Pioneer Park Specific Plan Project

Initial Study/Mitigated Negative Declaration

Lead Agency:

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

Project Applicant:

Redlands Pioneer Partners, LLC
4350 Von Karman Aveneu, Suite 200
Newport Beach, CA 92660

CEQA Consultant:

EPD SOLUTIONS, INC
3333 Michelson Drive, Suite 500
Irvine, CA 92612

June 2026

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Acronym List

A-P	Alquist-Priolo Earthquake Fault Zoning Act
AQMP	Air Quality Management Plan
AB	Assembly Bill
APN	Assessor's Parcel Numbers
BMPs	Best Management Practices
CARB	California Air Resources Board
CBC	California Building Code
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CFC	California Fire Code
CNEL	Community Noise Equivalent Level
dBA	A-weighted decibel
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse Gas
LHMP	Local Hazard Mitigation Plan
MBTA	Migratory Bird Treaty Act
MSHCP	Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrogen Oxides
O_3	Ozone
PM	Particulate Matter
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SOx	Sulfur Oxides
SWPPP	Stormwater Pollution Prevention Plan
TPZ	Timberland Production Zone
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
UWMP	Urban Water Management Plan
WQMP	Water Quality Management Plan

1. INTRODUCTION

1.1. PURPOSE OF THE INITIAL STUDY

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

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

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project, described in greater detail in Section 3.0, *Project Description*. As required by State CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Redlands, to determine if a Mitigated Negative Declaration or an Environmental Impact Report is required to evaluate the potential environmental impacts associated with the Project.

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

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

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

1.2. DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

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

Section 2. Environmental Setting

Provides information about the proposed Project's location.

Section 3. Project Description

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

Section 4. Environmental Checklist

Includes the summarized results for the Environmental Checklist from Appendix G of the State CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment. Identifies if an EIR is required, and if one is, what environmental topics need to be analyzed in the EIR.

Section 5. Environmental Analysis

Includes the information and data that were analyzed leading to the results of the Environmental Checklist.

Section 6. References

Includes sources supporting the information and analysis in this document.

2. ENVIRONMENTAL SETTING

2.1. PROJECT LOCATION

The Project site is situated in the northern portion of the City of Redlands within San Bernardino County. The Project site is located east of State Route 210 (SR-210), north of West San Bernardino Avenue, south of West Pioneer Avenue and is bisected by Tennessee Avenue. Regional access to the site is provided via SR-210 and Interstate 10 (I-10). Local access to the Project site is provided via West San Bernardino Avenue and West Pioneer Avenue. The Project site and the surrounding area are shown in Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*.

2.2. EXISTING LAND USE

The Project site encompasses approximately 35.31 gross acres (30.98 net acres), inclusive of four parcels identified by Assessor's Parcel Numbers (APN) 0167-091-09, -10, -11, and -012. The site was historically utilized for agricultural activities and is currently vacant and undeveloped. It is primarily vegetated with unplanned, non-native grasses, along with sparse shrubs. A portion of the site is developed with Tennessee Avenue, which bisects the site from West San Bernardino Avenue to West Pioneer Avenue. Existing conditions of the Project site and adjacent uses are shown in Figure 2-3, *Aerial View*, and Figures 2-4a and 2-4b, *Existing Site Photos*.

2.3. EXISTING GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The Project site has an existing General Plan Land Use Designation of Commercial (C) and is zoned as a Specific Plan Area, as shown on Figure 2-5, *General Plan Land Use*, and Figure 2-6, *Zoning Designation*. The Project site is located within the East Valley Corridor Specific Plan (EVCSP) (SP 40) area and is designated as Special Development District (EV/SD) by the Specific Plan. The EV/SD designation is intended to provide an alternative, more flexible site planning process which encourages creative and imaginative planning of administrative professional, commercial or industrial developments, or a mixture of such uses, within the framework of a single cohesive concept plan.

2.4. SURROUNDING LAND USES

The surrounding land uses are described in Table 2-1 along with the General Plan land use and zoning designations.

Table 2-1: Surrounding Existing Land Use and Zoning Designations

	Land Use	General Plan Land Use Designation	Zoning
North	West Pioneer Avenue followed by construction of a residential development (TTM No. 20528) to the northwest and Citrus Valley High School to the northeast	West: Medium Density Residential East: Public/Institutional	Specific Plan 64 Science Research Park (EV/SRP)
South	West San Bernardino Avenue followed by vacant land	Commercial (C) and Medium Density Residential	Concept Plan 4 and Multiple Family Residential District
East	Single-family residences	Low Density Residential (LDR)	Specific Plan 62 (SP62)
West	SR-210 followed by industrial uses	General Industrial (GI) (Unincorporated San Bernardino County)	Special Development District (EV/SD) (SP 40)

Figure 2-1: Regional Location

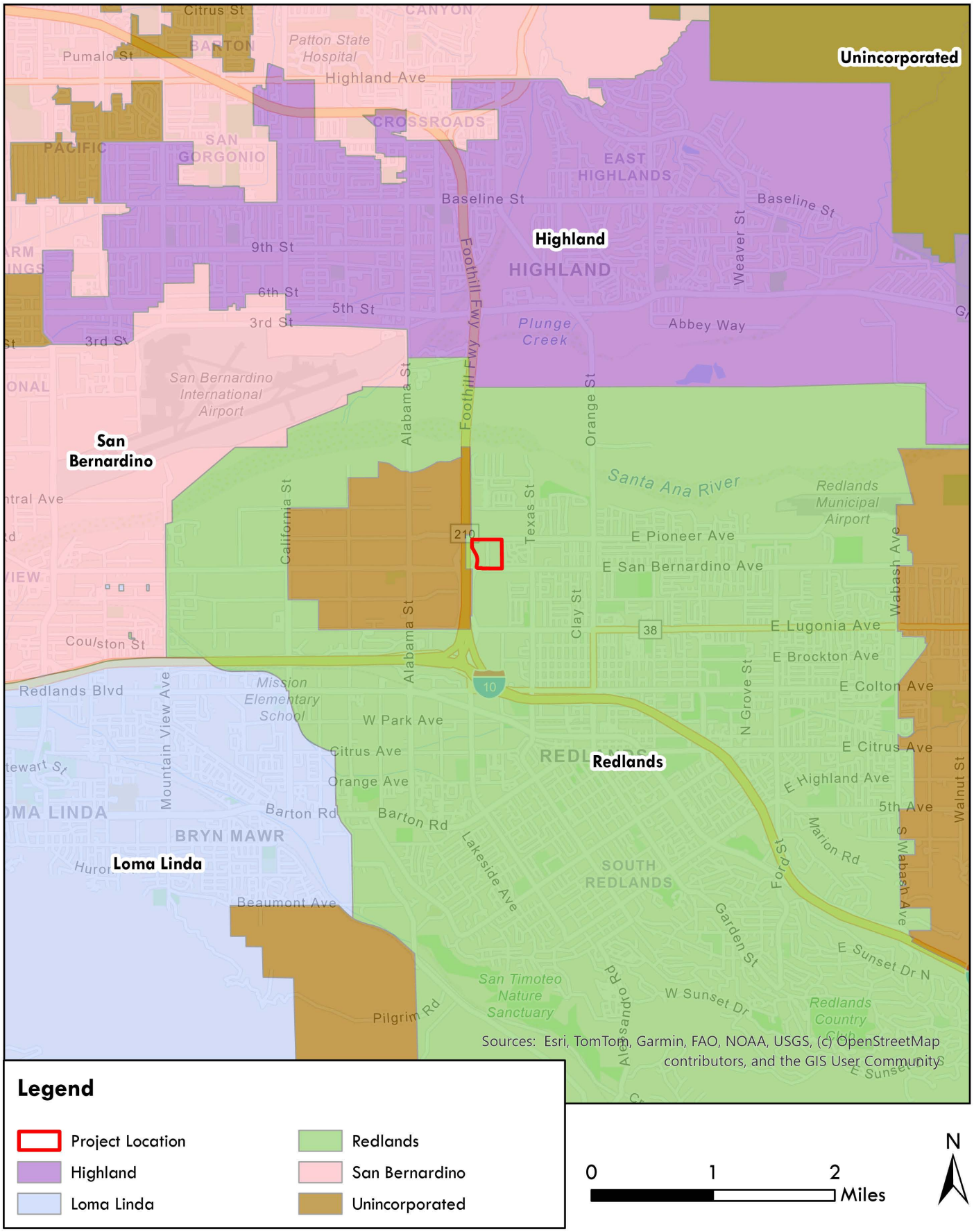

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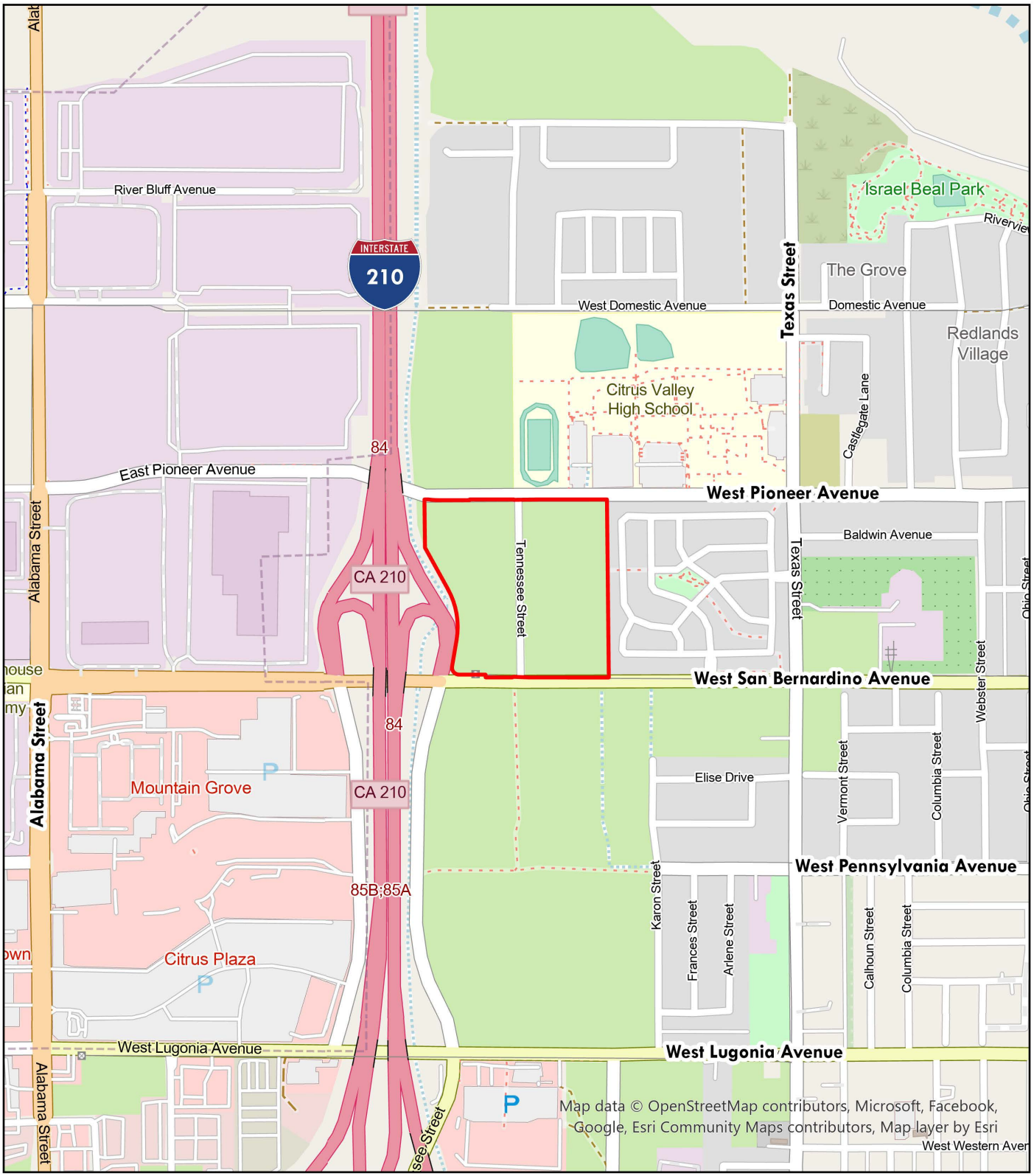
Figure 2-2: Local Vicinity



Legend

Project Boundary

0 0.15 0.3 Miles

N

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Figure 2-3: Aerial View

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Legend

Project Boundary

0 200 400 US Feet

N

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Figure 2-4a: Existing Site Photos Locations

Created with Vertical © 2025 Nearmap US, Inc.

Legend

Project Boundary

Photo Location

0 200 400 US Feet

N

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Figure 2-4b: Existing Site Photos

Photo 1: View of Project Site from northeast corner facing south along eastern edge of boundary.

Photo 2: View of Project Site from northeast corner facing west along northern edge of boundary.

Photo 3: View of Project Site from southwest corner facing north along western edge of boundary.

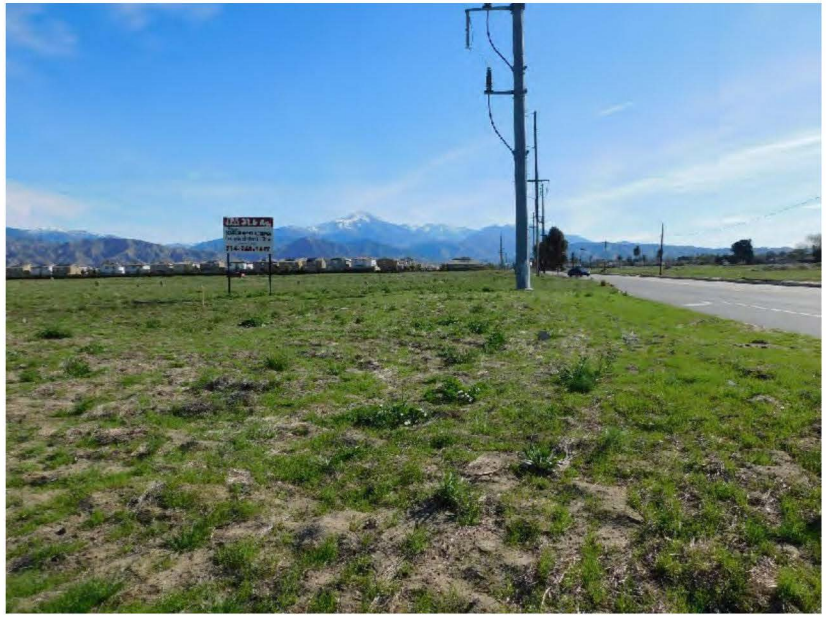

Photo 4: View of Project Site from southwest corner facing east along southern edge of boundary.

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Figure 2-5: Existing General Plan Land Use

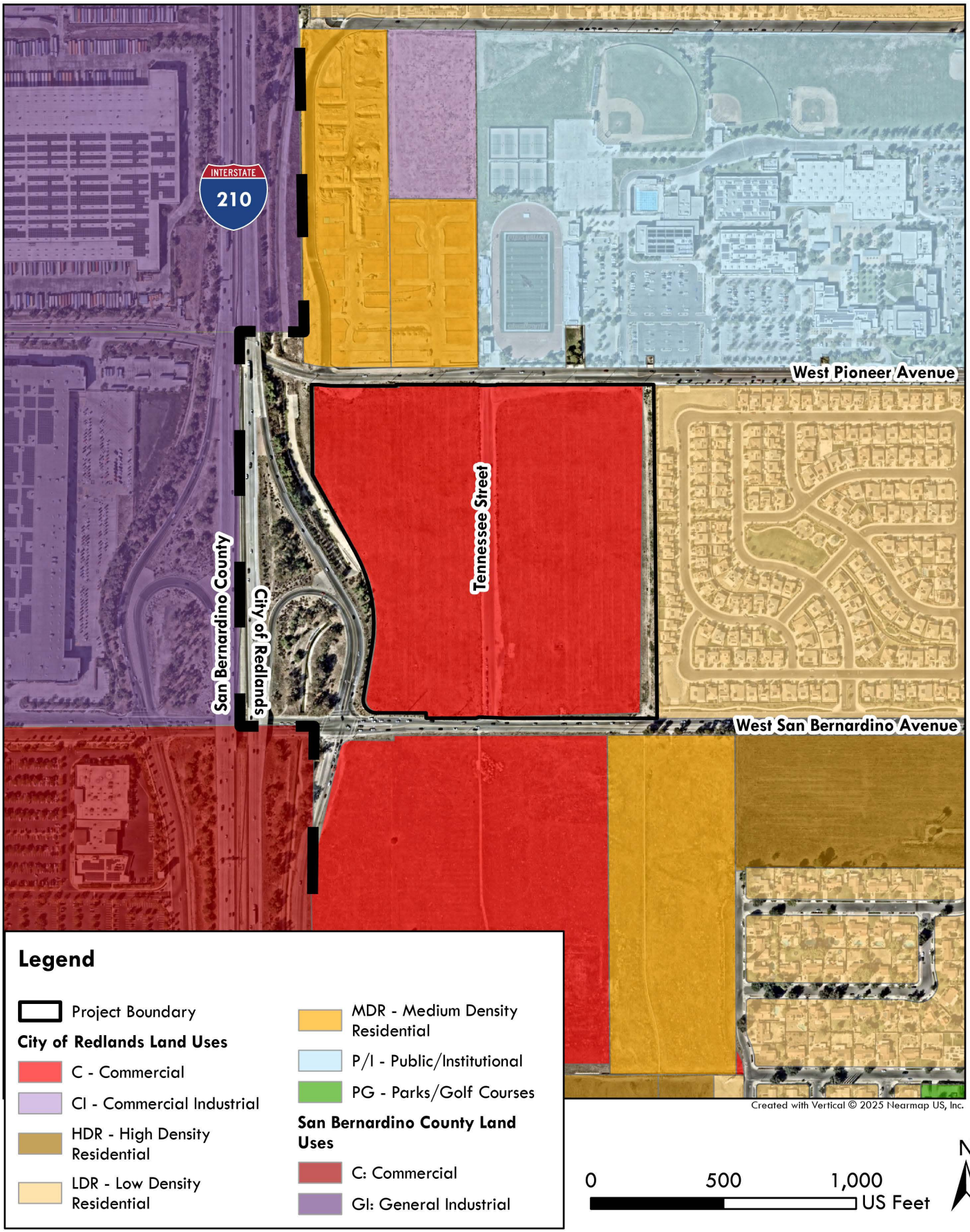

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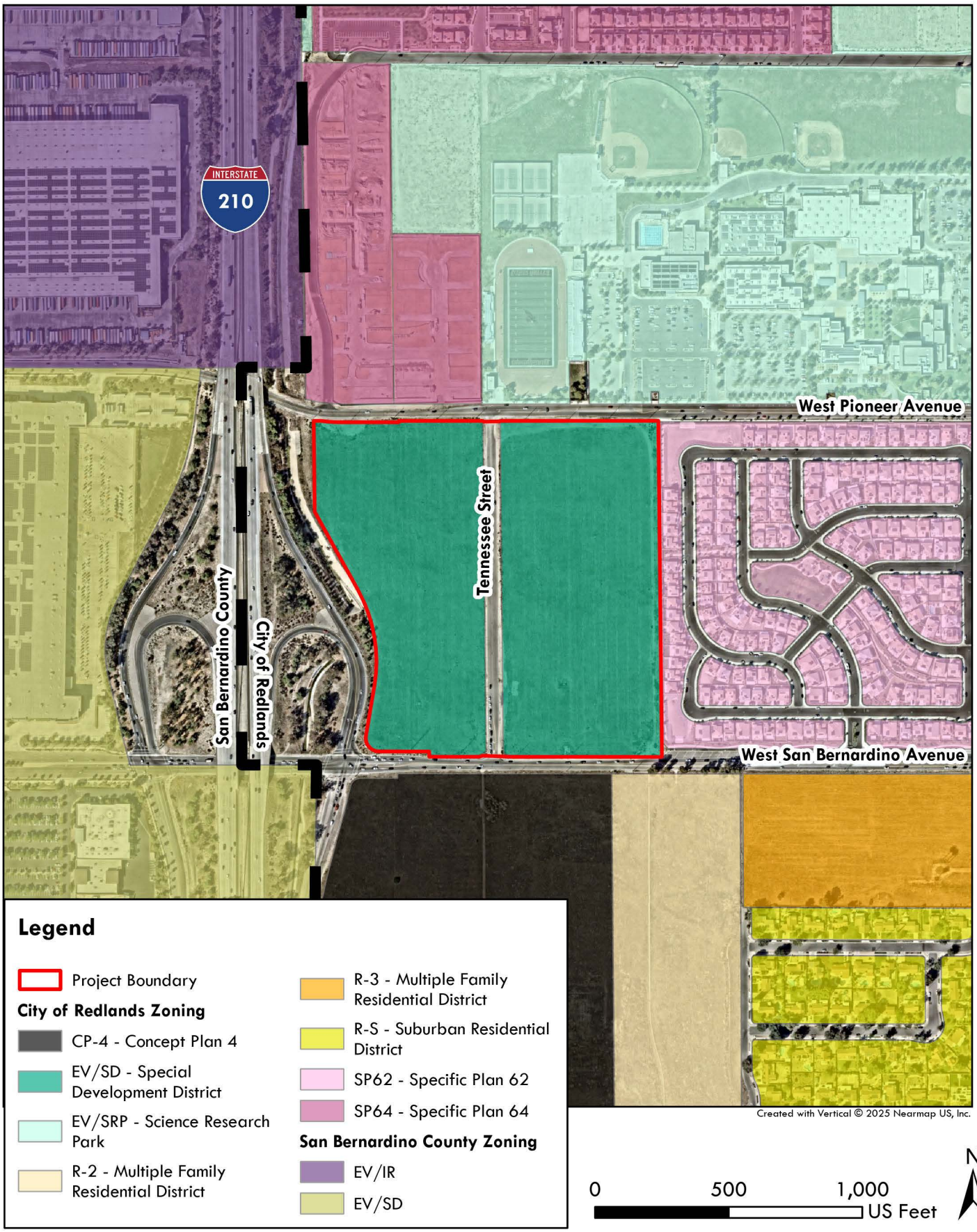
Figure 2-6: Existing Zoning



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3. PROJECT DESCRIPTION

3.1. PROJECT OVERVIEW

The proposed Project consists of a General Plan Amendment, Specific Plan Amendment, adoption of the new Pioneer Park Specific Plan ("Specific Plan" or "PPSP"), and Tentative Tract Map (TTM), to allow for residential development on four parcels covering 35.31 gross acres ("Specific Plan Area" or "Project site") in the City of Redlands. The proposed Specific Plan would include two zoning designations: Single-Family Residential (SFR) would cover a 30.56-acre portion of the Project site with an allowed density range of 8-9 dwelling units per acre (du/ac), and Multiple-Family Residential (MFR) would cover an approximately 0.42-acre portion of the Project site with an allowed density range of 16-17 du/ac. The proposed Specific Plan zoning would allow for a maximum of 275 single-family residences and seven multifamily units, for a total of 282 residences. The proposed Specific Plan provides a conceptual land use plan, regulations, guidelines, and programs for development of the Project site into a residential community in a manner consistent with the goals, objectives, principles, and policies of the City's General Plan. The proposed Specific Plan is designed to provide flexibility for development within the Project site. Additional improvements associated with the Project include roadway improvements, bicycle and pedestrian facilities, parking, landscaping, parks and recreation facilities, and utility infrastructure (on-site and off-site).

General Plan Amendment

The proposed General Plan Amendment would amend the City's General Plan Land Use Map by changing the existing land use designation of the Project site from Commercial (C) to Medium Density Residential (MDR). Figure 3-1, *Proposed Land Use Designation*, shows the proposed land use designation on the site.

Specific Plan Amendment

The Project site encompasses four parcels located within the East Valley Corridor Specific Plan (SP 40). The Project would include a Specific Plan Amendment to SP-40 to remove the Project site from the existing plan in order to adopt the new Pioneer Park Specific Plan (PPSP).

Zone Change

The proposed Project would require a zone change in order to change the zone of the site fromSP 40 to the Pioneer Park Specific Plan (SP 67). Upon adoption, the site would have a Specific Plan (SP 67) Zoning Map Designation. Refer to Figure 3-2, *Proposed Zoning*, for the proposed zoning on the site.

Pioneer Park Specific Plan

The PPSP proposes residential development within 30.98 net acres of the 35.31 gross acre site. The remaining 4.33 acres would be dedicated to the City as part of the public right-of-way along San Bernardino Avenue, Pioneer Avenue, and New York Street (proposed). The proposed Specific Plan would include two zoning designations: Single-Family Residential (SFR) would cover a 30.56-acre portion of the Project site with an allowed density range of 8-9 du/ac, and Multiple-Family Residential (MFR) would cover an approximately 0.42-acre portion of the Project site with an allowed density range of 16-17 du/ac. The

proposed Specific Plan would allow for a maximum of 275 single-family residences and seven multifamily units, for a total of 282 residences. Refer to Figure 3-3, *Proposed PPSP Designation*, for the proposed PPSP designations on the site.

Tentative Tract Map

The proposed Project includes approval of a Tentative Tract Map (TTM) to allow development of 256 residential lots, consisting of 255 single-family lots and one multifamily lot located in the northeast corner of the site. The multifamily lot would be developed with seven townhome units, resulting in a total of 262 residential units. Buildout under the TTM would not exceed the maximum development intensity permitted by the proposed Specific Plan (282 units) and is therefore accounted for in the analysis of maximum buildout within the Specific Plan Area included in this IS/MND.

The proposed TTM includes public right-of-way dedication and improvements along the Project site frontage on West Pioneer Avenue to the north and West San Bernardino Avenue to the south in order to continue the meandering sidewalk that currently exists to the east of the Project frontage. Refer to Figure 3-4, *Proposed Tentative Tract Map*.

Tennessee Street. As part of the Specific Plan and Tentative Tract Map 20797, the segment of Tennessee Street within the Specific Plan Area is proposed to be vacated and substituted by New York Street (proposed) along the eastern border of the Project site.

New York Street. New York Street is a planned street running north-south along the eastern edge of the Specific Plan Area and is identified as a modified road in the City of Redlands General Plan Connected City Element. The Specific Plan includes a modified design standard for this public collector street consisting of a 66-foot right-of-way, a 44-foot curb-to-curb width, a 5-foot-wide sidewalk on the west side, and an 11-foot-wide multi-use trail on the east side of the roadway. Curb and gutter designs are consistent with the City's standards.

West San Bernardino Avenue. Additional right-of-way dedication and street improvements along the southern frontage of the Specific Plan Area would include a 7-foot-wide sidewalk and 4-foot-wide landscape buffer within the 120-foot right-of-way.

West Pioneer Avenue. Additional right-of-way dedication and street improvements along the northern frontage of the Specific Plan Area would include a 5-foot-wide sidewalk and 6-foot-wide landscape buffer within the 66-foot right-of-way.

3.2. PROJECT FEATURES

Development Summary

The proposed Project would allow for the construction of up to 282 residential units, including 275 single-family homes and seven multifamily units.

Parking and Access

Each single-family residence within the Specific Plan Area would include parking within a two-car garage or carport, with multifamily residences within the Specific Plan Area parked based on unit size in either a

garage, carport, and/or unenclosed parking configuration. In addition to the specific single-family and multifamily spaces, unassigned and uncovered guest spaces in designated parking areas as well as on-street parking spaces on the on-site neighborhood streets would be available throughout the Specific Plan Area. The parking requirements for the housing types within the Specific Plan Area are summarized in Table 3-1, *Specific Plan Parking Requirements*.

Table 3-1: Specific Plan Parking Requirements

Specific Plan Zoning	Off-Street Parking
SFR	2 covered spaces per unit
MFR	1.5 spaces per unit, plus 1 guest space per 2 units

Proposed on-site roadways within the Specific Plan Area would connect to existing perimeter streets to the north and south as well as New York Street (proposed) to the east. The main neighborhood entry would be from New York Street (proposed), with secondary entries from West San Bernardino Avenue and West Pioneer Avenue. Internal circulation would be provided via internal streets designed to meet local circulation, safety, and access standards. The internal street layouts offer a variety of configurations, with roadway widths of 36 feet to accommodate two-way vehicle travel and emergency vehicle movements. Several street sections would include parallel parking lanes on both sides to provide on-street guest parking. Sidewalks would be provided throughout the Project site, with landscaped parkways included in select sections to enhance the streetscape and pedestrian environment. Curb and gutter improvements would also be constructed along both sides of the internal streets to manage stormwater runoff and define vehicular and pedestrian space.

Fencing and Walls

The proposed Project would include a variety of perimeter and interior fencing, and walls designed to provide privacy, security, and site screening. Block walls would be proposed to separate areas of private and public use, such as the backyard of units facing roadways. Privacy fences would be installed between individual residential lots to provide separation and privacy for future residents. Recreational and open space areas would be surrounded by a 36-inch wood split rail fence.

Landscaping

The proposed Project would include landscaped areas distributed throughout the Project site, including along internal streets, site perimeters, and within common open space areas. Landscaping would consist of street trees, perimeter planting, and landscaped parkway and setback areas designed to enhance visual quality, provide shade, and soften the interface between development areas and adjacent uses. Landscaped areas would be located along the northern and southern boundaries of the Project site and within internal circulation areas. Additional landscaping development standards are described in Appendix A of the Specific Plan.

Photovoltaic (PV) Solar

Consistent with the 2025 California Energy Code (Title 24 Part 6), the proposed Project would include photovoltaic (PV) solar panels on the rooftops of each residence and would meet all other Title 24 Part 6 requirements related to energy efficiency and low impact development (LID) standards.

Open Space

The proposed Project would provide a combination of private and common open space designed to support the recreational and aesthetic needs of future residents. A minimum of 50 square feet (SF) of private open space would be provided for each multifamily unit and a minimum of 200 SF of common open space would be provided for each unit within the Specific Plan Area.

Infrastructure Improvements

Lighting

Proposed outdoor lighting would be typical of residential uses and would consist of wall-mounted lighting and pole-mounted lights along the proposed internal roadways. The proposed Project's outdoor lighting would be directed downward and shielded to minimize any off-site light spillover.

