality by 2045. The GHG Reduction Strategy included in this updated CAP includes actions and quantified measures to meet and/or exceed State requirements.

The updated Redlands CAP reflects the latest guidance from the California Air Resources Board (CARB) established in the 2022 Scoping Plan, which is designed to implement the State's GHG emission reduction targets set in Assembly Bill (AB) 32, Executive Order (EO) S-3-15, and Senate Bill (SB) 32. Although previous guidance (i.e., in the 2017 Scoping Plan, which is now superseded by the 2022 Scoping Plan) provided efficiency metrics for local governments to implement these targets, this is no longer the primary approach recommended by CARB; rather, local governments are encouraged to adopt CAPs and implement local actions that support State efforts to electrify transportation, decarbonize buildings, and reduce VMT, among other GHG-reducing measures. The GHG Reduction Strategy outlined in the updated CAP aligns with this new approach. Nevertheless, quantified metrics, including the GHG emissions inventory and forecasts, remain essential to climate action planning (as described below).

### 1.6.1 EMISSIONS INVENTORY, BASELINE AND PROJECTIONS

GHG emissions inventories are used to measure a community's progress toward reducing GHGs. AB 32 established a statewide target of reducing GHG emissions to 1990 levels by 2020. California has exceeded this now-past target and has already established longer-term goals for 2030 (in SB 32) and 2045 (in AB 1279). The previous target for 2050 (80 percent below 1990 levels) is assumed to be in line with the State-adopted goal to achieve carbon neutrality (85 percent statewide reductions below 1990 levels) by 2045.

The earliest available GHG emissions inventory for the City of Redlands is 2015, as prepared for the 2017 CAP, which also included forecasts for 2030 and 2035, in accordance with the State target under SB 32 and the Redlands General Plan 2035. The updated Redlands CAP includes a new baseline GHG inventory for 2022 and updated emissions forecasts for 2030 and 2050. It is noted that the 2015 GHG inventory has been adjusted using the same methodology as the 2022, 2030, and 2050 inventories to allow valid comparison and measure progress since adoption of the 2017 CAP, due to change in data accounting methods/models and unavailability of tools used to prepare the 2015 GHG inventory for the 2017 CAP.

The 2022 GHG emissions inventory and 2030 and 2050 forecasts cover direct GHG emissions from sources within the boundaries of Redlands, including fuel combusted and solid waste generated within the city. Indirect emissions associated with the consumption of energy in Redlands that is generated outside the borders of the city (such as electricity, with no end point emissions) are also included. **Table 1** shows the 2022 emissions inventory and 2030 and 2050 emissions forecasts which reflect reasonably foreseeable future conditions with the land use and transportation network modeled by the San Bernardino Travel Activity Model Plus (SBTAM+) and includes the effect of state-level actions and efforts that would reduce GHG emissions in Redlands.

**Table 1** shows that the City will need to take actions to reduce GHG emissions, measured in metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e), to meet its GHG targets for 2030 and 2035 as adopted in the 2017 CAP. Significant additional reductions will also be required to align with the State's carbon neutrality goal and meet the proposed new long-term target for the Redlands CAP Update by 2050. In order to meet such goals, the updated CAP introduces measures and performance standards that would collectively achieve the specified emissions levels. The CAP places the biggest emphasis on mitigation through on-site GHG-reducing design features, VMT reduction, access to transit or shared mobility services, building decarbonization, and electric vehicle (EV) charging.

**Table 1: Projected Trajectory, Targets, and Required Reduction, 2015 -2050**

<i>Metric</i>	<i>2015 Baseline</i>	<i>2022 Baseline</i>	<i>2030 Adj. BAU</i>	<i>2050 Adj. BAU</i>
<b>Projected Trajectory</b>				
Population <sup>a</sup>	70,310	72,259	75,243	82,228
Total annual GHG emissions (MTCO <sub>2</sub> e)	497,625	554,413	481,891	396,512
Per capita emissions (MTCO <sub>2</sub> e per capita)	7.1	7.7	6.4	4.8
<b>Target Metrics and Reduction Levels</b>				
GHG reduction targets (MTCO <sub>2</sub> e per capita)	-	-	6.0	1.0
Emissions level if target is achieved (MTCO <sub>2</sub> e) <sup>b</sup>	-	-	451,458	82,228

Additional emissions reductions needed to achieve target (MTCO <sub>2e</sub> )	-	-	-30,433	-314,284
<ol style="list-style-type: none"> <li>1. Emissions for 2015 are adjusted from the 2015 GHG Inventory included in the 2017 CAP, using the same methodology as the 2022 baseline inventory to allow for valid comparison.</li> <li>2. Adj. BAU = Adjusted Business-As-Usual forecast.</li> <li>3. Population for 2015 and 2022 are from California Department of Finance estimates (Table E5). Population for 2030 and 2050 are as modeled by SBTAM+, consistent with regional projections under Connect SoCal 2024. All population values are consistent with those used to calculate the GHG inventory.</li> <li>4. The 2017 CAP target for 2035 is not shown because an updated GHG inventory forecast has not been quantified for that year, so gap analysis cannot be conducted.</li> <li>5. Product of the GHG reduction targets and the population shown in the table.</li> </ol>				

Source: Dyett & Bhatia, 2024

### 1.6.2 GHG EMISSION REDUCTION MEASURES

As shown in **Table 1** above, the City will need to take actions to reduce GHG emissions beyond the legislatively adjusted business-as-usual (BAU) scenario to meet its GHG targets for 2030 and 2035 as adopted in the 2017 CAP. Significant additional reductions will also be required to align with the State's carbon neutrality goal and meet the proposed new long-term target for the Redlands CAP Update by 2050. **Table 2** details the Preferred Strategy to meet the City's greenhouse gas (GHG) reduction targets. The Preferred Strategy reflects input from City staff, stakeholders, and community members as well as accounts for significant contributors to GHG emissions and areas in which the City has significant influence. Measures that can be quantified are summarized in **Table 2**, and additional supportive measures that cannot be quantified due to lack of available data, established quantification methodology, or potential for double counting are excluded from the summary table but are described in the CAP. As shown in **Table 2**, implementation of the potential GHG reduction measures is expected to be sufficient to meet the City's GHG reduction targets for both 2030 and 2050.

**Table 2: Summary of Reductions from Quantified Potential Measures, 2030 -2050**

Metric/Measure	Emissions Reductions (MTCO <sub>2e</sub> ) <sup>1</sup>	
	2030	2050
<b>Reduction Targets</b>		
Projected per capita emissions (MTCO <sub>2e</sub> per capita)	6.4	4.8
GHG Reduction Target (MTCO <sub>2e</sub> per capita)	6.0	1.0
Total emissions reductions needed to achieve target <sup>2</sup>	-30,433	-314,284
<b>Quantified Reduction Measures</b>		
TR-1a. Achieve EV charger target to support on-road ZEVs	-71,745	-251,700
TR-2a. Limit idling of off-road equipment and require upgraded equipment using cleaner fuels	-3,723	-12,948

TR-2b. Require electric landscaping equipment	-411	-1,771
TR-3a. Reduce fragmentation of pedestrian network	-771	-738
TR-3b. New bike paths, separated bike lanes, or bikeways	-60	-58
TR-3c. Transit-supportive roadway treatments	-10	-10
BE-2b. Adopt a local benchmarking ordinance	-351	-1,053
BE-2c. Require existing residential buildings to meet building performance standard	-10,706	-36,218
SW-1a. Accelerate solid waste diversion target to 75%	-1,496	-1,635
SW-1b. Divert 75% of organic waste (SB 1383)	-3,976	-4,346
SW-1c. 20% edible food recovery (SB 1383)	-437	-478
CS-1a. Increase urban tree canopy by planting new trees	-3,017	-15,083
<b>Total Reductions from Measures <sup>4</sup></b>	<b>-96,703</b>	<b>-326,038</b>
Target achieved?	Yes	Yes
<ol style="list-style-type: none"> <li>1. Estimated emissions reductions beyond the adjusted business-as-usual forecast scenarios for 2030 and 2050. Table shows these as negative values to emphasize that they are reductions, and do not mean additional emissions.</li> <li>2. Emissions reductions needed to achieve targets beyond state actions, including RPS, RGS, Title 24, and transportation sector reductions are already built into EMFAC 2021, that are included in the adjusted business-as-usual inventories.</li> <li>3. No additional reductions beyond RPS in 2050.</li> <li>4. Numbers may not sum exactly due to rounding.</li> </ol>		

