INITIAL STUDY

General Plan Amendment No. 148, Zone Change No. 476, Annexation No. 96 CITY OF REDLANDS, CALIFORNIA

Prepared for:

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November 2025

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE AND BACKGROUND

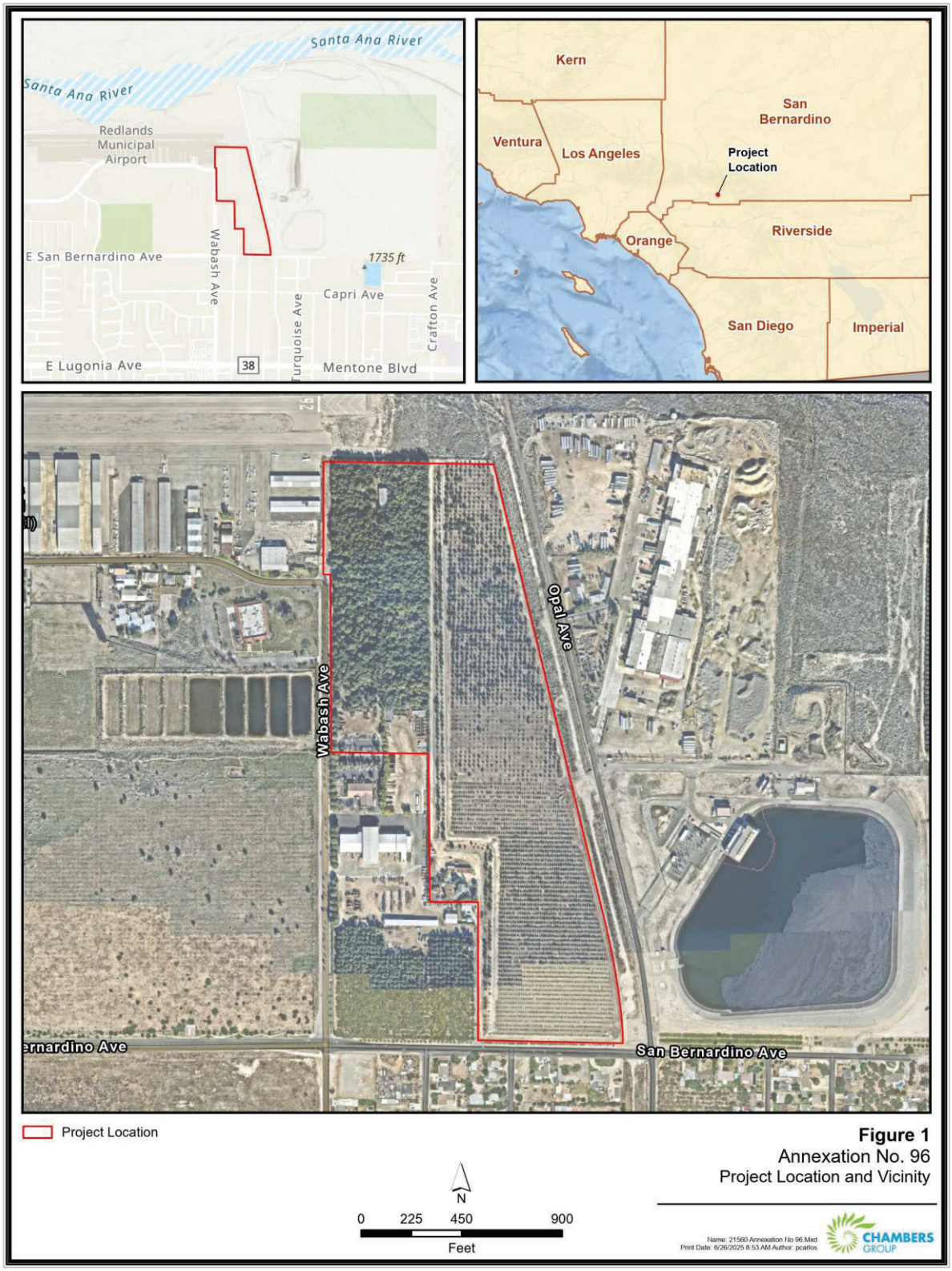
The General Plan Amendment (GPA) No. 148, Zone Change No. 476, Annexation No. 96 Project (hereafter, "Project") proposes the annexation of County of San Bernardino (County) parcels (Assessor's Parcel Number [APN]s: 0297-121-03, -04, -05, -09, -12, and -13) ("Project site") into the City of Redlands (City). The subject parcels are currently located outside the City's boundaries but lie within the City's Sphere of Influence (SOI) which defines the City's ultimate service area as established by the Local Agency Formation Commission (LAFCO) of the County of San Bernardino (County 2025).

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Project Site Location

The project area comprises six agricultural parcels encompassing approximately 47.3 acres in Mentone (unincorporated San Bernardino County) and is bounded by Opal Avenue (east), the Redlands Municipal Airport (north), San Bernardino Avenue (south) and the easterly city limit of Redlands (west) (See Figure 1). The project site contains citrus groves, avocado groves, and two single-family residences. Of the total site, approximately 32.7 acres are currently protected farmland under a Williamson Act contract.

Figure 1: Project Location and Vicinity Map



1.2.2 General Plan Land Use Categories and Zoning Designations (Current vs. Proposed)

The City's General Plan 2035 contains seven thematic chapters, serving as a long-range policy guide for future development and growth. Chapter 4: Livable Community provides key information on land use policies and designations, visually represented in Figure 4-1: General Plan Land Use (City 2018b). Currently, the Project site is designated 'Agricultural' according to the City's General Plan. Under the Countywide Policy Plan Land Use Map (LU-1A), the Project site is designated 'Resource/Land Management' (County 2020a).

The Project site is bordered by the following land use designations according to the City and County General Plans (City 2018b; County 2020a):

Table 1: General Plan Zoning and Land Use

	Existing Land Use	City of Redlands (City)		County of San Bernardino (County)	
		Zoning	GP Land Use	Zoning	GP Land Use
Project Site	Private Property (Orange and Avocado Groves)	N/A	Agriculture*	Agriculture (AG-AP)	Resource/Land Management
North	Redlands Municipal Airport	Airport-District (A-D)	Public/Institutional*	N/A	N/A
East	Industrial and Commercial Storage Uses	N/A	Light Industrial* and Public/Institutional*	Regional Industrial (IR)	General Industrial, Public Facility
South	Residences	N/A	Low Medium Density Residential*	Single Residential (RS)	Low Density Residential
West	Construction facility; Redlands Sports Park	Airport-District (A-D); Industrial (I-P), Commercial Industrial (C-M), Light Industrial (M-1), and Open Land (O)	Light Industrial, Commercial/Industrial and Parks/Golf Courses	N/A	N/A

*Within City's Sphere of Influence

1.3 PROJECT DESCRIPTION

The proposed project includes the following actions:

- General Plan Amendment: Change the City of Redlands land use designation for the area from Agricultural to Light Industrial and Commercial/Industrial.

- Pre-Zoning: Establish Light Industrial (M-1) and Commercial Industrial (C-M) zoning districts for the area.

- Williamson Act Cancellation: Cancel the existing agricultural preserve (Williamson Act) contract affecting approximately 32.7 acres within the project area.

- Annexation: Annex the area into the City of Redlands.

No immediate development, construction and/or ground-disturbing activities are proposed.

1.4 REQUIRED PERMITS AND APPROVALS

Reviewing Agencies include those agencies that do not have discretionary authority but may review the Initial Study (IS) and Environmental Impact Report (EIR) for adequacy and accuracy.

Responsible Agencies have discretionary approval authority for a project and may rely on the Initial Study (IS) and Environmental Impact Report (EIR) for their independent decision-making processes. Other Agencies do not have discretionary authority but may review the environmental document(s) to provide specialized expertise/feedback on the Project when circulating for public review and comment.

Responsible Agencies

- County of San Bernardino: Cancellation of agricultural preserve (Williamson Act) contract.
- San Bernardino County LAFCO: Annexation of the six unincorporated parcels (Assessor's Parcel Number [APN]s: 0297-121-03, -04, -05, -09, -12, and -13) into the City requires coordination with and approval by LAFCO.

Reviewing Agencies

- California Department of Conservation (CDOC)
- South Coast Air Quality Management District (SCAQMD)
- Regional Water Quality Control Board (RWQCB) – Region 8

1.4.1 Permits and Approvals

The following permits and approvals may be required to support the Proposed Project actions (i.e., General Plan Amendment, zone change, and annexation). While no immediate development is proposed, any future development following annexation would be subject to applicable City development entitlements and construction permits such as the following:

- Planning Commission Review and Approval (e.g., Site Plan Review) and/or Conditional Use Permit(s) for future proposals for site development and establishing land uses.

- National Pollutant Discharge Elimination System (NPDES) Construction General Permit compliance for future site development proposals.
- South Coast Air Quality Management District (AQMD) permits for future land uses, if applicable.
- Grading Permits for future site development proposals.
- Utility Connection permits for future site development proposals.

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages.

☐ *Aesthetics*	☒ *Agriculture and Forestry Resources*	☒ *Air Quality*
☐ *Biological Resources*	☒ *Cultural Resources*	☒ *Energy*
☒ *Geology / Soils*	☒ *Greenhouse Gas Emissions*	☒ *Hazards & Hazardous Materials*
☐ *Hydrology / Water Quality*	☒ *Land Use / Planning*	☐ *Mineral Resources*
☒ *Noise*	☒ *Population / Housing*	☐ *Public Services*
☐ *Recreation*	☒ *Transportation*	☒ *Tribal Cultural Resources*
☒ *Utilities / Service Systems*	☒ *Wildfire*	☒ *Mandatory Findings of Significance*

DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. 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. ☐
3. I find the proposed Project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☒
4. 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. ☐
5. I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required. ☐

Kevin Beery
Signature

11/12/2025
Date

Kevin Beery
Name

Senior Planner
Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

3.1 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

Sections 4.1 through 4.20 provide a discussion of the potential environmental impacts of the Project. The evaluation of environmental impacts follows the questions in the checklist provided in the CEQA Guidelines.

3.2 TERMINOLOGY USED IN THIS ANALYSIS

For each question listed in the IS checklist, a determination of the level of significance of the impact is provided. Impacts are categorized in the following categories:

- **No Impact.** A designation of no impact is given when no adverse changes in the environment are expected.
- **Less Than Significant.** A less than significant impact would cause no substantial adverse change in the environment.
- **Less Than Significant with Mitigation**. A potentially significant (but mitigable) impact would have a substantial adverse impact on the environment but could be reduced to a less-than-significant level with incorporation of mitigation measure(s).
- **Potentially Significant.** A potentially significant impact may cause a substantial adverse effect on the environment. Potentially significant impacts will be fully analyzed in the EIR.

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to the project (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the Lead Agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant.

"Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

"Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."

Mitigation measures are identified and explain how they reduce the effect to a less than significant level (mitigation measures may be cross-referenced).

Earlier analyses may be used where, pursuant to the Program EIR or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. (Section 15063[c] [3][D]. In this case, a brief discussion should identify the following:

a) Earlier analyses used where they are available for review

b) Which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and whether such effects were addressed by mitigation measures based on the earlier analysis

c) The mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project for effects that are "Less than Significant with Mitigation Measures Incorporated

References and citations have been incorporated into the checklist references to identify information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document, where appropriate, include a reference to the page or pages where the statement is substantiated.

Source listings and other sources used or individuals contacted are cited in the discussion.

The explanation of each issue identifies:

a) The significance criteria or threshold, if any, used to evaluate each question

b) The mitigation measure identified, if any, to reduce the impact to less than significant.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

The aesthetic value of an area is a measure of its visual character and quality, combined with the viewer response to the area. Scenic quality can best be described as the overall impression that an individual viewer retains after driving through, walking through, or flying over an area. Aesthetic resources include scenic resources, which include water forms, trees, rock outcroppings, historic buildings, and scenic highways. Impacts to aesthetic resources include obstruction and destruction of views to or from scenic resources and/or the degradation of the visual character of the area.