Gas and Electric

The proposed Project would be served by Southern California Edison for electricity and Southern California Gas for natural gas. There are existing overhead electric lines along West San Bernardino Avenue, south of the Project site. In addition, existing gas lines are located in the vicinity of the Project site.

Water and Sewer

Potable water service for the proposed Project would be provided via the installation of on-site eight-inch water lines located within the Project's internal roadways. The on-site system would connect to an existing sixteen-inch public water line located in Pioneer Avenue to the north and an eight-inch water line located within San Bernardino Avenue to the south. The proposed Project would also be responsible for developing 1,100 linear feet of an 8-inch non-potable water line within San Bernardino Avenue which would connect to the existing non-potable water lines located within San Bernardino Avenue to the east and west of the Project boundaries.

Sanitary sewer service would be provided through the installation of eight-inch sewer lines within the internal roadways, which would connect to the proposed eight-inch sewer main located along the within Pioneer Avenue to the north of the Project site as well as a 21-inch sewer main located within San Bernardino Avenue to the south of the Project site. The proposed Project would also include installation of 600 linear feet of an 8-inch sewer main within Pioneer Avenue to join the existing sewer main located west of the Project site.

Stormwater Drainage

Stormwater from the Project site would be managed through a combination of on-site infiltration basins and underground drainage infrastructure designed to comply with applicable municipal stormwater management standards. The Project proposes two infiltration basins: the first basin would be located in

the southwestern portion of the site with an 8,735 SF surface area; the second basin would be located in the northwestern corner of the site with a 22,090 SF surface area.

A new 24-inch storm drain line would be installed within the proposed interior roadways to convey stormwater to the proposed on-site basins. The basin located in the southwestern portion of the site would ultimately discharge to an existing 24-inch storm drain line located along the southwestern boundary of the Project site. The basin located in the northwestern portion of the site would ultimately discharge into the trapezoidal concrete open channel located immediately west of the Project site.

3.3. CONSTRUCTION

Construction activities for the proposed Project would occur over one phase, beginning the second quarter of 2027. Construction would occur in the following stages: (1) site preparation; (2) grading; (3) building construction; (4) paving; and (5) architectural coatings. Construction shall be permitted Monday through Saturday from 7:00 a.m. to 6:00 p.m. and prohibited on Sunday or nationally recognized holidays, pursuant to the City's Municipal Code Section 8.06.090(F).

The proposed Project grading would include 47,731 cubic yards (CY) of cut and 39,336 CY of fill. Therefore, the total export required for the Project construction would be approximately 8,395 cubic CY.

3.4. OPERATIONS

Upon completion, the proposed Project would operate as a residential community consisting of 275 single-family homes and seven multifamily units. Residential operations would be typical of medium-density housing and would include standard activities such as vehicle ingress/egress, waste collection, landscaping maintenance, and utility usage. The proposed Project is anticipated to be operational and occupied by 2028.

3.5. DISCRETIONARY ACTION CHECKLIST

The following discretionary approvals from the City of Redlands, as Lead Agency, are anticipated to be necessary for implementation of the proposed Project:

- Adoption of the Pioneer Park Specific Plan
- Adoption of a Specific Plan Amendment
- Adoption of a General Plan Amendment
- Adoption of a Zoning Map Amendment
- Approval of Tentative Tract Map (TTM)
- Approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permits, etc.

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Figure 3-1: Proposed Land Use Designations

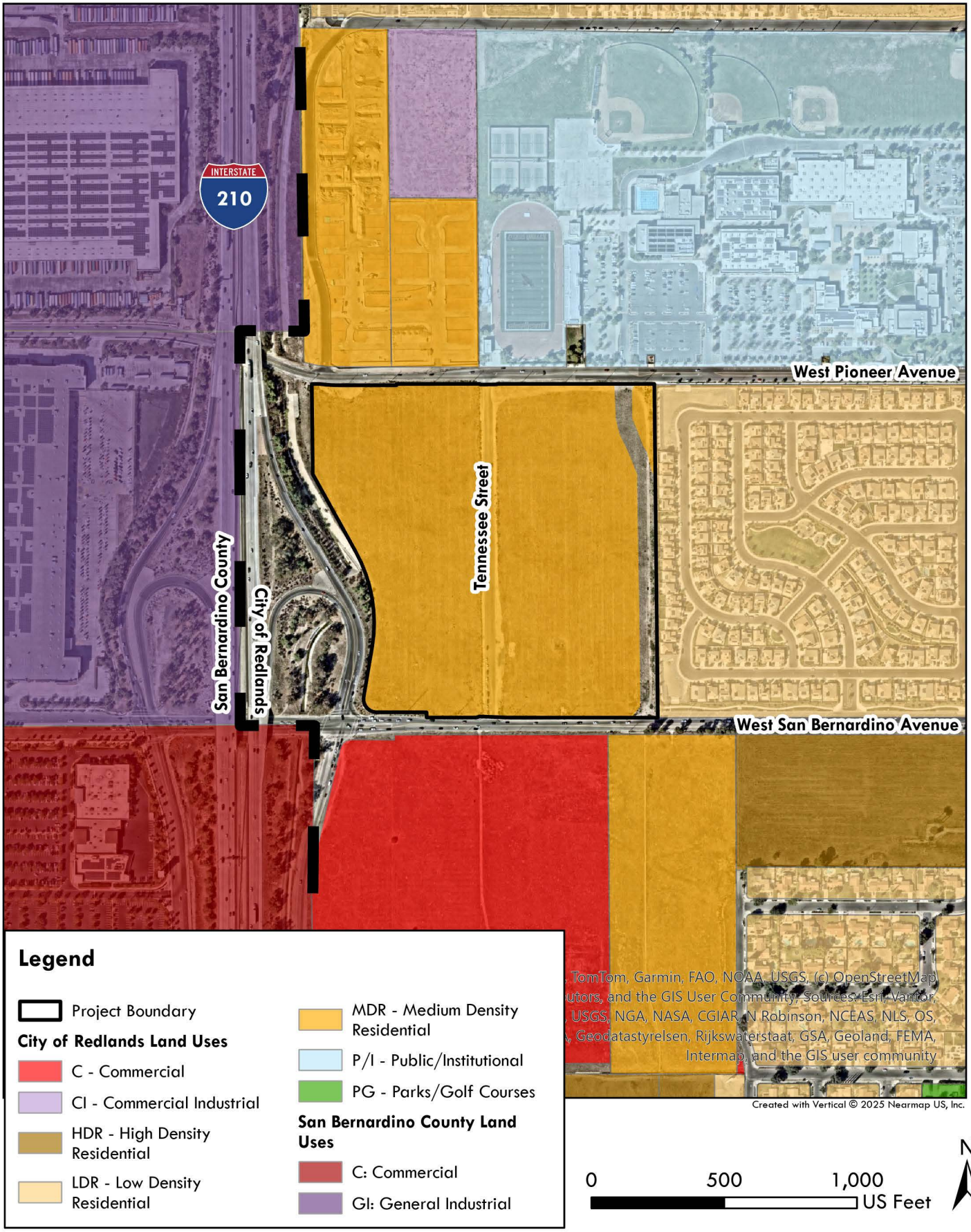

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Figure 3-2: Proposed Zoning

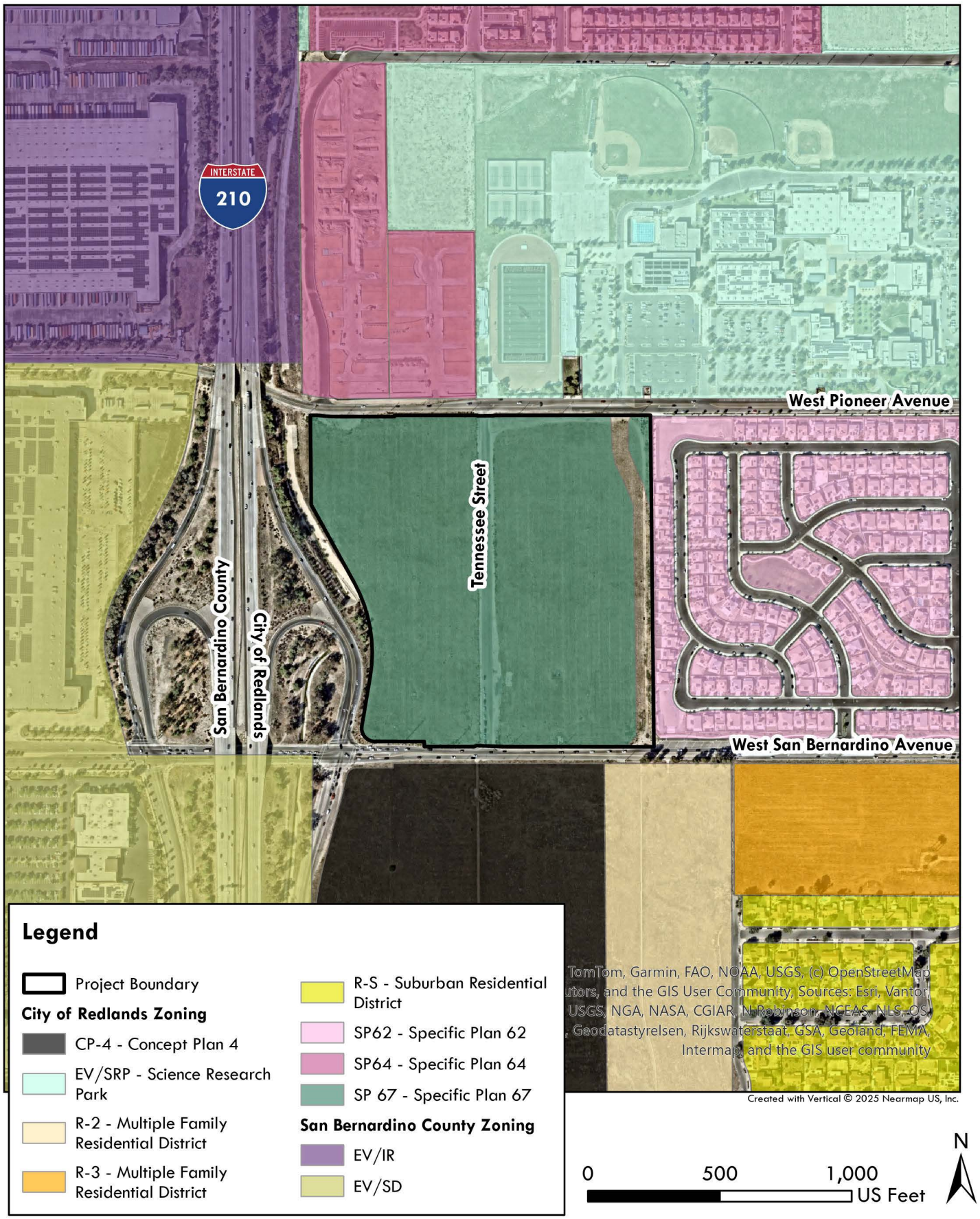

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Figure 3-3: Proposed PPSP Zoning

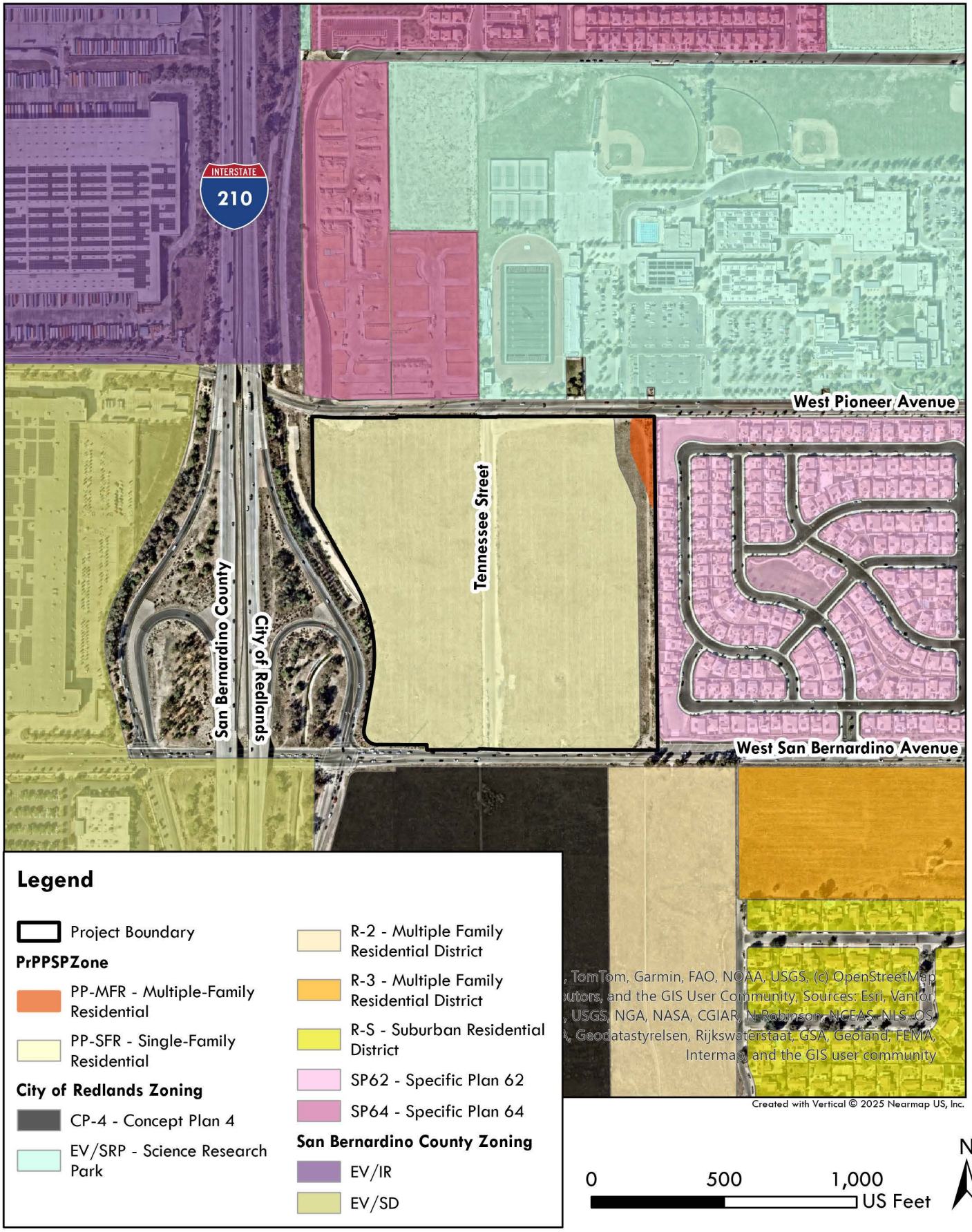

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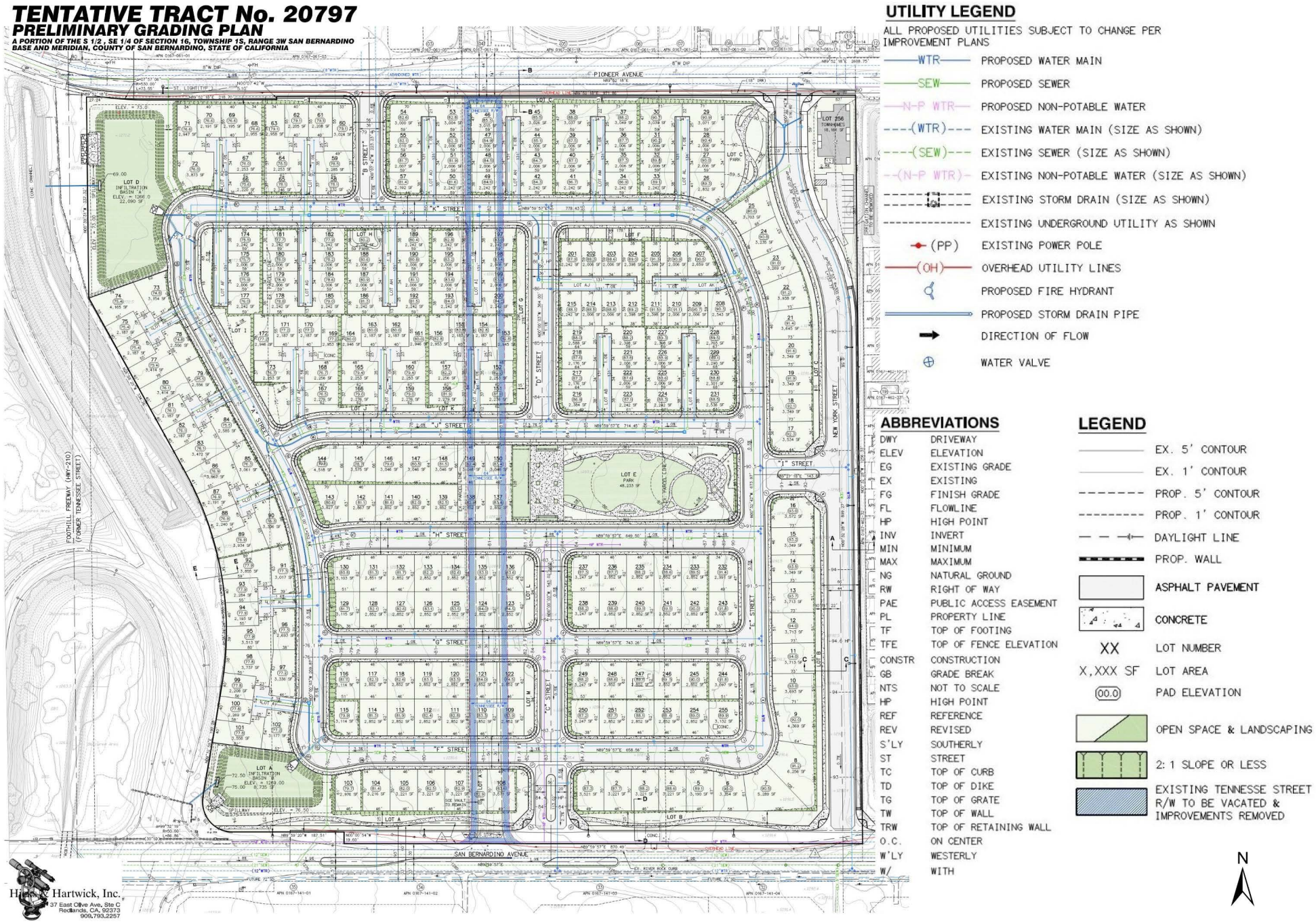
Figure 3-4: Proposed Tentative Tract Map



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4. ENVIRONMENTAL CHECKLIST

4.1. BACKGROUND

Project Title: Pioneer Park Specific Plan
Lead Agency: City of Redlands
Lead Agency Contact: Kevin Beery, Senior Planner
Project Location: City of Redlands
Project Sponsor's Name and Address: Redlands Pioneer Partners, LLC 4350 Von Karman Avenue, Suite 200 Newport Beach, CA 92660
Existing General Plan and Zoning Designation: General Plan Land Use Designation: Commercial Zoning Designation: East Valley Corridor Specific Plan (SP 40)
Project Description: The proposed Project consists of a General Plan Amendment, Specific Plan Amendment, adoption of the new Pioneer Park Specific Plan ("Specific Plan"), and Tentative Tract Map (TTM), to allow for residential development on four parcels covering 35.31 gross acres ("Specific Plan Area" or "Project site") in the City of Redlands. The proposed Specific Plan would include two zoning designations: Single-Family Residential (SFR) would cover a 30.56-acre portion of the Project site with an allowed density range of 8-9 dwelling units per acre (du/ac), and Multiple-Family Residential (MFR) would cover an approximately 0.42-acre portion of the Project site with an allowed density range of 16-17 du/ac. The proposed Specific Plan zoning would allow for a maximum of 275 single-family residences and seven multifamily units, for a total of 282 residences.
Surrounding Land Uses and Setting: North: West Pioneer Avenue followed by construction of a residential development (TTM No. 20528) to the northwest and Citrus Valley High School to the northeast West: SR-210 followed by industrial uses South: West San Bernardino Avenue followed by vacant land East: Single-family residences

4.2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐	Aesthetics	☐	Agriculture/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 and Service Systems	☐	Wildfire	☒	Mandatory Findings of Significances

4.3. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARACTION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “potentially significant” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier analysis pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature	Date
Kevin Beery, Senior Planner	City of Redlands
Name and Title	Lead Agency

4.4. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
1. 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.
2. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
3. "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).
4. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Guidelines Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:

    - Earlier Analysis Used. Identify and state where they are available for review.
    - Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    - Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

5. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
6. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
7. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
8. The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5. ENVIRONMENTAL ANALYSIS

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

5.1. AESTHETICS

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

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

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

As discussed in the City of Redlands General Plan EIR, scenic vistas in the City consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives (City of Redlands, 2017a). The Project site is located within a developed area of the city that is not designated as having a Resource Preservation land use category and is not located within a Historic or Scenic Preservation District. The Project vicinity consists of an urbanized environment that does not include or provide scenic vistas. While long range views of the San Bernardino Mountains are provided from surrounding roadways, land use changes that would occur under the Project are near already developed

areas of the City and coincide with areas designated for development under the current General Plan land use designations. Additionally, structures resulting from the Project would be generally within the heights of the existing developed areas and within the development guidelines set forth in the Municipal Code to ensure they would not block views of or from these scenic vistas as the structures would be consistent with views presently found in the area. In addition, buildout of the residences would be required to adhere to the Specific Plan setback requirements as shown in Table 5.1-1, which would ensure that public long-range views of the San Bernardino Mountains would not be impacted by the proposed development.

The General Plan includes several policies pertaining to preserving the unique visual qualities of the City's natural environment, including waterways, open space, hillsides, and vegetation. The General Plan includes policies to reduce the deterioration of these natural features, and consequently their scenic qualities. Future Specific Plan development would still be subject to development and planning review and must therefore conform to the proposed Specific Plan, zoning, and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks. Due to the siting and nature of the proposed land use changes, and General Plan policies that ensure that new development would have minimal impact on scenic corridors and other scenic resources, the proposed Project would have a less than significant impact on scenic vistas.

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

Less Than Significant Impact. There are currently no designated State scenic highways within the vicinity of the Project site. However, State Route (SR) 38 is an eligible, however not officially designated, State scenic highway (Caltrans, 2018). SR 38 is located approximately 1 mile southeast of the Project site, with various commercial and residential developments between the highway and the proposed Project site. Thus, the Project site is not within the viewshed from SR 38. The City has designated numerous roadway segments as scenic highways, drives, and historic streets subject to special development standards (City of Redlands, 2017b). The proposed Project site is not located adjacent to or within the viewshed of any of the City designated scenic/historical streets. As such, the Project would not result in the potential to damage scenic resources within a State- or City-designated scenic highway or roadway. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Project site is located within a developed urban environment, surrounded by single-family residential development to the east, a highway followed by industrial development to the west, Citrus Valley High School to the north, and vacant land to the south. As described previously, the Project site has an existing General Plan land use designation of Commercial and zoning designation of East Valley Corridor Specific Plan (SP-40). The proposed Project would require a General Plan Amendment to change the land use and zoning of the site to Medium Density Residential (MDR) and a zoning map change to remove the parcel from the SP-40 into the proposed Pioneer Park Specific Plan. The proposed land use designation and Specific Plan allow the Project programming and parameters to be consistent with the applicable design and development standards of the City of Redlands Municipal Code. Table 5.1-1, *Specific Plan Development Standards*, below, includes the PPSP's

development standards for both the Single-Family Residential and the Multiple-Family Residential designations. The MDR land use designation allows low- and medium-rise multi-unit buildings with an allowed density of up to 15 dwelling units per acre (du/ac). The proposed Specific Plan would allow for a maximum density of 9.23 du/ac, which is within the densities allowed under the MDR land use.

Table 5.1-1: Specific Plan Development Standards

Development Standard	PPSP Land Use	
	PP-SFR	**PP-MFR**
Min./Max Dwelling Units per Gross Acre[1]	8-9 du/ac	16-17 du/ac
Min. Lot Area	2,000 sf per du	18,000 sf
Max. Lot Coverage	65%	35%
Min. Lot Depth	50 ft	No Minimum
Min. Lot Width	30 ft	No Minimum
Max. Building Height	2 ½ stories or 35 feet	2 ½ stories or 35 feet
Min. Setbacks[2,3]		
Front Yard[4]	3 ft	15 ft
Side yard	4 ft	10 ft
Street Side Yard[4]	3 ft	19 ft
Rear Yard	10 ft	10ft
Garage/Carport	3 ft or 18 ft	20 ft
Min. Off Street Parking	2 covered spaces per unit	1.5 spaces per unit; plus 1 guest space per 2 units
Min. Private Outdoor Living Space	-	50 square feet per unit
Min. Common Outdoor Living Space	200 sf/unit	200 square feet per unit
Max. Fence and Wall Height		
Front Yard	3 ft	3 ft
Street Side Yard	6 ft	3 ft
Side/Rear Yard	6 ft; 8 ft allowed where required for fire protection	6 ft
Signage	Signage shall be permitted as per the provisions of the Redlands Sign Code	
Accessory Building	Accessory building development standards shall be as required by Chapter 18.20.160 (Accessory Buildings) of the Redlands Municipal Code. Except minimum separation distances from other buildings on the same site shall be per the building code	

[1] Gross acreage = total acreage less proposed West Pioneer Avenue and West San Bernardino Avenue rights-of-way and New York Street right-of-way.

[2] Uncovered parking in PP-MFR allowed within required yard setbacks.

[3] Roof eaves/overhangs may encroach up to 2 ft into a required yard. Separation between eaves/overhangs between buildings shall be a minimum of 4 ft.

[4] Porches may encroach up to 2-ft in the required front yard for Single-Family Plan 1-3 in the PP-SFR zone. Patios, porches, and balconies may encroach up to 3-ft in the required front yard and street side yards in the PP-MFR zone.
[5] Required off-street parking for PP-MFR may be uncovered.

The proposed Project would not degrade the existing character or quality of the site and its surroundings. All final designs of the proposed Project, including but not limited to the proposed buildings, signage, and landscape/hardscape features, would be required to conform to all applicable City design standards and would be subject to City review and approval, which would ensure that the proposed Project would not substantially degrade the existing visual character and quality of the Project site and its surroundings. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

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

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

Construction

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

Operation

Future development could add additional nighttime light sources, such as landscape lighting, security lighting, lighting from additional cars, and lighting emanating from proposed residences. Glare is not expected to result from the increase in pavement or from any future structures as non-reflective materials and architectural coatings would be utilized in the Project design in accordance with Redlands Municipal Code Section 18.12.170(B)(7) and Specific Plan design standards. Buildout of the Specific Plan would include specific setbacks, lighting standards, and building materials that would ensure the avoidance of

potential lighting impacts. Further, all future projects would be required to comply with the City's General Plan Policy 2-A.35 which calls for the development of standards for exterior lighting for new developments, which would be verified through plan check prior to project approval. Therefore, impacts related to lighting and glare would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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 conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The State of California Department of Conservation's Farmland Mapping and Monitoring Program is charged with producing maps for analyzing impacts on the state's agricultural resources. California's agricultural lands are rated based on soil quality and irrigation status. For CEQA purposes, the

following categories qualify as "Farmland": Prime Farmland, Farmland of Statewide Importance, and Unique Farmland.

The proposed Project would develop up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street. The Project site currently has a General Plan land use designation of Commercial (C), is zoned as Specific Plan Area, and is located within SP 40, which designates the site as Special Development District (EV/SD). While the Project site was historically utilized for agricultural activities there are currently no agricultural activities within or adjacent to the Project site.

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation and is identified as "Grazing Land" by the Department's California Important Farmland Finder (California Department of Conservation, 2022). Per Section 21060.1 of the State CEQA Guidelines, Farmland of Local Importance and Grazing Land are not considered Farmland. Therefore, there would be no impacts related to the conservation of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance from the proposed Project.

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

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments.

The Project site currently has a General Plan land use designation of Commercial (C), is zoned as Specific Plan Area, and is located within SP 40, which designates the site as Special Development District (EV/SD). The Project site is not designated or zoned for agricultural use, is not currently utilized for agricultural activities, and is not subject to a Williamson Act Contract. In addition, the Project is identified as "Grazing Land" by the Department's California Important Farmland Finder (California Department of Conservation, 2022). Therefore, development of the site for residential uses would not have an impact on existing agricultural zoning or a Williamson Act contract, and no impact would occur.

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

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

The Project site is currently vacant and predominantly undeveloped, consisting of disturbed land that does not support any natural plant communities. The site is bisected by Tennessee Street, which runs north to south through the center of the property, and is located within a mostly urbanized and developed area of the City. There are no forest lands or resources on or in proximity to the Project site. Additionally, the

Project site is not designated or zoned for forest or timber land or used for forestry. As such, development of the proposed Project would have no impact on forest land or resources.

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

No Impact. The Project site is currently vacant and predominantly undeveloped, consisting of disturbed land that does not support any natural plant communities. The site is bisected by Tennessee Street, which runs north to south through the center of the property, and is located within a mostly urbanized and developed area of the City. There are no forest lands or resources on or in proximity to the Project site. Therefore, development of the proposed Project would not cause loss of forest land or convert forest land to non-forest use. No impact would occur to forest land or timberlands.

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

No Impact. The proposed Project includes a General Plan Amendment to change the existing land use designation of the Project site from Commercial (C) to Medium Density Residential (MDR) and a Specific Plan Amendment to remove the site from SP 40 and incorporate it into the proposed PPSP to allow for the development of up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street.

The proposed Project site was historically developed with agricultural resources but has been vacant since 2003. Since the Project site was utilized for agricultural resources in 1986, any rezoning of the site is subject to review by the City Council to confirm consistency with the necessary findings in Section 2-C of the City of Redlands Measure U. As previously discussed within this section, the Project site does not contain existing farmland or forest land, and therefore, development of the Project would not convert farmland or forest land. The Project site and some of the surrounding areas are identified as “Grazing Land by the Department’s California Important Farmland Finder; however, per Section 21060.1 of the State CEQA Guidelines, Farmland of Local Importance and Grazing Land are not considered Farmland. The remainder of the surrounding area is identified as “Urban and Built-Up Land,” while land directly adjacent to the east is classified as “Farmland of Statewide Importance” and “Prime Farmland”. This adjacent land, however, has recently been developed with a residential neighborhood. Based on the site location and its urban nature, the proposed Project would not cause conversion of farmland or forest land. Therefore, the Project would result in no impact.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.3. AIR QUALITY

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

This section was prepared using the Air Quality, Energy, and GHG Impact Analysis Report prepared by EPD Solutions, Inc. in March 2026 (Appendix A) and the Construction Health Risk Assessment prepared by EPD Solutions, Inc. in March 2026 (Appendix B).