Sources: Dyett & Bhatia, 2024

## 2 Initial Study and Environmental Checklist

### 2.1 Project Information

1. **Project Title:** Redlands Climate Action Plan

2. **Lead Agency Name and Address:**

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

**Contact Person and Information:**

Jazmin Serrato, Assistant Planner  
(909) 798-7555 ext. 2  
jserrato@cityofredlands.org

**Project Location:** The Proposed Project consists of all land area located within the incorporated limits of the City of Redlands. Redlands covers 36.24 square miles in San Bernardino County and is bounded on the north by the Santa Ana River Wash, the City of Highland, and the San Bernardino mountains; on the east by unincorporated San Bernardino County (community of Mentone and the Crafton Hills) and the City of Yucaipa; on the south by the northern boundary of Riverside County; and on the west by the cities of Loma Linda and San Bernardino.

**Project Sponsor's Name and Address:**

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

3. **General Plan Designation:** Existing land use designations include Agriculture, Rural Living, Very Low Density Residential, Low Density Residential, Low Medium Density Residential, Medium Density Residential, High Density Residential, Office, Commercial, Transit Village, Commercial/Industrial, Light Industrial, Public/Institutional, Parks/Golf Courses, Open Space, Hillside Conservation, and Resource Preservation.0
4. **Zoning:** Existing zoning districts pursuant to Title 18 of the Redlands Municipal Code include Agricultural (A-1, A-1-20), Estate Agricultural (A-2), Rural Residential (R-R), Rural Residential Animals (R-R-A), Residential Estate (R-A, R-E), Residential Estate Animals (R-A-A), Suburban



Residential (R-S), Single Family Residential (R-1, R-1-D), Multiple Family Residential (R-2, R-2-2000, R-3), Administrative & Professional Office (A-P), Administrative Professional Commercial (A-P-C), Medical Facility (MF), Educational (E), Neighborhood Stores (C-1), Neighborhood Convenience Center (C-2), General Commercial (C-3), Highway Commercial (C-4), Commercial Industrial (C-M), Planned Industrial (M-P), Light Industrial (M-1), Industrial (I-P), General Industrial (M-2), Off Street Parking (P), Open Land District (O), Transitional District (T), Airport District (A-D), Airport Flight Zones overlay districts, Hillside Development (HD) overlay, and Flood Plain District (FP).

There are also several Specific Plans within the City of Redlands, the largest of which include the Transit Villages Specific Plan (Specific Plan No. 65) and the East Valley Corridor Specific Plan (Specific Plan No. 40) both of which include a variety of zoning districts including residential, commercial, industrial, open space, and other special districts. Other Specific Plans have been adopted that are solely for single-family residential planned developments.

5. **Description of Project:** The Proposed Project is the adoption of the Climate Action Plan update, a document that provides measures intended to reduce GHG emissions within the City. The Redlands Climate Action Plan (CAP) was adopted on December 5, 2017, to reinforce the City's commitment to reducing greenhouse gas (GHG) emissions and demonstrate how the City will comply with the State of California's GHG emission reduction standards. As a Qualified GHG Reduction Strategy, the CAP also enables streamlined environmental review of future development projects, in accordance with the California Environmental Quality Act (CEQA).

This update to the Redlands CAP presents the City's progress toward the GHG reduction targets established in the 2017 CAP and forecasts GHG emissions through 2050 to assess the City's capacity to support recent adjustments to the State's climate objectives, including an ambitious goal of carbon neutrality by 2045. The GHG Reduction Strategy included in this updated CAP also provides options for local actions to meet and/or exceed State requirements.

6. **Surrounding Land Uses and Setting:** The Planning Area consists of all land located within the incorporated limits of the City of Redlands. The Planning Area is bounded on the north by the Santa Ana River Wash, the City of Highland, and the San Bernardino mountains; on the east by the unincorporated community of Mentone and the City of Yucaipa; on the south by the northern boundary of Riverside County; and on the west by the cities of Loma Linda and San Bernardino. Of the total 36.24 square miles identified in the Livable Community Element of the City's General Plan, the leading land use in the Planning Area is residential, followed by vacant land; parks, open space, and recreation; and agriculture.<sup>1</sup>

7. **Other Public Agencies Whose Approval Is Required:** The City of Redlands is the lead agency with responsibility for approving the proposed Draft CAP and its measures. No other public agency approvals are needed.

## 2.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the Environmental Impacts discussion in Section 3.

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

## 2.3 Determination

On the basis of this initial evaluation:

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



Signature

Brian Foote, City Planner/Planning Manager

City of Redlands

4-30-2025

Date

## 2.4 Summary of Environmental Impact Analysis

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

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson act contract?				X
c. Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
e. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non- agricultural use or conversion of forest land to non-forest use?				X
<b>III. AIR QUALITY</b> . Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
<b>IV. BIOLOGICAL RESOURCES</b> . Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
<b>V. CULTURAL RESOURCES</b> . Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?			X	
d. Disturb any human remains, including those interred outside of formal cemeteries?			X	
<b>VI. Energy</b> . Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b> . Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				<b>X</b>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				<b>X</b>
ii) Strong seismic ground shaking?				<b>X</b>
iii) Seismic-related ground failure, including liquefaction?				<b>X</b>
iv) Landslides?				<b>X</b>
b. Result in substantial soil erosion, loss of topsoil, or changes in topography or unstable soil conditions from excavation, grading, or fill?			<b>X</b>	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				<b>X</b>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				<b>X</b>



	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontologic resource or site or unique geologic feature?				X
<b>VIII. GREENHOUSE GAS EMISSIONS</b> : Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impacts on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
<b>IX. HAZARDS AND HAZARDOUS MATERIALS</b> : Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g. Expose people or structures to a significant risk of loss of life or injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X
<b>X. HYDROLOGY AND WATER QUALITY</b> . Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
i. result in a substantial erosion or siltation on- or off-site;  ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;  iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
<b>XI. LAND USE AND PLANNING</b> . Would the project:				
a. Physically divide an established community?			X	
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	
<b>XII. MINERAL RESOURCES</b> . Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
<b>XIII. NOISE</b> . Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b. Generation of excessive groundborne vibration or groundborne noise levels?			X	
c. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
<b>XIV. POPULATION AND HOUSING</b> . Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	
<b>XV. PUBLIC SERVICES</b> .				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	
<b>XVI. RECREATION .</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b. Does the project include recreational facilities or require the construction or expansion of recreation facilities that might have an adverse physical effect on the environment?			X	

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

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			X	
<p><b>XIX. UTILITIES AND SERVICE SYSTEMS</b> Would the project:</p>				
<p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p>			X	

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X
<b>XX. WILDFIRE</b> . If located in or near state responsibility areas or lands classified as very high hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b. Due to slope, prevailing winds, and other factors exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines)			X	



	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				<b>X</b>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			<b>X</b>	
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			<b>X</b>	
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				<b>X</b>

## 3 Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions in the checklist.

### 3.1 Aesthetics

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

**Less Than Significant Impact.** The Draft CAP proposes measures that would aid in reducing the City's GHG emissions, and, thus, would not directly lead to development that would affect scenic vistas. However, the proposed measures encourage the installation of solar photovoltaic (PV) systems both through new private installs on residences and businesses, or on municipal facilities, to provide alternative sources of energy. Both private and municipal PV systems would most likely be placed on rooftops, which could alter scenic views. Scenic vistas in the Planning Area consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives.