1.	**AESTHETICS.** **Except as provided in Public Resources Code Section 21099, would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. As described in the City's General Plan, scenic vistas within the City include scenic corridors and views to open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Current and future scenic drives are identified within Chapter 2: Distinctive City of the General Plan. The General Plan indicates that specific development standards have been adopted by Resolution to protect identified scenic highways, drives, and historic streets (City 2018a).

The Project site is located west of Opal Ave, between the Santa Ana River and San Bernardino Ave, and is bordered by Redlands Municipal Airport and open space (to the north), industrial and commercial storage uses (to the east), residential neighborhoods (to the south), and a construction facility and Redlands Sports Park (to the west). The Project site contains citrus groves, avocado groves, and two single-family residences on the Project site, located at 9345 Wabash Ave (near its northwestern corner) and 1721 San Bernardino Ave (near its center).

The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. As no immediate development is proposed at this time, the Project would not have an adverse effect on a scenic vista. Future industrial and commercial uses would not impact scenic vistas from I-10 or Highway 38/Orange Street given it would not be visible from either highway. Any future development would require adherence to the development standards associated with commercial and industrial zoning and land uses. Impacts would be less than significant.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Less than Significant Impact. As described in a) above, the Project site is bordered by a mixture of commercial, industrial, residential neighborhoods, and open space/parks. The Proposed Project does not propose any immediate development, and, therefore, no physical impact would degrade the existing visual character or public views of the site and surroundings.

California Department of Transportation (Caltrans) has indicated I-10 near Redlands as a Scenic Highway (Caltrans 2020). Although I-10 passes by the Project site, it is not visible from either scenic segment. Highway 38/Orange St is an eligible scenic Highway on the California Department of Transportation (Caltrans) State Scenic Highway Map. This segment is approximately 0.77 miles south of the Project site over commercial buildings and residential neighborhoods.

Future development would obtain and comply with general construction guidelines and adhere to the City's design standards. Additionally, all future construction activities for the Project would be conducted in accordance with the California Building Code (CBC) and City regulations and ordinances. Impacts would be less than significant, and this issue will not be analyzed further in the EIR.

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

Less than Significant Impact. The Project site is on relatively flat ground in the City within an urbanized area. The Proposed Project does not currently involve any proposed development or physical impact, but future development would obtain and comply with general construction guidelines and adhere to the City's design standards. Compliance with appropriate guidelines and standards for future development results in a less-than-significant impact to scenic vistas. Impacts would be less than significant, and this issue will not be analyzed further in the EIR.

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

Less than Significant Impact. As noted throughout this section, no immediate development is proposed at this time as the Project is limited to redesignation and annexation only. The Proposed Project is within an urbanized area of the City bordered by development. Future onsite development would obtain and comply with general construction guidelines and adhere to the

City's design standards. Therefore, adverse effects associated with light and/or glare would be less than significant, and this issue will not be analyzed further in the EIR.

4.2 AGRICULTURE & FORESTRY RESOURCES

Agricultural resources include prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and commercial grazing land as defined in the Guidelines for the Farmland Mapping and Monitoring Program, pursuant to Section 65570 of the Government Code, as well as land in a Williamson Act contract.

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor and without intolerable soil erosion (7 United States Code [U.S.C.] 4201(c)(1)(A)).

Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops such as citrus, tree nuts, olives, cranberries, fruits, and vegetables (7 U.S.C. 4201(c)(1)(B)).

Additional farmland of statewide or local importance is land identified by state or local agencies for agricultural use, but not of national significance (7 U.S.C. 4201(c)(1)(C)).

The California Legislature passed the Williamson Act in 1965 to preserve agricultural and open-space lands by discouraging premature and unnecessary conversion to urban uses. The Act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict their land to agricultural and compatible open-space uses.

The Williamson Act is a means to restrict the uses of agricultural and open-space lands to farming and ranching uses during the length of the contract period. The Williamson Act Program was also envisioned as a way for local governments to integrate the protection of open space and agricultural resources into their overall strategies for planning urban growth patterns.

2.	**AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐	☐
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☒	☐	☐	☐
(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))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(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 the conversion of forest land to non-forest use?	☒	☐	☐	☐

4.2.1 Impact Analysis

a) Would the project 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?

Potentially Significant Impact. Prime farmland is land that has a combination of characteristics to be used as cropland, pasture, rangeland, and forest land. According to the Department of Conservation (DOC) California Important Farmland Finder mapping system, the Project site is designated as grazing land. The Farmland Mapping and Monitoring Program (FMMP), established in 1982, provides data to public and government entities to make informed decisions regarding the use of California's agricultural land and resources and as an effort to protect agricultural resources.

According to the Department of Conservation (DOC) Important Farmland Finder Map, the Project site is classified as "Unique Farmland," "Prime Farmland," "Urban and Built Up Land," and "Farmland of Statewide Importance" (DOC 2025a). The following provides a breakdown of acreage across each classification within the Project site:

- "Unique Farmland" (24.72 acres);
- "Prime Farmland" (17.80 acres);
- "Urban and Built Up Land" (3.55 acres); and

The Project site is currently zoned for agricultural and farmland use, containing orange groves, avocado groves, and two single-family residences. The Project proposes to incorporate the Project site into the City and redesignate the Project site from its current City's Sphere of Influence 'Agricultural' General Plan land use classification to 'Light Industrial' and 'Commercial/Industrial', and pre-zone the site as M-1 Light Industrial and C-M Commercial Industrial to accommodate future commercial and/or industrial uses upon annexation.

Therefore, implementation of the Proposed Project would convert Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to a non-agricultural use. The EIR will provide further analysis to determine the Project's potentially significant impact of farmland conversion to urban use (e.g., industrial and commercial).

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Potentially Significant Impact. The Williamson Act, established in 1965, was designed to respond to the increasing pressure occurring throughout California post-World War II to convert agricultural lands to urban development. The Project site consists of orange groves and avocado groves and contains parcels that are currently contracted under the Williamson Act program. 32.71 acres are currently under a Williamson contract within the Project area.

Therefore, the Proposed Project may conflict with existing zoning for agricultural use and parcels contracted under the Williamson Act program. As noted in Section 1.4.1 Permits and Approvals, the Proposed Project includes a cancellation request of the existing agricultural preserve contract. The EIR will provide further analysis to determine the Project's potentially significant impact to existing zoning for agricultural use and parcels contracted under the Williamson Act program.

c) Would the project 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. According to both the City's and County's General Plans, the Project site does not contain any land designated as "timberland" or "forest" (City 2018c; County 2020b). The Project site is primarily surrounded by urban uses, with some trees and vegetation in the vacant parcels to the west. Given there are no forested lands surrounding the site, the Proposed Project would not cause rezoning of forest or timberland zones and would not conflict with existing zoning for forest or Timberland Production. No impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed in c) above, the Project site is not designated for forest or timberland use nor is it zoned for forest uses under the City's or County's General Plans (City 2018c; County 2020b). The Project site is primarily surrounded by urban uses, with some trees and vegetation in the vacant parcels to the west. Given there are no forested lands surrounding the site, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Would the project 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 the conversion of forest land to non-forest use?

Potentially Significant Impact. Currently, the Project site is designated as 'Agricultural' according to the City's General Plan, bordered by Redlands Municipal Airport and open space (to the north), industrial and commercial storage uses (to the east), residential neighborhoods (to the south), and a construction facility and Redlands Sports Park (to the west). As noted in a), the Proposed Project involves annexation and a General Plan Amendment redesignating the allowable land uses and does not propose any immediate development. Additionally, the Proposed Project includes a cancellation request of the existing agricultural preserve.

As noted in b), the Proposed Project may conflict with existing zoning for agricultural use and parcels contracted under the Williamson Act program; this requires Williamson Act Contract documents, including a copy of the original contract and notice of non-renewal or contract cancellation, and any City protest(s) or cancellation request(s) to verify contract status, ensure proper termination or nonrenewal, and verify any terms and conditions that must be addressed before conversion. Therefore, the Proposed Project involves the conversion of agricultural land to non-agricultural uses, which may result in potentially significant impacts. This will be further analyzed in the EIR.

4.3 AIR QUALITY

3.	**AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
(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?	☒	☐	☐	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

4.3.1 Impact Analysis

a) Would the project conflict or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. CEQA requires a discussion of any inconsistencies between a Proposed Project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The South Coast Air Quality Monitoring District (SCAQMD) Air Quality Management Plan (AQMP) applies to the Proposed Project. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City.

Although no immediate development is proposed at this time, an Air Quality, Energy, and Greenhouse Gas Emissions Report will be prepared to determine the Project's impact on the SCAQMD AQMP and will consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

b) Would the project 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?

Potentially Significant Impact. As noted above in a), the Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. While immediate construction is not proposed at this time, future industrial or commercial development could have the potential to result in air quality impacts during Project construction and operation.

Construction phase air quality impacts could include emissions from construction exhaust and travel, demolition and earth moving activities, architectural coatings, and asphalt paving. Operational air quality impacts could include emissions from project generated vehicle traffic and from on-site sources. As noted, no immediate industrial or commercial development is proposed at this time. An Air Quality, Energy, and Greenhouse Gas Emissions Report will be prepared to determine the Project's impact on air quality standards and would consider the maximum allowable development under the existing regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are in proximity to localized sources of toxins are of particular concern. Sensitive land uses include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project site is mainly surrounded by Redlands Municipal Airport and Open Space (to the north), a mixture of industrial and commercial storage uses (to the east), and a construction facility and Redlands Sports Park (to the west). The nearest sensitive receptor are the single-family residences located along San Bernardino Ave, along the southern border of the Project site and

two single-family residences on the Project site, located at 9345 Wabash Ave (near its northwestern corner) and 1721 San Bernardino Ave (near its center).

As described, the Proposed Project does not currently involve any immediate development, as the Project is limited to land use redesignation and annexation only at this time. An Air Quality, Energy, and Greenhouse Gas Emissions Report will be prepared to determine the Project's impact to sensitive receptors and would consider a maximum allowable development under the proposed regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Potentially Significant Impact. Individual responses to odor or dust emissions are highly variable and can result in a variety of effects. Generally, the impacts from odor or dust emissions result from a variety of factors such as frequency, intensity, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to the emissions. The intensity refers to an individual's or a group's perception of the odor or dust emissions strength or concentration. The duration of the emissions refers to the elapsed time over which the emissions are experienced by individuals or groups. The offensiveness of the emissions is the subjective rating of the unpleasantness of the odor or dust. The location accounts for the distance between the source of the emission and the individuals or groups affected by the emissions.

As described, the Proposed Project does not currently involve any immediate development. An Air Quality, Energy, and Greenhouse Gas Emissions Report will be prepared to determine the Project's impact on odor or dust emissions and would consider the maximum allowable development under existing regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

4.4 BIOLOGICAL RESOURCES

Biological resources include habitats and vegetative communities, migratory corridors, plants, wildlife, fisheries, special status species (regulated by a law, regulation, or policy, such as threatened and endangered species), and waters of the United States.

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
(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 U.S. Fish and Wildlife Service?	☐	☐	☒	☐

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
(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?	☐	☐	☒	☐

4.4.1 Impact Analysis

Chambers Group conducted a reconnaissance-level survey and prepared a Biological Resources Report for the Proposed Project dated July 24, 2025. The Biological Resources Report was prepared to summarize the existing vegetation communities, identify special status species that have potential to occur, and identify potentially jurisdictional water features within the Project site. The complete report can be found in Appendix A.

a) Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as 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?

Less than Significant Impact.

Vegetation Communities and Other Areas

One vegetation community and one other land types were found within the Project site during the biological reconnaissance survey: Cultivated Agriculture and Developed.