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

Less Than Significant Impact. The Project site is located in the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and State Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. The current AQMP is the 2022 AQMP, adopted in December 2022.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). SCAQMD's CEQA Handbook provides the following two criteria to determine whether a project would be consistent or in conflict with the AQMP:

1. The Project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts from the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); and
2. The Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to SCAG's growth forecasts and the associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's regional growth projections, which rely in part on the general plans of jurisdictions within the SCAG region. Therefore, if the level of housing and employment growth related to the proposed Project is consistent with the

applicable assumptions used in the development of the AQMP, the proposed Project would not jeopardize attainment of the air quality levels identified in the AQMP.

Implementation of the proposed Project would require approval of a General Plan Amendment and Specific Plan Amendment. The amendments would change the Project site's existing land use designation in the City's General Plan Land Use Map from Commercial (C) to Medium Density Residential (MDR) and remove the site from the existing SP 40 in order to allow its incorporation into the proposed PPSP. The PPSP would allow buildout of the site with up to 275 single-family homes and seven multi-family homes.

The Project does not include employment generating uses and would not induce substantial unplanned employment growth or exceed regional growth assumptions for the area. Population growth associated with the Project was evaluated using assumptions consistent with SCAG Local Housing Data. Based on the City of Redlands reported average household size of 2.65 persons per household, the Project would generate approximately 748 residents.

According to SCAG growth forecasts, the population of the City of Redlands is projected to increase from approximately 69,500 persons in 2016 to approximately 80,800 persons in 2045. The population increase associated with the Project would represent a negligible increment of projected regional growth and would be consistent with the growth assumptions used in the development of the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was utilized during development of the 2022 AQMP. Accordingly, the Project would not result in growth beyond that analyzed in the 2022 AQMP and would not jeopardize attainment of regional air quality standards. Therefore, the Project would be consistent with the applicable General Plan and zoning framework and would satisfy Consistency Criterion No. 1.

Consistency Criterion No. 2 refers to the California Ambient Air Quality Standards. An impact would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds during construction or operation. Furthermore, the SCAB is in a non-attainment status for federal ozone standards and State and federal particulate matter standards. Any development in the SCAB, including the proposed Project, has the potential to cumulatively contribute to these pollutant violations. Should construction or operation of the Project exceed these thresholds a significant impact could occur. However, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

As presented in Tables 5.3-2 and 5.3-3 below, neither construction nor operation of the proposed Project would result in emissions that would exceed any applicable SCAQMD thresholds. Therefore, because the proposed Project does not exceed any of the thresholds, it would not conflict with SCAQMD's goal of bringing the Basin into attainment for all criteria pollutants and, as such, is consistent with the AQMP. The proposed Project would be consistent with Criterion No. 2. As the proposed Project would be consistent with both Criterion No. 1 and 2, impacts related to consistency with the AQMP would be less than significant.

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

Less Than Significant Impact. The SCAB is in non-attainment status for federal ozone standards, and State and federal particulate matter standards. The SCAB is designated as a maintenance area for federal PM_{10} standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Evaluation of the cumulative air quality impacts of the proposed Project has been completed pursuant to SCAQMD's cumulative air quality impact methodology. SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the Project region is in nonattainment under an applicable federal or State ambient air quality standard. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table 5.3-1.

Table 5.3-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
ROG	75	55
NOx	100	55
CO	550	550
SOx	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55

ROG = reactive organic gases; NOx = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter, 10 microns in diameter; $PM_{2.5}$ = particulate matter, 2.5 microns in diameter
Source: Appendix A

Construction

Construction activities associated with the proposed Project are expected to take place over 20 months and would generate pollutant emissions from the following phases: (1) site preparation, (2) grading, (3) building construction, (4) paving, and (5) architectural coating. The amount of emissions generated on a daily basis would vary, depending on the intensity and type of construction activities occurring.

All construction activities would be required to comply with applicable SCAQMD Rules, including SCAQMD Rule 402, Rule 403, and Rule 1113. Rule 402, Public Nuisance, prohibits the discharge of air contaminants that cause injury, nuisance, or annoyance to the public or damage to property and is included as PPP AQ-1. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403, included as PPP AQ-2, was accounted for in the construction emissions modeling.

SCAQMD Rule 1113, included as PPP AQ-4, regulates the VOC content in architectural coating, paint, thinners, and solvents, was also accounted for in construction emissions modeling. While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. As shown in Table 5.3-2, the California Emissions Estimator Model (CalEEMod) results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less-than-significant impact.

Table 5.3-2: Regional Construction Emission Estimates

Maximum Daily Emissions	ROG Maximum Daily Regional Emissions (pounds/day)*	NOx Maximum Daily Regional Emissions (pounds/day)*	CO Maximum Daily Regional Emissions (pounds/day)*	SO_2 Maximum Daily Regional Emissions (pounds/day)*	PM_{10} Maximum Daily Regional Emissions (pounds/day)*	$PM_{2,5}$ Maximum Daily Regional Emissions (pounds/day)*
Maximum Daily Emission 20271	3.74	34.25	36.70	0.07	8.91	4.5
Maximum Daily Emission 20281	65.95	12.98	28.41	0.04	3.35	1.05
Maximum Daily Emission (2027-2028)	**65.95**	**34.25**	**36.70**	**0.07**	**8.91**	**4.50**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
* The higher emissions from the winter and summer scenarios are presented. Values may vary slightly due to rounding.
1. Emissions for ROG, NOx, PM_{10}, and $PM_{2.5}$ have accounted for the 2027 and 2028 Adjustment Factors.
Source: Appendix A

Operation

Operational activities associated with the proposed residential development would result in emissions of CO, VOCs, NOx, SOx, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source, energy source, and mobile source emissions. Implementation of the proposed Project would result in new long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as landscaping and applications of architectural coatings. Project operations would be required to comply with SCAQMD Rule 445 Wood-Burning Devices, which would reduce emission production of particulate matter and VOCs from wood burning devices and is

included as PPP AQ-3. However, operational vehicular emissions would generate a majority of the emissions from implementation of the proposed Project.

Operational emissions associated with the proposed Project were modeled using CalEEMod 2022.1 and are presented in Table 5.3-3. As shown, the emissions generated from the proposed Project would not exceed the SCAQMD's applicable thresholds. Therefore, impacts would be less than significant.

Table 5.3-3: Regional Operation Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	8.41	6.85	60.91	0.15	13.74	3.56
Area	15.27	4.88	23.95	0.03	0.40	0.39
Energy	0.13	2.20	0.94	0.01	0.18	0.18
Total Operational Emissions	**23.81**	**13.93**	**85.80**	**0.19**	**14.32**	**4.13**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: Appendix A

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. Air quality sensitive receptors can include uses such as residences, long-term health care facilities, rehabilitation centers, and retirement homes. They generally include locations where an individual can remain for 24 hours. The sensitive receptor closest to the Project site is a residence located 4 meters (15 feet) east of the Project site. Additionally, the nearest school building is located approximately 148 meters (487 feet) north of the Project site.

Construction

Localized Significance Threshold

The daily emissions generated on-site by construction of the proposed Project have been evaluated against SCAQMD's localized significance thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. These thresholds set the maximum rates of daily construction or operational emissions from a project site that would not exceed a national or State ambient air quality standard. LSTs are developed based on the ambient concentrations of NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 35, East San Bernardino Valley. SCAQMD provides screening tables (Appendix C of the SCAQMD 2008 Final Localized Significance Threshold Methodology) for projects that disturb less than or equal to five acres in a day. These tables were created to easily determine if the daily emissions of NOx, CO, PM_{10}, and $PM_{2.5}$ from a project could result in a significant impact to the local air quality. The phase with the most ground disturbance would be the grading phase, which would result in a maximum of 4.0 acres of ground disturbance per day. Distance to the nearest sensitive receptor also determines the emission thresholds. As described above, the sensitive receptors closest to the Project site include a residence

about 4 meters east of the Project's boundary; therefore, the construction emission thresholds for 25 meters was used, as that is the lowest threshold provided. Consistent with SCAQMD guidance, the thresholds were calculated by interpolating the threshold values for the Project's disturbed acreage and nearest sensitive receptor distance (Appendix A).

Construction of the proposed Project could temporarily expose nearby sensitive receptors to airborne particulates and limited emissions from construction equipment, which typically consists of diesel fueled vehicles and machinery. Construction activities would be required to comply with applicable SCAQMD standard construction practices. SCAQMD Rule 402 requires implementation of dust suppression measures to prevent fugitive dust from creating an off-site nuisance and is incorporated as PPP AQ-1. SCAQMD Rule 403 requires the use of best available control measures to prevent fugitive dust from remaining visible beyond the property line and is incorporated as PPP AQ-2. As shown in Table 5.3-4, construction related criteria pollutant emissions would not exceed applicable SCAQMD localized significance thresholds, and impacts would be less than significant.

Table 5.3-4: Localized Construction Emission Estimates

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	**CO**	**PM_{10}**	**$PM_{2.5}$**
2027 (Year 1)				
Site Preparation	32.74	30.37	7.28	4.18
Grading	27.97	28.33	3.94	2.15
Building Construction and Paving	17.12	23.99	0.66	0.61
Building Construction	10.17	14.04	0.36	0.34
Maximum On-Site Emissions (2027)	***32.74***	***30.37***	***7.28***	***4.18***
2028 (Year 2)				
Building Construction	9.66	14.04	0.33	0.30
Building Construction and Architectural Coating	10.74	15.53	0.32	0.32
Architectural Coating	1.08	1.49	0.02	0.02
Maximum On-Site Emissions (2028)	***10.74***	***15.53***	***0.33***	***0.32***
Maximum On-Site Emissions (2027-2028)	**32.74**	**30.37**	**7.28**	**4.18**
SCAQMD Screening Thresholds	236.7	1,774.7	11.7	7.7
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: Appendix A

Diesel Health Risk Assessment

A Construction Health Risk Assessment (HRA) (Appendix B) was completed for the proposed Project to assess the potential mobile source health risk impacts to the nearest sensitive receptors (which are residents) and nearest workers to the proposed Project. Health risk impacts are a result of exposure to diesel particulate matter (DPM) emitted from construction equipment and heavy-duty diesel trucks accessing the site. The HRA was completed using USEPA AERMOD air dispersion model to determine how

the toxic air contaminants would move through the atmosphere after release from sources both on site and on surrounding airways. The air dispersion model uses emissions from various emission sources and meteorological data such as wind speed and direction, air temperature, and atmospheric mixing rates to estimate the air pollutant impacts at various geographic locations (referred to as receptor locations). The nearest and most impacted sensitive receptor is a single-family residence located approximately 4 meters (15 feet) east of the Project boundary at 1699 Camellia Lane. The nearest worker receptor is located at an Amazon Fulfillment Center located approximately 246 meters (807 feet) west of the Project's off-site improvement boundary.

The City of Redlands has not adopted a numerical significance threshold for cancer risk or non-cancer chronic health risk impacts. Therefore, the significance thresholds recommended by the SCAQMD were used for this assessment. The relevant significance thresholds include the following:

- Cancer Risk: 10 persons per million population as the maximum acceptable incremental cancer risk due to exposure to toxic air contaminants (TACs)
- Non-Cancer Hazard Index (HI): 1.0

Construction emissions were calculated using the latest CalEEMod Version 2022.1. DPM construction emissions were based on the CalEEMod construction runs for the proposed construction schedule and equipment inventory, using exhaust PM_{10} construction emissions to represent DPM emissions. Construction-related DPM emissions are expected to primarily occur as a function of heavy-duty equipment that would operate on-site during the construction phase. Additional DPM emissions would occur from the operation of construction vehicles that travel to/from the Project during construction (haul trucks and vendor trucks). As shown in Table 5.3-5, the estimated maximum cancer risk for construction is 9.40 in one million at the residential receptor located at 1699 Camellia Lane . The estimated maximum cancer risks for worker receptors during construction is 0.01 in one million. In addition, the Project's maximum estimated construction results for non-cancer health risk are 0.01 and less than 0.01 for the maximum impacted sensitive receptor and worker receptor, respectively, both below the significance threshold of 1.0. As shown in Table 5.3-5, emissions would be below the SCAQMD health risk thresholds.

Table 5.3-5: Project Construction Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor Prebirth to 1.22 years	9.40	10	No
Maximum Impacted Sensitive Receptor Adult (1.47 years)	0.28	10	No
Maximum Impacted Worker Receptor (1.47 years)	0.01	10	No
Receptor	**Chronic Non-Cancer Hazard Index**		**Exceeds Significance Threshold?**
	Maximum Lifetime Proposed Project Risk	**Significance Threshold**	
Maximum Impacted Sensitive Receptor	0.01	1.0	No
Maximum Impacted Worker Receptor	<0.01	1.0	No

Source: Appendix B

Operation

According to the SCAQMD LST methodology, LSTs apply to a project's stationary and on-site mobile sources. Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational LSTs. The proposed Project would operate as a residential development, which does not typically involve diesel vehicles regularly idling or queuing for long periods. Therefore, due to the lack of significant stationary source emissions or idling diesel-powered vehicles, impacts related to operational LSTs are presumed to be less than significant.

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

Less Than Significant Impact. The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project does not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, or other land uses that typically result in emissions associated with odor complaints, based on the SCAQMD CEQA Air Quality Handbook. Potential odor sources associated with the proposed Project may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant.

It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, the Project would result in less-than-significant impacts related to other emissions affecting a substantial number of people.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury, or damage to business or property.

PPP AQ-2: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-3: Rule 445. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 445, which reduce the emission of particulate matter from Wood Burning Devices.

PPP AQ-4: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

Mitigation Measures

None.

5.4. BIOLOGICAL RESOURCES

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

This section was prepared using the Biological Resources Assessment prepared by ELMT Consulting, on March 7, 2025 (Appendix C) and Burrowing Owl Memorandum prepared by ELMT Consulting, on March, 23, 2026 (Appendix D).

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

Less Than Significant with Mitigation Incorporated. The Project site does not support any natural plant communities. The site supports two land cover types that would be classified as disturbed and developed

(Appendix C). Neither vegetation community is considered sensitive pursuant to local or regional plans, policies, regulations or by CDFW or USFWS.

Special-Status Plants. A total of 20 plant species are listed as State and/or federally Threatened, Endangered, Rare, or Candidate species; or are 1B.1 listed plants on the California native Plant Society (CNPS) Rare Plant Inventory and have been recorded within the database search conducted on the California Natural Diversity Database (CNDDB). As described above, no special-status plants were detected on the Project site during the field survey on February 19, 2025, and no special-status plant species are expected to occur on the Project site due to the absence of suitable habitat. As a result, Project development and operation would not result in a substantial adverse effect either directly or indirectly, or through habitat modification, on any plant species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulation or by the CDFW or USFWS. Therefore, no impact would result from Project development and operation.

Special-Status Animal Species. According to the CNDDB, a total of 66 sensitive species of animals have the potential to occur on or within the vicinity of the Project site. No animal species listed as State and/or federal Threatened, Endangered, or Candidate were detected on the site during the reconnaissance surveys. Due to their regional significance, additional investigation on the potential occurrence of burrowing owl, San Bernardino kangaroo rat, and Crotch's bumble bee was included in the Biological Assessment.

Burrowing Owls

Despite a systematic search of the Project site, no burrowing owls or sign (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. A secondary investigation of the Project site took place on March 11, 2026and, again, did not identify any burrowing owls or signs of their presence (Appendix D). The majority of the Project site is unvegetated and/or vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owl that are subject to routine weed abatement activities. However, no suitable mammal burrows or structures/pipes that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the site. Based on the results of the field investigation, it was determined that the project site has a low potential to support burrowing owl, and focused surveys are not recommended. However, out of an abundance of caution, a pre-construction burrowing owl clearance survey is recommended to be conducted prior to development to ensure burrowing owl remain absent from the Project site and is included as Mitigation Measure BIO-1 (Appendix C).

San Bernardino Kangaroo Rat

The San Bernardino kangaroo rat, federally listed as endangered, is one of several kangaroo rat species in its range. The habitat of the San Bernardino kangaroo rat is described as being confined to pioneer and intermediate Riversidean Alluvial Fan Sage Scrub (RAFSS) habitats, with sandy soils deposited by fluvial (water) rather than Aeolian (wind) processes. Burrows are dug in loose soil, usually near or beneath shrubs. The site does not support Riversidean sage scrub, nor does it coincide with any natural waterway that provides seasonal scouring needed to form RAFSS, and no RAFSS habitat, nor any plant communities formed in alluvial fans, are present within or adjacent to the Project site. No sign (e.g., San Bernardino kangaroo rat characteristic burrows, dusting baths, and/or tail drags) was observed during the field investigation. Based on these conditions, it was determined that the Project site does not provide the

requisite habitat elements needed by San Bernardino kangaroo rat to be present. Therefore, it was determined that San Bernardino kangaroo rat is presumed absent from the Project site (Appendix C).

Crotch's Bumble Bee

Crotch's bumble bee is a candidate species for listing status by the CESA. It is a colonial species that lives almost exclusively from coastal California east towards the Sierra-Cascade Crest and can be found uncommonly in western Nevada and south through Baja California. Crotch's bumble bee inhabits grassland and scrub habitats in hotter and drier climates than most other bumblebee species. Generally, for all bumble bee species, high-quality habitat has three major components: a diverse supply of flowers for nectar and pollen, nesting locations, and subterranean spaces for overwintering queens. Based on the results of the survey, it was determined that the study area does not provide suitable habitat for Crotch's bumble bee. No bumble bees were observed within the study area during the field investigation, and, given the lack of habitat, no focused surveys are recommended (Appendix C).

With implementation of Mitigation Measure BIO-1, the development of the Project would not result in a substantial adverse effect, either directly or through habitat modification, on any animal species identified as a Threatened, Endangered, or Candidate species in local or regional plans, policies, regulation or by the CDFW or USFWS. Therefore, with implementation of Mitigation Measure BIO-1, impacts would be less than significant.

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

No Impact. The General Biological Assessment describes that the Project site does not contain any drainage, riparian, or riverine features (Appendix C). There are no CDFW, United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters within the Project site boundaries. The Project area does not contain any wetlands or vernal pools. Also, as described previously, the Project site contains disturbed/developed areas (Appendix C). Therefore, the Project would not result in impacts related to riparian habitat or other sensitive natural community.

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?

No Impact. As described in the previous response, the Project site does not include any wetlands or vernal pools. There are no CDFW, USACE, or RWQCB jurisdictional waters within the Project site boundaries. Therefore, the Project would not impact federally protected wetlands.

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

Less Than Significant with Mitigation Incorporated. Wildlife corridors are linear features that connect areas of open space and provide avenues for the migration of animals and access to additional areas of foraging. The Project site does not contain, nor is it adjacent to, any wildlife corridors. The Project site is relatively flat, and no hillside or drainages exist on the site. No wildlife movement corridors were found

to be present within the Project site. Areas of institutional, residential, and disturbed land are located beyond the roadways adjacent to the site. Development of the site would not result in impacts related to established native resident or migratory wildlife corridor.

However, the Project site contains shrubs that can support nesting birds and raptors protected under the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season. The Biological Assessment prepared for the Project site indicates that grading activities or vegetation removal during the nesting bird season of February 1 through August 31 might result in potential impacts to nesting birds (Appendix C). Therefore, if vegetation is required to be removed during nesting bird season, Mitigation Measure BIO-2 has been included to require a nesting bird survey to be conducted within three days prior to initiating vegetation clearing. With the implementation of Mitigation Measure BIO-2 and the policies of the Redlands General Plan, impacts related to nesting birds would be reduced to a less than significant level.

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

No Impact. The City has a Street Tree Policy and Protection Guidelines Manual (adopted January 2013) and a tree protection ordinance codified as Redlands Municipal Chapter 12.52 for street trees and trees in public places. The General Plan also includes tree protection policies consistent with the guidelines manual.

There are no street trees along the Project frontages and, therefore, the Project is not anticipated to conflict with the provisions of these existing tree policies and guidelines. Thus, implementation of the Project would not conflict with any local policies or ordinances protecting biological resources.

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

No Impact. The Project is within an urbanized area, and there are no adopted regional conservation plans in the City (City of Redlands, 2017a). There is, however, the Upper Santa Ana Wash Land Management and Habitat Conservation Plan, known also as the Wash Plan. The Wash Plan is the culmination of over a decade of coordination to develop an integrated approach to permit and mitigate all construction and maintenance activities within the Santa Ana River wash area, including water conservation, wells and water infrastructure, aggregate mining, transportation, flood control, agriculture, trails, and habitat enhancement. Specifically, the Wash Plan has been prepared as part of the Incidental Take Permit application submitted by the San Bernardino Valley Water Conservation District to the USFWS. The City, among other agencies, is a signatory to the Wash Plan and would participate in the implementation of the plan through a Certificate of Inclusion to receive coverage for planned projects. Implementation of the Wash Plan would result in permanent conservation and management of approximately 1,659.9 acres of native habitats that support slender-horned spine-flower, Santa Ana River woolly-star, cactus wren, California gnatcatcher, and San Bernardino kangaroo rat.

The Wash Plan was adopted in 2020 (SBVWCD, 2019). The Project area is located approximately 0.75 miles southwest of the nearest Wash Plan boundaries, with residential and commercial development in between the Project and the Wash Plan boundaries. Implementation of the Project would not conflict or otherwise impact the Wash Plan policies or objectives. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

Mitigation Measure BIO-1: Pre-construction Burrowing Owl Surveys To ensure burrowing owl remain absent from the Project site, a pre-construction burrowing owl clearance survey shall be conducted in accordance with California Department of Fish and Wildlife's (CDFW) 2012 Staff Report on Burrowing Owl Mitigation. Two surveys shall be conducted, the first 14-30 days prior to ground disturbing activities and the second within 24 hours immediately before ground disturbing activities. If no burrowing owls are observed onsite, no further review will be required.

If the site survey determines the presence of burrowing owl, mitigation in accordance with requirements set forth by CDFW shall be implemented as follows:

A. If burrowing owls are found on the project site, construction activities should be avoided during the breeding season (February 1 to August 31).
B. If an active burrow is found during the breeding season and construction activities cannot be avoided, a qualified biologist will establish buffers around occupied burrowing owl nests in accordance with the *Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game (May 7, 2012)* to avoid any direct or indirect impacts to burrowing owl.
C. If impacts to active burrows cannot be avoided, coordination will need to occur with CDFW to determine whether a California Endangered Species Act (CESA) Incidental Take Permit (ITP) will be required pursuant to Fish and Game Code section 2081. As part of the ITP, a plan to minimize and fully mitigate project-related impacts, avoid the incidental take of burrowing owl, and minimize disturbance of the species' habitat will need to be prepared for approval by CDFW prior to commencing project activities. The plan should include methods for the relocation and/or exclusion of the species. Unavoidable impacts to occupied burrowing owl burrows and habitat will require the permanent protection of mitigation lands and habitat enhancement or expansion, as determined through consultation with CDFW.
D. Active relocation and eviction/passive relocation shall require the preservation and maintenance of suitable burrowing owl habitat determined through coordination with the Wildlife Agencies.

MM BIO-2: Pre-construction Nesting Bird Survey. Vegetation removal shall occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the applicant must conduct avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s), as approved by the lead agency, within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. At a minimum, construction activities will stay outside of a 300-foot buffer around the active nests. For raptor species, the buffer is to be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist verifies that the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise

becomes inactive under natural conditions, normal construction activities may occur. The surveys shall be documented with a biological resources survey log and at the conclusion of monitoring shall be submitted to the City of Redlands for recordkeeping.

5.5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
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 dedicated cemeteries?	☐	☐	☒	☐

This section was prepared using the Archaeological and Built Environment Resources Inventory and Evaluation Report prepared by ECORP Consulting, Inc. in January 2025 (Appendix E).

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

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

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

The City of Redlands Municipal Code Section 2.62.170 provides the following historic-significance criteria to determine the designation of historic and scenic resources: (A) It has significant character, interest, or value as part of the development, heritage or cultural characteristics of the city of Redlands, state of California, or the United States; (B) It is the site of a significant historic event; (C) It is strongly identified with a person or persons who significantly contributed to the culture, history or development of the City; (D) It is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type or specimen; (E) It is a notable work of an architect or master builder whose individual work has significantly influenced the development of the City; (F) It embodies elements of architectural design, detail, materials, or craftsmanship that represents a significant architectural innovation; (G) It has a unique location or singular physical characteristics representing an established and familiar visual feature of a neighborhood, community, or the City; (H) It has unique design or detailing; (I) It is a particularly good example of a period or style; (J) It contributes to the historical or scenic heritage or historical or scenic properties of the city (to include, but not be limited to, landscaping, light standards, trees, curbings, and signs); (K) It is located within a historic and scenic or urban conservation district, being a geographically definable area possessing a concentration of historic or scenic properties which contribute to each other and are unified aesthetically by plan or physical development.

As described previously, the Project site is currently vacant and undeveloped, except for Tennessee Avenue which bisects the site from West San Bernardino Avenue to West Pioneer Avenue. An Archaeological and Built Environment Resources Inventory and Evaluation Report (Appendix E) was prepared for the Project, which included a records search that identified two previously recorded cultural resources located within the Project site: P-36-12468 and P-36-13622 (River Rock Curb). As such, a field survey was conducted, and the two previously recorded resources were revisited and their records were updated. No new archaeological or built environment resources were identified during the field survey.

According to the findings of the Archaeological and Built Environment Resources Inventory and Evaluation Report, Resource P-36-12468 does not meet the criteria for listing in the National Register (Criteria A-D), California Register of Historical Resources (Criteria 1-4), or for designation as a City of Redlands Historic Resource (City Criteria A-K), as detailed below. Additionally, although Resource P-36-13622 (River Rock Curb) was found to be potentially eligible for listing under NRHP/CRHR Criterion C/3 and under City of Redlands Historic Resources Criteria A, D, G, H, I, and J, it was determined that Resource P-36-13622 (River Rock Curb) lacks sufficient integrity to convey its historical significance, and, therefore, is not eligible for the NRHP, CRHR, or designation as a City of Redlands Historic Resource, as further described below.

Resource P-36-12468

Criterion A/1: The irrigation features of P-36-12468 were constructed circa 1900 to 1938 and are associated with the trend of early-20th-century citrus agricultural development in Redlands. Archival research indicates that P-36-12468 is not associated with events that have made a significant contribution to the broad patterns of history at the local level; therefore, it is not eligible for the NRHP/CRHR under Criterion A/1.

Criterion B/2: Research did not uncover any individuals directly associated with the construction or maintenance of P-36-12468 or the associated parcels. The resource is not associated with the lives of individuals significant in the past; therefore, it is not eligible for the NRHP/CRHR under Criterion B/2.

Criterion C/3: Resource P-36-12468 does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possesses high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; therefore, it is not eligible for the NRHP/CRHR under Criterion C/3.

Criterion D/4: The information potential of P-36-12468 is expressed in its built form and in the historical record. It has not yielded, nor is it likely to yield, information important in history or prehistory. The features of P-36-12468 are not associated with features that could include archaeological deposits. Further, based on other lines of evidence in the archival and material record, it is not eligible for the NRHP/CRHR under Criterion D/4. Documentation of this resource has exhausted its research potential.

Integrity: Resource P-36-12468 possesses some integrity of location and association, as it remains in its original location immediately northwest of downtown Redlands and remains associated with historic orange groves in the vicinity of Redlands. Resource P-36-12468 does not, however, possess integrity of setting, workmanship, and feeling, as its original rural orange grove setting has been replaced by suburban residential, commercial, and freeway development. Damage to the resource's construction diminishes its craftsmanship and its ability to convey the overall aesthetic of a 20th-century irrigation system in a Southern California orange grove, compromising its overall integrity.

City Criterion A: Resource P-36-12468 consists of ubiquitous and utilitarian features. Therefore, P-36-12468 does not have significant character, interest, or value as part of the development, heritage or cultural characteristics of the City of Redlands, State of California, or the United States, and is not eligible for designation as a City of Redlands Historical Resource under Criterion A.

City Criterion B: Resource P-36-12468 was likely constructed between 1900 and 1920 and is associated with the trend of early-20th-century citrus agricultural development in Redlands. Resource features are visible as structures in historic aerials as early as 1938 and may represent a phased development of the property. Archival research indicates that P-36-12468 is not associated with events that have made a significant contribution to the broad patterns of history at the local level and is not the site of a significant historic event. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion B.

City Criterion C: Research did not uncover any individuals directly associated with the construction or maintenance of P-36-12468. Local farm crews most likely built and maintained P-36-12468 over the course of its history; therefore, P-36-12468 is not strongly identified with a person or persons who significantly contributed to the culture, history or development of the City. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion C.

City Criterion D: Features associated with Resource P-36-12468 are utilitarian, and many exist both in Redlands and San Bernardino County; therefore, it is not one of the few remaining examples in the City possessing distinguishing characteristics of an architectural type or specimen and is not eligible for designation as a City of Redlands Historical Resource under Criterion D.

City Criterion E: Resource P-36-12468 exhibits a simplistic and utilitarian design. Based on design features and archival research, it is highly unlikely that it is a notable work of an architect or master builder whose individual work has significantly influenced the development of the City and is not eligible for designation as a City of Redlands Historical Resource under Criterion E.

City Criterion F: Many features like Resource P-36-12468 exist both in Redlands and San Bernardino County. Research did not find that the construction of the resource represented a significant innovation in the development of the features associated with P-36-12468; therefore, it does not embody elements of architectural design, detail, materials, or craftsmanship that represent a significant architectural innovation. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion F.

City Criterion G: Resource P-36-12468 consists of vacant land west of Camelia Lane, between West San Bernardino Avenue and West Pioneer Avenue. It was formerly used for citrus groves and other agriculture; however, archival resources did not suggest that it has a unique location or singular physical characteristics representing an established and familiar visual feature of a neighborhood, community, or the City. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion G.