Even so, the City's General Plan would continue to regulate development in these areas and enforce policies to ensure that opportunities to enjoy scenic views are either preserved or enhanced. Thus, substantial adverse effects are not expected to occur. In addition, PV systems on commercial or civic structures would likely not be significant enough to block or greatly alter the viewshed and would be subject to Planning and Building & Safety division review and approval. In addition, AB 2188, which took effect on January 1, 2015, required local governments to adopt a streamlined and expedited permit approval process for small residential rooftop solar energy panels. The City of Redlands Municipal Code Chapter 18.172 complies with AB 2188 regulations. The ordinance stipulates that once the application process is complete, a permit shall be issued. Therefore, small residential rooftop systems, consistent with the size and placement requirements set forth in the ordinance, are not subject to design review or other approval, such as local aesthetic policies. Therefore, impacts to scenic vistas would be less than significant.

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

**Less than Significant Impact.** Part of State Route 38 near Redlands is included on the Caltrans list of eligible scenic highways. State Route 38 features views of forested mountainsides and distant views of the desert. The City Council has also designated numerous streets as scenic highways,

drives, and historic streets. Special development standards have been adopted by resolution for these streets (General Plan Action 2-A.34). However, as discussed above, solar PV systems on commercial or civic structures would likely not be significant enough to block or greatly alter the viewshed and would require Planning and Building & Safety division review and approval. Additionally, as discussed above, the City of Redlands has adopted an ordinance for a streamlined and expedited permit approval process for small residential rooftop solar energy systems per AB 2188. Therefore, the installation of any small residential solar energy system that meet the size and placement requirements set forth in the ordinance would be exempt from local aesthetic policies. Impacts to scenic resources would be less than significant.

**c) Substantially degrade the existing visual character or quality of the site and its surroundings?**

**Less than Significant Impact.** The Draft CAP does not include any land use changes or other measures that would affect visual character. Rather, the CAP proposes a variety energy efficient retrofit programs for existing private and municipal buildings. The Draft CAP also includes several measures to improve the bicycle and pedestrian network. The result would be a more unified and aesthetically pleasing streetscape with an emphasis on well-designed sidewalks, landscaping, and street trees. Further, General Plan policies seek to ensure that any development or redevelopment is visibly compatible with the surrounding environment. Policies regarding visual compatibility in the General Plan pertain to scale, historic preservation, landscaping, and preservation of scenic views and vistas. Additionally, policies pertaining to areas of new development promote visually appealing streetscapes and public art in order to improve the visual character of the Planning Area.

Additionally, as discussed above, the installation of commercial or civic solar PV systems could result in slight changes to existing visual character but would be subject to Planning and Building & Safety division approval to determine appropriate sizing and placement prior to installation. However, as discussed above, small residential solar energy systems would not be subject to local aesthetic policies so long as they meet the size and placement requirements. Development would also be subject to Planning and Building & Safety division review and approval, as well as applicable General Plan policies, to ensure that they would not result in substantial changes to the visual character of the City. Therefore, the impacts to the existing visual character within the City would be less than significant.

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

**Less than Significant Impact.** The Draft CAP includes measures related to the installation of solar PV systems on homes, businesses, and municipal facilities. However, solar PV systems are specifically designed to absorb sunlight, not reflect it. Thus, their placement and orientation on private or municipal structures would not adversely affect day or nighttime views in the area. In addition, CAP measure TR-1b presents an opportunity to expand on the existing Street Light Upgrade Program to transition to more energy efficient LED streetlights. LED streetlights reduce direct and reflected uplight, which are the primary causes of urban sky glow. No new lighting is expected to be installed as the measure proposes working with existing streetlight infrastructure. Therefore, the number of streetlights would be the same as existing conditions. Therefore, impacts from light or glare would be less than significant.

## 3.2 Agriculture and Forestry Resources

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

**No Impact.** Agricultural land use, at approximately 7 percent of total land use in the Planning Area, represents a small portion of Redlands' overall land use. Prime and Unique Farmland, as well as Farmland of Statewide Importance, is scattered throughout the city, mostly on the periphery where development is less intense.<sup>2</sup> Most Prime Farmland is located in Crafton, and is used for citrus production. There is also Unique Farmland and Farmland of Statewide Importance located near this Prime Farmland in Crafton. Unique and Prime Farmland is also clustered in the San Timoteo Canyon along San Timoteo Canyon Road. North of the city, near the Santa Ana River Wash, are areas of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. Land designated as Prime Farmland is also located near the East Valley Corridor, where some farmland has converted to commercial and industrial land uses since the adoption of the 1995 General Plan.

The proposed CAP does not include any land uses changes or other strategies that would result in the conversion of Farmland to non-agricultural use. It would therefore have no impact on this topic.

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

**No Impact.** Like important farmland described above, Williamson Act contracts are spread throughout the periphery of the city.<sup>3</sup> Most contracted land is located in Crafton (to the east of the City of Redlands boundary), but there are also contracted lands in the San Timoteo Canyon (south portion of Redlands) and in the north of the city near the Santa Ana River Wash. The proposed CAP does not include any land use changes or other strategies that would conflict with an existing Williamson Act contract. It would therefore have no impact on this topic.

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

**No Impact.** The Planning Area does not have forest resources or land zoned for forest use. No impact related to forest land or timberland would occur.

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<sup>2</sup> California Department of Conservation, California Important Farmland Finder. Available online at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed March 13, 2025.

<sup>3</sup> California Department of Conservation. Division of Land Resource Protection. Williamson Act Contracts. Available online at: <https://www.conservation.ca.gov/dlrp/wa/Pages/contracts.aspx>, accessed March 13, 2025.

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

**No Impact.** As mentioned above, the City does not have any land that is designated or zoned for forest use. No impact related to forest land conversion would occur.

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

**No Impact.** As discussed above, the City does not have any land that is designated or zoned for forest land. However, several parcels within the City are zoned for agricultural uses. The proposed CAP does not include any land uses changes or other strategies that would result in the conversion of Farmland to non-agricultural use. It would therefore have no impact on this topic.

### 3.3 Air Quality

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

**Less than Significant Impact.** Air quality plans describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. The most recent Air Quality Management Plan (AQMP) was adopted by the South Coast Air Quality Management District (SCAQMD) in December 2022.<sup>4</sup> Consistency with the SCAQMD AQMP is based on whether the project would exceed the estimated air basin emissions used as the basis of the plan. The purpose of the Draft CAP is to reduce GHG emissions within the City to help contribute to global efforts to reduce the effects of climate change. Recommended measures within the Draft CAP include implementing energy efficient retrofits, developing EV infrastructure, reducing emissions from off-road sources, and improving pedestrian, bicycle, and transit connectivity. In addition to reducing GHG emissions, each of these elements would help to reduce criteria air pollutants. Short-term criteria pollutant emissions would be generated during construction activities with the use of construction equipment and vehicle trips. Assumptions for off-road equipment emissions in the air quality plan were developed based on annual hours of activity and equipment population for the region. The Draft CAP would not increase the assumptions for off-road equipment use in the AQMP. The estimated emissions used as the basis of the air quality plan are also based in part on projections of population and VMT. The Draft CAP would not increase population or VMT beyond that considered in the General Plan. Any renewable energy, energy-efficient, or infrastructure improvements installation as result of the proposed CAP would be subject to the development review and permitting process, and State and federal laws, as well as General Plan policies that protect air quality. Therefore, the Draft CAP would not conflict with the

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<sup>4</sup> South Coast Air Quality Management District. 2022 Air Quality Management Plan. Available at <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>. Accessed March 13, 2025.

implementation of the applicable air quality management plan. The impact would be less than significant.