Cultivated Agriculture: Agriculture consists of annual crops, vineyards, orchards, dairies, and stockyards. A large portion of the property is actively cultivated as a citrus and avocado orchard. A dense layer of leaf litter is present in the understory of the orchards. Occasional weedy annuals were observed in the area including prickly lettuce (*Lactuca serriola*), common sow thistle (*Sonchus oleraceus*), and horseweed (*Erigeron canadensis*). Cultivated areas account for approximately 42.74 acres of the Project site.

Developed: Developed areas are areas that have been altered by humans and now display man-made structures such as houses, paved roads, buildings, parks, and other maintained areas. Developed areas include a house and several buildings. There are 3.33 acres of Developed areas on the Project site.

General Plants

A total of 26 plant species were observed within the Project site during the biological reconnaissance survey. Plant species observed during the survey were representative of the existing Project site conditions. No special status plant species were observed during the survey.

General Wildlife

A total of 12 wildlife species were observed within the Project site during the biological reconnaissance survey. Wildlife species observed or detected during the survey were characteristic of the existing Project site conditions. No special status wildlife species were observed during the survey.

Special Status Plant Species

Database searches resulted in a list of 49 federal- and/or state-listed threatened, endangered, or otherwise special status plant species documented to historically occur within the vicinity of Project site. All 49 special status plant species identified in the literature review are considered absent from the Project site.

Special Status Wildlife Species

Database searches resulted in a list of 55 federal- and/or state-listed endangered or threatened, state SSC, or otherwise special status wildlife species documented to occur within the Project site. After a literature review and the assessment of the various habitat types within the Project site, it was determined that all 55 special status wildlife species are considered absent from the site.

US Fish and Wildlife (USFWS) Critical Habitat

USFWS Critical Habitat is defined as areas of land, water, and air space containing the physical and biological features essential for the survival and recovery of endangered and threatened species. Designated Critical Habitat includes sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Designated Critical Habitats require special management and protection of existing resources, including water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types.

Designated Critical Habitat delineates all suitable habitats, occupied or not, that is essential to the survival and recovery of the species.

According to the USFWS Critical Habitat for Threatened and Endangered Species WebGIS map, the Project is located south of Merriam's kangaroo rat designated critical habitat. However, the entire site is an active orchard and has been significantly altered and disturbed and no longer contains any native habitat. In addition, the site is bordered by development to the east, west,

and south, and therefore would not serve as a movement corridor for this species. No impacts to the Merriam kangaroo rat or critical habitat are anticipated to occur as a result Project activities. Thus, no additional surveys are recommended at this time. Should future development occur, the Project may require additional surveys or reporting to confirm if the existing conditions are consistent.

Nesting Birds

Most bird nests are protected under the Migratory Bird Treaty Act (MBTA). The MBTA states that it is unlawful to pursue, hunt, take, capture, kill, attempt to take, possess, sell, or export any migratory bird, nest, or egg.

As noted above, no immediate development is proposed at this time. If construction activities occur, to minimize potential impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA), these activities should take place outside the nesting season (February 1 to August 15) to the greatest extent practicable. If construction activities occur during nesting season, a preconstruction nesting bird survey should be conducted prior to initiation of ground-disturbing activities. To the maximum extent practicable, a minimum buffer zone around occupied nests should be determined by a qualified biologist to avoid impacts to the active nest. The buffer should be maintained during physical ground-disturbing activities. Once nesting has ceased and the nestlings have fledged, the buffer may be removed.

Based on the desktop research and survey of the Project site, the Proposed Project would not result in a substantial adverse effect on candidate, sensitive or special status species due to the site not having any native, critical or adequate habitat for these species. Impacts, therefore, would be less than significant.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less than Significant Impact. As reported in the Biological Resources Report (Appendix A), database searches revealed no National Wetlands Inventory (NWI) or National Hydrography Dataset (NHD) mapped features occur within or directly adjacent to the site. The Project site is comprised of citrus groves, avocado groves, and two single-family residences. No other drainages or water features including wetlands were observed during the survey.

The Project site is located south of the Santa Ana River and approximately 0.65 miles north of the Redlands Aqueduct; however, these features are located well outside of the Project site. Given that the Project site does not contain any riparian habitat or other sensitive communities, and it is outside of the Santa Ana River, impacts would be less than significant.

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

Less than Significant Impact. As discussed in the previous section, and in the Biological Resources Report, the Proposed Project would not result in impacts to protected wetlands. There are no wetlands found within the Project site as it is located inland within the City.

No impacts to waters of the United States or waters of the state are anticipated to occur as a result of this Project. Therefore, a USACE Section 404, RWQCB 401 certification, and a CDFW Streambed Alteration Agreement will not be required for Project authorization and the Project would result in less than significant impacts to riparian or other sensitive natural community due to its location.

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

Less than Significant Impact. As noted in a), the Project site is located adjacent to USFWS designated critical habitat for Merriam's kangaroo rat. However, the entire site is an active orchard and has been significantly altered and disturbed and no longer contains any native habitat. In addition, the site is bordered by development to the east, west, and south, and therefore would not serve as a movement corridor for this species. No impacts to the Merriam's kangaroo rat or critical habitat are anticipated to occur as a result Project activities. Thus, no additional surveys are recommended at this time. Future development may require updated surveys and reporting should the existing conditions change. Impacts would be less than significant.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less than Significant Impact. The County and City's General Plan outline various preservation policies and ordinances to protect the biological resources (City 2018c; County 2020b). The County's Natural Resources (NR) Element Goal NR-5, Biological Resources, includes Policy NR-5.1, Coordinated habitat planning, which requires coordination with existing or proposed habitat conservation and natural resource management plans.

Similarly, the City's General Plan, Chapter 6: Vital Environment, includes Policy 6-A.21, which requires future activities in the Santa Ana River Wash to align with the Santa Ana River Wash Habitat Conservation Plan (HCP). The HCP runs along the eastern edge of the Project site on Opal Ave but does not encompass the Project site itself (SBVWCD 2024). Therefore, the Proposed Project would not impact or conflict with the HCP.

As the Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City, no physical impacts would occur and therefore no trees would be removed. As noted in Section 4.2, Agriculture and Forestry Resources c) and d), no forested lands surround the Project site but there are some trees and vegetation in the vacant parcels to the west. Future construction and operations associated with industrial or commercial development would require compliance with the City's General Plan Policy 6-A.10, which requires the preservation of Redlands' network of urban forest and street trees, and Redlands Municipal Code Chapter 12.52 (Trees and Tree Protection Along Streets and in Public Places). Therefore, the

Proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than Significant Impact. As noted in e) above, the Proposed Project is not located within the HCP but is located along the western edge of the Wash Plan Boundary. The HCP is a long-term conservation strategy that addresses a range of species and habitats within the Upper Santa Ana River watershed (SBVWCD 2024), balancing ground-disturbing activities within the HCP with the conservation of special status plant and wildlife species.

As noted in the Biological Resources Report, the Project site is located south of the Santa Ana River and approximately 0.65 miles north of the Redlands Aqueduct, well outside of the Project site. The Project site does not contain special status plants and wildlife species due to a lack of suitable habitat for these species. Additionally, the Project site contains a citrus grove, an avocado grove, and two single-family residences. As such, the Project site has been significantly altered and disturbed and therefore no longer contains any USFWS designated critical habitat for Merriam's kangaroo rat.

While the Project site does not contain any special status species, and is not a designated critical or sensitive habitat or within the HCP, the Proposed Project shall comply with the MBTA. Furthermore, any future development could require updated surveys or reports to confirm if the existing conditions have changed. Therefore, the Proposed Project would have less than significant impacts to special status plants, wildlife, and USFWS designated critical habitats.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

4.5.1 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource?

Potentially Significant Impact. According to the CEQA Guidelines regarding historical resources, a substantial adverse change in the significance of a historical resource amounts to a significant

impact on the environment (Guidelines § 15064.5(b)). Accordingly, a substantial adverse change means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings resulting in the significance of the resource being materially impaired. The significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. No immediate industrial or commercial development is proposed at this time, and therefore, no physical impact would occur. However, future development would require compliance with policies outlined in the County and City's General Plans related to the preservation of national, state, and local historic resources, as outlined in County's General Plan Cultural Resources (CR) Element, Goal CR-2 Historic and Paleontological Resources, Policy CR-2.1 and Policy CR-2.2. Additionally, the Proposed Project would require compliance with the City's General Plan, Chapter 2: Distinctive City, Policy 2-A.25, which requires surveyance of resources over 50-years-old to be approved by the Historic and Scenic Preservation Commission (City 2018a; County 2020c).

A Cultural Resources Report, California Historical Resources Information System (CHRIS) records search, and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search will be conducted to determine the Project's potential impact on historical resources. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Potentially Significant Impact. Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:

An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

- Has a special and particular quality, such as being the oldest of its type or the best available example of its type; and

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a "unique archaeological resource" under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, "A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" (PRC § 21083.2[h]).

As noted above in a), the Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. As no immediate industrial or commercial development is proposed at this time, no physical impact would occur. Future development would comply with policies outlined in the County and City's General Plans related to the preservation of archaeological resources, as outlined in County's General Plan Cultural Resources (CR) Element, Goal CR-2 Historic and Paleontological Resources, Policy CR-2.3. Additionally, the Proposed Project would require compliance with the City's General Plan, Chapter 2: Distinctive City, Policy 2-A.72 and Policy 2-A.73, which require a consulting archaeologist to develop a mitigation and monitoring plan for projects and identify appropriate protection and preservation measures to archaeological resources (City 2018a; County 2020c).

A Cultural Resources Report, California Historical Resources Information System (CHRIS) records search, and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search will be conducted to determine the Project's potential impact on archaeological resources. This is a potentially significant impact that will be fully analyzed in the EIR.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant Impact. As noted in a) and b) above, the Proposed Project involves annexation and a General Plan Amendment redesignating the permitted uses of the parcels and does not propose any immediate development. The Project does not propose any ground disturbing activities associated with construction.

The Project site historically operated as a fruit grove and contains two residential buildings. Development of the grove and buildings have involved previous ground disturbing activities, and therefore, the site is unlikely to contain any human remains. However, future development would be subject to procedures required by State law. In the event that human remains are discovered during ground-disturbing activities, then the proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California PRC Section 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98.

In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Following the existing state regulations would result in less than significant impacts associated with disturbance of human remains during any future project construction. Impacts therefore would be less than significant.

4.6 ENERGY

This section describes the potential energy resources impacts from implementation of the Proposed Project.

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

4.6.1 Impact Analysis

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

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. No immediate development is proposed at this time. However, future construction activities may require BMPs or mitigation to reduce construction related emissions, minimizing the energy needed to implement the Proposed Project. Additionally, the Proposed Project would implement CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings. Compliance with this regulation would result in development that requires less electricity, natural gas, and other fuels for operational purposes.

An Air Quality, Energy, and Greenhouse Gas Emissions report will be prepared to determine the Project's energy consumption during any future construction or operation and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. There is no immediate development associated with the Proposed Project. However, future construction associated with the Proposed Project and subsequent

industrial or commercial development would comply with CCR Title 24, which regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting.

An Air Quality, Energy, and Greenhouse Gas Emissions report will be prepared to determine the Project's impact on renewable energy or energy efficiency plans and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii) Strong seismic ground shaking?	☐	☐	☒	☐
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv) Landslides?	☐	☐	☒	☐
(b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☒	☐	☐	☐

4.7.1 Impact Analysis

a) i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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.

Less than Significant Impact. The City is located within a seismically active region of Southern California; however, the Project site is not located within a state-designated Alquist-Priolo Fault Zone. The site is located approximately 2 miles southwest of the South Branch of the San Andreas Fault (DOC 2025d).