City Criterion H: Resource P-36-12468 exhibits a simplistic and utilitarian design with no embellishment; therefore, it does not have a unique design or detailing. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion H.

City Criterion I: Resource P-36-12468 was constructed between 1900 and 1938 but research did not find that the construction of P-36-12468 represented the work of a master. Therefore, it is not a particularly good example of a period or style, and is not eligible for designation as a City of Redlands Historical Resource under Criterion I.

City Criterion J: Resource P-36-12468 is located on the northern side of West San Bernardino Avenue; however, this road is one of many in the greater Redlands area and is not a major thoroughfare for the area. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion J.

City Criterion K: Resource P-36-12468 is in a neighborhood with a mix of property uses and architectural themes; it does not have a definable area possessing a concentration of historic or scenic properties that contribute to each other and are unified aesthetically by plan or physical development. As such, Resource P-36-12468 is not eligible for designation as a City of Redlands Historical Resource under Criterion K.

Resource P-36-13622 (River Rock Curb)

The evaluation of P-36-13622 (River Rock Curb) found it potentially eligible for the NRHP/CRHR under Criterion C/3 as well as Redlands Historic Resources Criteria A, D, G, H, I, and J.

Criterion A/1 and City Criterion B: Originally designed to provide flood control to the adjacent orange groves and roadway, P-36-13622 (River Rock Curb) reflects the broad trend of infrastructure and orange industry development in Redlands in the late 19th century. Despite this history, it was not found to have an association with a singular historic event that made a significant contribution to the broad patterns of local, state, or national history. Although the curb's representation of a construction style and material usage is notable, there is no evidence that an important occurrence or notable episode took place at or near its location; therefore, the curb does not meet this criterion as the site of a significant historic event. As such, the subject curb is not eligible for the NRHP/CRHR under Criterion A/1, nor for designation as a City of Redlands Historic Resource under City Criterion B.

Criterion B/2 and City Criterion C: Archival research failed to indicate any such direct association between individuals known to be historic figures at the national, state, or local level and the subject curb. Although the curb may have been constructed by early City public works crews or local craftsmen, no documentation identifies a specific individual directly responsible for their design or construction who meets the threshold of historical significance. There is no information in the archival record to suggest that this curb segment is associated with the lives of individuals significant from the past. As such, the subject curb is not eligible for the NRHP/CRHR under Criterion B/2, nor for designation as a City of Redlands Historic Resource under City Criterion C.

Criterion C/3: Resource P-36-13622 (River Rock Curb) was first designed in the 1890s to provide flood control to both the adjacent orange groves and the roadway. It embodies the distinctive characteristics of late-19th century infrastructure engineering and reflects the influence of the Arts and Crafts movement, which emphasized craftsmanship and the use of natural materials. The curb, which was built with hand-laid, rounded cobbles from nearby watercourses like the Santa Ana River and Mill Creek, represents a vernacular technique specific to the region and period. The curb showcases both aesthetic consideration and practical purpose through the artful mortaring of stones with their rounded surface exposed. Once more common in Redlands, river rock curbs are now exceedingly rare in both Redlands and Southern

California due to road widening and modernization projects over the decades. This river rock example, as opposed to the common poured concrete curbs, is a part of a regional infrastructure tradition that is consistent with the growth of the citrus industry and Arts and Crafts design philosophy. It stands as an important and early representation of infrastructure engineering related to the Redlands' citrus industry. While the curb is not known to be the work of a particular master mason or designer, it does represent a significant and distinguishable example of its type, especially in the context of Redlands, where few such curbs survive in this condition. Therefore, the subject curb is potentially eligible for listing in the NRHP and CRHR under Criterion C/3 for its embodiment of a distinctive construction method and its association with local aesthetic and cultural values of the period.

Criterion D/4: The information potential of P-36-13622 (River Rock Curb) is expressed in its built form and in the historical record. It has not yielded, nor is it likely to yield, information important in history or prehistory. As such, the subject curb is not eligible for the NRHP/CRHR under Criterion D/4.

City Criterion A: The circa 1895 Resource P-36-13622 (River Rock Curb) is a rare surviving example of late-19th century street infrastructure in Redlands and reflects the City's use of local, natural materials and craftsmanship during a period of civic growth. Built of hand-laid river cobbles, likely sourced from local watercourses such as Mill Creek or the Santa Ana River, the curb exemplifies a construction method historically associated with the Arts and Crafts movement and early flood-control engineering for the citrus industry. These curbs were once common throughout Redlands but have become increasingly rare due to street widening and modern infrastructure upgrades. As one of the longest intact stretches of its kind remaining in the City, this curb represents a unique and character-defining vestige of Redlands' historic streetscape and development pattern. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion A.

City Criterion D: Resource P-36-13622 (River Rock Curb) is one of the few remaining examples in the City that possesses the distinguishing characteristics of late-19th-century public infrastructure design for both roadway and citrus grove flood control. Constructed with locally sourced, rounded river stones laid by hand in mortar, this approximately 485-foot-long curb exemplifies a construction method associated with the Arts and Crafts era and early civic beautification efforts in Redlands. Formerly more common in Redlands, river rock curbs are now exceedingly rare in both Redlands and Southern California due to road widening and modernization projects. The entire segment maintains a high physical integrity as shown by original materials, workmanship, and road setting intact. As such, it is one of the few remaining examples in the City possessing the distinguishing characteristics of this architectural and infrastructural type. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion D.

City Criterion E: Despite displaying a high level of craftsmanship, P-36-13622 (River Rock Curb) is not known to be directly associated with master architect or builder whose individual contributions significantly influenced the development of the City. Although the craftsmanship is in line with Redlands' infrastructure practices from the late 19th century, no archival evidence was discovered linking its construction to a particular master designer or builder; therefore, the curb is not regarded as a creation by a master builder or architect whose individual work had a major impact on the City's development. As such the subject curb is not eligible for designation as a City of Redlands Historic Resource under Criterion E.

City Criterion F: As a fine example of late-19th-century infrastructure, P-36-13622 (River Rock Curb) showcases the use of natural materials that align with the Arts and Crafts style. Despite this, the curb does

not constitute a noteworthy architectural innovation in terms of both design and construction techniques. Although the use of hand-laid river rock demonstrates quality craftsmanship and a regional material expression, these elements do not represent a technological advance or original design approach. As a result, the curb is not eligible for designation as a City of Redlands Historic Resource under Criterion F.

City Criterion G: Resource P-36-13622 (River Rock Curb) differs from modern curbing found throughout Redlands due to its unique physical features, which include its organic form and hand-laid, rounded river stones. It is prominently situated next to a heavily traveled section of West San Bernardino Avenue. The curb serves as a visual and historic marker in the neighborhood because of its age, craftsmanship, and rarity, highlighting the region's agricultural past and late-19th-century development patterns. The curb is a well-known and recognizable visual element of the neighborhood and one of the few surviving examples of this kind of streetscape element. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion G.

City Criterion H: Using locally sourced river rock, P-36-13622 (River Rock Curb) has a unique design with hand-laid, rounded stones set in mortar. Few examples of this construction technique still exist today, although it was once used in Southern California and Redlands in the late 19th century. The curb's artisanal placement, natural coloration, and irregular stone sizes give it a textured, organic appearance that distinguishes it from other early infrastructure as well as contemporary concrete curbs. Its design reflects both a practical function and a purposeful aesthetic that aligns with the Arts and Crafts movement, which placed a high value on visible craftsmanship and natural materials. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion H.

City Criterion I: Resource P-36-13622 (River Rock Curb) retains a high level of physical integrity and clearly reflects late-19th-century public works design influenced by the Arts and Crafts movement. Its use of hand-laid, locally sourced river cobbles set in mortar is typical of the era’s focus on natural materials, craftsmanship, and environmental integration. Even though this curbing style was formerly more common, there are not many examples left in Redlands. As a result, the curb represents a streetscape aesthetic that was common in the early 1900s and is a particularly good example of civic design in Southern California. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion I.

City Criterion J: Resource P-36-13622 (River Rock Curb) contains unique materials and construction methods linked to the City's early infrastructure development and is situated along a section of West San Bernardino Avenue with high public visibility. Being one of Redlands' few surviving river rock curbs, it adds to the neighborhood's historic charm and aesthetically supports the City's streetscape identity from the late 19th century. The curb is historically and aesthetically connected to Redlands' development during the Arts and Crafts era. The subject curb is therefore eligible for designation as a City of Redlands Historic Resource under Criterion J.

City Criterion K: Resource P-36-13622 (River Rock Curb) is in a neighborhood with a mix of vacant lots and newly built single-family dwelling residential developments and does not have a definable area possessing a concentration of historic or scenic properties which contribute to each other and are unified aesthetically by plan or physical development. Therefore, the subject curb is not eligible for designation as a City of Redlands Historic Resource under Criterion K.

Historic District Considerations: Resource P-36-13622 (River Rock Curb) is not currently within or associated with an official City of Redlands historic district. It is in a neighborhood with a mix of vacant lots and newly built single-family dwelling residential developments that lack a cohesive theme. According to the literature review from the records search, there are no specific historic districts in Redlands for which this curb would serve as a contributing element. The curb is not a contributor to any existing historic district nor is it locally listed. Thus, the curb is not considered an element of any existing or potential Historic District.

Integrity: The Resource P-36-13622 (River Rock Curb) has been evaluated for integrity as an archaeological resource because the curb section was once a complete and more expansive built feature that has deteriorated into a fragmented section. It no longer serves its original purpose and exists as remains in the landscape so it should be assessed as an archaeological element rather than a built element. The existing curb section has not been moved but sections of the greater curb have been demolished; nevertheless, integrity of location is maintained. While it retains some evidence of original materials and workmanship with original rock and mortar, the resource has been substantially reduced to the point where it no longer conveys its complete design layout. With the loss of citrus groves, the surrounding landscape has a loss of the historic setting that diminishes its archaeological integrity. The remaining fragmented curb no longer expresses the feeling and association of its significance. In total, the loss of integrity of design, setting, feeling and association to the curb results in a resource that does not have sufficient integrity to convey its historical significance and is not eligible for the NRHP, CRHR, or as a City of Redlands Historic Resource. Therefore, it is not a Historical Resource in accordance with CEQA.

The proposed Project would develop up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street. Resource P-36-12468 was found ineligible for NRHP/CRHR, or designation as a City of Redlands Historic Resource and is therefore not considered a historical resource under CEQA or a historic property under Section 106 NHPA. Additionally, while Resource P-36-13622 (River Rock Curb) was found potentially eligible for the NRHP/CRHR under Criterion C/3 as well as Redlands Historic Resources Criteria A, D, G, H, I, and J, intensive site recording and focused archival research detailed in Appendix E determined that P-36-13622 (River Rock Curb) lacks sufficient integrity to convey its historical significance. Therefore, it is not eligible for the NRHP, CRHR, or designation as a City of Redlands Historic Resource, and does not qualify as a Historical Resource in accordance with CEQA. As such, removal of the two previously recorded resources, P-36-12468 and P-36-13622 (River Rock Curb), would not result in a substantial adverse change to a historical resource under CEQA Guidelines Section 15064.5(b), as neither resource possesses sufficient significance or integrity to qualify as a historical resource under Section 15064.5(a) of the CEQA Guidelines. Thus, impacts related to an adverse change to a historic resource would be less than significant.

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

Less Than Significant with Mitigation Incorporated. As part of the Archaeological and Built Environment Resources Inventory and Evaluation Report (Appendix E), an archaeological records search was conducted through the South Central Coastal Information Center (SCCIC) at Cal State University, Fullerton (CSU Fullerton). The results of the records search identified 47 previously recorded resources within one mile

of the Project boundaries, two of which are located within the Project site, P-36-12468 and P-36-13622 (River Rock Curb). Additionally, the records search indicated that 36 pervious cultural resource studies have been conducted within one mile of the Project site, with three of the studies including the Project site. The records search indicated that the entire Project site has been previously surveyed for cultural resources; however, these studies were conducted in smaller segments, at different times, by different consultants, or as many as 37 years ago under obsolete standards.

In addition to the records search, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on March 5, 2025 (Appendix E). The NAHC responded on March 5, 2025, stating the SLF search was positive for previously known tribal cultural resources or sacred lands. Additional outreach has been conducted by the City of Redlands under the official Assembly Bill (AB) 52 Native American consultation process and is discussed in Section 5.18, *Tribal Cultural Resources*. Further, a field study of the Project site was conducted on April 1, 2025, which did not identify any new archaeological or built environment resources. The two previously recorded resources within the Project site, P-36-12468 and P-36-13622 (River Rock Curb), were revisited during the survey, and their records were subsequently updated with DPR 523-series forms and evaluated for eligibility for inclusion in the NRHP, CRHR, and City of Redlands Historical Resource Designation. As discussed previously, Resource P-36-12468 is recommended to be ineligible for inclusion in NRHP/CRHR under any criteria, nor does it appear to meet the criteria as a Historic Resource under the Redlands Historic Resource Designation criteria, and should not be considered a historical resource under CEQA or a historic property under Section 106 of the NHPA. Additionally, Resource P-36-13622 (River Rock Curb) is ineligible for the NRHP, CRHR, or as a City of Redlands Historic Resource and not a Historical Resource in accordance with CEQA; therefore, its removal would not result in a significant impact or require mitigation or further documentation.

While the Project would not result in direct impacts to any previously known archaeological resources as defined by CEQA within the Project site, the proposed site preparation, grading, and other ground-disturbing activities associated with Project development have the possibility to expose undiscovered archaeological resources or cultural sites that may exist beneath or around the site. The Project site contains alluvium and, given the proximity of perennial waterways such as the nearby Santa Ana Wash, may have a likelihood of containing pre-contact archaeological sites. As such, there is moderate potential for the proposed Project to impact buried pre-contact archaeological resources; however the known structural foundations documented on site are associated with agricultural use, which limits the potential for subsurface historic archaeological deposits. Therefore, as a precaution, the Project would be required to implement Mitigation Measure CUL-1, for archaeological monitoring during ground disturbance activity. Mitigation Measure CUL-1 requires a qualified professional archaeologist to prepare and implement a Cultural Resource Monitoring Program (CRMP). The CRMP will include the archaeologist(s) presence at the pre-grade meeting, archaeological monitoring of ground disturbing activities, and for contractors to halt work in the event of uncovering a potential archaeological resource and to have the find evaluated by the qualified archaeologist. Further, the CRMP will include measures to ensure the proper treatment of any unknown resources that might be identified during construction activities. As such, the proposed Project would result in a less-than-significant impact related to archaeological resources with the implementation of Mitigation Measure CUL-1.

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

Less Than Significant Impact. The Project site does not contain a cemetery, and no known dedicated cemeteries are located within the immediate vicinity of the Project site. It is not expected that implementation of the proposed Project would result in the disturbance of human remains. However, implementation of the proposed Project would require grading of the Project site which could potentially impact previously uncovered human remains. As such, Mitigation Measure CUL-1 and PPP CUL-1 have been included for incidental discovery of unanticipated cultural resource, including human remains. Under Mitigation Measure CUL-2, if subsurface deposits believed to be cultural or human in origin are discovered during ground disturbing activities, all work within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the finding. The archaeologist shall evaluate the discovery and recommend appropriate treatment measures in accordance with CEQA Guidelines and applicable local, State, and federal regulations. Should human remains be unearthed, the archaeologist and construction contractor would be required by California law to comply with California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code (PRC) Section 5097.98, included as PPP CUL-1. California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Implementation of Mitigation Measure CUL-1 and PPP CUL-1, which requires compliance with existing laws, would ensure that impacts to human remains would be less than significant.

Existing Plans, Programs, or Policies

PPP CUL-1: Discovery of Human Remains. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the Most Likely Descendant(s). The Most Likely Descendant(s) shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Mitigation Measures

Mitigation Measure CUL-1: Archeological Monitoring. A Secretary of the Interior qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any

discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribes, including the Gabrieleño Band of Mission Indians – Kizh Nation, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel, and Agua Caliente Band of Cahuilla Indians, to describe how the City's Mitigation Measures will be carried out during the course of project related ground disturbing activity and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried Tribal Cultural Resources and archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribal Historic Preservation Officer and/or designated Tribal Representative from one or more consulting tribes. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the consulting tribes for review and comment, prior to final approval by the City. In case of disagreement on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process.

The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:

- Avoidance and preservation in place or reburial onsite. The discovered resource remains in its original location of discovery, and stipulations are developed for long term preservation. This may include project redesign to avoid the resource, soil capping, creative landscaping efforts to deter foot traffic, etc. If avoidance and preservation in place is determined to be not feasible;
- Relocation of the resource(s) and reburial onsite shall be required. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location(s) of the reburial shall be included in a Monitoring Report.
- Curation at a San Bernardino County curation facility that meets federal standards per 36 Code of Federal Regulations Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of

the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

In addition, the project would be required to adhere to Mitigation Measure TCR-2. Consulting tribes, including the Gabrieleño Band of Mission Indians – Kizh Nation, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel, and Agua Caliente Band of Cahuilla Indians, shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the consulting tribes and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services.

If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.

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

5.6. ENERGY

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

This section was prepared using the Air Quality, Energy, and GHG Impact Analysis Report prepared by EPD Solutions, Inc. in March 2026 (Appendix A).

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

Less Than Significant Impact.

Construction

During construction, the proposed Project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery truck trips; and
2. Electricity associated with providing temporary power for lighting and electric equipment.
3. Natural gas is not anticipated to be needed for construction activities. Any consumption of natural gas would be minor and negligible.

Construction activities related to the proposed residential development and the associated infrastructure are not expected to result in demand for fuel greater on a per-development basis than other development projects within San Bernardino County. Table 5.6-1, below, details the construction fuel and gasoline usage over the Project's construction period. As shown in Table 5.6-1, the Project would consume approximately 99,593 gallons of diesel fuel and approximately 78,497 gallons of gasoline during construction. Using the CARB EMFAC2021 model, the County of San Bernardino is estimated to consume approximately 264,229,526 gallons of on-road diesel fuel, 664,752,209 gallons of on-road gasoline, and 19,277,838 gallons of off-road diesel in 2027 (Appendix A). Therefore, construction of the proposed Project would increase the annual construction generated fuel use in San Bernardino County by approximately 0.01 percent for diesel fuel usage, 0.01 percent for on-road gasoline fuel usage, and 0.31 percent for off-road diesel usage. Thus, increased energy consumption from the construction of the proposed Project would be nominal.

Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to San Bernardino County's overall use of the state's available energy resources. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy

efficient than at comparable construction sites in the region or the state. In addition, construction activities are not expected to result in inefficient use of energy as gasoline and diesel fuel would be supplied by the construction contractors who would conserve the use of their supplies to minimize their costs on the proposed Project. The proposed Project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. Therefore, fuel consumption during construction would not be inefficient, wasteful, or unnecessary and impacts would be less than significant.

Table 5.6-1: Total Construction Fuel Usage

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
On-Road Construction Vehicles	39,329	78,497
Off-Road Construction Equipment	60,264	-
Total	**99,593**	**78,497**
On-Road Countywide	264,229,526	664,752,209
Off-Road Countywide	19,277,838	463,498
On-Road Percentage	**0.01%**	**0.01%**
Off-Road Percentage	**0.31%**	**-**

Source: Appendix A

Operation

Once operational, the proposed Project would generate demand for electricity, natural gas, and gasoline. Operational use of energy includes the heating, cooling, and lighting of proposed buildings, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occur during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC); energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced.

As detailed in Table 5.6-2, operation of the proposed Project is estimated to result in the annual use of approximately 8,604,672 thousand British thermal units (BTU) of natural gas, 1,145,554 kilowatt-hours (kWh) of electricity, and approximately 279,444 gallons of gasoline. The County of San Bernardino is estimated to consume approximately 45,309,168,520 BTU of natural gas, 16,286,000,000 kWh of electricity, and approximately 664,752,209 gallons of gasoline annually (Appendix A). Therefore, operation of the proposed Project would increase the annual operational energy use in San Bernardino County by approximately 0.01 percent for electricity usage, 0.02 percent for natural gas usage, and 0.04

percent for gasoline usage. Thus, increased energy consumption from the operation of the proposed Project would be nominal.

Table 5.6-2: Project Annual Operational Energy Consumption

Proposed Project Energy Usage	San Bernardino Countywide Energy Consumption	Percentage Increase in Countywide Consumption from Proposed Project
Electricity (Kilowatt-Hour)		
1,145,554	16,286,000,000	0.01%
Natural Gas (Thousands British Thermal Units)		
8,604,672	45,309,168,520	0.02%
Petroleum (Gallons of Gasoline Fuel)		
279,444	664,752,209	0.04%

Source: Appendix A

Electrical and natural gas demand associated with Project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As previously stated, the Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage.

Therefore, construction and operations-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

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

Less Than Significant Impact. In 2002, the Legislature passed SB 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's 2025 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the Project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the Project would be relatively small in comparison to the overall use in the County of San Bernardino, and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the Project's total impact on regional energy supplies would be minor, the Project would not conflict with or obstruct California's energy

conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the Project would not result in the inefficient, wasteful, and unnecessary consumption of energy and the increases in energy demand would be minimal compared to the energy demands of the County.

The California Title 24 Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. The CEC is responsible for adopting, implementing, and updating building energy efficiency. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. Future buildings pursuant to the proposed Specific Plan would have solar infrastructure as required by CCR Title 24 requirements. Thus, the Project would not obstruct use of renewable energy or energy efficiency.. Therefore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would not occur. As such, the proposed Project would have less-than-significant impacts related to energy.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)	☐	☐	☒	☐
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 geologic feature?	☐	☒	☐	☐

This section was prepared using the Geotechnical and Infiltration Evaluation prepared by GeoTek, Inc. on April 8, 2025 (Appendix F) and the Archaeological and Built Environment Resources Inventory and Evaluation Report prepared by ECORP Consulting, Inc. in January 2025 (Appendix E).

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?

Less Than Significant Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate "Earthquake Fault Zones" along with faults that are "sufficiently active" and "well-defined." The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

A Geotechnical and Infiltration Evaluation was conducted by GeoTek, Inc. for the Project site (see Appendix F). According to Appendix F, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. As the Project site does not contain an earthquake fault, it is not affected by a State-designated Alquist-Priolo Earthquake Fault Zone. Thus, impacts would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. As described in Appendix F, the Project site is within a seismically active region. Because the Project site is in a seismically active region of Southern California, occasional seismic ground shaking is likely to occur within the lifetime of the proposed Project. The closest active fault is the Redlands fault in the Crafton Hills fault zone approximately 2.97 miles southeast of the Project site (City of Redlands, 2017a). Thus, strong seismic ground shaking has a high likelihood of occurring at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, which consists of poorly consolidated materials such as alluvium, and in response to an earthquake of great magnitude.

The California Building Code (CBC [California Code of Regulations, Title 24, Part 2]) includes provisions for earthquake resistant design that include considerations for geologic hazard and on-site soil conditions. The City of Redlands has adopted the CBC in Chapter 15.04 of the Municipal Code, and the proposed Project would be required to adhere to the provisions of the CBC as part of the plan check and development review process. Also, consistent with the CBC and the City's Municipal Code, construction of the Project would implement the recommendations of the Geotechnical and Infiltration Evaluation prepared for the Project to ensure there would be no geologic risks associated with development of the site. Therefore, with compliance with the requirements of the CBC and the City's Municipal Code, the proposed Project would not expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking more than other developments in Southern California. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soil layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil

conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

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

The Geotechnical and Infiltration Evaluation (included as Appendix F) conducted for the Project site determined that groundwater below the site exists at a depth greater than 50 feet. Additionally, the Geotechnical and Infiltration Evaluation determined due to the relatively dense nature of the site's subsurface soils, along with the relatively deep groundwater level, the liquefaction potential is considered to be very low (Appendix F). Furthermore, according to the San Bernardino County Geologic Hazard Overlay Map FH31 C, the Project site is not located in an area mapped for suspected liquefaction susceptibility (Appendix F). Thus, the soils underlying the Project site would not be considered at risk for liquefaction. Additionally, the proposed Project would be required to be constructed in compliance with the CBC, the City's Municipal Code, and development standards, which would be verified through the City's plan check and permitting process. Therefore, the proposed Project would not result in any impacts on people or structures due to ground failure or liquefaction and impacts would be less than significant.

iv. Landslides?

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

The Project site is relatively flat and is not located near any substantial slopes or hillsides. Based on the field investigation conducted for the Geotechnical and Infiltration Evaluation of the Project site, no evidence of ancient landslides or slope instability was observed (Appendix F). Additionally, according to the San Bernardino County Geologic Hazard Overlay Map FH31 C, the Project site is not located in an area mapped for suspected landslide susceptibility (Appendix F). Therefore, the proposed Project would not expose people or structures to slope instability or seismically induced landslides, and no impacts would occur.

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

Less Than Significant Impact. The proposed Project would develop up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street. The Project would involve earthmoving activities that would disturb soil and leave exposed soil on the ground surface. The proposed Project would also be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs), included as PPP WQ-1. BMPs may include a combination of construction methods to reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Additionally, the Construction General Permit issue by the State Water Resources Control Board (SWRCB), regulates construction activities to minimize water pollution, including sediment. With compliance with Regional Water Quality Control Board (RWQCB) SWPPP requirements (PPP WQ-1),

and installation of BMPs, which would be ensured by the City's plan check review by the Building and Safety Division, construction impacts related to erosion and loss of topsoil would be less than significant.

The proposed Project includes installation of landscaping throughout the Project site, including along internal streets, site perimeters, and within common open space areas. With this landscaping, areas of loose topsoil that could be eroded by wind or water would not exist upon operation of the proposed Project. In addition, as described in Section 5.10, *Hydrology and Water Quality*, the hydraulic features of the proposed Project have been designed to slow, filter, and retain stormwater within landscaping and the two proposed infiltration basins, which would also reduce the potential for stormwater to erode topsoil. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

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

Less Than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. As described above, the Project site is relatively flat and does not contain, nor is it adjacent to, any significant slope or hillside area. The Project would not create slopes. Thus, on or off-site landslides would not occur from implementation of the Project.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. As described previously, high groundwater does not exist in the Project vicinity and subsurface conditions are not considered to be conducive to liquefaction. Therefore, the Geotechnical and Infiltration Evaluation determined that the Project site is not susceptible to liquefaction (Appendix F). Similarly, the site is not susceptible to lateral spreading. Impacts related to lateral spreading would be less than significant with compliance with the mandatory CBC requirements.

Subsidence is a general lowering of the ground surface over a large area that is generally attributed to lowering of the ground water levels within a groundwater basin. Localized or focal subsidence or settlement of the ground can occur as a result of an earthquake motion in an area where groundwater in basin is lowered. According to the Geotechnical and Infiltration Evaluation, some layers of loose sands and silty sands present on-site would be prone to settlement during a strong earthquake; however, based on seismic settlement calculations, only minimal seismic settlement is expected to occur below a depth of approximately 50 feet. With implementation of the recommendations within the Geotechnical and Infiltration Evaluation, and compliance with mandatory CBC requirements, impacts related to subsidence would be less than significant.

Overall, compliance with the requirements of the CBC and Geotechnical and Infiltration Evaluation recommendations as ensured by the City through the permitting process would reduce potential impacts related to lateral spreading, subsidence, liquefaction, and collapse to a less-than-significant level.

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

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Geotechnical and Infiltration Evaluation, included as Appendix F, performed an evaluation of the potential for expansive soils at the site and the expansion index testing was performed on near surface soils as well as soils at a depth of about seven feet below grades. The results of expansion index testing indicated that near surface soils exhibit very low expansion index and site soils at a depth of about seven feet below grades exhibit very low potential for settlement upon wetting (Appendix F). In addition, as described previously, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including effects related to expansive soils. Therefore, impacts would be less than significant.

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

No Impact. The proposed Project would connect to existing sewer lines in San Bernardino Avenue and Pioneer Avenue, and the Project would not use septic tanks or alternative wastewater disposal systems. As a result, no impacts related to septic tanks or alternative wastewater disposal systems would occur from implementation of the proposed Project.

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

Less Than Significant Impact with Mitigation Incorporated. The proposed Project would develop up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street. The Project would include earthmoving activities such as grading, with the potential to disturb previously unknown paleontological resources. The Geotechnical and Infiltration Evaluation (Appendix F) indicates that the Project site is underlain by disturbed soil associated with previous agricultural use at depths of approximately two to four feet, overlaying alluvial material encountered to the maximum depth of approximately 51.5 feet. The Archaeological and Built Environment Resources Inventory and Evaluation Report (Appendix E) also describes that the Project site is underlain by Holocene-age alluvial fan deposits. Holocene alluvium is generally considered to be geologically too young to contain significant nonrenewable paleontological resources (i.e., fossils) and is thus typically assigned a low paleontological sensitivity. Nevertheless, earthmoving activities associated with Project construction could still potentially encounter previously unknown paleontological resources. Therefore, as a precaution, the Project would be required to implement Mitigation Measure GEO-1, preparation of a Paleontological Resources Impact Mitigation Program (PRIMP). Mitigation Measure GEO-1 requires preparation of a PRIMP and that ground disturbing activities be monitored to identify and recover any significant

fossil remains. With implementation of Mitigation Measure GEO-1, impacts to paleontological resources would be less than significant.

Existing Plans, Programs, or Policies

PPP WQ-1: General Construction Permit. As listed in Section 5.10, *Hydrology and Water Quality*.

Mitigation Measures

Mitigation Measure GEO-1: Paleontological Resources Impact Mitigation Program (PRIMP). Prior to the issuance of grading permits, the Applicant shall provide a letter to the City Development Services Director, or the Director's designee, from a professional paleontologist, stating that a qualified paleontologist (who meets the Society of Vertebrate Paleontology's definition for qualified profession paleontologist) has been retained to provide services for the proposed Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist on-site. The PRIMP shall be provided to the City for review and approval. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. Prior to commencement of grading activities, the City of Redlands Planning Division, or designee, shall verify that all Project grading and construction plans specify the requirements herein related to the PRIMP and the unanticipated discovery of paleontological resources.

In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered pursuant to the guidelines of the Society of Vertebrate Paleontology.