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

**Less than Significant Impact.** The proposed CAP provides measures to reduce greenhouse gas emissions and energy use from future development. Any renewable energy, energy-efficient, or infrastructure improvements installation as result of the proposed CAP would be subject to the development review and permitting process, and State and federal laws, as well as General Plan policies that protect air quality. Therefore, cumulative air quality impacts from the proposed CAP would be less than significant.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less than Significant Impact.** Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include children, older adults, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The greatest potential for toxic air contaminant (TAC) emissions would originate from diesel particulate matter emissions associated with off-road equipment operations. Because the Draft CAP does not require substantial development activity, implementation of the measures would not be anticipated to expose sensitive receptors to substantial TAC concentrations. In fact, CAP measures TR-2a and TR-2b work to reduce emissions from off-road sources. Therefore, the impact would be less than significant.

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

**Less Than Significant Impact.** Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment, which could be considered offensive to some individuals. Odors from these sources would be localized and generally confined to the immediate area surrounding the construction site and would be temporary. The Project would use typical construction techniques, and the odors from off-road equipment and on-road vehicles would be typical of most construction sites and temporary in nature. Therefore, the odor impact during construction would be less than significant.

The Proposed Project would not be expected to generate increased odors. The Draft CAP includes food waste reduction measures that would arrange for the dedicated treatment of food waste. Processing of food waste could result in objectionable odors. However, food waste would go to dedicated facilities for food waste where operations for those facilities would comply with applicable SCAQMD regulations. Therefore, the odor impact during operation would be less than significant.

### 3.4 Biological Resources

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

**Less than Significant Impact.** The Draft CAP is a policy document that would not directly lead to development that would conflict with local policies protecting listed species. The CAP would not modify, either directly or indirectly, habitats of any species identified as a candidate, sensitive, or special status species. CAP measures do propose some development, such as new EV chargers (Measure TR-1a), pedestrian and bicycle network improvements (measures TR-3a and TR-3b), greater mixed uses and denser housing near transit (Measure TR-3e), and a community shared solar generation system (Measure BE-1b). Such proposed development would be in already urbanized areas where listed species are not known to exist.

However, if new development were to involve listed species, project specific biological studies and mitigation would be required as part of specific project approvals in compliance with applicable federal, state and local requirements. Specifically, General Plan Action 6-A.11 requires a biological survey for individual projects that would identify specific impacts to critical habitat and restrict development accordingly. Other policies would require the City to protect wildlife habitat and wildlife corridors, limit grading and ground-disturbing activities, and support conservation and restoration of natural habitats. Principles and actions in the General Plan, the City's development review process, and regulatory permitting required by existing federal and State laws relative to listed species would reduce potential impacts of the proposed CAP on federally or State-listed species of plants or animals to less than significant levels.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

**No Impact.** Within Redlands, most riparian areas are designated Open Space under the proposed General Plan and would thus be protected from direct impacts from development. Further, the proposed CAP does not include any land use changes or other strategies that would result in adverse effects on any riparian habitat or other sensitive natural community and would therefore have no impact.

- c) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** The proposed CAP does not include any land use changes or other strategies that would result in adverse effects on protected wetlands and would therefore have no impact.

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

**No Impact.** The proposed CAP does not include any land use changes or other strategies that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and would therefore have no impact.

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

**Less than Significant Impact.** The Draft CAP is a policy document that would not directly lead to development that would conflict with local policies protecting biological resources, such as a tree preservation policy. However, the Draft CAP recommends measures to improve pedestrian, bicycle, and transit connectivity, which could result in the development of expanded alternative transportation facilities. Should sidewalks and bike paths be expanded as part of the Proposed Project, any removal of trees and vegetation along City streets would comply with Chapter 12.52 of the City's Municipal Code. The Trees and Tree Protection Along Streets and In Public Places Ordinance requires a permit relating to the planting, maintenance, and removal of trees. Wherever it is necessary to remove a tree or trees, the City shall require that such trees be replanted or replaced. Thus, impacts related to local policies or ordinance, such as a tree preservation policy, would be less than significant.

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

**No Impact.** The City is participating in the Upper Santa Ana River Wash Habitat Conservation Plan. The proposed CAP does not include any land use changes or other strategies that would conflict with the provisions of the adopted habitat conservation plan. Therefore, there would be no impact from the proposed CAP.

### 3.5 Cultural Resources

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?**

**Less than Significant Impact.** The proposed CAP does not include any land use changes or other strategies that would result in adverse effects on any historical resources. Further, at the time any construction project pursuant to the CAP is proposed, the project-level CEQA document would need to identify potential impacts on known or potential historic sites and structures. The CEQA Guidelines require a project that will have potentially adverse impacts on historical resources to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Redlands Historic and Scenic Preservation Ordinance offers additional protections to historic resources by giving the City the authority to make recommendations, decisions, and



determinations regarding the designation, preservation, protection, and enhancement of historic resources, including the authority to deny demolition, except in cases of proven hardship. Additionally, the General Plan includes goals and policies that would minimize or avoid impacts on historical resources by requiring the protection and preservation of such resources.

Thus, with implementation of General Plan principals and actions, and adherence to federal, State, and local regulations, potential impacts on historical resources from construction pursuant to the CAP would be less than significant.

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

**Less than Significant Impact.** The Draft CAP does not propose any measure that would directly result in an adverse change in the significance of an archaeological resource. However, construction associated with CAP measures, such as expanding pedestrian, bicycle, and transit facilities would most likely take place within existing rights-of-way. Should construction associated with implementation of the proposed measures take place outside the existing rights-of-way, new ground disturbance has the potential to uncover unknown resources. In accordance with Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f), which recognize that historical or unique archaeological resources may be accidentally discovered during project construction, General Plan Action 2-A.74 requires that areas identified to contain historical or unique archaeological resources be evaluated of by a qualified archaeologist for implementation of avoidance or appropriate mitigation measures, pursuant to CEQA Guidelines Section 15064.5(f). Additional policies would serve to ensure the availability of information regarding archaeological resources in the Planning Area in order to allow the avoidance of negative impacts on known resources, as well to ensure the development of appropriate mitigation and monitoring procedures for projects on sensitive sites. As such, compliance with State and local regulations pertaining to the discovery of archaeological resources would ensure a less than significant impact.

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

**Less than Significant Impact.** There is a remote possibility that ground-disturbing activities that would occur as a result of implementing transportation and building measures as set forth in Draft CAP could uncover previously unknown human remains. In the unlikely event that this occurs, compliance with State regulations pertaining to the discovery of human remains would ensure a less than significant impact.

## 3.6 Energy

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

**Less than Significant Impact.** Implementation of the proposed CAP would not result in construction or operational impacts related to wasteful consumption of energy resources. The CAP Update is a policy document containing climate action measures and actions to reduce Redlands GHG emissions. The CAP Update would not involve land use or zoning changes but would

promote infrastructure development and redevelopment. Furthermore, the purpose and intended effect of the CAP Update is to reduce GHG emissions generated in the City to help reduce the effects of climate change, including those emissions generated by energy demand and supply. The CAP Update encourages electrification, use of renewable energy, and energy efficiency in existing residential and commercial building stock as well as proposed new residential and commercial buildings.

Measures BE-1 through BE-3 propose the expansion of decarbonization and electrification efforts for municipal buildings and construction. In addition, Measure TR-2 focuses on electrifying landscaping equipment and upgrading off-road equipment to use cleaner fuels. As such, the CAP update would not result in the use of non-renewable resources in a wasteful or inefficient manner. Therefore, the proposed CAP would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy. Rather, the CAP would assist in reducing use of non-renewable energy resources.