The Project proposes to redesignate the Project site from its current City Sphere of Influence's 'Agricultural' General Plan land use classification to 'Light Industrial' and zone the site as M-1 Light Industrial and C-M Commercial Industrial to accommodate future commercial and/or industrial uses upon annexation (City 2018b). There is no immediate development or construction proposed at this time. Future industrial or commercial development shall require compliance with the California Building Code (CBC). Section 1613 of the CBC requires all structures be designed and constructed to resist the effects of earthquake motions in accordance with the Minimum Design Loads for Buildings and Other Structures established by the American Society of Civil Engineers (CBSC 2022).

Future development would also comply with City regulations and ordinances, pertaining to the mitigation of potential geologic and seismic impacts, such as the City's General Plan Chapter 7: Healthy Community, Seismic and Geologic Hazard policies (City 2018d), which may require preparation of separate technical analyses, separate entitlements and permitting prior to approval. Impacts would be less than significant.

a) ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Less than Significant Impact. The most significant seismic hazard potentially affecting the Project site is ground shaking from a major earthquake. As noted, the Project site is located in a seismically active region of Southern California but is not identified to be located within a State-designated Alquist-Priolo Fault Zone. The type and magnitude of seismic hazards affecting the site are dependent on the distance to fault zones, the intensity, and the magnitude of the seismic event. The site is located approximately two miles from the nearest fault trace (DOC 2025d). As noted in a) above, no immediate development is proposed at this time, so no physical impact would result from the Proposed Project's implementation.

Future construction activities involving industrial or commercial development would require compliance with the CBC Section 1613 and the City's General Plan Chapter 7: Healthy Community, Seismic and Geologic Hazard Policy 7-A.116, requiring the adoption of revisions of the CBC that incorporate the most current seismic design standards and hazard reduction measures recommended by the Applied Technology Council (ATC), the Structural Engineers Association of California (SEAOC), the Earthquake Engineering Research Institute (EERI), the Seismic Safety Commission, and the Southern California Earthquake Center (City 2018d). Compliance with the City's General Plan policies and development consistent with the CBC would result in a less than significant impact associated with risk of loss, injury, or death involving strong seismic ground shaking.

a) iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less than Significant Impact. The Proposed Project only involves annexation and redesignation, with no immediate development or construction that would cause physical impacts. The Department of Conservation's EQZapp Program indicates the Project site has not been evaluated for liquefaction hazards (DOC 2025d). However, the San Bernadino County Policy Map HZ-2 Liquefaction & Landslide Hazards does not show the Project site in a liquefaction zone (County 2020d).

Future construction activities involving industrial or commercial development would require compliance with CBC Section 1613 and the City's General Plan Chapter 7: Healthy Community, Seismic and Geologic Hazard Policy 7-A.114, which requires the preparation of a geotechnical report for new construction, as deemed appropriate by the City Building Department. The geotechnical report would address existing or potential landslides, active/potentially active faulting, liquefaction, and any other geotechnical concepts as appropriate, and make recommendations for mitigating any potential adverse impacts (City 2018d). Impacts therefore would be less than significant regarding seismic-induced ground failure, including liquefaction.

a) iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less than Significant Impact. The San Bernadino County Policy Map HZ-2 Liquefaction & Landslide Hazards does not show the Project site in a landslide susceptibility zone (County 2020d). The elevation profile on Google Earth illustrates average slope of 2%, indicating the Project site is relatively flat. As noted in a) iii) above, future construction would require compliance with CBC requirements and the City's General Plan Chapter 7: Healthy Community, Seismic and Geologic Hazard Policy 7-A.114, which may require the preparation of a geotechnical report for new construction, which would address and mitigate potential landslides (City 2018d).

Future construction associated with the Proposed Project would comply with the most recent CBC requirements and City's General Plan policies. Given that the Project site is relatively flat and that future development would adhere to City polices, impacts would be less than significant with regard to landslide-related impacts.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The Proposed Project involves annexation and a General Plan Amendment to redesignate the allowable uses of the parcels. No immediate development or physical impacts would occur. Future construction and operation of the Project site would require compliance with City requirements addressing potential erosion and stormwater management including those outlined in the General Plan's policy 6-A.36 for construction and post construction measures to prevent erosion and sedimentation. This may include preparation and submittal of separate entitlements and permits prior to Project approval. These can include adherence to the provisions of the National Pollution Discharge Elimination System (NPDES) Construction General Permit and Stormwater Pollution Prevention Plan (SWPP). The SWPP would require specific best management practices (BMPs) to prevent erosion and protect the quality of stormwater runoff. In addition, the Project must also comply with SCAQMD Rule 402 (Nuisance) and Rule 403

(Fugitive Dust), which would reduce construction erosion impacts associated with future development.

Compliance with these federal, regional, and local requirements would reduce the potential for both on-site and off-site erosion effects to accepted levels during any future Project construction. Upon completion of any future construction activities, ground surfaces would be stabilized by Project structures, paving, and landscaping. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with soil erosion and topsoil loss.

c) *Would the project 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?*

Less than Significant Impact. As noted in a) iii) above, the Proposed Project site is not located within a liquefaction zone. The soil is not prone to liquefaction, is relatively flat, and consists of a mixture of soils – Soboba stony loamy sand, Soboba gravelly loamy sand, and Hanford coarse sandy loam soils (County 2020d, USDA 2025).

As noted in the Biological Resources Report, Hanford coarse sandy loam is considered well drained and is not classified as hydric, and Soboba gravelly loamy sand and Soboba stony loamy sand are both considered excessively drained and are not classified as hydric, which means the soils have low expansive properties because they are primarily sand without clay characteristics (Appendix A; USDA 2025). Future construction activities would be conducted in accordance with CBC Chapter 16, Section 1613 Earthquake Loads, which implements seismic design provisions per American Society of Civil Engineers (ASCE) 7, including site class (i.e., soil type).

As noted throughout this section, no physical impacts from construction would result as the Proposed Project is solely focused on annexation and redesignation. Therefore, there would be no work that could create an unstable area. Additionally future development would require compliance with the CBC and existing General Plan policies. Implementation of the Proposed Project would result in a less than significant impact associated with off-site landslide, lateral spreading, liquefaction, or collapse.

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

Less than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These types of soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible.

However, the Proposed Project is located on a mixture of Soboba stony loamy sand, Soboba gravelly loamy sand, and Hanford coarse sandy loam soils, which have low expansive properties because it is primarily sand without clay characteristics (USDA 2025). Since the Proposed Project only involves annexation and redesignation, no development is proposed that could create direct or indirect impacts to life or property. Once construction is proposed, activities would be conducted in accordance with CBC Chapter 16, Section 1613 Earthquake Loads, which implements seismic design provisions per American Society of Civil Engineers (ASCE) 7, including site class (i.e.,

soil type). Additionally, future work would require compliance with the City development standards and may require further review of the site plan and design prior to approval. Therefore, implementation of the Proposed Project would result in less than significant impact with regards to life or property.

e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

Less than Significant Impact. The Proposed Project site is located within the City's Municipal Utilities and Engineering Department (MUED) Sewer Service Area (City 2024). As noted, the Project only involves annexation and redesignation, and therefore no immediate development or physical impacts would occur.

Future development would rely on existing wastewater infrastructure to accommodate wastewater disposal requirements. As noted in c) and d), the soils on-site are well-drained and are therefore capable of supporting the use of wastewater disposal systems as it would have low expansive properties. Should any future development require expansion of wastewater disposal system or septic tanks, these would require compliance with the General Plan policies with regard to stability. As outlined in the City's General Plan Policy 7-A.114, a geotechnical report for new construction may be deemed appropriate by the City Building Department. The geotechnical report would address other geotechnical concepts as appropriate, and make recommendations for mitigating any potential adverse impacts (City 2018d). Given the soils on-site have adequate capacity to support wastewater disposal systems and future development would comply with General Plan policies, implementation of the Proposed Project would result in less than significant impacts to wastewater disposal.

f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. No immediate construction is proposed at this time. While the Project site has been previously disturbed and operated a fruit grove, any future work that could require extensive excavation could uncover resources not previously known.

Future construction activities would require compliance with the County's General Plan Cultural Resources Element, which includes policies and principles to establish direction on notification, coordination, and partnerships to preserve and conserve cultural resources. Goal CR-2 (Historic and Paleontological Resources) outlines measures to protect and preserve paleontological resources for their cultural importance to local communities as well as their research and educational potential, including the following:

- Policy CR-2.3 Paleontological and archaeological resources: We strive to protect paleontological and archaeological resources from loss or destruction by requiring that new development include appropriate mitigation to preserve the quality and integrity of these resources. We require new development to avoid paleontological and archeological

resources whenever possible. If avoidance is not possible, we require the salvage and preservation of paleontological and archeological resources (County 2020c).

As stated in Section 4.5, Cultural Resources, a Cultural Resources Report, California Historical Resources Information System (CHRIS) records search, and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search will be conducted to determine the Project's impact on paleontological resources. This is a potentially significant impact that will be fully analyzed in the EIR.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

4.8.1 Impact Analysis

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

Potentially Significant Impact. The Proposed Project involves annexation and a General Plan Amendment to redesignate the allowable uses of the parcels currently located within unincorporated County area into the City. No immediate development is proposed at this time.

Future Project construction activities may generate direct carbon dioxide, nitrous oxide, and methane emissions from construction equipment, transport of materials, and construction workers commuting to and from the Project site. Operational or long-term emissions could occur over the life of the Project. GHG emissions may result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions could also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

An Air Quality, Energy, and Greenhouse Gas Emissions report will be prepared to determine the Project's potential impact related to greenhouse gases and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Potentially Significant Impact. As noted above in a), the Proposed Project involves the redesignation and annexation of parcels, with no immediate development proposed.

Future construction could require compliance with the City's Climate Action Plan (CAP) energy efficiency goals by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards and with current local and State standards and CAP goals to increase diversion and reduction of waste by diverting construction waste from landfills to recycling, discussed later in Section 4.19 Utilities.

Although no immediate development is proposed at this time, an Air Quality, Energy, and Greenhouse Gas Emissions report will be prepared to determine the Project's compliance with the County's GHG Reduction Plan and the City's CAP. The analysis would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

4.9 HAZARDS AND HAZARDOUS MATERIALS

The Proposed Project and Proposed Project site were analyzed to determine the potential for both hazards and hazardous materials to occur on-site. Background research included an evaluation of the Geotracker and EnviroStor websites, operated by the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control DTSC, respectively.

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☒	☐	☐	☐
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐

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

4.9.1 Impact Analysis

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

Less than Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. There is no immediate development proposed at this time, and therefore, no physical impacts would occur. Future construction related to industrial and commercial uses may include the transport of hazardous and potentially hazardous materials to/from and used on the Project site.

While specific construction and development activities are currently unknown, the Project site would be redesignated from its current City General Plan land use classification of 'Agricultural' to 'Light Industrial' and 'Commercial/Industrial;' – and concurrently be pre-zoned as 'M-1 (Light Industrial) and 'C-M (Commercial Industrial).' 'Light Industrial' land use classification designates areas intended for manufacturing, distribution, research and development (R&D) industries, and ancillary commercial uses. Heavy industries, such as aggregate mining and processing and concrete batch plants, are not included in this category and are only permitted in areas designated by the Santa Ana Wash Plan. 'Commercial/Industrial' land use classification allows compatible commercial and light industrial land uses, including auto services, commercial retail and services, manufacturing, flex commercial space and business parks (City 2018b).

Future construction associated with industrial and commercial development could involve equipment (e.g., loaders, pickup trucks, backhoe, water trucks, asphalt pavers, cranes, and excavators) that may include small quantities of hazardous substances (e.g., gasoline, diesel fuel, lubricants, cleaning agents) as part of daily operations. The transport, use and handling of these hazardous materials would be temporary, and storage would be required to comply with applicable local, state, and federal regulations. Additionally, Best Management Practices (BMPs), such as proper labeling of chemicals, storage in approved containers, preparation of an accidental release plan, and compliance with hazardous materials handling protocols would be implemented during any future construction phase associated with the Proposed Project. The appropriate BMPs and operational requirements will be developed based on the type of facility to be constructed.