Criteria for discarding specific fossil specimens shall be made explicit in the PRIMP. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project construction, then recovery techniques shall be applied. Actions include recovering a sample of the fossiliferous material prior to construction, monitoring construction activities and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage, and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource. If no institution accepts the fossil(s), they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, shall be prepared and submitted to the City of Redlands Planning Division. The report and inventory, when submitted to the City of Redlands Planning Division, shall signify completion of the program to mitigate impacts to paleontological resources.

5.8. GREENHOUSE GAS EMISSIONS

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

This section was prepared using the Air Quality, Energy, and GHG Impact Analysis Report prepared by EPD Solutions, Inc. in March 2026 (Appendix A).

California State Executive Order S-3-05, issued by Governor Arnold Schwarzenegger in June 2005, established comprehensive GHG reduction targets for the State. It mandated reducing GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. This Executive Order laid the foundation for subsequent climate change mitigation efforts in California, including the development of various policies and programs aimed at reducing emissions across sectors such as transportation, energy, and industry. The objective of the Executive Order is to contribute to capping worldwide CO_2 concentrations at 450 parts-per-million (ppm), stabilizing global climate change.

The City adopted the Redlands Climate Action Plan (CAP) and General Plan 2035 in 2017. The CAP's GHG emission targets and goals are based on meeting the goals in Executive Order B-30 15 and SB 32 and following the CAP guidelines established in CARB's 2022 Scoping Plan. The CAP includes emissions targets of 6.0 $MTCO_2e$ per capita (service population) per year for 2030 and 5.0 $MTCO_2e$ per capita per year for 2035. Thus, for purposes of analysis in this analysis, if Project-related GHG emissions do not exceed the 6.0 $MTCO_2e$ per capita (service population) per year for 2030 threshold, then Project-related GHG emissions would clearly have a less-than-significant impact.

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

Less Than Significant Impact. Global climate change is not confined to a particular project area. A typical project does not generate enough greenhouse gas (GHG) emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Construction

During construction, temporary sources of GHG emissions include construction equipment and workers' commutes to and from the site. Construction GHG emissions associated with the proposed Project were

modeled using CalEEMod version 2022.1 and are presented in Table 5.8-1. As shown on Table 5.8-1, the proposed Project has the potential to generate a total of approximately 41 $MTCO_2e$ per year from construction emissions amortized over 30 years.

Table 5.8-1: Project Construction GHG Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
2027	735
2028	483
Total Emissions	**1,217**
Total Emissions Amortized Over 30 Years	41

Note: Numbers have been rounded.
Source: Appendix A

Operation

Operation of the proposed Project would result in area and indirect sources of operational GHG emissions that would primarily result from vehicle trips, electricity and natural gas consumption, and solid waste generation. The CalEEMod modeled operational and total GHG emissions that would be generated from implementation of the proposed Project are shown in Table 5.8-2. The proposed Project's construction-related GHG emissions are amortized over 30 years and added to the operational emissions estimate in order to determine the proposed Project's total annual GHG emissions. As shown in Table 5.8-2, the Project's construction and operational GHG emissions would total 3,318 $MTCO_2e$ per year, equating to 4.44 $MTCO_2e$ per service population per year, which is below the City of Redlands CAP Year 2030 target threshold of 6.0 $MTCO_2e$ per service population per year. Additionally, the proposed Project would be required to meet the 2022 Title 24 building standards for energy efficient lighting and appliances as well as CALGreen Standards which require sustainable measures be taken such as the inclusion of bike racks, efficient lighting, and using trees as shade in parking areas. Overall, impacts related to the generation of greenhouse gas emissions through Project construction and operation would be less than significant.

Table 5.8-2: Total Project GHG Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Mobile	2,458
Area	75
Energy	645
Water	31
Waste	68
Refrigeration	1
Total Project Operation Emissions	**3,277**
Amortized Construction Emissions	41
Total Project Emissions	**3,318**
Service Population	748
Emissions per Service Population per Year	4.44

Activity	Annual GHG Emissions ($MTCO_2e$)
City of Redlands CAP YEAR 2030 Service Population Threshold Per Capita Per Year	6.0
Threshold Exceeded?	**No**

Note: Numbers have been rounded.
Source: Appendix A

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

Less Than Significant Impact. The Project would comply with applicable plans, policies, and programs outlined in the City of Redlands General Plan and CAP, which incorporate the goals and reduction strategies of the 2022 California Air Resources Board (CARB) Scoping Plan and align with the SCAG Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level, and the proposed Project would be required to comply with these regulations as they come into effect. Therefore, implementation of the proposed Project would not conflict with existing plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gas.

State and Regional Guidance

2022 Scoping Plan

The 2022 CARB Scoping Plan Update sets the GHG emission reduction target for 2045 at 85 percent below 1990 levels, which was codified by SB 32. As seen in Table 5.8-3, the Project would be consistent with the 2022 Scoping Plan.

Table 5.8-3: 2022 Scoping Plan Consistency Summary

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	**Consistent.** The Project would comply with Title 24 Part 6 energy requirements as well as Title 24 Part 11 building standards, along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent.** The proposed Project includes the installation of sidewalks along the Project's frontage on Tennessee Street and West San Bernardino Avenue and the addition of a bus stop (provided by Omnitrans) to the south of the Project site to encourage alternative modes of transportation. The Project is consistent with the growth and land use assumptions in the Southern California Association of Governments' 2024 RTP/SCS, so the Project would not interfere with the analysis completed for the Connect SoCal report outlining VMT reduction targets and measures.

Action	Consistency
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	**Consistent.** The proposed Project would comply with Title 24 Part 6 by providing electrical wiring in garages to allow for the future installation of electric vehicle chargers.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The proposed Project would comply with the Title 24 Part 6 building energy requirements, which would require all in-unit appliances for residential projects to be Energy Star certified.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Consistent.** The proposed Project would be required to use construction equipment that is registered by CARB and meets CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.

Source: Appendix A

SCAG Connect SoCal 2024

On April 4, 2024, the SCAG Regional Council adopted Connect SoCal 2024, the 2024–2050 RTP/SCS. Connect SoCal 2024 establishes long range regional transportation goals, transportation improvement programs, regional housing needs allocations, and related strategies to integrate land use and transportation planning throughout the SCAG region. A key objective of the RTP/SCS is to reduce per capita GHG emissions from passenger vehicle travel in accordance with State targets.

The Project site is located within the SCAG region and is therefore subject to the regional planning framework established by Connect SoCal 2024. As a residential development consisting of 275 single-family homes and seven multifamily dwelling units, the Project would not generate population or employment growth beyond what is anticipated in the City of Redlands General Plan and associated regional growth forecasts. The Project requires a General Plan Amendment and Specific Plan Amendment to allow the proposed residential uses; however, the development would occur within the City and would not alter regional transportation patterns or infrastructure planning assumptions.

Although SCAG policies are implemented primarily at the regional and local jurisdiction levels rather than at the individual project level, the proposed Project would not interfere with the implementation of Connect SoCal 2024 strategies. The Project would comply with applicable State building energy efficiency standards (Title 24) and would support regional objectives related to coordinated land use and transportation planning. Accordingly, the Project is consistent with Connect SoCal 2024 and would not conflict with SCAG's regional growth, transportation, or GHG reduction framework.

Local Planning and Climate Action Guidance

City of Redlands General Plan Update

The City of Redlands General Plan 2035 Final Environmental Impact Report (FEIR) states that implementation of the General Plan would generate new GHG emissions, directly and indirectly. However,

General Plan policies would help Redlands achieve the goals of SCAG's RTP/SCS, which would contribute to the achievement of SCAG's GHG emissions reductions goals per capita required by California State Senate Bill (SB) 375. Therefore, the General Plan FEIR concluded that there would be no impacts related to GHG emissions, and no mitigation measures were required or identified. While no significant GHG-related impacts have been identified in relation to adoption and implementation of the General Plan, the General Plan includes policies that would further reduce the GHG emissions from individual development projects that take place through 2035. Table 5.8-4 summarizes how the Project is consistent with the applicable General Plan policies that focus on GHG emissions reductions.

Table 5.8-4: City of Redlands General Plan Consistency Summary

Goals, Policies, and Actions	Consistency
8-A.1 Work with Southern California Edison Company (SCE) and Southern California Gas Company (SCG) to educate the public about the need to conserve energy resources and the higher energy efficiency of new appliances and building materials.	**Consistent.** The Project would not impede this action. The Project incorporates high-efficiency, all-electric appliances and complies with Title 24 Part 6 and Part 11 energy standards, supporting energy conservation goals. By aligning with these building standards, the Project indirectly reinforces the City's efforts to educate the public on energy-efficient technologies and sustainable building practices.
8-A.2 Support San Bernardino County and San Bernardino Associated Governments (SANBAG) in implementation of their energy-related policies.	**Consistent.** The Project would not impede this action. All Project development activities, including design, construction, and operation, adhere to State energy codes and regional sustainability requirements. The Project is compatible with County and SANBAG energy related policies, contributing to overall regional energy conservation and GHG reduction strategies.
8-A.3 Leverage and help drive community participation in utility company programs and financial incentives within the City (e.g., one stop information clearinghouse, incentives, on bill financing, etc.).	**Consistent.** The Project would not impede this action. While primarily a private residential development, the Project supports the City's objectives by integrating energy-efficient measures and infrastructure that align with available utility programs and incentives, such as electrical wiring for future EV chargers and energy efficient appliances, encouraging residents to participate in utility programs and adopt energy saving practices.
8-A.5 Accelerate the adoption of solar power and/or other alternative energy usage in Redlands through actions such as: Establishing incremental growth goals for solar power/alternative energy systems in Redlands; Developing guidelines, recommendations, and examples for cost-effective solar and/or other alternative energy-based installation; and Installing solar/alternative energy technology on available City spaces.	**Consistent.** The Project would not impede this action. The Project is designed to comply with current Title 24 standards and CALGreen Code requirements, which facilitate energy-efficient design and support renewable energy integration. The proposed residences would include solar roofs in compliance with Title 24 requirements, contributing to the City's incremental adoption of renewable energy technologies and supporting long term sustainability goals.

Goals, Policies, and Actions	Consistency
8-A.6 Complete a cost-benefit analysis for new City energy conservation or renewable energy projects that reviews the costs and benefits of a project over its life cycle to ensure the highest and best use of available funds.	**Consistent.** The Project would not impede this action. The Project is designed to meet energy efficiency standards under Title 24 Part 6 and Part 11, which ensures long-term operational cost savings. By using energy-efficient systems and all-electric appliances, the Project aligns with the City's goal of optimizing energy investments and supports the overall efficiency of City and community energy programs.
8-A.7 Seek alternatives to reduce non-renewable energy consumption attributable to transportation within the Planning Area. Seek funding and other assistance from the South Coast Air Quality Management District (AQMD) for installation of electric vehicle charging stations at appropriate locations throughout the city.	**Consistent.** The Project incorporates measures to reduce transportation-related non-renewable energy consumption, including the installation of sidewalks along the Project frontage and a proposed Omnitrans bus stop to encourage alternative transportation modes. Additionally, the Project includes electrical wiring in garages for potential future electric vehicle charging infrastructure, which supports the City's initiatives for EV adoption and aligns with regional programs such as AQMD funding opportunities.
8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled.	**Consistent.** The Project is designed and constructed in full compliance with Title 24 Part 6 and Part 11 standards. All residential units would include Energy Star certified appliances, and the Project would incorporate energy-efficient building materials and systems. This ensures the Project contributes to the City's objectives for energy efficiency and reduced GHG emissions.
Policy 8-P.9 Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	**Consistent.** The Project incorporates multiple sustainability measures, including all-electric appliances, energy-efficient building design, and infrastructure to support alternative transportation. By maintaining Project GHG emissions below the City's CAP thresholds (4.44 $MTCO_2e$ per service population per year Project emissions vs. 6.0 $MTCO_2e$ CAP threshold), the Project contributes to the reduction of community-wide emissions and aligns with the City's sustainability initiatives.
Policy 8-P.10 Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use.	**Consistent.** The Project demonstrates alignment with this policy through energy-efficient design, and potential support for EV charging. While the Project is a private residential development, its adherence to energy and efficiency standards supports municipal goals by reducing fossil fuel consumption indirectly and promoting energy-conscious building practices in the community.

Source: Appendix A

City of Redlands Climate Action Plan

The City of Redlands adopted its CAP in December 2017 to establish a framework for reducing GHG emissions communitywide through 2035. The CAP contains GHG reduction policies across transportation,

land use, energy use, water management, and waste reduction and recycling. The CAP was developed to align with statewide GHG reduction targets, including those established in the 2022 CARB Scoping Plan, which sets sector-specific strategies necessary to achieve carbon neutrality by 2045. By incorporating the objectives of the CARB Scoping Plan, the CAP supports reductions in building energy, transportation, waste, and land use, and promotes implementation of mandatory measures in effect at the time of construction and operation, including compliance with the California Building Standards Code (Title 24), which incorporates the California Energy Code (Part 6) and CALGreen Code (Part 11). Table 5.8-5 shows the Project's consistency with applicable City of Redlands CAP policies related to GHG emissions reduction and sustainability.

Additionally, based on project-specific GHG emissions modeling, the proposed Project would generate approximately 3,318 metric tons of $MTCO_2e$ per year, as shown in Table 5.8-2, equating to 4.44 $MTCO_2e$ per service population per year, which is below the City of Redlands CAP Year 2030 target threshold of 6.0 $MTCO_2e$ per service population per year. Thus, the Project would be in line with the GHG reduction goals of the City's CAP.

Table 5.8-5: City of Redlands CAP Consistency Summary

Policies	Consistency
Policy 8-A.45 Prepare a Climate Action Plan to ensure that the Planning Area complies with State-mandated GHG emissions.	**Consistent.** The Project's construction and operational GHG emissions are projected at 3,318 $MTCO_2e$ per year, which equates to 4.44 $MTCO_2e$ per service population per year based on an average household size of 2.65 persons per household. This is below the City of Redlands CAP 2030 threshold of 6.0 $MTCO_2e$ per service population per year. By remaining below the CAP threshold, the Project aligns with the City's commitment to comply with State-mandated GHG emission reduction requirements and demonstrates adherence to the framework established in the CAP.
Policy 8-A.46 Continue to monitor the City's compliance with State-mandated GHG emissions, as provided for in the Climate Action Plan. Make timely adjustments to City policies as required to continue meeting State GHG targets, and as changes in technology, federal and State programs, or other circumstances warrant.	**Consistent.** The Project's emissions are below the Redlands CAP threshold and therefore would not interfere with ongoing monitoring of the City's compliance with State-mandated GHG targets. Additionally, the Project would incorporate current technologies and standards, including Energy Star appliances, Title 24 compliance, and energy-efficient building measures. These features ensure that the Project remains aligned with evolving State and City GHG programs and can accommodate future policy updates without contributing to exceedances.
Policy 8-A.47 Demonstrate City leadership by giving preference to or providing incentives for climate friendly purchasing.	**Consistent.** The Project does not impede City-led climate-friendly purchasing programs and supports local sustainability goals by implementing energy efficient appliances, adherence to Title 24 Part 6 energy requirements, and potential infrastructure for electric vehicle charging. While the Project is a private residential development, its design and construction practices are consistent with the City's objectives for

Policies	Consistency
	energy efficiency and reduced carbon footprint, supporting broader CAP goals.
Policy 8-A.48 Support a regional approach to study the feasibility of establishing Community Choice Aggregation (CCA) or another program that increases the renewable energy supply and maintains the reliability and sustainability of the electrical grid.	**Consistent.** The Project is compatible with regional renewable energy initiatives such as Community Choice Aggregation by providing infrastructure for future integration of electric vehicle charging and Energy Star appliances. By complying with local building standards and energy codes, the Project does not impede the development or operation of regional renewable energy programs and contributes to the City's overall strategy for grid sustainability and increased renewable energy utilization.

Source: Appendix A

As shown in Tables 5.8-4 and 5.8-5, the Project is consistent with the City of Redlands General Plan and CAP, which incorporate the 2022 CARB Scoping Plan and align with the SCAG Connect SoCal 2024 RTP/SCS. The Project would implement applicable GHG reduction design features and would not interfere with plans, policies, or regulations adopted to reduce GHG emissions. Additionally, the Project would comply with State energy standards provided in Title 24 and incorporate sustainable design features. Therefore, the proposed Project would not result in a conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
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?	☐	☐	☒	☐

This section was prepared using the Phase I Environmental Site Assessment prepared by AEI Consultants in December 2024 (Appendix G).

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

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

health and safety of persons or harmful to the environment if released into the workplace or the environment.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the proposed Project. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard, however, on all construction sites, and the proposed Project would not cause greater risks than would occur on other similar construction sites. Construction contractors would be required to comply with federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials.

To avoid an impact related to an accidental release, the use of BMPs during construction are implemented as part of a SWPPP pursuant to requirements set forth by the NPDES General Construction Permit (PPP WQ-1). Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

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

Mandatory compliance with laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment. Impacts would be less than significant.

Operation

The Project site would be developed with residential uses. Operation of the proposed residences would generally include the use of common hazardous materials, including: solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. Although the proposed Project would utilize common types of hazardous materials, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the proposed Project. Therefore, operational impacts related to routine transport, use, and disposal of hazardous materials during operation of the proposed Project would be less than significant.

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

Less Than Significant Impact. In December 2024, AEI Consultants completed a Phase I Environmental Site Assessment (Phase I ESA) of the Project site (Appendix G). The 2024 Phase I ESA did not identify any Recognized Environmental Conditions (RECs) related to the Project site.

Construction

Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. The Project site does not have any RECs, was previously used for agricultural uses, and is currently vacant land. To avoid an impact related to an accidental release, the use of BMPs during construction are implemented as part of a SWPPP as required by the NPDES General Construction Permit (PPP WQ-1). Implementation of a SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

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

With implementation of construction BMPs, impacts related to the reasonably foreseeable upset or accident conditions related to hazardous materials would be less than significant.

Contaminated Soils. The Project site was previously used for agricultural uses, and therefore there is potential for agricultural chemicals, such as pesticides and fertilizers, to have been used on-site, and that the site has been impacted by the use of such agricultural chemicals. According to the Phase I ESA no evidence of spilling, dumping, emitting, and/or mishandling of pesticides and/or fertilizers was identified, and thus the former agricultural uses do not represent a REC. Furthermore, while residual pesticides may remain in shallow soil, the past agricultural uses do not represent a REC under the ASTM E1527 definition.

Additionally, according to the Phase I ESA, a 500-gallon steel tank containing diesel fuel was previously located on the site within the ultimate right of way of San Bernardino Avenue near Tennessee Street, at 1000 San Bernardino Avenue. The tank was removed by Haz Mat Trans, Inc. on March 7, 2006, and one soil sample collected from beneath the UST was submitted to Centrum Analytical Laboratories, Inc., for analysis. The sample was analyzed for total petroleum hydrocarbons as diesel, and concentrations of methyl tert-butyl ether, benzene, and volatile hydrocarbons as diesel were all indicated as non-detectable. Therefore, impacts related to hazards from contaminated soils would be less than significant.

Operation

As described above, the risks related to upset or accident conditions involving the release of hazardous materials into the environment would be adequately addressed through compliance with existing federal, State, and local regulations. Development under the proposed Project would involve residential uses that would use and store common hazardous materials such as paints, solvents, and cleaning products. Also, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides.

As described previously, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the proposed Project. In addition, a Water Quality Management Plan (WQMP) is required to be implemented for the proposed Project (as further discussed in Section 5.10, *Hydrology and Water Quality*). The BMPs that would be implemented as part of the WQMP would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the proposed Project. As such, operation of the proposed Project would not result in 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, and impacts would be less than significant.

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

Less Than Significant Impact. Citrus Valley High School (located at 800 West Pioneer Avenue) is located across West Pioneer Avenue adjacent to the northeast boundary of the site and within 0.25 miles of the site.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be used for construction at the Project site. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous materials and may also generate hazardous emissions. As discussed in Impact (a), construction contractors would be required to comply with federal, State, and local laws and regulations regarding the use of hazardous materials. Additionally, as discussed in Section 5.3, *Air Quality*, construction-related emissions would be regulated by SCAQMD Rules 402 and 403 (PPP AQ-1 and PPP AQ-2). Furthermore, to the extent possible, construction vehicles accessing the sites would use designated truck route West San Bernardino Avenue, so trucks would not drive past Citrus Valley High School. Therefore, potential construction-related impacts to the school caused by hazardous emissions and materials would be less than significant.

Operation

As described in response to Impact HAZ-1, operation of the proposed Project includes activities related to residential development, which generally uses common hazardous materials, including: solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. Normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment or school facilities in the vicinity of the proposed Project. Therefore, operational impacts related to nearby schools would be less than significant.

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

Less Than Significant Impact. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, nor are any of the adjacent properties. Government Code Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

The Phase I ESA that was conducted included database searches to determine if the Project area or any nearby properties are identified as currently having hazardous materials. The record searches determined that although the site has a history of removal of non-RCRA hazardous waste, consisting of one 55-gallon drum of soil, one 55-gallon drum of waste oily water, and one cubic yard box of waste oil, the listing identified the site as "not a generator, verified." Therefore, the Project site is not located on or near by a site which is included on a Cortese List of hazardous materials sites pursuant to Government Code Section 65962.5 (Appendix G).

Also, although the Phase I ESA (Appendix G) identified off-site sources of contamination, such as hazardous waste generation, it did not identify any nearby or surrounding area sites that are included on a Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As a result, impacts related to hazards from being located on or adjacent to a hazardous materials site would not occur from implementation of the proposed Project.

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

Less Than Significant Impact. The San Bernardino International Airport (SBIA) is located approximately two miles northwest of the Project site. The Project site is located within the SBIA airport influence area boundary; however, it is outside of the six compatibility zones that regulate land uses to minimize air crash hazards to persons on the ground, as shown in Figure 3.7-2, *Airport Hazards,* from the City of Redlands General Plan EIR (City of Redlands, 2017b). Aircraft operations are subject to Federal regulations regarding flight altitudes and aircraft noise. Therefore, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area and impacts would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. According to the City of Redlands General Plan EIR, the Project site is located adjacent to I-210,

which is designated as an emergency route (City of Redlands, 2017b). However, installation of new local streets and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of any lanes within I-210. Any temporary lane closures along West Pioneer Avenue and West San Bernardino Avenue needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and potential construction-related emergency access or evacuation impacts would be less than significant.

Operation

Direct access to the Project site would be provided via New York Street (proposed) to the east as well as two proposed local streets: one on West San Bernardino Avenue and one on West Pioneer Avenue. The New York Street (proposed), Project local streets, and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Redlands Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 15.20. As such, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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

Less Than Significant Impact. The Project site is within a developed area in the City of Redlands. The Project site is bound by Citrus Valley High School to the northeast and vacant land to the northwest, single-family residences to the east, vacant land to the south, and industrial to the west. The Project site is not adjacent to any wildland areas. According to the CAL FIRE Hazard Severity Zone map, the Project site is within an area identified as a High Fire Hazard Severity Zone (HFHSZ) in a Local Responsibility Area (CAL FIRE, 2024). While the Project site is currently undeveloped, except for Tennessee street, and vacant with low to the ground vegetation, the site is bounded by West Pioneer Avenue, West San Bernardino Avenue, and I-210 and the surrounding area is predominately developed with residential, industrial, and public/institutional uses or is undergoing development. As such, the area lacks extensive combustible vegetation necessary for the uncontrolled spread of wildfire. Furthermore, the proposed Project would be an infill development, converting vacant land into a residential development, which would remove existing combustible materials and vegetation and thereby reducing fire hazard risk on-site. In addition, the proposed Project would feature block walls and adapted vegetation adhering the Redlands Fire Department Landscape and Vegetation Management Development Guidelines.

Implementation of the proposed Project would be required to adhere to the California Fire Code, as adopted by the City of Redlands in Municipal Code Chapter 15.20 and would be reviewed by the City's Building and Safety Division during the permitting process to ensure that the Project plans meet the fire protection requirements. The Project site does not include any slopes or prevailing winds that would

exacerbate fire risks. As a result, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 402. As listed in Section 5.3, *Air Quality*.

PPP AQ-2: Rule 403. As listed in Section 5.3, *Air Quality*.

PPP WQ-1: General Construction Permit. As listed in Section 5.10, *Hydrology and Water Quality*.

Mitigation Measures

None.

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
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 result in a substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) 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 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?	☐	☐	☒	☐

f) 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 impede or redirect flood flows?	☐	☐	☒	☐
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

This section was prepared using Preliminary Water Quality Management Plan (PWQMP) prepared by Hicks & Hartwick, Inc. in May 2025 (Appendix H).

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

Less Than Significant Impact.

Construction

Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute waters.

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

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process included as PPP WQ-1, which would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The proposed Project would develop up to 282 new residential units which would introduce pollutants such as chemicals from household cleaners, nutrients from fertilizer, pesticides and sediments from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. Thus, the proposed Project would be required to comply with existing regulations that limit the potential for pollutants to discharge from the site through the incorporation of source control BMPs, preventative LID site design practices, and treatment control BMPs. The preventative LID site design practices would reduce runoff generation.

The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs would treat stormwater runoff. For the purposes of stormwater quality, a combination of on-site infiltration basins and underground drainage infrastructure is proposed. The Project proposes two infiltration basins. The first basin would be located in the southwestern corner of the site with an 8,735 SF surface area and the second basin would be located in the northwestern corner of the site with a 22,090 SF surface area. All stormwater runoff would be collected via new 24-inch storm drain lines proposed within the interior roadways to convey runoff to the two on-site basins for infiltration. The basin located in the southwestern corner of the site would ultimately discharge to an existing 24-inch storm drain line along the southwestern boundary of the site, which connects to the Caltrans-maintained storm drain system along the east side of I-215. The basin located in the northwestern corner of the site would ultimately discharge into the trapezoidal concrete open channel immediately west of the Project site, which connects to the Caltrans-maintained storm drain system along the east side of I-215.

With implementation of the operational source and treatment control BMPs that are outlined in the PWQMP (Appendix H), which would be reviewed and approved by the City during the plan check and permitting processes, potential pollutants would be reduced to the maximum extent feasible. Therefore, implementation of the proposed Project would not substantially degrade water quality and impacts would be less than significant.

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

Less Than Significant Impact. Groundwater recharge is facilitated by percolation of stormwater through previous surface areas to groundwater resources. Increasing the imperviousness of an area could interfere with groundwater recharge capabilities of an area. The Project site is currently largely pervious. The proposed Project would develop the currently vacant site with up to 282 residential units, resulting in an overall increase of impervious surfaces on-site with the potential to interfere with groundwater recharge and can potentially deplete supplies. However, the Project would include landscaping and permeable areas throughout the site that would allow stormwater to infiltrate on-site. The proposed Project would install new on-site water and sewer lines that would be connected to the City's existing infrastructure in the surrounding streets. Two infiltration basins would be installed in the northwest and southwest corners of the site. Stormwater would be captured via new 24-inch storm drain lines proposed within the interior roadways to convey runoff to the on-site basins for infiltration. The Project site is not utilized for groundwater recharge and the Project would include landscaping and drainage improvements that would contribute to infiltration. As a result, the proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge; and the Project would not impede sustainable

groundwater management of the basin. Thus, the proposed Project would have less than significant impact.

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

Less Than Significant Impact.

Construction

Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment and could result in erosion or siltation. However, as described previously, construction of the proposed Project requires City approval of a SWPPP prepared by a Qualified SWPPP Developer (included as PPP WQ-1). The SWPPP is required during the City's plan check and permitting process and would include construction BMPs to reduce erosion or siltation. Typical BMPs for erosion or siltation include use of silt fencing, fiber rolls, gravel bags, stabilized construction driveway, and stockpile management. In addition, the City requires a standalone Erosion Control Plan for all grading plans. Adherence to the City's erosion plan guidelines during construction of the Project and the existing requirements and implementation of the required BMPs per the plan check and permitting process would ensure that erosion and siltation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The Project site is currently vacant and undeveloped and contains no drainage, riparian, or riverine features, nor do rivers or streams intersect the site. Development of the proposed Project would include residential dwelling units, interior roadways, and communal open space and would increase the amount of impervious surfaces on-site. The pervious surfaces on the site would be landscaped and there would be no substantial areas of bare or disturbed soil on-site subject to erosion. The Project's proposed 24-inch storm drain lines within the interior roadways would convey runoff from the site's impervious areas to the two on-site basins for infiltration. On-site drainage facilities would be regularly maintained, with lot BMPs managed by the lot owner and the infiltration basins and associated storm drains maintained by the City of Redlands through a Community Facilities District (CFD).

As discussed previously, the proposed Project would be required to comply with existing regulations through the use of source control BMPs, preventative LID site design practices, and treatment control BMPs to ensure that operation of the residential development would not result in erosion or siltation. With implementation of the operational BMPs that are outlined in the PWQMP (Appendix H), which would be reviewed and approved by the City during the plan check and permitting processes, impacts related to erosion or siltation on-site or off-site would be less than significant.

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

would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As described in the previous response, the Project site does not contain, nor is adjacent to, a stream, river, creek, or other flowing water body. Thus, impacts related to alteration of the course of a stream or river would not occur. In addition, the proposed Project would be required to implement a SWPPP (included as PPP WQ-1) during construction that would implement BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and flooding on or off-site would not occur.

Also, as described above, the proposed Project would implement preventative LID site design practices to maintain the existing on-site drainage pattern and preserve the existing time of concentration, which would typically decrease with additional impervious surfaces (Appendix H). After construction of the Project, flows would travel east to west along the internal street system to catch basins located at low points and street intersections. Flows collected in the catch basins would then flow through the storm drain system to two infiltration basins in the northwest and southwest corners of the site for treatment and infiltration. The proposed infiltration basins would remove pollutants in stormwater runoff (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides).

Additionally, per the State Water Resources Control Board Municipal Separate Storm Sewer System (MS4) permit requirements, post development peak stormwater runoff discharge rates are not allowed to exceed the estimated pre-development water discharge rate. With installation of an on-site storm drain system and infiltration basins, the rate of stormwater runoff would not substantially increase in a manner that would result in additional on-site flooding and would not result in off-site flooding. Therefore, impacts associated with changes to the existing drainage pattern that could result in flooding would be less than significant, and no mitigation would be required.

e) 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As described in the previous responses, the proposed Project would be required to implement a SWPPP (PPP WQ-1) during construction that would include BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and that pollutants would not discharge from the Project site, which would reduce potential impacts to drainage systems and water quality to a less than significant level.