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

**Less than Significant Impact.** Any development pursuant to the CAP would be required to comply with the latest California Energy Commission (CEC) requirements, including CEC Building Energy Efficiency Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation. The proposed CAP includes an inventory of citywide GHG emissions; forecasts of future citywide GHG emissions; monitoring and reporting processes to ensure State GHG targets are met; and measures for reducing GHG emissions to meet such State requirements. The proposed CAP is written for intended implementation through the year 2050. The proposed CAP would also support the CARB passenger vehicle GHG emissions reduction targets through measures that would reduce VMT and provision of EV infrastructure throughout the city. Therefore, impacts would be considered less than significant.

## 3.7 Geology and Soils

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

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?**
- ii) Strong seismic ground shaking?**
- iii) Seismic-related ground failure, including liquefaction?**
- iv) Landslides?**

**No impact.** The Planning Area is located within a seismically active area where several faults and fault zones are considered active by the California Department of Conservation, Division of Mines and Geology. As such, earthquakes in and near the Planning Area have the potential to cause ground shaking of significant magnitude as well as liquefaction and seismically-induced landslides in parts of the city. Even so, the proposed CAP does not include any land use changes or other measures that relate to these geologic hazards and would therefore have no impact.

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

**Less than Significant Impact.** No future project resulting from implementation of the Draft CAP would directly involve substantial loss of topsoil or directly result in substantial soil erosion. In the event that new development or construction of expanded bike paths and pedestrian amenities would require construction activity that may result in substantial soil erosion or loss of topsoil, such activities would be subject to the latest version of the CBC and the National Pollutant Discharge Elimination System (NPDES) to reduce erosion impacts. In addition, earthwork and ground-disturbing activities, unless below minimum requirements, require a grading permit, compliance with which minimizes erosion, and the City's grading permit requirements ensure that construction practices include measures to protect exposed soils such as limiting work to dry seasons, covering stockpiled soils, and use of straw bales and silt fences to minimize offsite sedimentation. As such, the impact would be less than significant.

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

**No Impact.** The potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as California Building Code (CBC) requirements which are used to minimize the risk associated with these hazards. However, the proposed CAP does not include any land use changes or other measures that would affect soil stability and would therefore have no impact.

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

**No Impact.** The potential hazards of expansive soils would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements which are used to minimize the risk associated with these hazards. However, the proposed CAP does not include any land use changes or other measures that would affect soil stability and would therefore have no impact.

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

**No Impact.** The proposed CAP does not include any land use changes or other measures that would affect septic or alternative wastewater disposal systems and would have no impact.

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

**No Impact.** Some portions of the city, especially in San Timoteo Canyon, are underlain by geologic formations that have yielded fossiliferous materials (Albright, 1999).<sup>5</sup> However, the proposed CAP does not include any land use changes or other strategies that would result in adverse effects on any paleontological resources. There would be no impact.

### 3.8 Greenhouse Gas Emissions

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

**Less than Significant Impact.** The measures in the Draft CAP are not anticipated to generate substantial construction emissions, because those measures would result in only minor upgrades to existing uses. In addition, any construction-related GHG emissions would be anticipated to be more than offset by the operational benefits of the measures in the CAP. Implementation of the strategies and measures proposed within the Draft CAP would result in annual community-wide GHG emission reductions. As shown in Table 2, the future Draft CAP measures would result in total MTCO<sub>2</sub>e reductions of approximately 96,703 MTCO<sub>2</sub>e by 2030 and 326,038 MTCO<sub>2</sub>e by 2050. As the proposed CAP would meet all State-mandated emissions targets through 2050, impacts would be considered less than significant, and no additional measures are required.

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

**Less than Significant Impact.** The updated Redlands CAP reflects the latest guidance from the California Air Resources Board (CARB) established in the 2022 Scoping Plan, which is designed to implement the State's GHG emission reduction targets set in Assembly Bill (AB) 32, Executive Order (EO) S-3-15, and Senate Bill (SB) 32. AB 32 established a statewide target of reducing GHG emissions to 1990 levels by 2020. California has exceeded this now-past target and has already established longer-term goals for 2030 (in SB 32) and 2045 (in AB 1279). The previous target for 2050 (80 percent below 1990 levels) is assumed to be in line with the State-adopted goal to achieve carbon neutrality (85 percent statewide reductions below 1990 levels) by 2045. The proposed CAP that would serve as the implementation tool for GHG monitoring and reporting and would serve

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<sup>5</sup> Albright, Barry L. 1999. Magnetostratigraphy and Biochronology of the San Timoteo Badlands, Southern California, with Implications for Local Pliocene-Pleistocene Tectonic and Depositional Patterns. Geological Society of America Bulletin, v. 111, no. 9, p. 1265-1293.

to implement a number of measures aimed at reducing greenhouse gas emissions to meet such State targets.

Additionally, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) includes a set of policy objectives related to mobility, communities, environment, and economy. The passage of California Senate Bill 375 (SB 375) in 2008 requires that SCAG prepare and adopt an SCS sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures and policies, will reduce GHG emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the California Air Resources Board. With implementation of the proposed CAP's measures related to sustainable and multi-modal transportation, the proposed CAP would complement the goals and policies of the RTP/SCS and would continue to carry out the goals of AB 32 and SB 375. Therefore, the CAP would, by nature, result in reduced transportation GHG emissions and achieve the overarching goals of local, regional, and State plans to reduce GHG emissions. As such, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be less than significant.

### 3.9 Hazards and Hazardous Materials

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

**Less than Significant Impact.** Implementation of the Draft CAP and its measures would not result in the routine transport, use, or disposal of hazardous materials. It is possible that construction activities would require the use of materials that include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control (DTSC), United States Environmental Protection Agency, the Occupational Safety & Health Administration, the San Bernardino County Fire Protection District, and the San Bernardino County Environmental Health Services (EHS). The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, state, and local regulations governing such activities. Therefore, the impact would be less than significant.

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

**Less than Significant Impact.** Implementation of the Draft CAP could result in the rehabilitation and renovation of older residential, commercial, and municipal structures to support energy retrofits and the installation of private and municipal solar PV systems. Structures built prior to 1978 may contain asbestos-containing building materials and lead paint. If not properly handled and released into the environment in large enough quantities, these materials could pose a threat to construction workers and residents. However, these retrofits would primarily be small-scale, and

no single renovation would likely result in releases large enough to pose a health hazard to the public. In addition, demolition and construction activities involving hazardous materials removal are heavily regulated, and construction workers must comply with applicable federal and state safety regulations. Compliance with such regulations would ensure a less than significant impact.

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

**Less than Significant Impact.** The Draft CAP does not directly recommend projects that would involve the handling of hazardous or acutely hazardous materials. Compliance with regulatory requirements, such as environmental site assessments and health risk assessments, would ensure construction and operation impacts within one-quarter mile of an existing or proposed school are less than significant.

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

**Less than Significant Impact.** According to the DTSC and the State Water Resources Control Board (SWRCB), hazard materials sites are located throughout the City, some of which could be encountered during implementation of measures in the Draft CAP.<sup>6, 7</sup> In addition, the Draft CAP is a policy document that in itself would not create a significant hazard. Implementation of the Draft CAP, such as implementation of measures related to pedestrian, bike, and transit connectivity could result in construction of bicycle paths or expanded pedestrian and transit amenities, which could require disturbance of a site. However, demolition and construction activities involving hazardous materials sites are heavily regulated, and construction workers would be required to comply with applicable federal and state safety regulations. Compliance with such regulations would ensure a less than significant impact.

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

**No Impact.** The Planning Area includes portions that are within the airport land use plan area of the Redlands Municipal Airport or within two miles of the San Bernardino International Airport (SBIA). The proposed CAP does not include any land use changes or strategies that would affect land uses within the Redlands Municipal Airport land use plan area or within two miles of SBIA and would have no impact. As such, there would be no impacts on the safety of those working or residing within the Redlands Municipal Airport land use plan area or within two miles of SBIA from the Proposed Project.