While the Proposed Project would not result in significant impact related to potentially hazardous materials, subsequent development projects may require additional hazard assessments and would vary on a project-by-project basis. General Plan policies 7-A.119, 7-A.120, 7-A.123 and 7-A.124 outline the requirements for future development projects to coordinate with appropriate public services and agencies such as the fire department, DTSC, or a Certified Unified Public Agency (CUPA), to identify any emergency response plans required, regulate development sites that may contain contaminated soil or groundwater, and prohibit or mitigated projects that may emit hazardous emissions nearby schools, housing and care facilities.

Adherence to these guidelines would ensure that any future construction and operation would have a less than significant impact related to the transport, use, or disposal of hazardous materials.

b) *Would the project 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. The Proposed Project involves annexation and a General Plan Amendment to redesignate the permitted uses of the parcels and does not propose any immediate development. As noted in a), handling of hazardous materials during future development would be temporary and may require implementation of construction and operational BMPs to ensure that the potential release of hazardous materials would not create a significant impact. Future construction would be required to comply with applicable local, state, and federal regulations related to hazardous material transport and storage including the General Plan policies to address hazardous materials. While the Proposed Project does not involve the release of hazardous materials, adherence to the General Plan policies outlined in the previous section require that future development be reviewed on a project-by-project basis to determine if a subsequent assessment would be required. Impacts therefore would be less than significant.

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

No Impact. There are no currently operating schools within one-quarter mile of the Project site. Valley Star High School, located along the eastern border of the Project site on Opal Ave, was closed in 2018 according to the California Department of Education (CDOE) (CDOE 2018). Other schools near the Project site include Mentone Elementary School (located 1.12 miles southeast), Judson & Brown Elementary school (located 1.18 miles southwest), Redlands East Valley High School (located 1.42 miles south), and Crafton Elementary School (located 1.64 miles south). No impact would occur.

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

No Impact. The Proposed Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Redlands Municipal Airport, located approximately a quarter mile north of the Project site, is listed as an open Cleanup Program site (SWRCB 2025; DTSC 2025). San Bernardino Fire Department conducts regular inspections of the airport through the Cleanup Program and the site has been listed as inactive as of January 2018. The Proposed Project is not located within an active listed site, and therefore, would not create a significant hazard to the public or the environment. No impact would occur.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

Potentially Significant Impact. As noted in d), the Redlands Municipal Airport is located approximately a quarter mile north of the Project site. The Project is located within the Airport Influence Area (AIA) of the Redlands Municipal Airport. The City has adopted an airport land use planning "local process" under the California Public Utilities Code (PUC) Section 21670.1(c)1. This local process designates the City as the airport land use authority under State law, and the City's Airport Land Use Compatibility Plan (ALUCP) was adopted by the City Council in 1997 and revised in 2003 (City 2003).

The City's General Plan 2035 outlines Airport Compatibility Zones in Figure 7-7: Airport Hazards, outlining portions of the Project site in the 'Approach/Departure Zone' and the 'Extended Approach/Departure Zone,' with the lower portion of the Project site within a 'Common Traffic Pattern Area.' Wabash Ave borders the western edge of the Project site and serves as a direct route to the Redlands Municipal Airport on Sessums Dr (City 2018d; Google 2025).

While the northern portion of the Project is within the 'Airport Noise Contour (60 CNEL),' the proposed redesignation and annexation does not involve any immediate development. Once construction and operation are proposed, an Airport Land Use Compatibility Assessment, Aviation Hazard Risk Assessment, and Federal Aviation Administration (FAA) Coordination Services may be required.

In summary, there is no immediate development or construction proposed at this time and therefore, the Proposed Project would not create a physical impact that could result in a safety hazard for people working within an airport land use area or vicinity of an airport. However, a separate study is being prepared to analyze potential noise impacts due to the vicinity of the Project site. This is a potentially significant impact that will be fully analyzed in the EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. The Project site includes three streets that serve as ingress and egress points: (1) Opal Ave bordering the eastern edge; (2) Wabash Ave along the western edge between the Project site and Redlands Municipal Airport; and (3) San Bernardino Ave along the southern edge.

The Project is located within the County's Emergency Operations Plan (EOP) jurisdiction and the City's Local Hazard Mitigation Plan (LHMP). The County's Fire Department Office of Emergency Services implements the EOP, which includes mitigation programs to protect and equip communities with resources to effectively respond to disasters (County 2018). At the City level, the LHMP outlines mitigation strategies to reduce and/or eliminate impacts from hazards within the City (City 2021a).

The Proposed Project would not create interference with established emergency response or emergency evacuation plans, as there is no proposed alteration of infrastructure identified in an evacuation plan. Future development would require compliance with the County's EOP and City's LHMP. Although no immediate development is proposed at this time, a Transportation / Vehicle Miles Traveled (VMT) report will be prepared to determine the Project's potential impact to an adopted emergency response or emergency evacuation plan, as noted in Section 4.17 d),

Transportation, and Section 4.20 a), Wildfire. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Less than Significant Impact. While the Project site is not within a State Responsibility Area (SRA), the northern portion of the site is bordered by 'Moderate' to 'High' Fire Hazard Severity Zones in a Local Responsibility Area, extending to the west and east of the Project site (CalFire 2025). Future construction and operation associated with industrial and commercial uses would require compliance with CalFire, California Department of Industrial Relations, and Cal-Occupational Safety and Health Administration (OSHA) construction safety guidelines and the City's wildfire policies outlined in Chapter 7: Healthy Community of its General Plan (City 2018d).

The area surrounding the Proposed Project consists of a mix of industrial and commercial storage uses (to the east), Redlands Municipal Airport (to the north), residential developments (to the south), and construction facilities and Redlands Sports Park (to the west). Given the developed nature of the area and minimal vegetation upon the proposed conversion of agricultural to industrial uses, future construction associated with the Project would not exacerbate wildfire risks. Therefore, implementation of the Proposed Project would result in less than significant impacts to people or structures involving wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

Hydrology is the study of the movement, distribution, and quality of water throughout the Earth, and thus addresses both the hydrologic cycle and water resources. Water quality is the physical, chemical, and biological characteristics of water, characterized through the methods of hydrometry. The primary bases for such characterization are parameters which relate to drinking water, safety of human contact, and the health of ecosystems.

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(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 substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	☐	☐	☒	☐
	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?	☐	☐	☒	☐
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. The Project involves annexation and a General Plan Amendment to redesignate the permitted uses of the parcels currently located within unincorporated County area into the City. No immediate development is proposed, and therefore, no physical impacts to the Project site would occur.

Future development would obtain and comply with general construction guidelines and adhere to the City's design standards. Future construction in the Project site would be subject to City, County, and State requirements for erosion control and grading. Because construction activities could disturb one or more acres and more than 50 cubic yards of earth, the Applicant would be required to adhere to the provisions of the NPDES Construction General Permit and obtain a Grading Permit from the City, as noted in Section 4.7 b), Geology and Soils.

Construction activities subject to permits and requirements outlined in Section 4.7b), Geology and Soils could include clearing, grading, and soil disturbance through stockpiling and grading. Future work may require compliance with the NPDES Construction General Permit and implementation of a SWPPP, which would include BMPs designed to prevent erosion and sedimentation in stormwater runoff. These construction BMPs would help retain stormwater and any constituents, pollutants, and sediment on the Project site, which would assist in the prevention of water quality impacts to downstream receiving waters during construction.

Compliance with City, County, and State requirements during future proposed construction could prevent future work from violating water quality standards or waste discharge requirements or degradation of surface or groundwater quality. Impacts therefore would be less than significant.

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

Less than Significant Impact. The Project site currently contains vegetation (e.g., citrus groves and avocado groves) and two single-family residences serviced by the City. Any future development will result in an increase in impervious surfaces associated with industrial uses. The conversion of agricultural land to industrial will inherently increase the impervious surface present due to development (e.g., asphalt and concrete).

The Project site is serviced by existing water supply through the Santa Ana River watershed via on-site irrigation from the Bear Valley Mutual Water Company (City 2021b). Absence of water would not allow the continued growth of the orange trees to fill the property.

At this time, the Project would not involve construction and operations that would decrease groundwater supplies. Future developments may require the preparation of independent assessments to determine if there are adequate water supplies and if the future development would affect groundwater recharge. The General Plan policy 8-A.25 outlines strategies to encourage water conservation and includes use of permeable surfaces, incorporating features to serve recharge, and providing incentives for water efficient fixtures.

Compliance with the General Plan policies would ensure that future development impacts would be adequately addressed. Impacts would be less than significant.

c) Would the project 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 substantial erosion or siltation on- or off-site;

Less than Significant Impact. While there are no streams or rivers on the Project site, the Santa Ana River Watershed is approximately 0.65 miles north of the Project site within the North City Subwatershed. The City's Drainage Master Plan notes the North City Watershed is relatively flat and comprises predominately agricultural and industrial land uses that generally drain to the Santa Ana River (City 2014).

Additionally, as described in Section 4.7 c), Geology and Soils, the Proposed Project site is not located within a liquefaction zone, is relatively flat, and consists of a mixture of well-drained soils – Soboba stony loamy sand, Soboba gravelly loamy sand, and Hanford coarse sandy loam soils (County 2020d; USDA 2025) which have low expansive potential. Once construction is proposed, activities would be conducted in accordance with CBC Chapter 16, Section 1613 Earthquake Loads, which implements seismic design provisions per American Society of Civil Engineers (ASCE) 7, including site class (i.e., soil type). Additionally, future work would require compliance with the City development standards and may require further review of the site plan and design prior to approval. The Project, therefore, would have a less than significant impact on existing drainage patterns and would not result in 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 off-site;
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or

ii and iii)

Less than Significant Impact. As described in a) i) above, the drainage of the site would continue to use the existing drainage pattern of discharging storm runoff into the Santa Ana River Watershed north of the Project boundary. The Project site is relatively flat, and consists of a mixture of well-drained soils – Soboba stony loamy sand, Soboba gravelly loamy sand, and Hanford coarse sandy loam soils – that collectively result in low runoff potential with high infiltration rates (USDA 2025).

As noted, the Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. No construction activities are proposed at this time, and therefore, no increase in runoff would occur. Future construction would require compliance with City requirements and ordinances pertaining to the mitigation of potential erosion, runoff and drainage impacts. Requirements and potential mitigation would be determined on a future project-by-project basis. Therefore, the Proposed Project would have a less than significant impact related to stormwater drainage or polluted runoff.

iv) impede or redirect flood flows?

Less than Significant Impact. As noted in a), the Project site currently contains vegetation (e.g., citrus groves and avocado groves) and two single-family residences. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. As noted, no immediate development is proposed at this time. Any proposed work in the future would result in the conversion of agricultural land to industrial and commercial development which could result in an increase in impervious surfaces, such as asphalt and concrete. Future ground disturbances may require implementation of project-specific BMPs and other operational measures including but not limited to implementing drainage improvements. Therefore, the Proposed Project would have a less than significant impact with impeding or redirecting flood flows.

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

No Impact. A tsunami is a series of waves created when a body of water, such as an ocean, is rapidly displaced. The Project site is located approximately 55 miles inland from the Pacific Ocean, and thus the risk of tsunami-induced inundation is considered very low.