Per the State Water Resources Control Board Municipal Separate Storm Sewer System (MS4) permit requirements, post development peak stormwater runoff discharge rates are not allowed to exceed the estimated pre-development water discharge rate. The proposed Project would implement preventative LID site design practices to maintain the existing on-site drainage pattern and preserve the existing time of concentration, which would typically decrease with additional impervious surfaces (Appendix H). Under the Project, flows would travel east to west along the internal street system to catch basins located at low points and street intersections. Flows collected in the catch basins would then flow through the storm drain system to two infiltration basins in the northwest and southwest corners of the site for treatment

and infiltration. The proposed infiltration basins would remove pollutants in stormwater runoff (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). Thus, operation of the Project would not substantially increase stormwater runoff, and pollutants would be filtered on-site. Impacts related to drainage systems and polluted runoff would be less than significant with implementation of existing requirements, which would be verified during the plan check and permitting process.

f) 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 impede or redirect flood flows?

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the Project area (06071C8704J) is identified as: Flood Zone X, an area of minimal flood hazard outside the 0.2% annual chance floodplain (FEMA, 2024). The City would review the proposed Project permit applications to ensure the proposed development would not be subject to significant flood hazard and structures would be floodproofed. Thus, the proposed Project would not impede or redirect flood flows, and impacts related to flood flows would be less than significant.

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

Less Than Significant Impact. As discussed above, the Project site is classified as Flood Zone X, which is an area of minimal flood outside the 0.2% annual chance floodplain. In addition, a SWPPP would be prepared and implemented as part of the Project to ensure that pollutants are contained and would not be released from the Project site during construction as included in PPP WQ-1. Post construction stormwater infrastructure would ensure capture and treatment of storm flows. Therefore, implementation of the proposed Project would not risk the release of pollutants due to Project inundation in a flood hazard zone.

Tsunamis are tidal waved generally caused by earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The Project site is approximately 50 miles from the Pacific Ocean shoreline. Based on the inland location of the site, the Project site is not within a tsunami zone.

A seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Project site is not within vicinity of any impounded bodies of water. As such the proposed Project is not at risk of a seiche and impacts would be less than significant.

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

Less Than Significant Impact. The Project site is located in the Upper Santa Ana River watershed, which is regulated by the Santa Ana Regional Water Quality Control Board (SARWQCB). Water quality standards for the Santa Ana region, including the Upper Santa Ana River watershed, are set forth in the Water Quality Control Plan: Santa Ana River Basin (Basin Plan). The Basin Plan establishes water quality objectives to protect the valuable uses of surface waters and groundwater in the Santa Ana region. Under Section 303(d) of the Clean Water Act, the Basin Plan is intended to protect surface waters and groundwater from both point and nonpoint sources of pollution within the Project area and identifies water quality standards and objectives that protect the beneficial uses of various waters. To meet the

water quality objectives established in the Basin Plan, SARWQCB established total maximum daily loads, which are implemented through stormwater permits. The proposed Project would be required to comply with applicable regulations associated with water quality. Compliance with these regulations would ensure that the proposed Project would be consistent with the Basin Plan.

The Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. The Project site is underlain by the Upper Santa Ana Valley Groundwater Basin, which is a very low-priority basin (California Department of Water Resources, 2020). To date, no sustainable groundwater management plan has been developed for the Upper Santa Ana Valley – San Bernardino groundwater basin nor the Bunker Hill groundwater subbasin.

Additionally, the Project would be subject to existing City of Redlands General Plan policies in the Sustainable Community Element that aim to limit potential water quality impacts and to promote groundwater conservation. Implementation of policies in the City of Redlands General Plan and the Basin Plan would ensure the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP WQ-1: General Construction Permit. Prior to grading permit issuance, the Project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a qualified SWPPP developer pursuant to the Municipal Code Chapter 13.54. The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other City requirements to comply with the National Pollutant Discharge Elimination System (NPDES) requirements to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City staff or its designee to confirm compliance.

Mitigation Measures

None.

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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) Physically divide an established community?

No Impact. The physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development was built inconsistent with the land uses in the community such that it divided the community.

The proposed Project would develop up to 282 residential units on a site that is currently covered by vacant land and Tennessee Street. The Project site is undeveloped and utilized primarily for agricultural purposes. Entitlements for the Project would include a General Plan Amendment to change the existing land use designation from Commercial (C) to Medium Density Residential (MDR). However, the Project would be consistent with the surrounding uses. The surrounding area is currently developed with vacant land and Citrus Valley High School to the north, vacant land to the south, single-family residences to the east, and SR-210 to the west. The proposed Project would result in vacating Tennessee Avenue within the Project site and the development of New York Street; however, those improvements would be limited to the boundaries of the Project site and would not result in the disruption of access to services. Therefore, the Project would not physically divide an established community and would result in no impact.

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

Less Than Significant Impact.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS goals that are relevant to the proposed Project focus largely on maximizing mobility, encouraging development patterns and densities that reduce infrastructure costs, and provide for efficiency. The proposed Project would be consistent with the applicable 2024 RTP/SCS goals, as detailed below in Table 5.11-1. Therefore, implementation of the proposed Project would not result in conflict with RTP/SCS goals.

Table 5.11-1: 2024 SCAG RTP/SCS Consistency Analysis

Goals	Project Consistency
Transit and Multimodal Integration	

Goals	Project Consistency
Increase multimodal connectivity (e.g., first/last mile transit and airport connections), which includes planning for and developing mobility hubs throughout the SCAG region	**Consistent**. As discussed in Section 5.17, *Transportation*, The Project would develop infill residential units which are of close proximity to a variety of public transit access points. The Project site is served by Omnitrans and there are two bus stops within one mile of the Project site. The proposed Project would also improve sidewalks and pedestrian connectivity along the frontage and provide an additional buss stop along Pioneer Avenue for Omnitrans service.
Through land use planning, support residential development along high-frequency transit corridors and around transit/rail facilities and centers	
Expand the region's networks of bicycle and pedestrian facilities. This includes creating more low stress facilities, such as separated bikeways and bike paths, slow streets, and open streets	**Consistent.** As discussed in Section 5.17, *Transportation*, potential future projects would be required, if deemed necessary, to provide bicycle facilities, as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. The proposed Project would also improve sidewalks and pedestrian connectivity along the frontage and provide an additional bus stop along Pioneer Avenue for Omnitrans service.
Safety	
Work with local, state and federal partners to advance safer roadways, including reduced speeds to achieve zero deaths and reduce GHGs	**Consistent.** As discussed in Section 5.17, *Transportation*, development implemented pursuant to the proposed Specific Plan would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Additional right-of-way dedication and street improvements along the southern frontage of the Specific Plan Area would include a 7-foot-wide sidewalk and 4-foot-wide landscape buffer within the 120-foot right-of-way. Right-of-way dedication and street improvements along the northern frontage of the Specific Plan Area would include a 5-foot-wide sidewalk and 6-foot-wide landscape buffer within the 66-foot right-of-way. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
15-Minute Communities	
Develop technical-assistance resources and research that support 15-minute communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access to neighborhood amenities, open space and urban greening, job centers and multimodal mobility options	**Consistent.** As discussed in Section 3.0, *Project Description,* the Project would develop an underutilized property and create infill residential units. The site has two bus stops within one mile and is surrounded by a variety of open spaces including Texonia Park and Martinez Park.

Goals	Project Consistency
Sustainable Development	
Research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure	**Consistent.** As discussed in Section 5.6, *Energy*, the proposed Project would comply with CALGreen/Title 24 requirements to implement energy conservation measures and water efficient plumbing.
Air Quality	
Coordinate with local, regional, state and federal partners to meet federal and state ambient air-quality standards and improve public health	**Consistent.** As described in Section 5.3, *Air Quality*, the proposed Project would not result in a cumulatively considerable impact and would be required to comply with all relevant State, regional, and local regulations and policies for reducing particulate emissions.
Clean Transportation	
Facilitate development of EV charging infrastructure through public-private partnerships	**Consistent.** As discussed in Section 5.6, *Energy*, future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Support the deployment of clean transit and technologies to reduce greenhouse gas emissions as part of the CARB innovative clean technology (ICT) rule	**Consistent.** The Project would not conflict with this measure and future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Natural and Agricultural Lands Preservation	
Work with implementation agencies to support, establish or supplement voluntary regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process	**Consistent.** As discussed in Section 5.17, *Transportation*, buildout of the proposed Specific Plan would result in a less than significant VMT impact. In addition, buildout would result in a cumulative reduction in Citywide VMT.
Continue efforts to support partners in identifying priority conservation areas— including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection	**Consistent.** The proposed Project site is located in an urbanized and developed area, within a vacant parcel. Upon implementation of Mitigation Measures BIO-1 and BIO-2, impacts to sensitive species would be less than significant.
Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts	
Climate Resilience	
Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives	**Consistent.** As discussed in Section 5.19, *Utilities and Service Systems,* the proposed Project would be required to implement the CALGreen requirements for efficient use of water. Additionally, development and construction of the Project site would require preparation and adherence to SWPPP and WQMP.
Collaborate with partners to foster adoption of systems and technologies that can reduce water demand and/or increase water supply, such as alternative groundwater recharge technologies, stormwater capture systems,	

Goals	Project Consistency
urban cooling infrastructure and greywater usage systems	Therefore, development of the site would not deplete or pollute groundwater resources.

City of Redlands General Plan 2035

The Project proposes to amend the existing General Plan land use designation on the Project site from Commercial to Medium Density Residential. The Medium Density Residential land use designation allows up to 15 dwelling units per acre. The intent of this land use category is to provide areas for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. While the development does require a land use change for the Project site, the proposed development would be subject to all land use and planning policies in the General Plan. In addition, the Project would establish the Pioneer Park Specific Plan. The proposed residential development and related infrastructure would be subject to development standards established by the Pioneer Park Specific Plan, including design guidelines to define the community and visual character. The proposed Project would be consistent with both the General Plan and new Specific Plan. Furthermore, the project-level review of the Project includes a site design review to ensure compliance with site-specific development standards, as outlined in the City's Zoning Code and other applicable ordinances. With compliance with the above plans and policies, the proposed Project would not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and a less than significant impact would occur.

Table 5.11-2: Project Consistency with Applicable General Plan Principles, Actions and Policies

General Plan Policy	Proposed Project
Principle 2-P.2 Embrace the unique identities of individual neighborhoods in Redlands and encourage the celebration and enhancement of characteristics that make each neighborhood distinct.	**Consistent.** The proposed Project would be consistent with the Pioneer Park Specific Plan development standards, as shown in Table 5.1-1, including setbacks from adjacent roadways, screening features, fencing, and landscaping. All final designs of the proposed Project, including but not limited to the proposed buildings, signage, and landscape/hardscape features, would be required to conform to all applicable City design standards and would be subject to City review and approval during the plan check and permitting process.
Action 2-A.4 Maintain continuity in streetscape design along major streets and avenues that traverse north and south – California, Nevada, Alabama, Tennessee, Orange, Church, University, Judson, and Wabash; and those that traverse east and west – Pioneer, San Bernardino, Lugonia, Redlands Boulevard, and Citrus.	**Consistent.** As discussed in Section 3.0, *Project Description*, the proposed Project would include roadway improvements along both Pioneer Avenue and San Bernardino Avenue as identified in the City of Redlands General Plan Connected City Element.
Action 2-A.10 Permit densities, design, and uses that will help preserve the character and amenities of existing neighborhoods.	**Consistent.** The proposed Project would be consistent with the Pioneer Park Specific Plan development standards, as shown in Table 5.1-1, including setbacks from adjacent roadways, screening features, fencing, and landscaping. All final designs of the proposed Project, including but not limited to the proposed buildings, signage, and landscape/hardscape features, would be required to conform to all applicable City design

General Plan Policy	Proposed Project
	standards and would be subject to City review and approval during the plan check and permitting process.
Action 2-A.13 Maintain continuity in land uses, including commercial and residential uses, across barriers such as I-10 and Highway 210. These barriers should not be seen as "walls" that define completely different neighborhoods or divide the city by land use.	**Consistent.** All developments within the Project area would be consistent with the surrounding area and land uses.
Action 2-A.14 Use development standards to ensure smooth transitions for neighborhoods that border one another so that neighborhoods maintain their unique qualities while being compatible with one another.	**Consistent.** The proposed Project would be consistent with the Pioneer Park Specific Plan development standards, as shown in Table 5.1-1, including setbacks from adjacent roadways, screening features, fencing, and landscaping. All final designs of the proposed Project, including but not limited to the proposed buildings, signage, and landscape/hardscape features, would be required to conform to all applicable City design standards and would be subject to City review and approval during the plan check and permitting process.
Policy 2-P.8 Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.	**Consistent.** The proposed Project area includes the development of infill residential which would comply with the Municipal Code design standards. The development of infill residential would also assist in the growth of Redlands' unique community and enable future tenants to enjoy the local history.
Policy 2-P.9 Provide incentives to protect, preserve, and maintain the city's heritage.	**Consistent.** As discussed in Section 5.5, *Cultural Resources*, Resource P-36-12468 was found ineligible for NRHP/CRHR, or designation as a City of Redlands Historic Resource and is therefore not considered a historical resource under CEQA or a historic property under Section 106 NHPA. Additionally, while Resource P-36-13622 (River Rock Curb) was found locally eligible for the NRHP/CRHR under Criterion C/3 as well as Redlands Historic Resources Criteria A, D, G, H, I, and J, intensive site recording and focused archival research detailed in Appendix E determined that P-36-13622 (River Rock Curb) lacks sufficient integrity to convey its historical significance; therefore, it is not eligible for the NRHP, CRHR, or designation as a City of Redlands Historic Resource, and does not qualify as a Historical Resource in accordance with CEQA.
Policy 2-P.11 Encourage retention of the character of existing historic structures and urban design elements that define the built environment of the city's older neighborhoods.	
Policy 2-P.12 Encourage retention of historic structures in their original use or reconversion to their original use where feasible. Encourage sensitive, adaptive reuse where the original use is no longer feasible.	
Policy 2-P.13 Encourage preservation of and public access to defined and established significant scenic vistas, viewpoints, and view corridors.	**Consistent.** The Project area consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the proposed Specific Plan are in or near already developed areas of the City and coincide with areas designated for development under the General Plan.

General Plan Policy	Proposed Project
Policy 2-P.17 Protect archaeological and paleontological resources for their aesthetic, scientific, educational, and cultural values.	**Consistent.** As discussed in Section 5.5, *Cultural Resources*, the proposed Project would be required to implement Mitigation Measure CUL-1 which requires contractor awareness training. If resources are discovered, Mitigation Measure CUL-2, would ensure that if any buried resources are present, they would be handled in a timely and proper manner.
Action 2-A.25 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.	**Consistent.** As discussed in Section 5.5, *Cultural Resources*, the proposed Project completed an evaluation of potential historic resources for the proposed Project that could potentially impact a building or structure in excess of 45 years of age as included as Appendix E. The report found that no resources on the site are eligible for the NRHP, CRHR, or designation as a City of Redlands Historic Resource.
Action 2-A.67 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	**Consistent.** Buildout of the Specific Plan would be within the permitted densities of the proposed MDR land use of the site. As stated above, the new development would be visually compatible with the surrounding environment.
Action 2-A.68 Discourage changes in residential areas that would disturb the character or clearly have a destabilizing effect on the neighborhood.	
Action 2-A.69 Encourage shared parking or in-lieu parking in older neighborhoods.	**Consistent.** The Proposed Specific Plan parking requirements would receive approval from the City and in compliance with parking requirements.
Action 2-A.71 Using an annually updated Archaeological Resource Sensitivity Map, review proposed development projects to determine whether a site contains known prehistoric or historic cultural resources and/or to determine the potential for discovery of additional cultural resources.	**Consistent.** As discussed in Section 5.5, *Cultural Resources*, the proposed Project would be required to implement Mitigation Measure CUL-1 which requires contractor awareness training. If resources are discovered Mitigation Measure CUL-2 would ensure that if any buried resources are present, they would be handled in a timely and proper manner. In addition, the proposed Project would be required to implement Mitigation Measure GEO-1, requiring a PRMP and paleontological monitoring.
Action 2-A.72 Require that applicants for projects identified by the South Coastal Information Center as potentially affecting sensitive resource sites hire a consulting archaeologist to develop an archaeological resource mitigation plan and to monitor the project to ensure that mitigation measures are implemented.	
Action 2-A.73 Require that areas found during construction to contain significant historic or prehistoric archaeological artifacts be examined by a qualified consulting archaeologist (RPA certified) or historian for appropriate protection and preservation.	
Action 2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.	

General Plan Policy	Proposed Project
Action 2-A.75 Require, as a standard condition of approval, that project applicants provide an assessment as to whether grading for the proposed project would impact underlying soil units or geologic formations that have a moderate to high potential to yield fossiliferous materials, prior to issuance of a grading permit. If the potential for fossil discovery is moderate to high, require applicants to provide a paleontological monitor during rough grading of the project.	
Principle 2-P.18 Reinforce Redlands' identity as a "Tree City" through cohesive streetscapes that enhance its sense of place and its heritage, and that promote pedestrian comfort.	**Consistent.** The proposed Project would comply with the municipal code design standards and receive approval from the City prior to buildout.
Action 2-A.79 Avoid sound walls as a standard on arterial streets in residential areas.	
Principal 4-P.1 Promote a balanced rate and distribution of development and uses pursuant to the standards identified in Measure U and compatible with the fabric of the existing community.	**Consistent.** Buildout of the Specific Plan would be within the permitted densities of the proposed MDR land use of the site. As stated above, the new development would be visually compatible with the surrounding environment.
Principal 4-P.3 Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city.	**Consistent.** As discussed in Section 3.0, *Project Description*, the site is located in an infill area. The Project site is vacant and is not currently utilized for agricultural or rural uses.
Action 4-A.1 Promote the orderly development and growth of urban areas in infill areas and the city center while encouraging the ongoing cultivation of agricultural land and the preservation of rural living areas in the canyons, Crafton, and Mentone.	
Action 4-A.3 Ensure that infill development complements existing development in use, design, and scale, and that it supports the cohesion and integration of the city's development pattern.	**Consistent.** As stated above, the new development would be visually compatible with the surrounding environment.
Principle 1.A.20 Development within the planning area and sphere of influence of the City of Redlands shall conform to development standards within the City. Development Agreements- All development agreements entered into by the City and developers pursuant to California Government Code Sections 65864 et. seq., - after the Effective Date of this initiative measure as defined in Section 3 hereof, shall conform to the policies contained in the Redlands General Plan. Extension of Public Utilities Outside the City Limits - No extension of City provided utility services to areas outside the City limits shall occur until such areas are properly annexed to the City, except that utility services may be extended to areas outside the City limits without prior annexation if all of the following conditions are met:	**Consistent.** The proposed Project would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City.

General Plan Policy	Proposed Project
The area to be served is not contiguous to the City of Redlands; 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 of Redlands, payment of all capital improvement and other development fees which would be applicable to the property if it were within the City limits at the time of extension of such services, and immediate processing of annexation to the City at the City's request; and; Impacts of New Development on Public Schools Shall Be Mitigated - A mandatory component of the socio-economic cost/benefit studies shall be an analysis of the effect of the proposed development on public schools facilities and resources, and shall include proposed measures to mitigate any identified adverse impacts on school facilities to the greatest extent permitted under California law.	
Principle 4-P.9 Locate medium- and high-density development near regional access routes, transit stations, employment centers, shopping areas, and public services.	**Consistent.** Development pursuant to the Project would be urban and of medium density. As stated in Section 5.17, *Transportation*, the Project site is served by Omnitrans, which would allow for medium-density development near transit routes. Furthermore, the Specific Plan is located in the vicinity of employment centers, shopping areas, and public services.
Principle 4-P.10 Ensure that the scale and character of new development is appropriate for surrounding terrain and the character of existing development.	**Consistent.** As stated above, the new development would be visually compatible with the surrounding environment.
Principle 4-P.17 Limit negative impacts to residential neighborhoods from incompatible uses.	**Consistent.** The proposed Project would result in residential development, therefore, there would be no result in incompatible uses to residential neighborhoods. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Project site and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial development.
Action 4-A.13 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	**Consistent.** Buildout of the Specific Plan would be within the permitted densities of the proposed MDR land use of the site. As stated above, the new development would be visually compatible with the surrounding environment.
Action 4-A.14 Discourage changes in residential areas that would disturb the character of or clearly have a destabilizing effect on the neighborhood.	

General Plan Policy	Proposed Project
Action 4-A.96 Encourage site designs that create an active street frontage and screen parking from the Colton Avenue and Orange Street frontages.	**Consistent.** Buildout of the Project site would be required to be consistent with design standards which would be verified by the City during the plan check and permitting process prior to obtaining building permits.
Action 4-A.141 Regulate land uses within safety and noise compatibility zones in accordance with the Airport Land Use Compatibility Plan.	**Consistent.** As stated in Section 5.9, *Hazards and Hazardous Materials*, the Project site is not within the modeled noise contours of neighboring airport.
Action 4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.	**Consistent.** The Specific Plan would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. The proposed TTM would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.
Principle 5-P.1 Maintain a cohesive circulation system through a "layered network" approach promoting complete streets and mobility for all modes while emphasizing specific transportation modes for specific corridors and geographic areas.	**Consistent.** As discussed in Section 3.0, *Project Description*, the proposed Project would include roadway improvements along both Pioneer Avenue and San Bernardino Avenue, as identified in the City of Redlands General Plan Connected City Element. The proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices.
Principle 5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.	**Consistent.** The proposed Project would be required to construct or pay its fair share toward street, pedestrian infrastructure, and bicycle infrastructure improvements upon review of Project designs by the City.
Action 6-A.10 Maintain and enhance Redlands' network of urban forest and street trees.	**Consistent.** Buildout of the Specific Plan would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Principle 6-P.7 Protect environmentally sensitive lands, wildlife habitats, and rare, threatened, or endangered plant and animal communities.	**Consistent.** As stated in Section 5.4, *Biological Resources*, upon implementation of Mitigation Measures BIO-1 and BIO-2, impacts to sensitive species would be less than significant.
Principle 6-P.8 Minimize disruption of wildlife and valued habitat throughout the Planning Area and emphasize that open space is for more than just human use, but also serves as habitat for biological resources.	
Principle 6-P.10 Landscape public areas using native vegetation where practical.	**Consistent.** Buildout of the Specific Plan would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Action 6-A.11 Require a biological assessment of any proposed project site within the Planning Area where species that are State or federally listed as rare, threatened, or endangered are identified as potentially present.	**Consistent.** A Biological Assessment was prepared for the Project site and is included as Appendix C. As stated in Section 5.4, *Biological Resources*, upon implementation of Mitigation Measures BIO-1 and BIO-2, impacts to sensitive species would be less than significant.

General Plan Policy	Proposed Project
Principle 6-P.19 Promote the protection of waterways in Redlands from pollution and degradation as a result of urban activities.	**Consistent.** The proposed Project has developed a PWQMP (Appendix H) that includes post-development BMPs and would be required to prepare a SWPPP that includes construction BMPs in order to ensure that implementing projects would not result in any water quality issues.
Principle 6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.	
Action 6-A.35 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.36 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.37 Protect and, where feasible, enhance or restore the city's waterways, including zanjas and ditches, preventing erosion along the banks, removing litter and debris, and promoting riparian vegetation and buffers.	
Action 6-A.39 Require that new development provides landscaping and re-vegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants.	**Consistent.** Buildout of the Specific Plan would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Action 6-A.43 Ensure that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate. Dry weather runoff from new development must not exceed the pre-development baseline flow rate to receiving waterbodies.	**Consistent.** As discussed in Section 10, *Hydrology and Water Quality*, the proposed Project would include a SWPPP that develops Best Management Practices for reducing pollution in stormwater during construction (PPP WQ-1). The proposed Project would also implement the operational BMPs that are outlined in the PWQMP (Appendix H), which would be reviewed and approved by the City during the plan check and permitting processes.
Action 7-P.1 Promote active lifestyles and community health by furthering access to trails, parks, public open space, and other recreational opportunities.	**Consistent.** As discussed in Section 5.17, *Transportation*, development facilitated by the Project would include sidewalk improvements along both San Bernardino Avenue and Pioneer Avenue. Roadway improvements would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits.
Principle 7-P.10 Equitably share the cost of parkland creation and maintenance between existing and new residents, businesses, and property owners	**Consistent.** Implementation of the Specific Plan would be required to pay all development impact fees in order to

General Plan Policy	Proposed Project
Action 7-A.3 Provide 5 acres of park area for each 1,000 Planning Area residents, and additional parkland for specialized, and low-use park acreage.	ensure that the City can continue to provide adequate recreational facilities.
Principle 7-P.16 Ensure that all Redlands residents have access to a variety of transportation and physical activity options that enhance health and that work for diverse lifestyles, incomes, and abilities	**Consistent.** As discussed previously, the proposed Project would include roadway improvements along both Pioneer Avenue and San Bernardino Avenue as identified in the City of Redlands General Plan Connected City Element. The improvements include roadway widening, additional landscaping, and an improved sidewalk. The proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices.
Principle 7-P.17 Achieve more walkable, livable neighborhoods by expanding the multimodal transportation system and creating a safe, pedestrian-oriented environment	
Action 7-A.35 Implement street design features that facilitate walking and biking in both new and established areas. Require a minimum standard of these features for all new developments.	
Action 7-A.39 Install appropriate facilities along streets and at roadway intersections to improve and ensure pedestrian safety.	
Action 7-A.89 Require adherence to applicable buildings codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code.	**Consistent.** Future projects implementing the Specific Plan would undergo development review pursuant to the Redlands Municipal Code and Specific Plan guidelines in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.
Action 7-A.93 Require that new development minimizes risks to life and property from fire hazard through: • Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.; • Siting and designing development to avoid hazardous locations; • Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent; • Using appropriate building materials and design features to ensure the minimum amount of required fuel modification; and • Using fire-retardant, native plant species in landscaping.	
Principle 7-P.41 Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure as a criterion in land use planning	**Consistent.** As discussed in Section 5.13, *Noise*, the proposed Project would be below the applicable City thresholds for construction and operational noise increases as well as potential vibration impacts.
Action 7-A.136 Require a noise analysis be conducted for all development proposals located where projected	

General Plan Policy	Proposed Project
noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10.	
Action 7-A.137 For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.	
Action 9.0w Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary	**Consistent.** As discussed in Section 5.13, *Noise*, new development would be constructed pursuant to the Redlands Municipal Code, which limits hours of construction.
Principle 7-P.49 Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.	**Consistent.** As discussed in Section 5.3, *Air Quality*, the proposed Project would be below applicable thresholds and would be consistent with all SCAQMD and CARB air quality standards related to impacts on sensitive receptors.
Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.	**Consistent.** Implementing projects pursuant to the Specific Plan would be required to adhere to the California Building Code.
Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	**Consistent.** The future projects within the Project site would be required to be in line with City Municipal Code and PPSP standards and would contain landscaping throughout the site.
Action 8-A.37 Promote design in new development that incorporates space for recycling containers and other waste diversion facilities	**Consistent.** The future projects within the Project site would be required to provide for recycling, in line with City Municipal Code standards.

City of Redlands Municipal Code

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

Overall, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.12. 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?	☐	☐	☒	☐

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

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

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

According to the City of Redlands General Plan, the Project site is designated as MRZ 2, indicating that, per geologic data, significant portland cement concrete-grade aggregate resources are present (City of Redlands, 2017a). The site is currently designated Commercial (C) and zonedSP 40 and is neither used nor planned for mineral extraction. In addition, the Project site has no history of mining and is partially surrounded by existing residential and public/institutional development that is incompatible with mining operations. Accordingly, implementation of the proposed Project would not cause the loss of availability of mineral resources valuable to the region or state, and impacts would be less than significant.

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

Less Than Significant Impact. As stated above, the City of Redlands General Plan designates the Project site as MRZ 2. However, the site is currently designated Commercial (C) and zoned SP 40, meant for commercial development, and no mineral extraction activities occur on the site currently or have occurred historically. The area is urbanized and the site is predominately surrounded by existing residential, industrial, and public/institutional uses that would not support the development of mining operations and the subsequent increase in mining related pollution. The development of the Project does not constitute

a loss of mineral resources as the surrounding land uses do not support the development of mining operations. Potential impacts to locally important mineral resources would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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?	☐	☐	☐	☒

This section was prepared using the Noise and Vibration Impact Analysis prepared by EPD Solutions, Inc. In March 2026 (Appendix I).

Regulatory Background

Federal Transit Administration (FTA) Manual

The Transit Noise and Vibration Assessment Manual (FTA Manual), prepared by the FTA, September 2018, is the only guidance document from a government agency that defines what constitutes a significant noise impact from implementing a project. The FTA Manual also provides guidance on construction noise and recommends developing construction noise criteria on a project-specific basis that utilizes local noise ordinances if possible. However, local noise ordinances usually relate to nuisance and hours of allowed activity and sometimes specify limits in terms of maximum levels but are generally not practical for assessing the noise impacts of a construction project. Project construction noise criteria should take into account the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land uses. The FTA standards are based on extensive studies by the FTA and other governmental agencies on the human effects from noise.

As previously stated, the City does not have construction noise level limits for activities that occur within the specified hours listed in the Municipal Code, thereby construction noise was assessed using criteria from the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (2018) (FTA Manual). Table 5.13-1 below shows the FTA's Detailed Analysist Construction Noise Criteria based on the composite noise levels per construction phase.

Table 5.13-1: Detailed Assessment Construction Noise Criteria (FTA)

Land Use	Daytime 1-hour L_{eq} (dBA)	Nighttime 1-hour L_{eq} (dBA)
Residential	80	80
Commercial	85	85
Industrial	90	90

Source: Appendix I

City of Redlands General Plan

The City establishes land use compatibility standards in the Healthy Community Element of the City General Plan (2017). The following General Plan Healthy Community Element goals and policies are applicable to the Project.

Principles

a. **7-P.39.** Support measures to reduce noise emissions by motor vehicles, aircraft, and trains.
b. **7-P.41.** Ensure that new development is compatible with noise environment by continuing to use potential noise exposure as a criterion in land use planning.
c. **7-P.43.** Ensure long-term compatibility between the Redlands Municipal Airport and surrounding land uses.