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<sup>6</sup> DTSC. EnviroStor. Website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed March 18, 2025.

<sup>7</sup> SWRCB. GeoTracker. Website: <http://geotracker.waterboards.ca.gov/>, accessed March 18, 2025.

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

**Less than Significant Impact.** In the case of the Proposed Project, relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan and, to the extent that they mitigate potential disasters in the Planning Area, the Redlands Hazard Mitigation Plan (HMP) and the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). In situations where an emergency evacuation is necessary, the use of roads and freeways within the city would be necessary. The Draft CAP is a policy-based document, and the recommendations and measures in the Draft CAP would not interfere with an adopted emergency response plan or emergency evacuation plan. Further, the Draft CAP recommends measures that would increase safety for drivers, pedestrians, and bicyclists and seeks to reduce the number of automobiles on Redlands streets, both of which may make evacuation and emergency response safer and more efficient. Therefore, this impact would be less than significant.

**g) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**No Impact.** The majority of Redlands is characterized by CAL FIRE as having a Moderate fire threat level, with areas of High and Very High Fire Hazard Severity Zones found on the periphery of the city and in the sphere of influence (SOI) outside of city limits: in the canyonlands, Crafton, Mentone, and in the Santa Ana River Wash. Areas of Little or No Threat can be found along San Timoteo Creek and the Santa Ana River. Areas of High fire threat are characterized by natural vegetation that can serve as fuel for wildland fires, and steeper topographies that can impede emergency access and facilitate the rapid spread of potential fire. However, implementation of the proposed CAP would not include any land use changes or measures that would affect exposure to wildland fire risk and would therefore have no impact.

### 3.10 Hydrology and Water Quality

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

**Less than Significant Impact.** The Draft CAP proposes measures that would not directly violate water quality standards or waste discharge requirements. However, implementation of the Draft CAP could result in construction-related wastewater discharge into the local sewer system. Although increases in wastewater are not expected to be large enough to substantially increase the amount of runoff or amount of pollutants in the runoff, if necessary, implementation of the Draft CAP would be required to comply with NPDES to control stormwater discharges. The Draft CAP includes measures to implement the Water Efficient Landscape Ordinance, Urban Water Management Plan, and Water Systems Plan which would minimize waste discharge as a result of new construction. Nonetheless, if appropriate, any project associated with the Draft CAP would be subject to a Stormwater Pollution Prevention Plan and/or be required to incorporate Best

Management Practices (BMPs) during construction to reduce potential impacts. Therefore, impacts to water quality would be less than significant.

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

**No Impact.** The Draft CAP proposes measures that would not deplete groundwater or interfere with groundwater recharge. The proposed Draft CAP intends to promote water conservation through implementation of the Water Efficient Landscape Ordinance, Urban Water Management Plan, and Water Systems Master Plan. Additional measures include water efficiency requirements for new and renovated buildings, increased enforcement of water used restrictions, and promotion of water-efficient products and practices. Improvements to pedestrian, bicycle, and transit connectivity could increase the amount of landscaping which could increase the need for water for irrigation purposes. However, any landscaping would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and would comply with applicable water-efficient landscape standards within the City of Redlands Municipal Code. No impacts on groundwater supply would occur.

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

- i. **result in a substantial erosion or siltation on- or off-site;**
- ii. **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**
- iii. **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- iv. **impede or redirect flood flows?**

**Less than Significant Impact.** The Draft CAP proposes measures that would not directly alter existing drainage patterns. However, some measures, such as improving the bike and pedestrian network, could slightly increase the amount of surface runoff due to new pedestrian and bicycle paths. Even so, the addition of new pedestrian and bicycle paths would not result in substantial surface runoff increases and any changes would be subject to existing federal and state regulations. Locally, any development pursuant to the CAP would be subject to the City's Flood Damage Prevention ordinance that helps prevent flood damage resulting from hydromodification. Adherence to the City's Storm Drains Ordinance would limit surface runoff from development, reducing siltation and erosion. In addition, the General Plan's goals and policies are intended to preserve natural water courses or naturalized drainage channels, and to ensure future development incorporates BMPs to reduce runoff from a site. As such, the impact would be less than significant.



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

**No Impact.** The Planning Area is located sufficiently inland to be out of what would be considered a potential hazard area for seiches, tsunamis, and sea level rise. Areas prone to flooding in Redlands are in the north, south, and central portions of the Planning Area. Areas with a 1-percent annual chance of flooding (commonly referred to as the 100-year floodplain) are generally mapped along the Santa Ana River Wash, along San Timoteo Canyon, and along the Zanja watercourse from Loma Linda through Downtown and Crafton. Areas with shallow flooding (AO zones) are mapped along the Zanja and pass through Downtown.<sup>8</sup> The proposed CAP does not include any land use changes or other measures that would impact the location of structures relative to flood hazard areas, nor would it result in structures built that could risk release of pollutants due to project inundation. As such, there would be no impact.

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

**Less than Significant Impact.** Construction and operation associated with the Proposed Project would comply with local, State, and federal regulations, including the NPDES Construction General Permit, Santa Ana River Basin Plan, San Bernardino County MS4 Permit, and the City's Code. Commonly practiced BMPs, as required by these regulations, would be implemented to control construction site runoff and reduce the discharge of pollutants to storm drain systems from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground-disturbing or construction activities associated with future development, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the Basin Plan. Construction runoff would also have to be in compliance with the water quality objectives for the region. The NPDES Construction General Permit requires stormwater discharges not to contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards, including designated beneficial uses. As detailed above, the proposed CAP would have no impacts on groundwater. Therefore, the Proposed Project would not obstruct implementation of a water quality control plan the impact is less than significant.

## 3.11 Land Use and Planning

**a) Physically divide an established community?**

**Less than Significant Impact.** The Draft CAP is a policy-based document that does not directly involve the construction of a specific project. Implementation of the Draft CAP and its measures would enhance pedestrian, bicycle, and transit connectivity and encourage the development of greater mixed uses and denser housing near transit, which could result in the development of

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<sup>8</sup> FEMA. Flood Maps. Website: <https://www.fema.gov/flood-maps>, accessed March 18, 2025.

structures or improvements that could divide an established community. However, the implementation of the Draft CAP intends to increase connectivity throughout the city by implementing both external and internal design guidelines for bike, pedestrian, and transit connectivity, which would connect existing residential development to nearby sidewalks and bus stops. Therefore, impacts to established communities would be less than significant.

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

**Less than Significant Impact.** Implementing the Draft CAP would require some modification of existing City policies, including changes to the Municipal Code and Zoning Code. The CAP includes a measure to amend the Zoning Code to allow community gardens in as many districts as possible. In addition, the CAP proposes the adoption of ordinances that have more stringent requirements for the installation of EV chargers, reduction of waste from City operations, diversion of construction and demolition waste, utilization of recycled asphalt pavement, and water efficiency in new and renovated buildings. While the proposed measures could conflict with some existing policies, the Draft CAP is designed to mitigate adverse environmental impacts associated with global climate change. Where conflicts do occur, the proposed Draft CAP measures would generally result in greater avoidance or mitigation of environmental effects. The impact would be less than significant.

### 3.12 Mineral Resources

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

**No Impact.** The State Mining and Geology Board (SMGB) has classified large areas in the north of the Planning Area as Mineral Resource Zone-2 (MRZ-2), indicating the existence of a deposit that meets certain criteria for value and marketability. Portions of these areas, centered around the Santa Ana River Wash, have been designated as containing regionally significant PCC (Portland cement concrete)-grade aggregate resources such as sand, gravel, and crushed rock. Even so, the proposed CAP does not include any land use changes or other strategies that would result in the loss of availability of known mineral resources of value to the region or state and would therefore have no impact.