A seiche is a standing wave in an enclosed or partially enclosed body of water. Inland bodies of water within the Project's vicinity include Crafton Hills Reservoir / Dam (approximately 2.1 miles southeast) and Seven Oaks Reservoir / Dam (approximately 3.3 miles northeast) (Google 2025). According to the Department of Water Resources, Division of Safety of Dams, (DSOD), Seven Oaks Dam is classified with an "Extremely High" downstream hazard potential, while Crafton Hills is

classified as "High" (DWR 2025c). However, due to the distance of both dams from the Project site, the likelihood of a seiche-related inundation impacting the site is low.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the Project site, the Project site is located within 'Zone X,' as defined by the FEMA Flood Hazard Layer. 'Zone X' represents areas of minimal flood hazard, located outside the 500-year floodplain, with less than a 0.2% annual change of flooding (FEMA 2023). No portion of the site lies within a Special Flood Hazard Area (SFHA) (i.e., the 100-year floodplain), and thus the site is not subject to federal floodplain development requirements under the National Flood Insurance Program (NFIP).

Given that the site is located well inland from the Pacific Ocean, located more than 2 miles from the nearest dam, and is situated in a FEMA-designated area of minimal flood risk (Zone X), the Proposed Project does not have a high risk of inundation due to being in a flood, tsunami, or seiche zone. No impacts related to these hazards are expected to occur.

e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less than Significant Impact. The City is part of the Santa Ana Regional Water Quality Control Board (RWQCB). The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), which contains water quality standards and an implementation plan to protect the Santa Ana Region's surface and groundwaters.

The City is responsible for monitoring total dissolved solids (TDS) and nitrogen in groundwater every three years starting in 2005 (RWQCB 2020). The City, as part of the Basin Monitoring Program Task Force, must complete a Recomputation of Ambient Water Quality every three years and prepare a Water Quality Report for the Santa Ana River annually (RWQCB 2020). As a result, the City has an active role in collecting data for the management of water quality in the region.

The Project site is in the Upper Santa Ana Valley-San Bernardino Groundwater Basin. According to the Sustainable Groundwater Management Act 2019 (SGMA) Basin Prioritization Dashboard, the groundwater basin is a "Very Low Priority," which means they have minimal impacts or risks to water supply, population, or the environment (DWR 2025a). Therefore, the California Department of Water Resources does not require the formation of a Groundwater Sustainability Agency (GSA) or a Groundwater Sustainability Plan for the Basin (DWR 2025b), resulting in no conflict of a sustainable groundwater management plan by the Project.

As discussed, the Proposed Project does not currently involve any construction activities as the Project is limited to land use redesignation and annexation only. As noted in a), any future development would be required to comply with City, County, and State requirements regarding protection of water quality. Under the General Plan, this may include identifying strategies to encourage water conservation and incorporating site features to allow recharge. Therefore, the Proposed Project would have a less than significant impact on the implementation of water quality control plans or sustainable groundwater management plans.

4.11 LAND USE PLANNING

Cities and counties "plan" in order to identify important community issues (such as new growth, housing needs, and environmental protection), project future demand for services (such as sewer, water, roads, etc.), anticipate potential problems (such as overloaded sewer facilities or crowded roads), and establish goals and policies for directing and managing growth. Local governments use a variety of tools in the planning process including the general plan, specific plans, zoning, and the subdivision ordinance.

The City's General Plan 2035 contains seven thematic chapters, serving as a long-range policy guide for future development and growth. Chapter 4: Livable Community provides key information on land use policies and designations. Similarly, the County's General Plan contains a Land Use Element, outlining specific goals related to land use compatibility and annexations. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. The Project site designated as an 'Agricultural' land use under the City's General Plan, and 'Resource/Land Management' land use under the County's General Plan.

The Project proposes to redesignate the site from its current City General Plan land use of 'Agricultural' to 'Light Industrial' and 'Commercial/Industrial'. Concurrently, the Project would pre-zone the site as 'M-1 (Light Industrial)' and 'C-M (Commercial Industrial'). While no immediate development is proposed at this time, the Project site's pre-zoning would enable future industrial and commercial development upon annexation into the City.

Land use classifications (also referred to as land use categories) are broad designations adopted in the City's General Plan that express the intended long-term use of land – such as 'Agricultural' or 'Light Industrial.' Land use districts are more specific designations established in Title 18 of the City's Municipal Code, which regulates the City's zoning ordinance. These districts, such as 'M-1 (Light Industrial)' and 'C-M (Commercial Industrial),' provide detailed standards and permitted uses that guide how land may be developed (City 2025a).

4.11.1 Impact Analysis

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	☐	☐	☒	☐
(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?	☒	☐	☐	☐

a) Would the project physically divide an established community?

Less than Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. The Project site is surrounded by Redlands Municipal Airport and Open Space (to the north), a mixture of industrial and commercial storage uses (to the east), and a construction facility and Redlands Sports Park (to the

west). Residential development – designated as 'Low Density Residential' in the County's General Plan – are located south of the Project site (City 2018b; County 2020a).

Currently, the Project site is zoned for 'Agricultural' use, with no parcels designated for residential uses. Its eastern portion contains a citrus grove, while its western portion contains a dense stand of trees with a residential structure (9345 Wabash Ave) near its northwestern corner, and another residential structure (1721 San Bernardino Ave) near its center.

While there are two single-family residences on the Project site, it is not an established residential community. Therefore, the Proposed Project would not physically divide an established residential community or involve the construction of new roadways or bridges that would divide the residential community south of the Project site. Additionally, the Proposed Project would result in consistent zoning and land use within the greater area as there are parcels in the vicinity that are developed and used for non-agricultural purposes. Impacts would be less than significant.

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

Potentially Significant Impact. As described above in a), the Proposed Project involves the annexation of parcels currently within unincorporated County area into the City, land use redesignation ('Agricultural' to 'Light Industrial' and 'Commercial/Industrial' according to the City's General Plan), and pre-zoning to 'M-1 (Light Industrial)' and 'C-M (Commercial Industrial).'

Per Section 15382 of the CEQA Guidelines, economic and social changes itself would not be a significant environmental effect. However, if it is related to a physical change, this may be considered an impact. The Proposed Project would comply with the annexation and amendment processes. Should future development occur, it may require a separate analysis to identify if the physical changes could result in a significant environmental impact if the future uses may conflict with any land use plans or policies. Given that the Proposed Project includes a cancellation request of the existing agricultural preserve areas, impacts may be potentially significant. This would be analyzed further in the EIR.

4.12 MINERAL RESOURCES

Mineral resources are commercially viable mineral or aggregate deposits such as sand, gravel, and other construction aggregate. California is the largest consumer of sand and gravel in the nation; but it is also a major provider, producing approximately one billion dollars' worth of mineral resources annually.

The California Geological Survey (CGS) provides objective geologic expertise and information about California's diverse non-fuel mineral resources. Maps, reports, and other data products developed by the CGS staff assist governmental agencies, mining companies, consultants, and the public in recognizing, developing, and protecting important mineral resources. The California Department of Conservation (DOC) protects mineral resources to ensure adequate supplies for future production. The California Surface Mining and Reclamation Act of 1975 (SMARA) was developed to encourage production and conservation of mineral resources, prevent or minimize adverse effects to the environment, and protect public health and safety.

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

4.12.1 Impact Analysis

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the California Division of Mines and Geology, no significant mineral deposits are known to exist in the City. In addition, the City is required by the Surface Mining and Reclamation Act of 1975 (SMARA) to adopt policies recognizing the importance of the identified mineral resources, clarifying the intent that this information is to be used when making land use decisions in areas designated to be of statewide or regional significance, and emphasizing the conservation and development of identified mineral deposits.

The Proposed Project site is not identified as being within a significant mineral resource zone in the DOC's Mineral Land Classification Map. The Proposed Project involves the redesignation and annexation of parcels, and therefore does not involve any mining activities, oil exploration, or drilling (DOC 1986). Should any future construction occur on the Project site, it must be analyzed on a project basis to determine if it could result in impacts related to mineral resource availability, particularly if future work involves mining or drilling activities. No impact would occur.

b) Would the project 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 noted in a) above, the Project proposes to redesignate and annex parcels. No immediate development is proposed at this time, and no mining activities, oil exploration, or drilling would occur. Future construction and operation would occur on land that has not been designated to contain a locally significant resource for minerals. Therfore, no impact would occur.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
(c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

4.13.1 Impact Analysis

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

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. Although no immediate development is proposed at this time, a Noise Report will be prepared to determine the Project's potential impact associated with any future construction or operation and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. Although no immediate industrial or commercial development is proposed at this time, a Noise Report will be prepared to determine the Project's potential impact associated with any future construction or operation and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Potentially Significant Impact. As noted in Section 4.9 d) and e), Hazards and Hazardous Materials, the Redlands Municipal Airport is located approximately a quarter mile north of the

Project site. Therefore, the Project site is within the Redlands Airport Influence Area on the Redlands Municipal Airport Compatibility map (City 2003).

The City's General Plan 2035 outlines Airport Compatibility Zones in Figure 7-7: Airport Hazards, outlining portions of the Project in 'Approach/Departure Zone' and 'Extended Approach/Departure Zone,' with the lower portion of the Project site within a 'Common Traffic Pattern Area.' Wabash Ave borders the western edge of the Project site and serves as a direct route to the Redlands Municipal Airport on Sessums Dr (City 2018d; Google 2025).

While the northern portion of the Project is within the 'Airport Noise Contour (60 CNEL),' the proposed redesignation and annexation do not involve any immediate development. Once construction and operation are proposed, an Airport Land Use Compatibility Assessment, Aviation Hazard Risk Assessment, and Federal Aviation Administration (FAA) Coordination Services may be required.

In summary, there is no immediate development or construction proposed at this time and therefore, the Proposed Project would not create a physical impact that could result in a safety hazard for people working within an airport land use area or vicinity of an airport. However, a separate study is being prepared to analyze potential noise impacts due to the vicinity of the Project site and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be further analyzed in the EIR.

4.14 POPULATION AND HOUSING

Population refers to the occupants of housing projects, population indirectly associated with workers or proposed nonresidential projects, or changes in the amount and distribution of population and employment permitted by adoption or revision to a land use plan. Important areas include changes in the number, characteristics, geographical distribution, and timing of new residents directly or indirectly resulting from a project and the degree to which project-related changes are consistent with city, regional or other adopted population growth policies. Other issues are the degree to which project-related population is already present in the area under analysis (i.e., already residing or working in the area) or whether they represent immigrants.

Housing impacts may result directly from a project, which includes housing units, or indirectly from revisions to the Housing Element in a General Plan or changes in housing demand associated with new non-residential development projects.

A project would have a significant adverse impact if it would induce substantial population growth in an area, either directly by proposing new homes and businesses or indirectly through the extension of roads or other infrastructure; displaced housing units causing the construction of replacement housing somewhere else; or displaced people causing the construction of replacement housing somewhere else.

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

4.14.1 Impact Analysis

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. While no immediate development is proposed at this time, future development would obtain and comply with general construction guidelines and adhere to the City's design standards. Additional analyses may be required to determine the impacts of future development on population growth should future projects include new businesses or require extension of roads and other infrastructure. Given the proposed changes to the Project site, impacts related to unplanned population growth could result in potentially significant impacts. This section will be analyzed further in the EIR.

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

Less than Significant Impact. The Project site contains citrus groves, orange groves, and two single-family residences. Residential development – designated as 'Low Density Residential' in the County's General Plan – are located south of the Project site. The Proposed Project could displace residents of the two single-family residences located within the Project site. However, the Proposed Project would not result in a substantial number of displaced residents or require construction of replacement housing; therefore, impacts would be less than significant.

4.15 PUBLIC SERVICES

Public services include fire, police, schools, parks, and libraries. A project would impact a public service if it would result in an increased demand for that service or if the project would result in a hindrance to that service.

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☒	☐
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

a) *i) 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 fire protection?*

ii) 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 police protection?

Less than Significant Impact. The Proposed Project would not affect the service standards related to police protection and fire protection. The Proposed Project site is located approximately 4.11 miles northeast of the Redlands Police Station and 2.73 miles northeast of the Redlands Fire Station 263 (Google 2025).