Actions

a. **7-A.135.** Use the noise and land use compatibility matrix (Table 7-10 [of the General Plan]) and Future Noise Contours Map (Figure 7-9) as criteria to determine the acceptability of a given land use including the improvement/construction of streets, railroads, freeways, and highways. Do not permit new noise-sensitive uses – including schools, hospitals, places of worship, and homes – where noise levels are "normally unacceptable: or higher, if alternative locations are available for the uses in the city.
b. **7-A.136.** Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10.
c. **7-A.137**. For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.
d. **7-A.138.** Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.

The Healthy Community Element establishes maximum allowable exterior noise exposure standards for new development affected by transportation noise sources, including arterial roadways, freeways, airports, and rail corridors. As shown in Table 5.13-2, *Noise/Land Use Compatibility Matrix*, the standards contained in the General Plan provide guidance for evaluating land use compatibility with transportation-related noise sources and serve as a planning framework to assess the relationship between land use types and existing or projected exterior noise levels.

Table 5.13-2: Noise/Land Use Compatibility Matrix

Land Use Categories		Community Noise Equivalent Level (CNEL)						
Categories	**Uses**	**< 60**	**65**	**70**	**75**	**80**	**85**	**>**
RESIDENTIAL	Single Family, Duplex Multiple Family	A	C	C	C	D	D	D
RESIDENTIAL	Mobile Homes	A	C	C	C	D	D	D
COMMERCIAL Regional, District	Hotel, Motel, Transient Loding	A	A	B	B	C	C	D
COMMERCIAL Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater, Mixed Uses with residential units	A	A	A	A	B	B	C
COMMERCIAL INDUSTRIAL INSTITUTIONAL	Office Building, Research & Dev., Professional Offices, City Office Building	A	A	A	B	B	C	D
COMMERCIAL Recreation INSTITUTIONAL Civic Center	Amphitheater, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D
COMMERCIAL Recreation	Children's Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	A	B	B	B
COMMERCIAL General, Special INDUSTRIAL INSTITUTIONAL	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
INSTITUTIONAL General	Hospital, Church, Library, Schools Classroom	A	A	B	C	C	D	D
OPEN SPACE	Parks	A	A	A	B	C	D	D
OPEN SPACE	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
AGRICULTURE	Agriculture	A	A	A	A	A	A	A

Zone A (Normally Acceptable): Specified Land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Zone B (Conditionally Acceptable): New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Zone C (Normally Unacceptable): New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Zone D (Clearly Unacceptable): New construction or development should generally not be undertaken.
Source: City of Redlands. (2017). *City of Redlands General Plan Healthy Community Element.*

City of Redlands Municipal Code

Section 8.06.070. Exterior Noise Limit.

A. The noise standards for the categories of land uses identified in [Table 5.13-2, *Maximum Permissible Exterior Sound Levels by Receiving Land Use*] of this section shall, unless otherwise indicated, apply to all such property within a designated zone.

Table 5.13-3: Maximum Permissible Exterior Noise Level by Receiving Land Use

Receiving Land Use Category Noise Level - dBA	Time Period	Noise Level - dBA
Single-family residential districts	10:00 PM – 7:00 AM	50
	7:00 AM – 10:00 PM	60
Multifamily residential districts; Public space; institutional	10:00 PM – 7:00 AM	50
	7:00 AM – 10:00 PM	60
Commercial	10:00 PM – 7:00 AM	60
	7:00 AM – 10:00 PM	65
Industrial	Anytime	75

Source: Section 8.06.070: Exterior Noise Limits

B. No person shall operate, or cause to be operated, any source of sound at any location within the city or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level when measured on any other property to exceed:
   1. The noise standard for that land use specified in Table 5.13-3 for a cumulative period of more than thirty (30) minutes in any hour; or
   2. The noise standard specified in [Table 5.13-3] plus five (5) dB for a cumulative period of more than fifteen (15) minutes in any hour; or
   3. The noise standard specified in [Table 5.13-3] plus ten (10) dB for a cumulative period of more than five (5) minutes in any hour; or
   4. The noise standard specified in [Table 5.13-3] plus fifteen (15) dB for a cumulative period of more than one (1) minute in any hour; or
   5. The noise standard specified in [Table 5.13-3] plus twenty (20) dB or the maximum measured ambient level, for any period of time.

C. If the measured ambient level exceeds the allowable noise exposure standard within any of the first four (4) noise limit categories listed above, the allowable noise exposure standard shall be adjusted in five (5) dB increments in each category, as appropriate, to encompass or reflect the ambient noise level. If the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.

D. The ambient noise shall be measured at the same location along the property line utilized in subsection 8.06.060B of this chapter, with the alleged offending noise source inoperative. If the alleged offending noise source cannot be shut down, the ambient noise shall be estimated by performing a measurement in the same general area of the source but at a sufficient distance that the noise from the source is at least ten (10) dB below the ambient in order that only the ambient level be measured. If the difference between the ambient and the noise source is five (5) to ten (10) dB, then the level of the ambient itself can be reasonably determined by subtracting a one decibel correction to account for the contribution of the source.

Summary of Thresholds

Table 5.13-4, *Significance Criteria Summary*, provides a summary of thresholds established by the City of Redlands.

Table 5.13-4: Significance Criteria Summary

Analysis	Conditions	Significant Criteria	
		Daytime	Nighttime
Off-Site Traffic[1]	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project Increase	
	If ambient is 60-65 dBA CNEL	≥ 3 dBA CNEL Project Increase	
	If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project Increase	
Operational	Noise Level Standards for Residential Properties[2]	60 dBA	50 dBA
Construction	Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of six o'clock (6:00) p.m. and seven o'clock (7:00) a.m., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, the city or another governmental entity.[2]		
	Noise Level at Residential Property[5]	80 dB	-
	Vibration Damage Criteria[6]	0.3 PPV (inches/second) – *Older residential structures*	
		0.5 PPV (inches/second) – *Commercial structures*	

1. FICON. (1992). *Federal Agency Review of Selected Airport Noise Analysis Issue.*
2. City of Redlands. (2026). *City of Redlands Municipal Code.*
3. City of Redlands. (2010). *City of Redlands Noise Element.*
4. FTA. (2018). *Transit Noise and Vibration Impact Assessment Manual*.
5. Caltrans. (2020). *Transportation and Construction Vibration Guidance Manual*.

Existing Noise Levels

To assess existing ambient noise levels in the Project area, EPD Solutions, Inc. conducted two short-term noise measurements on February 12, 2026, at locations in the vicinity of the proposed Project (Appendix I). These measurement locations are shown in Figure 5.13-1, *Noise Measurement Locations*, and are representative of typical noise exposure levels experienced at the nearest sensitive receptors. Each measurement consisted of a 15-minute recording taken between 10:30 AM and 11:30 AM. These short-term L_{eq} measurements are considered indicative of general noise conditions throughout the day.

The measurements were conducted during "off-peak" traffic hours (between 9:00 AM to 3:00 PM) to establish a more conservative baseline. During traditional peak hours, traffic congestion often results in lower vehicle and heavy truck volumes. In contrast, free-flowing traffic conditions immediately before or after peak periods can produce higher noise levels. The recorded noise levels at the measurement sites and at the nearest sensitive receptors are summarized in Table 5.13-5, *Ambient Noise Measurements*.

Table 5.13-5: Ambient Noise Measurements

Site Location	Description	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
NMST-1	Intersection of Half Moon Avenue and Camelia Lane, facing Pioneer Avenue	57.3	69.6	51.8
NMST-2	West of 912 Elise Drive, facing the site	56.6	73.2	51.1

Source: Appendix I
Notes: dBA=A-weighted decibels; L_{eq}=Equivalent Sound Level; L_{min}=Minimum Sound Level; L_{max}=Maximum Sound Level

The most recent long-term noise measurements were conducted for a previous study near the Project site from December 7 to December 8, 2022 using Larson Davis Spark dosimeters. The recorded noise levels at the measurement sites are summarized in Table 5.13-6, *Long-Term Noise Measurements*. These measurement locations are shown in Figure 5.13-1, *Noise Measurement Locations*, as mentioned above.

Table 5.13-6: Long-Term Noise Measurements

Location	Description	Noise Level (dBA)					Noise Sources
		Daytime		Nighttime		CNEL	
		L_{eq}	L_{max}	L_{eq}	L_{max}		
NMLT-1	Located on the southeast corner of Karon Street and Pennsylvania Avenue. On a utility pole. Approximately 22 feet from Pennsylvania Avenue centerline.	53.7-62.8	69.6-86.4	50.0-61.7	67.9-84.9	62.7	Traffic on Pennsylvania Avenue and Karon Street.

Notes: CNEL=Community Noise Equivalent Level; dBA=A-weighted decibels; L_{eq}=Equivalent Sound Level; L_{max}=Maximum Sound Level
Source: Appendix I

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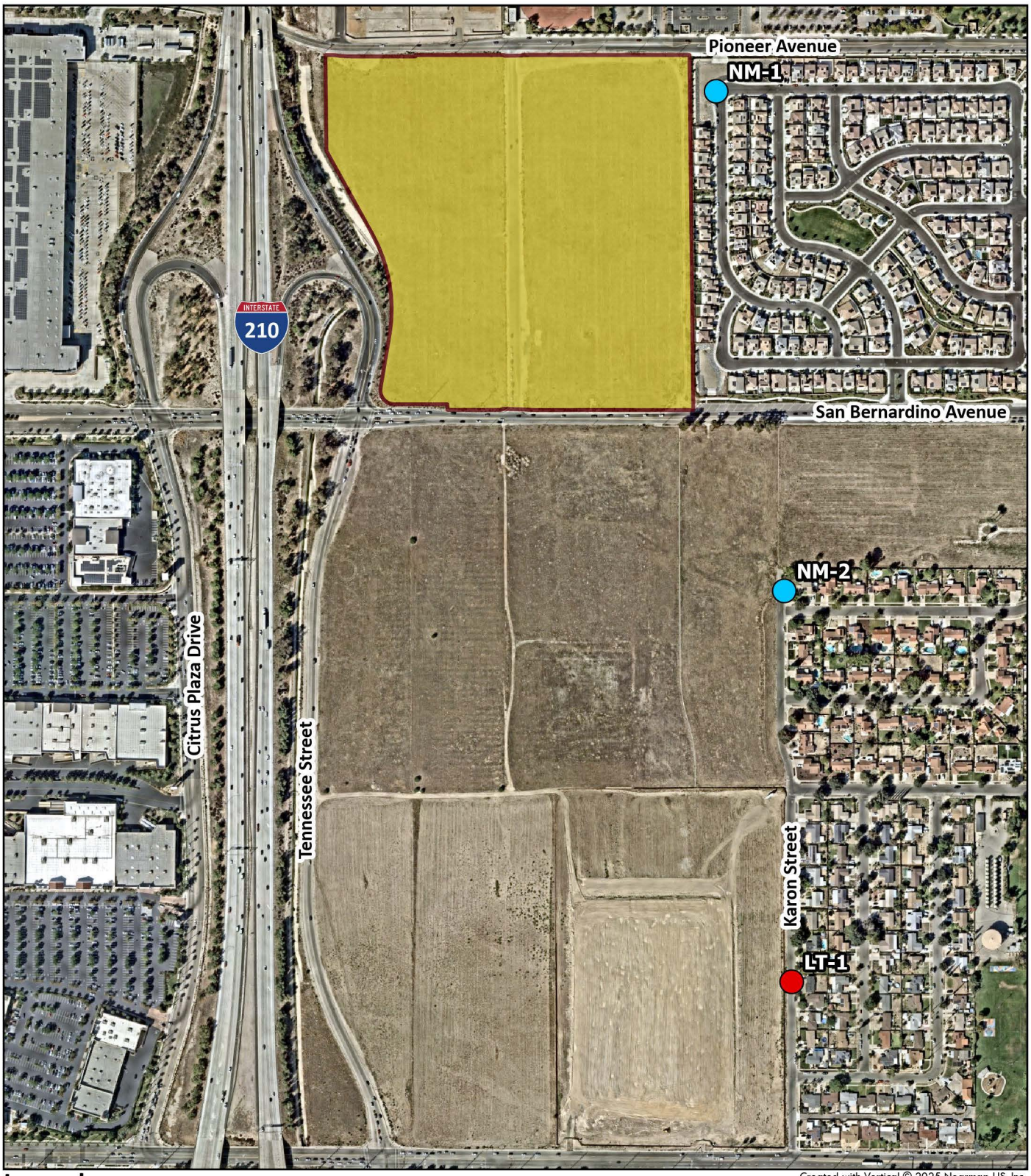
Figure 5.13-1: Noise Measurement Locations



Legend

- Project Boundary
- Long Term Noise Measurement Location
- Noise Measurement Location

0 500 1,000 US Feet

N

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

Less Than Significant Impact.

Construction

Two types of short-term noise impacts could occur during the construction of the Project including construction crew commutes and construction activities. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. According to the California Emissions Estimator Model (CalEEMod), which is used to predict the number of construction-related automotive trips, the maximum number of Project construction trips traveling to and from the Project site during an overlapping construction phase (building construction and architectural coating) would be expected to be 194 daily worker trips and 52 vendor trips in total (Appendix A). Traffic count data indicates that West Pioneer Avenue and West San Bernardino Avenue currently accommodate 4,675 and 6,450 daily vehicle trips (Appendix I), respectively. Therefore, the Project's construction trips (194 worker trips and 53 vendor trips) would not result in a doubling of traffic on the transportation network and therefore would not be perceptible. Therefore, short-term construction-related roadway noise impacts associated with worker commute and equipment transport to the Project site would be less than significant.

Construction activities are temporary and would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. Such short-term construction activities include demolition, site preparation, grading, building construction, paving, and architectural coating. Noise levels from these activities would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Table 5.13-7, lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (FHWA, 2006)

Table 5.13-7: Typical Construction Equipment Noise Levels

Activity	Equipment[1]	Quantities[1]	Maximum Noise Level @ 50 Feet[2,3]
			dBA L_{max}
Site Preparation	Rubber Tired Dozers	3	81.7
	Crawler Tractors	4	84.0
Grading	Graders	1	85.0
	Excavators	2	80.7
	Rubber Tired Dozers	1	81.7
	Crawler Tractors	2	84.0
	Rubber Tired Loader	2	79.1
Building Construction	Cranes	1	80.6
	Forklift	3	74.7
	Tractors/Loaders/Backhoe	3	84.0

Activity	Equipment[1]	Quantities[1]	Maximum Noise Level @ 50 Feet[2,3]
			dBA L_{max}
	Generator Sets	1	80.6
	Welders	1	74.0
Paving	Pavers	2	77.2
	Paving Equipment	2	89.5
	Rollers	2	80.0
Architectural Coating	Air Compressors	1	77.7

Source: Appendix I

As seen in Table 5.13-8, the closest off-site sensitive residential receiver to the Project site are single-family residences adjacent to the western Project boundary. The geographic center of the Project site is approximately 625 feet from the closest single-family residences. These noise level projections do not take into account intervening topography or barriers. As shown in Table 5.13-8, *Composite Noise Level by Phase*, the composite noise level of each phase would range from 51.8 dBA L_{eq} to 65.7 dBA L_{eq} at the nearest single-family residences from the geographic center of the Project site to the east, which would not exceed the FTA threshold of 80 dBA for residential properties. As such, impacts related to on-site construction noise would be less than significant.

Table 5.13-8: Composite Noise Level by Phase

Activity	Maximum Noise Level @ 50 Feet	Maximum Noise Level @ 625 Feet
	dBA L_{eq}	dBA L_{eq}
Site Preparation	87.6	65.7
Grading	87.6	65.6
Building Construction	86.1	64.1
Building Construction and Paving	89.3	67.4
Paving	86.5	64.6
Building Construction and Architectural Coating	86.3	64.4
Architectural Coating	73.7	51.8

Operation

On-Site Operational Noise

Adjacent off-site land uses would be potentially exposed to stationary source noise impacts from the proposed on-site heating, ventilation, and air conditioning (HVAC) equipment and mobile sources including passenger vehicles, daily delivery trucks, and weekly garbage trucks moving on-site. The potential noise impacts to off-site sensitive land uses from the proposed HVAC equipment and vehicular activities are discussed below.

The HVAC units were modelled to be in the backyard of the proposed residences, and it was assumed that the HVAC units would operate for 585 minutes during the daytime and 250 minutes during the nighttime,

resulting a total of 14 hours per day, which is the average running hours on a hot day with a PWL of 67 as discussed above. As a proposed Specific Plan project, the specific buildings and design of the residential units are not yet confirmed. However, the modeling assumed that each lot would have an operating HVAC system on-site as a conservative analysis. Based on the modeling results from CadnaA, the noise generated from HVACs operating concurrently on-site would be 29.3 dBA during the daytime and 28.2 dBA during the nighttime, which would not exceed the City's thresholds of 60 dBA and 50 dBA at the nearest residential property, respectively (Appendix I). Therefore, the incremental increase in ambient noise from operation of the proposed Project would be less than significant.

On-Site Traffic Noise

There are two components of on-site mobile noise: vehicles traveling on internal roads, including regular automobile vehicles, occasional delivery trucks, and weekly garbage trucks, and parking activities. As a conservative analysis, it was assumed that there would be 260 vehicles per hour during the day trips at each driveway, which is the highest peak hour trips based on the Traffic Impact Analysis prepared for the Project. It was assumed truck activity would make up one percent of the vehicle activity per hour on-site to account for occasional delivery trucks and weekly garbage trucks.

The Project includes two garage spaces for each single-family residential unit and one and half spaces per multi-family unit, plus one guest space per two units. The noise generated by the proposed Project would be consistent with that of the surrounding single-family residential properties to the east and school to the north. Based on the Noise Navigator Sound Level Database with Over 1700 Measurement Values, light traffic would generate 50.8 dBA at 50 feet (Berger, E. H. et al, 2015), which is within the "normally acceptable" level for single and multi-family land uses based on the community noise standards (see Table 5.13-2). As such, traffic associated within the residential development is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale.

Off-Site Traffic Noise

The FHWA-RD-77-108 traffic noise model was used to evaluate traffic-related noise conditions along local roadway segments in the Project vicinity without noise attenuation from barriers and topography. The "Existing with Project" levels would be calculated based on existing trip generation plus the Project daily trips with roadway distribution based on the *Pioneer Park Traffic Impact Analysis* (TIA Analysis), dated 2026, prepared by EPD Solutions, Inc. Based on TIA Analysis, the Project would generate an estimated increase of 2,543 daily trips, including 196 AM peak hour trips and 260 PM peak hour trips. It is important to note the modeled noise level is not representative to the actual ambient noise level. However, the noise increase along off-site roadways is calculated as the difference between existing conditions and existing-plus-project conditions to provide a comparable analysis. The threshold is based on the actual ambient noise level. According to the Caltrans Traffic Noise Analysis Protocol, a doubling of traffic on a roadway results in an increase of 3 dB (Caltrans, 2020a). A 3 dBA change is considered a just perceptible difference. Since the existing ambient noise level is between 60-65 dBA, as shown on Table 5.13-5, *Ambient Noise Measurements*, the mobile noise increases due to implementation of the Project was compared to a threshold of 3 dBA (as listed in Table 5.13-4, *Significance Criteria Summary*) to evaluate the significance. As shown in Table 5.13-9, *Existing Plus Project Traffic Noise Levels*, noise levels under the "Existing" scenario at the curbside from the roadway centerline range from 59.8 to 70.2 dBA. The increase

in noise levels due to the Project would range from 0.5 to 1.5 dBA, which would not exceed the 3 dB threshold based on the measured ambient noise level. As such, impacts would be less than significant.

Table 5.13-9: Existing Plus Project Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project				Increase over Existing Scenario (dBA)	Threshold[2] (dBA)
	Existing ADT[1]	dBA @ curbside from Roadway Centerline	Existing Plus Project ADT[2]	dBA @ curbside from Roadway Centerline	Centerline to 70 dBA CNEL (feet)	Centerline to 65 dBA CNEL (feet)		
West Pioneer Avenue								
West of Future New York Street	4,675	67.8	6,880	69.5	-	50	1.5	3
East of Future New York Street	6,450	68.7	7,240	69.2	-	47	0.5	3
West San Bernardino Avenue								
Between West Pioneer Avenue and West San Bernardino Avenue	9,105	70.2	10,410	70.8	-	61	0.6	3
West of New York Street	7,665	67.8	9,840	68.9	42	91	1.1	3
New York Street/Tennessee Street								
Between West Pioneer Avenue and West San Bernardino Avenue	2,420	59.8	2,720	60.7	-	-	0.9	3

Notes: ADT= average daily traffic; CNEL=Community Noise Equivalent Level; dBA=A-weighted decibels.
1. EPD Solutions, Inc. (2026). *Pioneer Park Traffic Impact Analysis.*
1. 2. The threshold is based on the ambient noise level measured in the Project vicinity, which is between 60-65 dBA.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Construction activity can cause varying degrees of ground vibration, depending on the equipment and methods used, the distance to receptors, and soil type. Construction vibrations are intermittent, localized intrusions. The use of heavy construction equipment, particularly large bulldozers, and large loaded trucks hauling materials to or from the site generate construction-period vibration impacts.

Although there are no adopted State or City ground-borne vibration standards, vibration standards included in the FTA Manual were used to analyze the Project's ground-borne vibration impacts on human

annoyance. FTA guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration damage. For older residential structures, the construction building vibration damage criterion is 0.3 in/sec in PPV (Appendix I).

The Noise and Vibration Impact Analysis prepared for the proposed Project evaluated construction equipment vibration levels at the closest sensitive receptors. As shown in Table 5.13-10, at approximately 15 feet, a large bulldozer would create a vibration level of 0.191 inch per second PPV.

Table 5.13-10: Construction Equipment Vibration Levels

Equipment	Reference Vibration Level at 25 Feet (PPV [inches/second])[1]	Vibration Level at 15 Feet (PPV [inches/second])[2]	Vibration Level at 650 Feet (PPV [inches/second])[2]
Large Bulldozer	0.089	0.191	0.001
Loaded Trucks	0.076	0.164	0.001
Small Bulldozer	0.003	0.140	<0.001
Highest Vibration		0.191	0.001
Thresholds		**0.3**	**0.5**
Exceed thresholds?		No	No

Notes:
1. FTA. (2018). *Transit Noise and Vibration Impact Assessment Manual*.
2. $PPV_{equip} = PPV_{ref} \times \left(\frac{25}{D}\right)^{1.5}$, D=distance between the equipment to the sensitive receptors.

Source: Appendix I

As indicated in Table 5.13-10, vibration levels are expected to approach 0.191 PPV in/sec at the surrounding structures which would not exceed the Caltrans Manuel threshold of 0.3 in/sec PPV or 0.5 in/sec PPV for building damage potential. Vibration levels at all other buildings would be lower. Although construction vibration levels at the nearest buildings would have the potential to result in an annoyance, these vibration levels would no longer occur once construction of the Project is completed. Because construction activities are regulated by the City's Municipal Code, which states that construction activities are allowed between the hours of 7:00 AM to 6:00 PM Monday through Saturday, vibration impacts would not occur during the more sensitive nighttime hours. As such, construction would not result in any vibration damage, and impacts would be less than significant.

Operation

The proposed Project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from Project-related traffic on the adjacent roadways are unusual for on road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Caltrans has done extensive research on vibration level created along freeways and State Routes and their vibration measurements of roads have never exceeded 0.08 inches per second PPV at 15 feet from the center of the nearest lane, with the worst combinations of heavy trucks. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Garbage trucks and delivery trucks on-site would be travelling at very low speeds, so it is expected that garbage truck vibration at

nearby sensitive receptors would not be noticeable. Therefore, operational vibration impacts would be less than significant.

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?

No Impact. The Project site is located approximately 1.6 miles southwest of the San Bernardino International Airport. The San Bernardino Countywide Plan shows that the Project site is within the Airport Safety Review Area but outside of the Redlands Municipal Airport 70 dBA Contour and San Bernardino International Airport 65 dBA Contour (County of San Bernardino, 2019). Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels from airports, and there would be no impact.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.14. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The proposed Project provides for development of a vacant parcel and would include a General Plan Amendment and adoption of the PPSP. The maximum development that would occur from buildout of the proposed PPSP is 282 residential units. Using the Redlands General Plan EIR growth induction rate of 2.65 people per household, buildout of the proposed residential units would generate up to 748 residents. While this increase in units and potential population growth has not been planned for by the City, the increase of 282 dwelling units and up to 748 additional persons on the site would not represent substantial unplanned population growth that cannot be handled by the City's existing utilities and service providers. Additionally, the potential increase in population growth would 4 percent of the SCAG 2024 RTP/SCS growth projections for the City of Redlands (an increase of 15,925 residents between 2019 and 2050) (SCAG, 2024). Therefore, the proposed Project would not exceed regional growth assumptions, and as such, impacts would be less than significant.

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

No Impact. The Project site is currently undeveloped and vacant. No housing would be displaced as a result of Project development and as such there would be no impacts.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.15. PUBLIC SERVICES

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

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

i. Fire Protection and Emergency Services

Less Than Significant Impact. The Project is located in the service area of the City of Redlands Fire Department (RFD). The Fire Department responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are four stations in Redlands:

- Fire Station 261: 525 East Citrus Avenue
- Fire Station 262: 1690 Garden Street
- Fire Station 263: 10 West Pennsylvania Avenue
- Fire Station 264: 1270 West Park Avenue

The nearest fire station to the Project site is Station 263, located approximately 0.75 miles southeast of the site. Buildout of the proposed Project would result in an increase of 747 residences compared to existing conditions. The Project may create an incremental increase in demand for fire protection and emergency medical services. Future development within the Project site would be installed with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent waterless fire suppression systems pursuant to the California Fire Code, adopted as Chapter 15.20 of the Redlands Municipal Code, the CBC, and other existing regulations regarding fire safety. Development Impact Fees, included as PPP PS-1, would serve to ensure the maintenance of existing facilities and the timely provision of new facilities as needed. As of April 2025, the RFD has reopened Fire Station 262 after upgrades were made to the station in order to improve

operational efficiency. In addition, the City of Redlands City Council has approved plans for a new fire station located near Heritage Park, in the central part of the city in order to expand services. Whether the City chooses to construct new fire stations in the future is too speculative to be considered as a Project-related impact. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Therefore, with the payment of development fees included as PPP PS-1, Project impacts to fire services would be less than significant.

ii. Police Protection

Less Than Significant Impact. The Project site is served by the Redlands Police Department (RPD) which is staffed with over 85 sworn officers and approximately 40 civilian personnel (City of Redlands, n.d.). The increased residential population from the buildout of the proposed Project could increase the frequency of emergency and non-emergency calls to the RPD, as compared to existing conditions. Buildout of the proposed Project is not expected to increase demand for police protection to the extent that new facilities would be required beyond what has already been planned for. Currently, the RPD is in the development of an additional police station to meet future demand based on planned population growth within the City. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Payment of development impact fees included as PPP PS-1 would serve to ensure the maintenance of existing facilities. In addition, property tax revenue generated by development of the Project would provide funding for police services and would help to offset the Project's increase in the demand for services. Therefore, impacts to police protection facilities would be less than significant.

iii. School Services

Less Than Significant Impact. As discussed in Section 5.14, *Population and Housing,* full buildout of the Project site would result in the generation of up to 748 additional residents. The Project site is located within the Redlands Unified School District (RUSD) and is served by Kingsbury Elementary School, Clement Middle School, and Citrus Valley High School. According to the Department of Finance, San Bernardino's school aged (5-17 years old) population would be 17.6% by 2028 (Department of Finance, 2024b). Thus, the proposed Project is expected to generate 131 school aged children by full buildout in 2028. As stated above, Project site is located within the RUSD and is served by an elementary school, a middle school, and a high school. According to the RUSD, the school district currently has an enrollment of 19,310 students (RUSD, n.d.).

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impact on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the RUSD has instituted school facility fees that would apply to future developments pursuant to the future developments pursuant to the Project, specifically fees for new residential construction based on floor area (square footage). Accordingly, future project applicants would be required to pay school fees to the RUSD to offset the impact of additional student enrollment at schools serving the Project.

Pursuant to State law, payment of the school fees established by the RUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, fully mitigate the proposed Project's impact on school facilities. Therefore, impacts on school facilities would be less than significant.

iv. Parks

Less Than Significant Impact. As discussed in Section 5.14, *Population and Housing,* full buildout of the proposed Project would result in the generation of up to 748 additional residents. Without the development of new parks, this population increase would place additional physical demands on existing parks and recreational facilities, which could result in deterioration of existing facilities. The City of Redlands has 424.2 acres of parkland, or a ratio of 5.9 acres of parkland per 1,000 residents which exceeds the State law requirement of 5.0 acres per 1,000 residents (City of Redlands, 2017a). According to the City's General Plan Parks and Recreational Open Space Element, there are several different kinds of parks in Redlands, including community parks, neighborhood parks, and pocket parks. There are 3 existing parks totaling 27.9 acres within 1.25 miles of the Project site. The addition of 748 new residents would increase the use of recreational facilities and would require approximately 3.74 acres of new parkland based on the parkland/recreational space standard of 5.0 acres per 1,000 residents. However, with a total of 73,849 residents, the City of Redlands needs 369.25 acres of parkland to meet the City's requirement which is exceeded by the already existing 424.2 acres.

Furthermore, the City's mechanism for addressing parkland needs are its development impact fees as set forth in Municipal Code Chapter 3.32 included as PPP PS-2. The funds would be used to maintain and operate the existing park facilities and construct additional facilities, as deemed warranted by the City. Any potential new facilities would be subject to the City's policies designed to protect environmental resources and environmental review under CEQA, which would be separate from this Project. Based on the existing parkland within the Project area and the incremental population increase resulting from buildout of the proposed PPSP, the Project would not result in overuse of existing parks and facilities that would result in substantial deterioration of existing facilities. Additional City policies requiring maintenance and funding of existing and future recreational facilities would ensure that parks are in good physical condition. The development of future recreational facilities would be subject to existing building and construction regulations as well as additional environmental review that would ensure that construction activities have a minimal effect on the surrounding environment. These, along with Redlands General Plan policies established to protect environmental resources, air quality, and water quality, would ensure that any future park construction within the City would have a less than significant impact.

v. Other Public Facilities

Less Than Significant Impact. As with all developments, buildout of the proposed Project would contribute to the incremental demand for expanded government services and facilities, including libraries, community recreation centers, public health facilities, and/or animal shelters. The policies set forth by the

Redlands General Plan ensure that, within the City, these public services are improved and expanded to meet demand as development occurs. Future development of new public facilities would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated. Additionally, the Project would generate new tax revenues that would contribute to and supplement existing revenue sources for the maintenance and enhancement of these facilities. Therefore, Project implementation would not adversely affect public facilities or require the construction of new or modified public facilities that are not already addressed in this document. Impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-1 **Development Impact Fees.** Prior to issuance of any building permits for the buildout of the Specific Plan, the project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.