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

**No Impact.** As stated above, the proposed CAP does not include any land use changes or other strategies that would affect existing mining operations within or adjacent to the Planning Area and would therefore have no impact.

### 3.13 Noise

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

**Less than Significant Impact.** While the Draft CAP is a policy-based document and does not directly recommend any measures that would generate excessive amounts of construction noise, construction activity associated with implementation of the Draft CAP measures could possibly result in temporary increases in noise levels. 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 Section 8.06.090 would be required for any future construction. Therefore, the noise impact from construction activities associated with implementation of the proposed General Plan would be less than significant. Regarding operational noise, the proposed CAP does not include any land use changes or other measures that would result in noise increases and would therefore not generate noise levels in excess of existing standards (no impact).

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

**Less than Significant Impact.** Similar to Section 3.13(a), temporary construction activities as a result of implementation of the Draft CAP could result in excessive groundborne vibration or groundborne noise. In addition, the Draft CAP is a policy-based document and does not directly recommend any measures or land use development that would generate excessive amounts of construction noise. A majority of the measures would involve small scale construction projects, such as energy efficient retrofits and streetlight replacement. The exact nature of future construction that could occur is not known at this time; thus, construction noise levels cannot be estimated. However, all construction activities would be required to comply with the City's Noise Control Ordinance and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce noise groundborne vibration and noise levels associated with construction activities. This impact would be less than significant.

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

**No Impact.** The Redlands Municipal Airport is located in the northeast part of the city and adjacent to the Santa Ana River Wash. Portions of the Planning Area include the 60 and 65 CNEL noise contour for the Redlands Municipal Airport. However, the proposed CAP does not include any land use changes or other measures that would affect or expose people to airport noise, and would therefore have no impact.

### 3.14 Population and Housing

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

**Less than Significant Impact.** The proposed CAP includes measures to improve the pedestrian, bicycle, and transit network which would involve the implementation of bike lanes and transit-supportive roadway treatments. However, these improvements would serve to improve transit times and reliability as well as walking and biking safety. Therefore, such measures would not indirectly induce substantial population growth. In addition, CAP measures encourage greater mixed uses and denser housing near transit. However, these measures would not induce substantial unplanned growth in the area as they stem from policies envisioned in the Transit Villages Specific Plan and General Plan. As such, the impact would be less than significant.

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

**Less than Significant Impact.** Retrofitting residential buildings to be more energy efficient would involve small construction work and replacement housing would not be necessary. Allowing greater mixed uses and denser housing near transit would involve new development but would not displace existing people or housing. The impact would be less than significant.

### 3.15 Public Services

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

- a) **Fire protection?**

**Less than Significant Impact.** While the Draft CAP would not directly introduce new structures, future infill development and redevelopment could occur near transit corridors. New development could increase fire protection service needs in the City. However, the City estimates fire protection needs based on growth as projected in the City's General Plan, and new development anticipated via existing zoning would be consistent with anticipated projections. The impact would be less than significant.

- b) **Police protection?**

**Less than Significant Impact.** Similar to the evaluation under Section 3.15(a), the possible increase in population that may occur as a result of implementation of the Draft CAP would not increase the demand for police protection service to the extent that new police protection facilities would be

required. Implementation of the Draft CAP measures related to pedestrian and bicycle networks would involve physical infrastructure improvements such as expanded sidewalks and bike paths. New pedestrian and bike amenities could slightly increase the number of police personnel needed within the route areas, but would not result in the need for new police facilities or additional personnel. The impact would be less than significant.

**c) Schools?**

**Less than Significant Impact.** Similar to the evaluation under Section 3.15(a) and (b), the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new schools over current levels or anticipated projections. The impact would be less than significant.

**d) Parks?**

**Less than Significant Impact.** Similar to the evaluations above, the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new park facilities over current levels or anticipated projections. Additionally, the proposed measures involve the implementation of enhanced bike, pedestrian, and transit connectivity, as well as expanding the city's urban forest and community gardens which would provide additional passive recreation areas and opportunities within the city. When such expanded recreational facilities are proposed, their construction and operation would be subject to separate project-level CEQA review. Even so, construction of such facilities is not expected to significantly impact the environment, given that such projects would occur in already-developed areas of the city to further enhance the existing transportation network. The impact would be less than significant.

**e) Other public facilities?**

**Less than Significant Impact.** Similar to the evaluations above, the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new public facilities over current levels or anticipated projections. The impact would be less than significant.

## 3.16 Recreation

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

**Less than Significant Impact.** Implementation of the Draft CAP is not expected to result in substantial population growth and thus would not result in increased physical deterioration of parks and recreational facilities. The Draft CAP measures promote the expansion of the current network of bicycle and pedestrian paths, which would provide additional passive recreational facilities within the city and could potentially lessen wear on existing facilities. The impact would be less than significant.

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

**Less than Significant Impact.** Implementation of the Draft CAP is not expected to result in substantial population growth and thus would not result in increased physical deterioration of parks and recreational facilities. Implementation of the Draft CAP includes measures that promote the expansion of the current network of bicycle and pedestrian paths, which would provide additional passive recreational facilities within the city. When such expanded recreational facilities are proposed, their construction and operation would be subject to separate project-level CEQA review. Even so, construction of such facilities is not expected to significantly impact the environment, given that such projects would occur in already-developed areas of the city to further enhance the existing transportation network. Therefore, the impact would be less than significant.

### 3.17 Transportation

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**
- b) **Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

**Less than Significant Impact.** Implementation of the Draft CAP would result in the development of bike, pedestrian, and transit connectivity improvements and encourage mixed uses and denser housing near transit. The CAP measures also involve transportation demand strategies to reduce commute trips to work, school, and other frequent destinations. As such, these measures and actions support decreasing vehicle miles traveled by encouraging alternative forms of transportation and the development of related infrastructure, thus reducing total GHG emissions from transportation throughout the city. Such measures would not conflict with the City's Municipal Code and would further support goals, policies, and actions identified in the City's General Plan, Sustainable Mobility Plan, and Transit Villages Specific Plan (TVSP), as well as SCAG's RTP/SCS. All modifications to the transportation network would be subject to review by the City for compliance with the General Plan and be required to comply with applicable local, State, and Federal regulations. Therefore, implementation of the proposed CAP would result in less-than-significant impact related to consistency with plans addressing the transportation circulation system.

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

**Less than Significant Impact.** The proposed measures are aimed at providing alternative modes of transportation and reducing the amount of VMT throughout the city. In fact, the Draft CAP promotes safety improvements of walking, biking, and transit use through enhancing connectivity and implementing supportive roadway treatments. The Draft CAP does not include measures that would substantially increase hazards due to a design feature or incompatible uses. The impact would be less than significant.

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

**Less than Significant Impact.** The Draft CAP recommends measures that would increase safety for drivers, pedestrians, and cyclists and seeks to reduce the number of automobiles on Redlands streets, both of which may make access for emergency vehicles easier and more efficient. The impact would be less than significant.

### 3.18 Tribal Cultural Resources

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
  - i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
  - ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less than Significant Impact.** The Planning Area has the potential to contain tribal cultural resources from past Native American activities. Sensitive areas include lands along water sources—though there is potential that resources near waterways have been disturbed over time by alluvial processes and flooding—and the many rock outcroppings and boulders in upland portions of the Planning Area. However, the proposed CAP, as a policy document, does not include any land use changes, land development, ground-disturbing activities, or other strategies that would result in adverse effects on any known tribal cultural resources. The City sent written notifications to local Native American Tribes on January 30, 2025, and two tribal governments responded (the Agua Caliente Band of Cahuilla and the Yuhaaviatam of San Manuel Nation). No information has been provided to the City of Redlands regarding any known or likely to occur tribal cultural resources, and no consultation process was requested. Therefore, the anticipated impacts to tribal cultural resources are expected to be less-than-significant or no impacts.