The Proposed Project involves only annexation and a General Plan Amendment to redesignate the permitted uses of the parcels. Implementation of the Project would involve no development or construction, resulting in no physical impacts. Therefore, the Project would not result in population growth requiring the expansion of existing services or the creation of new services. There would be no demand for increased police or fire protection throughout the area. The area

is currently being serviced by the Redlands Police Station and Fire Station 263 and would continue to receive the same services as nearby land uses.

Future construction and operation would require coordination with the Redlands Police Department and Redlands Fire Department to ensure industrial and commercial development can be serviced. Additionally, future development would require compliance with Ordinance No. 2986, which establishes Development Impact Fees (DIFs) for new development to recover the costs to the City for the future construction of public infrastructure, facilities, and improvements necessitated by new development. Ordinance No. 2986 Section 5 and 6 provide a breakdown of Fire Protection Facilities Fee(s) and Police Facilities Fee(s), respectively (City 2025b). Impacts to fire and police protection would be less than significant.

iii) 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 schools?

Less than Significant Impact. As noted in Section 4.9 c), Hazards and Hazardous Materials, there are no currently operating schools within one-quarter mile of the Project site. Valley Star High School, located along the eastern border of the Project site on Opal Ave, was closed in 2018 according to the California Department of Education (CDOE 2018).

Other schools near the Project site include Mentone Elementary School (located 1.12 miles southeast), Judson & Brown Elementary school (located 1.18 miles southwest), Redlands East Valley High School (located 1.42 miles south), and Crafton Elementary School (located 1.64 miles south).

As noted above in a) i) and a) ii), the Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. No immediate development is proposed at this time. However, future construction associated with industrial and commercial development may affect schools, which would require coordination and compliance with City requirements, including the payment of DIFs as outlined in Ordinance No. 2968 (City 2025b). Impacts to schools would be less than significant.

iv) 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 parks?

No Impact. The Proposed Project would not induce population growth requiring the extension of existing park services or the creation of new park services. The nearest parks to the Project site are the Redlands Sports Park, located on Dearborn St approximately 0.57 miles west of the Project site, and Crafton Park, located on Orange Blossom Trail approximately 1.44 miles south of the Project site.

Because the Project only involves annexation and redesignation, no immediate development or physical impacts would occur. Future construction associated with industrial and commercial development would require coordination with the Facilities and Community Services Department within the Parks Division, responsible for maintaining 18 established parks that comprise over 253 acres of land throughout the City, and payment of DIFs in accordance with Section 1 Open Space and Parks Fee of Ordinance No. 2968 (City 2025b). As the Proposed Project would not involve any physical impacts to the site, implementation would result in no impacts to parks.

v) 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 other public facilities?

No Impact. As described throughout this section, the proposed activities associated with the Project are defined by redesignation and annexation of currently unincorporated parcels into the City's jurisdiction. While no immediate development is proposed at this time, future industrial and commercial uses could induce growth requiring the extension of existing services or the creation of new services. Therefore, future development would require coordination with governmental facilities and the payment of DIFs, as noted above and may require additional analyses. For the purposes of the Proposed Project, which does not include any physical impacts to the site, the Proposed Project would result in no impacts to other public services.

4.16 RECREATION

Recreational facilities include active and passive facilities. Active recreational facilities include parks, tennis and basketball courts, pools, golf courses, and various other facilities. Passive recreational facilities include plazas and other public places.

A project would result in a significant impact on recreational facilities if it would increase the use of existing parks and facilities such that substantial physical deterioration of the facility would occur or be accelerated, or if the project included recreational facilities or required construction that might have an adverse physical effect on the environment.

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

4.16.1 Impact Analysis

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?

No Impact. The increased use of existing parks and recreational facilities typically results from a substantial increase in population growth or a lack of recreational facilities in an area. The Proposed Project involves the redesignation and annexation of parcels currently located within the unincorporated County area into the City, with no immediate development proposed.

As noted in Section 4.15 a) iv), Public Services, the Proposed Project would not induce population growth requiring the extension of existing park services or the creation of new park services as no new construction is proposed at this time, and any future development that may induce population growth is unknown.

Future construction associated with industrial and commercial development would require coordination with the Facilities and Community Services Department within the Parks Division, responsible for maintaining 18 established parks that comprise over 253 acres of land throughout the City, and payment of DIFs in accordance with Section 1 Open Space and Parks Fee of Ordinance No. 2968 (City 2025b). Therefore, the Proposed Project would not result in a substantial increase in population growth or physical deterioration of recreational facilities; no impacts are expected to occur.

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?

No Impact. As noted above in a), the Proposed Project does not involve the construction or expansion of recreational facilities as it is solely focused on redesignation and annexation.

The Project site is currently designated as 'Agricultural' under the City's General Plan within its Sphere of Influence. The area surrounding the Proposed Project consists of a mix of industrial and commercial storage uses (to the east), Redlands Municipal Airport (to the north), construction facilities and Redlands Sports Park (to the west), and residential development (to the south).

As noted above in a), future development would require coordination with the Facilities and Community Services Department within the Parks Division and payment of DIFs in accordance with Section 1 Open Space and Parks Fee of Ordinance No. 2968 (City 2025b). Therefore, the Proposed Project would not create an adverse physical effect on the environment through construction or expansion of recreational facilities, resulting in no impact.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	☒	☐	☐	☐
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
(d)	Result in inadequate emergency access?	☒	☐	☐	☐

4.17.1 Impact Analysis

a) Would the project conflict with a program, *plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?*

Potentially Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently within unincorporated County area into the City. While no development is proposed at this time, any future industrial and/or commercial development that involves changes or improvements to access and circulation would be reviewed by the City's Engineering Department.

A Transportation / Vehicle Miles Travelled (VMT) report will be prepared to determine the Project's alignment with applicable plans, ordinances, and/or policies addressing the circulation system and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. As noted above in a), the Proposed Project would involve the redesignation and annexation of parcels currently within unincorporated County area into the City. The Project proposes to redesignate the site from its current City General Plan land use classification of 'Agricultural' to 'Light Industrial' and 'Commercial/Industrial'. Concurrently, the Project would pre-zone the site as 'M-1 (Light Industrial)' and 'C-M (Commercial Industrial)' to accommodate future commercial and/or industrial development upon annexation into the City (City 2018b; City 2025a).

The Proposed Project only involves annexation and redesignation, with no immediate development proposed that could cause physical impacts. A Transportation / VMT report will be prepared to determine the Project's potential impact related to VMT and would consider the

maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

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

Potentially Significant Impact. As noted, the Proposed Project does not propose immediate industrial or commercial development. The Proposed Project would therefore not introduce new traffic flows associated with construction or alter roadways surrounding the Project site.

As described in b) above, the site is currently designated as 'Agricultural' under the City General Plan land use classification. Upon redesignation to 'Light Industrial' and 'Commercial/Industrial' and annexation, the Project site will be compatible with future industrial or commercial uses and therefore would not introduce incompatible uses.

Although no immediate development is proposed at this time, a Transportation VMT report will be prepared to determine the Project's impact and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

d) *Would the project result in inadequate emergency access?*

Potentially Significant Impact. The Project site is accessible through Wabash Ave and Opal Ave. Any future construction and operation of the Proposed Project would not interrupt emergency access to and from the Project site.

As noted in Section 4.9 f), Hazards and Hazardous Materials, future operation of the Proposed Project would not interfere with implementation of the San Bernadino County Emergency Operations Plan (EOP) or the City's Local Hazard Mitigation Plan (LHMP), as there is no proposed alteration of infrastructure identified in an evacuation plan. Future construction associated with industrial and commercial development would comply with the County's EOP and City's LHMP (County 2018; City 2021a). Although no immediate development is proposed at this time, a Transportation / VMT report will be prepared to determine the Project's impact on emergency access and would consider the maximum development allowed under the existing development regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

4.18 TRIBAL CULTURAL RESOURCES

This section describes the potential tribal cultural resources effects from implementation of the Proposed Project.

18.	TRIBAL CULTURAL RESOURCES. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	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	☒	☐	☐	☐
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

4.18.1 Impact Analysis

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

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

a) & b) Potentially Significant Impact. Tribal cultural resources are defined in Public Resources Code §21074 as sites, features, places, cultural landscapes, or objects of cultural value to a California Native American tribe, which are either (1) listed or eligible for listing in the California Register of Historical Resources, or (2) included in a local register of historical resources.

As noted in Section 4.5 a) and b), Cultural Resources, and Section 4.7 f), Geology and Soils, Cultural Resources Report, California Historical Resources Information System (CHRIS) records search, and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search will be conducted to determine the Project's impact on historical, archaeological, and paleontological resources. Additionally, the Proposed Project requires compliance with Assembly Bill 52.

Assembly Bill (AB) 52 requires public agencies to consult with tribes that may have a traditional affiliation to a project area to gather information on a site's sensitivity and identify if any mitigation measures would be required to preserve discovered or undiscovered tribal cultural resources. AB 52 tribal consultation is **CURRENTLY** in progress in compliance with CEQA requirements and will be fully analyzed in the EIR.

4.19 UTILITIES AND SERVICE SYSTEMS

Utilities and service systems include potable water and wastewater treatment. The quantity of water consumed and wastewater generated by a project is determined by several factors, including the size, type, and characteristics of the project. The need for construction of new or replacement water and wastewater treatment facilities (e.g., reservoirs, storage tanks, water mains, filtration plants, pumps, wells, and other connections or distribution facilities) would depend on the existing capacity and anticipated demand for the Proposed Project site.

The City operates its own water and wastewater utilities, cemetery, airport, landfill and solid waste services (City 2023).

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☒	☐	☐	☐
(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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	☐	☐	☒	☐

4.18.2 Impact Analysis

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

Less than Significant Impact. The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. No immediate industrial or commercial development is proposed at this time.

The City is served by the Redlands Municipal Utilities and Engineering Department, which manages the delivery of essential utility and infrastructure services (City 2024). The City's General Plan 2035 Chapter 4: Livable Community, Section 4.2: Principles of Managed Development, Policy 1.A.20 (Principle 2, Section b): Extension of Public Utilities Outside the City Limits states:

"No extension of City provided utility services to areas outside the City limits shall occur until such areas are properly annexed to the City, except that utility services may be extended to areas outside the City limits without prior annexation if all of the following conditions are met:

- The area to be served is not contiguous to the City; and
- The City and the land owner have entered into a properly recorded and binding pre-annexation agreement establishing covenants running with the land that assure full compliance with all development standards of the City, payment of all capital improvement and other development fees which would be applicable to the property if it were within the City limits at the time of extension of such services, and immediate processing of annexation to the City at the City's request; and;
- The land owner agrees as a condition of extension of utility facilities to serve the proposed development to pay the full cost of such extension of such utility facilities." (City 2018b)

By pursuing annexation prior to service extension, the Project would comply with and support the City's long-term planning policies and service delivery framework. Once development is proposed, any future industrial or commercial development would be serviced by Southern California Gas Company for natural gas, Southern California Edison for electricity, Charter Communications for telecommunication services, and the City for water and wastewater. There are existing connections in the vicinity of the Project site for gas and electricity. Will Serve letters would be required from Southern California Gas Company and Charter Communications.

As noted in Section 4.10 b), Hydrology and Water Quality, the City provides water to the City and its Sphere of Influence, with over 23,600 municipal water service connections in 2020. The service area encompasses 22 square miles within the City and 7 square miles outside City limits within its Sphere of Influence.

The City's 2020 Integrated Regional Urban Water Management Plan (IRUWMP) indicates the 2030 water supply, including recycled water, is 32,238 AF. The projected water use in 2030 is 26,860 AF, including 3,145 AF of Commercial/Industrial use (City 2021b). Additionally, the City's Wastewater Master Plan Wastewater Treatment Plant (WMPWTP) capacity analysis indicated

that the present treatment system is sufficient to meet projected demands in the near terms, long term, and ultimate buildout (City 2021c).