Policies in the proposed General Plan would minimize or avoid potential impacts to any resources not known at this time that may be encountered in future, and would promote coordination with local Native American tribal groups during future projects to ensure the protection of any tribal cultural resources. Future development projects would also be subject to State and federal law regarding the protection of tribal cultural resources. With implementation of the identified proposed General Plan principles and actions, and future Native American consultation required by State law for development projects, potential impacts on tribal cultural resources from future development within the city would be reduced to less than significant levels.

### 3.19 Utilities and Service Systems

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

**Less than Significant Impact.** While the Draft CAP would not directly introduce new structures, future development could occur as a result of encouraging the development of greater mixed uses and denser housing near transit. However, the population or new surface increases would not be substantial enough to create large enough increases in demand for utility service systems that would require or result in new or expanded facilities. Further, the Draft CAP proposes water efficiency retrofits for new development, renovated buildings, and lawns in residential districts. The Draft CAP also proposes the continued implementation of the Wastewater Master Plan to optimize operational efficiency. Such measures would involve retrofits to existing development that would reduce the use of utility service systems and would not create the need for new or expanded utility facilities. The impact would be less than significant.

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

**Less than Significant Impact.** As detailed in the City's General Plan EIR<sup>9</sup>, future development under the proposed General Plan has been projected to be accommodated by existing water sources and entitlements during normal, dry, and multiple dry years through 2035. The possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for water supplies over anticipated projections. In addition, the Draft CAP recommends water efficiency retrofits (measures PW-1a through PW-1f), which would reduce the City's water demand. Therefore, the impact is less than significant.

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

**Less than Significant Impact.** As detailed in the City's General Plan EIR<sup>10</sup>, future development under the proposed General Plan has been projected to be accommodated by existing wastewater treatment capacity through 2035. The possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for wastewater capacity over anticipated projections. In addition, the Draft CAP recommends the

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<sup>9</sup> City of Redlands. *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*. July 2017. Available online at: <https://www.cityofredlands.org/post/planning-division-general-plan>, accessed March 21, 2025.

<sup>10</sup> Ibid.



continued implementation of the Wastewater Master Plan to optimize operational efficiency, which would reduce the City's water demand. Therefore, the impact is less than significant.

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

**Less than Significant Impact.** The Draft CAP intends to reduce solid waste generation as a whole through implementation of a solid waste diversion and reduction measures in order to achieve a solid waste disposal rate of 75 percent diversion. Specific measures include adopting a food recovery policy, increasing education and enforcement of organics waste collection, encouraging the elimination of single use plastics, and requiring new developments to submit waste reduction plans. Such measures would result in an increased diversion of waste from landfills and reduce landfill methane emissions. Therefore, the impact would be less than significant.

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

**No Impact.** The Draft CAP does not recommend any measure that does not comply with applicable solid waste regulations. Conversely, the Draft CAP proposes a measure that would reduce the amount of waste sent to landfills and would comply with SB 1383, by locally diverting 75 percent or organic waste from landfills in order to match the statewide goal. Therefore, no impact would occur.

## 3.20 Wildfire

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

**Less than Significant Impact.** In the case of the Proposed Project, relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan and, to the extent that they mitigate potential disasters in the Planning Area, the Redlands Hazard Mitigation Plan (HMP) and the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). In situations where an emergency evacuation is necessary, the use of roads and freeways within the city would be necessary. The Draft CAP is a policy-based document, and the recommendations and measures in the Draft CAP would not interfere with an adopted emergency response plan or emergency evacuation plan. Further, the Draft CAP recommends measures that would increase safety for drivers, pedestrians, and bicyclists and seeks to reduce the number of automobiles on Redlands streets, both of which may make evacuation and emergency response safer and more efficient. Therefore, this impact would be less than significant.

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

**No Impact.** The majority of Redlands is characterized by CAL FIRE as having a Moderate fire threat level, with areas of High and Very High Fire Hazard Severity Zones found on the periphery of the city and in the SOI outside of city limits: in the canyonlands, Crafton, Mentone, and in the Santa Ana River Wash. Areas of Little or No Threat can be found along San Timoteo Creek and the Santa

Ana River. Areas of High fire threat are characterized by natural vegetation that can serve as fuel for wildland fires, and steeper topographies that can impede emergency access and facilitate the rapid spread of potential fire. However, implementation of the proposed CAP would not include any land use changes or measures that would affect exposure to wildland fire risk, and would therefore have no impact.

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

**Less than Significant Impact.** Implementation of the Draft CAP measures related to pedestrian and bicycle networks would involve physical infrastructure improvements such as expanded sidewalks and bike paths. Draft CAP measures also involve other infrastructure improvements, such as the installation of EV chargers, roundabouts, and a community shared solar generation system. All such infrastructure improvements associated with the CAP would occur in already developed areas served by existing roadway and utility infrastructure and generally removed from areas of elevated wildfire risk.

Even so, additional utility infrastructure or roads needed under the Proposed Project would comply with existing State regulations, including Title 14 of the California Code of Regulations and the California Fire and Building Codes, would help reduce wildfire risks from such infrastructure construction. Additional General Plan policies to help reduce infrastructure-related wildfire risk include policies related to vegetation management, water supply for fire suppression, and individual development fire protection plan review in wildland-urban interface areas to ensure that proper mitigation is incorporated. Compliance with existing regulations and policies would ensure that installation or maintenance of infrastructure associated with the Proposed Project would not exacerbate fire risk, therefore this impact is less than significant.

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

**No Impact.** Implementation of the proposed CAP would not include any land use changes or measures that would expose people or structures to significant risk as a result of post-fire instability and would therefore have no impact.

### 3.21 Mandatory Findings of Significance

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

**Less than Significant Impact.** The purpose of the Draft CAP is to reduce community-wide GHG emissions in the City of Redlands to reduce environmental impacts associated with global climate

change. The Draft CAP proposes measures to lessen numerous environmental impacts and does not contain any strategy or measure that would either directly substantially reduce habitat, reduce wildlife populations, threaten animal or plant communities, restrict the range of species, or eliminate examples of history or prehistory. The impact would be less than significant.

Implementation of the Proposed Project would not directly result in the destruction of, or damage to, historical resources. However, construction associated with Draft CAP measures, such as expanding pedestrian, bicycle, and transit facilities, would most likely take place within existing rights-of-way. Should construction associated with implementation of the proposed measures take place outside the existing rights-of-way, new ground disturbance has the potential to uncover unknown resources. In the event that this occurs, compliance with State regulations pertaining to discovery of archaeological resources would ensure a less than significant impact.

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

**Less than Significant Impact.** The Draft CAP would not result in any adverse environmental impacts that are cumulatively considerable. The project is intended to contribute to a cumulative reduction in GHG emissions and to reduce adaptation impacts associated with global climate change, both of which would have beneficial cumulative environmental effects. Measures within the Draft CAP that may result in indirect adverse environmental impacts are evaluated throughout this initial study. However, as all impacts are considered to be less than significant, it is unlikely that any impact would contribute to a significant cumulative impact. The impact would be less than significant.

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

**No Impact.** The Draft CAP is a policy document intended to reduce the City’s community-wide GHG emissions to help cumulatively address the adverse environmental impacts associated with global climate change, while also protecting and enhancing the quality of life within the city. The Draft CAP measures strive to protect the environment, enhance human health and safety, and conserve natural resources, both within and beyond Redlands. Adoption and implementation of the Draft CAP would result in beneficial environmental effects and would not cause substantial adverse direct or indirect effects on human beings resulting from a change in the physical environment. There would be no impact.

## **4 List of Preparers**

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