The Proposed Project does not involve any immediate development and therefore would not result in significant impacts related to exceedance of City capacity for utilities. However, future construction and operation would require compliance with City requirements to ensure adequate services. Impacts would be less than significant.

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

Potentially Significant Impact. As described in Section 4.10 b), Hydrology and Water Quality, the City's 2020 Integrated Regional Urban Water Management Plan (IRUWMP) indicates the City obtains the majority of its surface water from the Santa Ana River Watershed (located approximately 0.65 miles north of the Project site) and Mill Creek Watershed, groundwater from Bunker Hill Basin and Yucaipa Basin, recycled water, and small amounts of imported water from the State Water Project (SWP) as needed.

During wet years, the City contributes to regional efforts to recharge the Bunker Hill groundwater basin with SWP water and local surface water in wet years to optimize water availability during dry years, when other supplies may be limited (City 2021b).

The IRUWMP includes a water supply reliability assessment analysis up to five consecutive dry water years. The assessment is based on a 10% increase throughout the five-year drought, to be conservative. The long-term analysis of the groundwater table during average years and multi-dry years indicates that the supply will still be capable of meeting the City's demand through 2045; the groundwater portion is projected to be 17,484 acre-feet with Bunker Hill and Yucaipa basins combined.

According to Senate Bill (SB) 610, a Water Supply Assessment (WSA) would be required for proposed large-scale development projects to ensure that there is sufficient water supply. Triggers for an WSA would involve a water-demand project consisting of either a residential development of more than 500 dwelling units, shopping center or business establishment employing more than 1,000 person or more than 500,000 square feet of floor space (250,000 square feet for commercial office), hotel or motel having more than 500 rooms, or an industrial, manufacturing or processing plant or industrial park to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

Given the proposed rezone of the Project site, and with the potentially available acreage for future development, impacts may be potentially significant. This section would be analyzed further in the EIR.

c) *Would the project 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. The City's Wastewater Master Plan future flow projections included 1.1 million gallons per day (MGD) of wastewater flow for 55 developments currently planned to

be built between 2020 and 2030, in addition to the City-wide forecasted population growth (City 2021c). As no immediate industrial or commercial development is proposed at this time, the Project would have no impact on wastewater treatment capacity. Future construction and operations may require analyses to assess impacts on wastewater treatment capacity as it would be based on the proposed uses of the parcels. Thie includes adherence with General Plan policy 8-P.6 with use of local surface sources and identifying water management practices and conservation measures. Therefore, the Proposed Project would result in a less than significant impact related to wastewater treatment.

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?*

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

d &e) **Less than Significant Impact.** The California Street Landfill is owned and operated by the City and has a remaining capacity of 4,184,751 cubic yards and a permitted throughput of 829 tons per day (CalRecycle 2025). As stated in the Redlands Strategic Plan, in 2017, the City Council adopted a new solid waste rate structure, including funding designated for capital improvement projects and the purchase of more efficient landfill equipment (City 2023). This has resulted in increasing usable capacity of the landfill by 42 percent. SB 1383, effective January 1, 2022, brought regulations aimed to divert 50% of organic waste from landfills below 2014 levels by 2020 and 75% by 2025. The Strategic Plan also states the City has met and exceeded all required state mandates outlined in SB 1383.

The Proposed Project involves the redesignation and annexation of parcels currently located within unincorporated County area into the City. As noted, no immediate development is proposed at this time. Future development could result in an increase in impervious surfaces associated with industrial or commercial uses and require additional material that could increase the generation of solid waste. Future proposed construction and operational shall adhere to the City's goals that 75% of solid waste generation be source-reduced, recycled or composted. Mitigation measures may be required associated with the potential need to expand landfills. Further analyses may be required to assess the impacts of future development regarding solid waste generation. Therefore, impacts would be less than significant.

4.19 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
(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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐

4.19.1 Impact Analysis

a) Would the project impair an adopted emergency response or emergency evacuation plan?

Potentially Significant Impact. The Proposed Project involves annexation and a General Plan Amendment to redesignate the permitted uses of the parcels and does not propose any immediate development. While the Project site not within a State Responsibility Area (SRA), the northern portion of the site is bordered by 'Moderate' to 'High' Fire Hazard Severity Zones in a Local Responsibility Area, extending to the west and east of the Project site (CalFire 2025).

The Proposed Project is located within the County's Emergency Operations Plan (EOP) jurisdiction and the City's Local Hazard Mitigation Plan (LHMP). The County Fire Department Office of Emergency Services implements the EOP, which includes mitigation programs to protect and equip communities with resources to effectively respond to disasters (County 2018). At the City level, the LHMP outlines mitigation strategies to reduce and/or eliminate impacts from hazards within the City (City 2021a).

Given the Proposed Project is limited to annexation and redesignation, no immediate development or construction would cause any physical impacts. Therefore, the Project would not interfere with the implementation of existing emergency response plans. Future industrial and/or commercial development that involves changes or improvements to access and circulation would be reviewed by the City's Engineering Department and would require compliance with the County's EOP and City's LHMP.

As noted in Section 4.9 f), Hazards and Hazardous Materials and Section 4.17 d), Transportation, the Project site includes three streets that serve as ingress and egress points: (1) Opal Ave

bordering the eastern edge; (2) Wabash Ave along the western edge between the Project site and Redlands Municipal Airport; and (3) San Bernardino Ave along the southern edge. A Transportation / VMT report will be prepared to determine the Project's impact on emergency access and would consider the maximum development allowed under the existing regulations. This is a potentially significant impact that will be fully analyzed in the EIR.

b) *Would the project, 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?*

Less than Significant Impact. The Project site currently contains vegetation (e.g., citrus groves and avocado groves) and two single-family residences. The Proposed Project involves only annexation and redesignation, with no immediate development or construction that would cause physical impacts. Future development could result in an increase in impervious surfaces associated with urban uses. The area surrounding the Proposed Project consists of a mix of industrial and commercial storage uses (to the east), Redlands Municipal Airport (to the north), residential developments (to the south), and construction facilities and Redlands Sports Park (to the west).

The conversion of agricultural land to non-residential designations will inherently increase the impervious surface present due to development (e.g., asphalt and concrete). It is important to note that while no immediate development is proposed at this time, future development would require compliance with City requirements. The General Plan provides policies and actions to ensure that risks would be minimized for development within a fire hazard zone (7-A.90, 7-A.92 – 96, and 7-A.100) which requires that new development ensure that the area has adequate services and safe infrastructure, would minimize the risk by incorporating fuel modification or brush clearance techniques, coordinate with the Fire Department to identify prevention strategies, and adhere to requirements under the Redlands Fire Department's Prevention Standard for "Fire Safety Modification Zones 1 and 2."Adherence to the listed policies and actions would result in a less than significant impact.

c) *Would the project 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. As stated above in b), the Project site not within a State Responsibility Area (SRA), but the northern portion of the site is bordered by 'Moderate' to 'High' Fire Hazard Severity Zones in a Local Responsibility Area, extending to the west and east of the Project site (CalFire 2025). The Project site currently contains vegetation (e.g., citrus groves and avocado groves) and two single-family residences. Future development could result in an increase in impervious surfaces associated with industrial uses. The area surrounding the Proposed Project consists of a mix of industrial and commercial storage uses (to the east), Redlands Municipal Airport (to the north), residential developments (to the south), and construction facilities and Redlands Sports Park (to the west).

However, as stated above in b), the Project would not exacerbate wildfire risks. If future development were to necessitate the construction of new roads, the City's Engineering Department would review any proposed changes or improvements to access and circulation. Additionally, any development would require adhering to the standards set forth in the actions

listed above with regard to new development. Adherence to the General Plan, and in coordination with the City and Fire Department, impacts would be less than significant associated with infrastructure that may exacerbate fire risk.

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

Less than Significant Impact. As discussed in Section 4.7 a) iv), Geology and Soils, the Project site is not in a landslide susceptibility zone (County 2020d). The elevation profile on Google Earth illustrates average slope of 2%, indicating the Project site is relatively flat (Google 2025). While no immediate development is proposed at this time, future development of the Project site would require grading and finished pad construction in accordance with the California Building Code. Therefore, implementation of the Proposed Project would result in a less than significant impact to people or structures involving downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.

4.20 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
(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?)	☒	☐	☐	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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?*

Potentially Significant Impact. As discussed in Section 4.4, Biological Resources, the Biological Resources Report (Appendix A) described the Project site is an active orchard that has been significantly disturbed and is bordered by development. While the Project is located south of Merriam's kangaroo rat designated critical habitat, no immediate industrial or commercial development is proposed at this time. However, if the site does eventually go into development, updated surveys or reports may be required to confirm the site conditions. All special status plant and wildlife species were considered absent from the Project site due to a lack of suitable habitat for these species.

If construction activities associated with industrial or commercial development occur, to minimize potential impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA), these activities should take place outside the nesting season (February 1 to August 15). If construction activities occur during nesting season, a preconstruction nesting bird survey should be conducted prior to initiation of ground-disturbing activities. To the maximum extent practicable, a minimum buffer zone around occupied nests should be determined by a qualified biologist to avoid impacts to the active nest. The buffer should be maintained during physical ground-disturbing activities. Once nesting has ceased and the nestlings have fledged, the buffer may be removed. Additional

measures or studies may be required once development is proposed. Therefore, impacts would result in a less than significant impact.

Additionally, as described in Section 4.5, Cultural Resources, the Proposed Project currently does not involve ground-disturbance associated with development, as it solely focuses on redesignation and annexation. However, a Cultural Resources Report will be prepared and impacts to historical, archaeological, and paleontological resources will be fully analyzed in the EIR.

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

Potentially Significant Impact. As discussed in this IS, potential Project-related impacts are either less than significant, or would result in no impact related to most of the following impacts: 4.1, Aesthetics; 4.4, Biological Resources; 4.7, Geology and Soils (non-paleontology); 4.9, Hazards and Hazardous Materials (transport, release, proximity to schools and hazardous sites, wildland fires); 4.10, Hydrology and Water Quality; 4.11, Land Use Planning; 4.12, Mineral Resources; 4.14, Population and Housing; 4.15, Public Services; 4.16, Recreation; 4.19, Utilities; and 4.20, Wildfire. Given these impacts would be less than significant or mitigated to a less than significant level, the Proposed Project's contribution to cumulatively considerable impacts would be less than cumulatively considerable.

However, the Proposed Project has the potential to result in significant impacts for several other environmental topics that will be further analyzed in the EIR, including: 4.2, Agriculture and Forestry Resources; 4.3, Air Quality; 4.5, Cultural Resources; 4.6, Energy; 4.7, Geology and Soils (Paleontological Resource); 4.8, Greenhouse Gas Emissions; 4.9, Hazards and Hazardous Materials (Noise, Emergency Evacuation Plan); 4.13 Noise; 4.17, Transportation; and 4.18, Tribal Cultural Resources. Therefore, the Proposed Project's contribution to cumulatively considerable impacts will be further analyzed in the EIR.

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

Potentially Significant Impact. Substantial adverse effects on human beings directly or indirectly are primarily resulting from impacts to air quality, geology and soil, greenhouse gas emissions, hazardous materials, land use, noise, and wildfire. The Project currently focuses on the redesignation and annexation of parcels, and no immediate development is proposed. However, appropriate technical studies will be prepared to assess the Proposed Project's impacts for environmental topics (listed above in b) that have the potential to result in significant impacts and will be further analyzed in the EIR, including: 4.2, Agriculture and Forestry Resources; 4.3, Air Quality; 4.5, Cultural Resources; 4.6, Energy; 4.8, Greenhouse Gas Emissions; 4.13 Noise; 4.17, Transportation; and 4.18, Tribal Cultural Resources.

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