PPP PS-2 **Open Space and Park Fees.** The project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.

Mitigation Measures

None.

5.16. RECREATION

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

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

Less Than Significant Impact. As discussed previously in Section 5.15, *Public Services*, there are 27.9 acres of existing parks within 1.25 miles of the proposed Project area and 424.2 acres of parks within the City of Redlands.

In addition to parks, the City operates numerous recreational community centers and facilities and has a joint use agreement with RUSD allowing public access to school recreational facilities. Other recreational opportunities include open spaces such as San Timoteo Canyon, Live Oak Canyon, Crafton Hills, and approximately 27.58 acres of recreational trails. At the estimated 2023 population of 73,849 residents, the ratio of existing parkland acres per 1,000 residents is 5.7, which exceeds the GP's parkland/recreational space standard of 5.0 acres per 1,000 residents.

Without the development of new parks and recreational facilities, future population increases would place additional physical demands on existing parks and facilities. The General Plan designates areas for parkland, recreational facilities, and trails to serve the City's population as it grows. The City's mechanism for addressing parkland and recreational facility needs is its development impact fee program as set forth in the Redlands Municipal Code Chapter 3.32, included as PPP PS-2. In the City, development impact fees are collected at the time a building permit is issued for the purpose of further alleviating the impacts caused by new development on the City's infrastructure. Fees are used for the acquisition, construction, and improvement of public facilities demanded by new development. A separate funding structure has been established to account for the impact of new development on each of the following types of public facilities: open space, parks and recreational facilities, public facilities (including public safety, library and general government facilities), transportation, water, solid waste, and sewer. Therefore, Project implementation would not increase the use of existing park facilities such that deterioration would be accelerated and impacts would be less than significant

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

Less Than Significant Impact. The PSSP would provide a centralized park space with play structures, seating, and/or bicycle racks as well as pockets parks throughout the Specific Plan Area. The Specific Plan includes a provision requiring that the central recreational area be completed prior to issuance of certificate of occupancy for more than 50 percent of the total primary residential units to be developed. The development of future parkland and recreational facilities would be subject to existing building and construction regulations and environmental review that would ensure that future construction activities have a minimal effect on the surrounding environment. Furthermore, individual recreational facility projects within the Project site would be subject to the mitigation measures included throughout this Initial Study, and the Redlands General Plan policies established to protect biological resources, cultural resources, and paleontological resources. Adherence to existing regulations and mitigation measures included in this Initial Study would ensure that the Project would not result in construction or expansion of recreational facilities which might have an adverse impact on the environment, and impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-2: As listed in Section 5.15, *Public Services*.

Mitigation Measures

None.

5.17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 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?	☐	☐	☒	☐

This section was prepared using the VMT Analysis prepared by EPD Solutions, Inc. In March 2026 (Appendix J).

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

Less Than Significant Impact. The following analysis has been prepared pursuant to SB 743, which requires that VMT thresholds be utilized for traffic analysis, and State CEQA Guidelines Section 15064.3 that states that a project's effect on automobile delay shall not constitute a significant environmental impact.

Project Trip Generation

Vehicle trip estimates for buildout of the proposed Project were generated by using trip rates from the Institute of Transportation Engineers, *Trip Generation 12th Edition*, 2025. Based on the density of the proposed housing, trip rates for Land Use Code 210 (Single-Family Housing) and Land Use Code 220 (Multifamily Housing [Low Rise]) were used.

Table 5.17-1 identifies the trips generated by buildout pursuant to the proposed Specific Plan. As detailed, buildout pursuant to the Project is forecasted to generate 2,543 average daily trips, with 196 AM peak hour trips, and 260 PM peak hour trips.

Table 5.17-1: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
210 Single-Family Detached Housing[1]		DU	9.09	0.19	0.51	0.70	0.58	0.35	0.93
220 Multifamily Housing (Low-Rise)[2]		DU	6.21	0.10	0.31	0.41	0.32	0.20	0.52
Project Trip Generation									
Single-Family Detached Housing[1]	275	DU	2500	52	141	193	159	97	256
Multifamily Housing (Low-Rise)[2]	7	DU	43	1	2	3	2	2	4
Total Project Trip Generation			**2543**	**53**	**143**	**196**	**161**	**99**	**260**

DU = Dwelling Unit

[1]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 210 - Single-Family Detached Housing (Average Rate)

[2]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 220 - Multifamily Housing (Low-Rise) (Average Rate)

Roadway, Transit, Bicycle, and Pedestrian Facilities

Roadway

Regional access to the Project site is provided by I-210. Local access to the site is provided via San Bernardino Avenue, Pioneer Avenue, and Tennessee Street. As described above, the proposed Project would vacate the portion of Tennessee Street located within the Project site and proposes to develop New York Street along the eastern boundary of the Project site. New York Street is identified as a modified road in the City of Redlands General Plan Connected City Element. The Specific Plan includes a modified design standard for this public collector street consisting of a 66-foot right-of-way, 44-foot curb-to-curb width, a 5-foot-wide sidewalk on the west side, and an 11-foot-wide multi-use trail on the east side of the roadway. Curb and gutter designs would be consistent with the City's standards. In addition, the proposed Project would provide right-of-way dedication along both San Bernardino Avenue and Pioneer Avenue to allow for full buildout of the roadways pursuant to the General Plan, including sidewalks with a landscaped buffer between the roadways and sidewalks. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. The facilities and would provide additional facilities as needed. Thus, the proposed Project would not conflict with existing policies related to roadway facilities and impacts would be less than significant.

Transit Services

There are various Omnitrans bus stops that serve the Project site including those along San Bernardino Avenue, east of the site and along Lugonia Avenue, south of the site. This existing transit service would continue to serve its ridership and new riders from implementation of the proposed Project. In addition, the proposed Project would include buildout of a new Omnitrans bus stop is proposed on West San Bernadino Avenue on the west side of the project entry drive to the neighborhood. Buildout of the proposed Project would be incremental in response to market needs and within the area currently served by Omnitrans and SBCTA. Therefore, the proposed Project would not conflict with an existing program related to transit facilities, and impacts would not occur.

Bicycle Facilities

The City's General Plan Figure 5-3, *Bicycle Facilities*, identifies both Pioneer Avenue and San Bernardino Avenue as planned bicycle routes. There is currently no bicycle infrastructure in the vicinity of the Project site. Buildout of the Specific Plan would include buildout of both Pioneer Avenue and San Bernardino Avenue consistent with their General Plan Connected City Element definition as a collector street and Major Arterial, respectively. In addition, New York Street (proposed) would include a portion of the multi-use Lugonia Trail along the eastern border of the roadway. This would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. Therefore, the proposed Project would not alter or conflict with existing bicycle facilities, and impacts related to bicycle facilities would not occur.

Pedestrian Facilities

Generally, throughout the Project area, sidewalks are provided on both sides of the street. As part of the PPSP, the pedestrian circulation system would be improved along West Pioneer Avenue, West San Bernardino Avenue, and New York Street (proposed), while on-site pedestrian sidewalks would be provided internal to the neighborhood, connecting homes and common outdoor living spaces. The on-site pathways would also link to the off-site routes along West Pioneer Avenue and West San Bernardino Avenue, enhancing overall connectivity and ensuring convenient access throughout the area. New York Street (proposed) bordering the Project to the east would also include sidewalks that connect to on- and off-site sidewalks. Additionally future development is subject to compliance with applicable accessibility requirements of the American Disabilities Act, Title 24 of the Uniform Building Code as locally amended, and the Department of Housing and Urban Development's Fair Housing Accessibility Guidelines. Therefore, the proposed Project would not conflict with pedestrian facilities. Thus, impacts related to pedestrian facilities would not occur.

Policies

Section 5.11, *Land Use and Planning*, includes a list of applicable goals and policies related to the Project. Tables 5.11-1 and 5.11-2 include analysis of the Project's consistency with the SCAG Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy and City of Redlands General Plan, respectively. As discussed in Section 5.11, the Project would be consistent with all applicable goals and policies. Thus, impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system of the Project site and surrounding area would not occur.

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

Less Than Significant Impact. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of GHGs, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019, with the provisions of the section applying statewide beginning on July 1, 2020. State CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, states that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The proposed Project was analyzed in comparison to the City of Redlands VMT Guidelines. As discussed in the City of Redlands VMT Guidelines, if a project meets the screening criteria set forth in the guidelines, then it would be considered to have a less-than-significant impact on VMT. The applicability of each screening criteria, in comparison to the proposed Project is discussed below. The Project is located within traffic analysis zone (TAZ) 53836302.

Screening Criterion 1 – TPA

Per the City's Guidelines, projects located in a Transportation Priority Area (TPA)[1] may be presumed to have a less-than-significant VMT impact. The TPA map from the San Bernardino County Transportation Authority (SBCTA) VMT screening tool output illustrates that the proposed Project site is not located within a TPA. Therefore, the Project does not meet the requirements of Screening Criterion 1 (Appendix J).

Screening Criterion 2 – Low VMT Area

The City's guidelines include a screening threshold for projects located in a low-VMT generating area, which is defined as (TAZs with a total daily VMT/SP that is 15 percent less than the baseline level for the county. For projects that are inconsistent with the land use assumptions coded into the project's TAZ, this screening criterion would not be appropriate. The proposed Project is not consistent with the land use assumptions coded into the Project's TAZ and would require a General Plan Amendment. Therefore, Screening Criterion 2 is not applicable to the Project.

Screening Criterion 3 – Land Use Type

If any implementing projects within the proposed Rezoning area consist of a local serving K-12 school, local park, daycare center, local-serving gas station, local-serving bank, local-serving hotel, student housing project on or adjacent to a college campus, local-serving assembly use, community institution, local-serving community college, affordable housing, assisted living facility, or senior housing, the

[1] A Transit Priority Area (TPA) is defined as a half-mile radius around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below.
Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.
Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

implementing projects would screen out of further VMT analysis. Further, if an implementing project generates less than 3,000 $MTCO_2e$, such as a project that proposes 167 single-family dwelling units or fewer, 232 low-rise multifamily dwelling units or fewer, 299 mid-rise multifamily dwelling units or fewer, 59,100 SF or less of office space, 112,400 SF or less (with no stores larger than 50,000 SF) of local-serving retail uses, 463,600 SF or less of warehousing uses, or 74,600 SF or less of light industrial uses, the project would screen out of further VMT analysis. Implementing projects that generate less than 3,000 $MTCO_2e$ per year would be presumed to have a less-than-significant impact on VMT pursuant to Screening Criterion 3.

The Project proposes a total of 275 single-family dwelling units and seven multifamily residential dwelling units, which is more than the threshold provided in the City's Guidelines. Therefore, the Project does not meet the requirements of Screening Criterion 3.

The Project would not meet any of the City of Redland's VMT screening criteria; therefore, a full VMT analysis was prepared for the Project (Appendix J).

VMT Analysis

As Screening Criteria 1 through 3 would not be met for the proposed Project, a full VMT analysis has been prepared for the Project. The VMT analysis results from SBTAM for TAZ 53836302 are provided below in Tables 5.17-2.

As shown in Table 5.17-2, the Project VMT/SP for TAZ 53836302 would be 25.09 percent below the applicable threshold under Project Baseline 2026 conditions and 32.62 percent below the applicable threshold under Cumulative Year 2050 conditions. Therefore, buildout of the proposed Project would result in a less-than-significant VMT impact.

Table 5.17-2: SBTAM+ VMT Analysis of the Project

	Base Year 2019	Baseline 2026	Cumulative Year 2050
Project TAZ 53836302 Total Origin Destination VMT Plus Project	17,269	19,910	28,966
TAZ 53836302 Households	282	329	489
TAZ 53836302 Household Occupancy	2.65	2.65	2.65
TAZ 53836302 Population	747	871	1,296
TAZ 53836302 Employment	0	0	0
TAZ 53836302 Service Population	747	871	1,296
Project TAZ OD VMT/Service Population Plus Project	**23.1**	**22.9**	**22.4**
OD VMT/Service Population for San Bernardino County	**34.98**	**35.89**	**39.03**
15% Below County's OD/VMT/Service Population	**29.73**	**30.51**	**33.18**
% Above/Below Threshold	-22.28%	-25.09%	-32.62%
Impact?		No	No

Source: Appendix J

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

Less Than Significant Impact. Proposed on-site roadways within the Specific Plan Area would connect to existing perimeter streets to the north and south as well as New York Street (proposed) to the east. The main neighborhood entry would be from New York Street (proposed), with secondary entries from West San Bernardino Avenue and West Pioneer Avenue. Internal circulation would be provided via internal streets designed to meet local circulation, safety, and access standards. The proposed Project would include development of a left turn lane/median within both San Bernardino Avenue and Pioneer Avenue to allow full access to the site, and vehicles leaving the site along San Bernardino Avenue would only be allowed to turn right. The internal street layouts offer a variety of configurations, with roadway widths of 36 feet to accommodate two-way vehicle travel and emergency vehicle movements. Design of the proposed Project, including the internal private roadway, ingress, egress, and other streetscape changes are subject to the City's development standards. For example, the design of the internal drive aisle would be reviewed to ensure fire engine accessibility and turn around area is provided to the fire code standards. As a result, impacts related to vehicular circulation design features would be less than significant.

d) Result in inadequate emergency access?

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

As described previously, the Project area would be accessed via four proposed local streets The design of driveways and on-site circulation would be reviewed through the City's permitting process to confirm compliance with design standards, including adequate turning space for passenger vehicles, trucks, and fire trucks. Because the proposed Project is required to comply with all applicable City codes, as verified by the City, potential impacts related to inadequate emergency access would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.18. TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

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:

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

Less Than Significant with Mitigation Incorporated. Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) require meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on tribal cultural resources (TCRs). TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (PRC Section 21074). In compliance with SB 18 and AB 52, on July 24 2025, the City sent letters to Native American groups or individuals that may have knowledge regarding tribal cultural places in the Project area. Requests for consultation were received from five tribes: the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), the Yuhaaviatam of San Manuel Nation (San Manuel), the Agua Caliente Band of Cahuilla Indians (Agua Caliente), the Morongo Band of Mission Indians (Morongo), and the Soboba Band of Luiseño Indians (Soboba).

An AB 52/SB 18 consultation was requested by San Manuel. San Manuel considers the Project area sensitive for TCRs. Additionally, AB 52 consultation was requested by the Kizh Nation, which consulted with the City and considers the area sensitive for cultural resources. Furthermore, due to the presence of tribal cultural resources within the Project vicinity, Kizh Nation, Soboba, and Morongo Tribes described that there is a potential of encountering historic and prehistoric resources during project construction. As

such, the consulting tribes requested inclusion of mitigation measures due to the potential of the Project to unearth previously undocumented TCRs during construction. The Soboba and Agua Caliente Tribes did recommend resource protection measures to be included in the MND but reviewed and agreed to the draft mitigation during consultation.

As such, development pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb unknown buried TCRs. Thus, Mitigation Measure CUL-1, PPP CUL-1, and Mitigation Measures TCR-1 through TCR-3 are required and would reduce the potential for TCRs to be impacted during earthmoving activities and provides for preservation of any identified resources. With implementation of Mitigation Measures CUL-1, CUL-2, and TCR-1 through TCR-3, impacts related to a substantial adverse change in the significance of a TCR would be less than significant.

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

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

As described in Section 5.5, *Cultural Resources*, the Project site is located in an urbanized area; however, future development pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb buried archaeological resources, including TCRs. No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for known TCRs to occur in the Project area, and therefore, impacts are expected to be less than significant. However, the City has agreed to implement mitigation measures for a tribal monitor as well as actions in the event of any inadvertent discovery of TCRs. Thus, Mitigation Measures CUL-1 and CUL-2 are included to reduce the potential for archaeological resources, including TCRs, to be impacted during earthmoving activities and provides for preservation of any identified resources. Furthermore, as a result of SB 18 and AB 52 tribal consultation, Mitigation Measures TCR-1 through TCR-3 are included in the case if an incidental discovery of a TCR during ground disturbing activity. With implementation of Mitigation Measures Mitigation Measures CUL-1, CUL-2, and TCR-1 through TCR-3, impacts related to a substantial adverse change in the significance of a TCR would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

Mitigation Measure TCR-1: Retain Native American Monitors Prior to Commencement of Ground-Disturbing Activities

A. The Project plans, specifications, and grading permits shall state that the Project applicant shall retain Native American monitor(s) from or approved by one or more consulting tribes including the Gabrieleño Band of Mission Indians – Kizh Nation, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel, and Agua Caliente Band of Cahuilla Indians. Participation in monitoring is entirely voluntary, and any tribe may choose not to participate, may discontinue participation at any time, or defer monitoring to other tribes. Monitoring may be conducted by multiple qualified tribal representatives on a simultaneous or rotating schedule, as determined by the consulting tribes. The monitor(s) shall be retained a minimum of 15 days prior to the commencement of any "ground-disturbing activity" for the Project (both onsite and any offsite locations that are included in the Project description and/or required in connection with the proposed Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement(s) shall be submitted to the Lead Agency prior to the earlier of the commencement of any ground-disturbing activity or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor(s) shall complete daily monitoring logs that shall provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the tribe(s). Monitor logs shall identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, or places of significance, etc. Copies of monitor logs shall be provided to the Project applicant upon written request to the consulting tribes.

D. Onsite tribal monitoring shall conclude upon the earlier of the following (1) written confirmation to the consulting tribes from a designated point of contact for the Project applicant or Lead Agency that all ground-disturbing activities and phases associated with the Project site or in connection with the Project are complete; or (2) a determination and written notification by the consulting tribes to the Lead Agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.

E. If a significant Tribal Cultural Resource is encountered, as defined by CEQA (as amended, 2015), a consulting Tribal which did not elect to monitor the project at the beginning of development, may elect a to have a Tribal monitor present for the remainder of the project.

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. In the event of the discovery of unidentified and/or potential tribal cultural resources, all consulting Native American Tribal representatives that requested notification of any unanticipated discovery of tribal cultural resources on the Project shall be notified. The consulting tribes, including the

Gabrieleño Band of Mission Indians – Kizh Nation, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel, and Agua Caliente Band of Cahuilla Indians, in consultation with the Lead Agency and the qualified Secretary of Interior standards archeologist, shall determine the significance of the discovered resource.

B. Avoidance and preservation in place or reburial onsite. The discovered remains in its original location of discovery, and stipulations are developed for long term preservation. This may include project redesign to avoid the resource, soil capping, creative landscaping efforts to deter foot traffic, etc. If avoidance and preservation in place is determined to be not feasible;
C. Relocation of the resource(s) and reburial onsite shall be required. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location(s) of the reburial shall be included in a Monitoring Report.
D. Curation at a San Bernardino County curation facility that meets federal standards per 36 Code of Federal Regulations Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, then Public Resource Code 5097.9, 5097.98, as well as Health and Safety Code Section 7050.5 shall be followed. No photographs are to be taken except by the coroner, with written approval by the consulting tribes including the Gabrieleño Band of Mission Indians – Kizh Nation, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel, and Agua Caliente Band of Cahuilla Indians.
C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code sections 5097.98(d)(1) and (2).
D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

5.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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 waste?	☐	☐	☒	☐

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

Less Than Significant Impact.

Water Infrastructure

The Municipal Utilities and Engineering Department (MUED) maintains the water system in the City of Redlands. The proposed Project would develop the vacant Project site, which is currently served by MUED's water infrastructure, and would install new on-site potable water infrastructure and connect to an existing sixteen-inch public water line located in Pioneer Avenue to the north and an 8-inch water line located within San Bernardino Avenue to the south. The proposed Project would also be responsible for developing 1,100 linear feet of an 8-inch non-potable water line within San Bernardino Avenue which would connect to the existing non-potable water lines located within San Bernardino Avenue to the east and west of the Project boundaries. The new on-site water system would convey water supplies to the

proposed residences and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Code for efficient use of water.

Upon completion of the non-potable water line extension within San Bernardino Avenue, the water lines within Pioneer Avenue and San Bernardino Avenue right-of-way would have sufficient capacity to meet the increased water demand for the proposed Project. No expansion of the existing water pipelines serving the site are necessary. The installation of new water distribution lines would be dedicated solely to the proposed Project and would not supply water to any off-site areas.

The construction activities related to the on-site water infrastructure and the off-site non-potable water improvements that would be needed to serve the proposed Project are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this Initial Study. For example, construction emissions from excavation and installation of the water infrastructure are included in Sections 5.3, *Air Quality*, and 5.8, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater Treatment

The Project would install eight-inch sewer lines within the internal roadways, which would connect to the proposed eight-inch sewer main located along the within Pioneer Avenue to the north of the Project site as well as an existing 21-inch sewer main located within San Bernardino Avenue to the south of the Project site. The proposed Project would also include installation of 600 linear feet of an 8-inch sewer main within Pioneer Avenue to join the existing sewer main located west of the Project site.

The proposed extension would be required to connect the Project site to the main lines within the right-of-way and would not result in further expansion of sewer services. The necessary on-site and off-site installation of wastewater infrastructure is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified in other sections of this Initial Study. Therefore, the proposed Project would not result in the construction of new wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Stormwater Drainage

The proposed Project would increase the overall impervious surface area on the Project site compared to existing condition. As discussed in Section 5.10 of this document, the proposed Project would increase the impervious surface area on the Project site compared to existing condition; however, with implementation of BMPs, the proposed Project would install drainage features that would handle and treat all potential stormwater runoff from the Project site. Furthermore, the proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities beyond the on-site improvements included as part of the proposed Project. All new residential development that connects to the system would be required to pay for its applicable fair-share Development Impact Fee(s). Therefore, impacts to stormwater drainage facilities would be less than significant.

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

Less Than Significant Impact. Water service would be provided to the proposed Project site by the City of Redlands MUED. The 2020 San Bernardino Valley Regional Urban Water Management Plan (UWMP),

adopted in June 2021, was prepared for the City of Redlands and therefore accounts for the water usage that would be attributed to development of the Project site, consistent with its existing land use designation and zoning classification. According to the UWMP, the City has four sources of water to provide to its service area: purchased imported water from the State Water Project; groundwater from the Bunker Hill Subbasin and the Yucaipa Subbasin; surface water from the Mill Creek and Santa Ana River watersheds; and recycled water (SBVWBC, 2021).

The Water Supply Reliability Assessment within the UWMP concludes that the City has adequate supplies to meet projected demands under multiple dry year scenarios, taking into account the recent prolonged drought (SBVWBC, 2021). The UWMP concludes that the Santa Ana River Watershed region would have a reliable water supply, based on projected 2045 water demand of 29,735 acre-feet per year (AFY) and a projected 2045 water supply of 35,544 AFY. According to the City's 2022 Water Systems Master Plan, single-family development is estimated to require 1.466 AFY per acre and multifamily development is estimated to require 4.210 AFY per acre (City of Redlands, 2022). Based on this factor, the proposed Project, with a total footprint of 30.56 acres of single-family development and 0.42 acres of multifamily development, is estimated to require approximately 46.57 AFY, representing only 0.1 percent of the projected 2045 demand and 0.1 percent of the projected 2045 supply. Therefore, the incremental water demand from the proposed Project would be minimal and would have a less-than-significant impact on water supply in the foreseeable future during multiple dry years

Therefore, water demand from the proposed Project would be within the City's current and projected water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. All new residential developments that connect to the system are required to pay their applicable fair-share Development Impact Fee(s). Thus, impacts related to water supplies would be less than significant.

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

Less Than Significant Impact. The City's Wastewater Treatment Plant (WWTP) has the capability to treat 9.5 million gallons a day and is projected to treat 6.75 million gallons per day with buildout of the General Plan (City of Redlands, 2017a). Thus, even with buildout of the certified General Plan, there would be 29 percent of WWTP capacity available.

According to the City's Wastewater Master Plan, Medium Density Residential development results in sewage flow factor of 165 gallons per day per dwelling unit (gpd/DU) (City of Redlands, 2021). Thus, buildout of the proposed Project would result in a total sewer demand of 46,530 gpd, or 52.2 AFY, representing approximately 0.4 percent of the WWTP's remaining daily capacity. Therefore, the relatively incremental increase in wastewater from the Proposed Project would not have a significant impact on the WWTP.

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

Less Than Significant Impact. 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,

2026). As of December 2025, the facility received a peak tonnage of 276.39 tons of solid waste in a day and consistently operates well below the maximum permitted daily tonnage (CalRecycle, 2026).

Construction

The Project proposes to construct a residential development on currently undeveloped land; therefore, no demolition is required. Construction of the Project would be subject to Construction and Demolition (C&D) waste diversion requirements under CALGreen Code Section 5.408, which mandates 65 percent diversion of C&D debris. However, given no demolition would occur on-site, there would be limited waste disposal during construction of the Project. Therefore, impacts would be less than significant.

Operation

Full buildout of the proposed Project would result in the development and operation of 282 residential dwelling units. Based on the CalRecycle waste generation rates, residential uses generate 10 pounds of waste per unit per day. Using this waste generation rate, the buildout of the proposed Project would generate approximately 2,820 pounds (1.41 tons) of waste per day (514.65 tons per year). However, future projects would be required to implement AB 341, which requires a diversion of 75 percent of waste from landfills. Therefore, approximately 128.66 tons of waste per year would be directed to landfills from operation of the Project.

As the California Street Landfill has the capacity to process an additional 552.61 tons of solid waste per day, the solid waste generated by the Project would be within the capacity of the landfill. The solid waste generated by full buildout of the proposed Project would represent approximately 0.2 percent of the excess capacity of the California Street Landfill. Furthermore, the California Street Landfill is permitted to operate through buildout of the proposed Project. Thus, the proposed Project would be served by existing landfills with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity would be less than significant.

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

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

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

Future developments pursuant to the proposed Project would be required comply with Redlands Municipal Code Section 13.66.040, Construction and Demolition Recycling Requirements, which requires that no demolition permit or building permit shall be issued for any development activity unless the construction and demolition recycling plan has been approved by the municipal utilities director. In addition, the proposed Project would be required to comply with all federal, State, and local regulations related to solid waste, and would comply with all applicable standards related to solid waste diversion, reduction, and recycling during construction and operation. Therefore, implementation of the proposed Project would result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

5.20. WILDFIRE

If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Less than Significant Impact. The Project site is not located within a State Responsibility Area (SRA); the nearest SRA is approximately three miles southwest in unincorporated San Bernardino County. However, the site is within a Local Responsibility Area (LRA) designated as a High Fire Hazard Severity Zone (CAL FIRE, 2024). While the Project site is currently undeveloped, except for Tennessee street, and vacant with low to the ground vegetation, the site is located within an urban area bounded by West Pioneer Avenue, West San Bernardino Avenue, and I-210, and is predominantly surrounded by residential, industrial, and public/institutional uses. The City's General Plan identifies several evacuation routes out of the City, which include Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. The following roads would provide safe access out of the San Bernardino Valley, as cited in the City of Redlands General Plan:

- Hospitality Lane from Tippecanoe Avenue to Waterman Avenue
- Coulston Street from Mountain View Avenue to Tippecanoe Avenue
- Lugonia Avenue from Orange Street to Mountain View Avenue
- Redlands Boulevard from Orange Street to Waterman Avenue

The Project site does not contain any emergency facilities and would not interfere with, obstruct, or alter these highways and roadways that serve as evacuation routes during emergency events.

Additionally, the proposed Project would provide adequate emergency access to the site via local streets from New York Street (proposed), with secondary entries from West San Bernardino Avenue and West Pioneer Avenue, connecting to internal streets with roadway widths of 36 feet to accommodate two-way

vehicle travel and emergency vehicle movement, ensuring access for emergency vehicles throughout the site. Additionally, a fires access plan has been prepared for the Project's proposed tentative tract map which would be reviewed and approved by the City of Redlands Fire Department and the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Since the Project is required to comply with all applicable City codes, as verified by the City, any potential impacts related to an emergency response or evacuation would be less than significant.

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

Less Than Significant Impact. As stated previously, the Project site is within a LRA designated as a High Fire Hazard Severity Zone (CAL FIRE, 2024). However, the Project site is located in an urbanized area that would not exacerbate wildfire risks. While the Project site is currently undeveloped, except for Tennessee street, and vacant with low to the ground vegetation, the site is bounded by West Pioneer Avenue, West San Bernardino Avenue, and I-210 and the surrounding area is predominately developed with residential, industrial, and public/institutional uses or is undergoing development. As such, the area lacks extensive combustible vegetation necessary for the uncontrolled spread of wildfire. Furthermore, the proposed Project would be an infill development, converting vacant land into a residential development, which would remove existing combustible materials and vegetation and thereby reduce fire hazard risk on-site.

Implementation of the Project would be required to adhere to the California Fire Code, as adopted by the City of Redlands in Municipal Code Chapter 15.20 and would be reviewed by the City's Building and Safety Division during the permitting process to ensure that the Project plans meet the fire protection requirements. In addition, the Project site does not contain slopes or prevailing wind conditions that would exacerbate wildfire risk. Further, since the Project proposes residential development consistent with existing residential, industrial, and public/institutional development in surrounding area, it would not exacerbate wildfire risk compared to existing conditions. Therefore, impacts related to the exposure of people or structures to significant risk involving wildland fires would be less than significant.

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

Less Than Significant Impact. Development of the proposed Project would involve the vacation of Tennessee Street, to be replaced by the construction of New York Street (proposed) as planned in the City of Redlands General Plan Connected City Element. The Project would also construct new local streets to be accessed from New York Street (proposed), West Pioneer Avenue, and West San Bernardino Avenue, along with additional right-of-way dedication and street improvements along the site's northern frontage on West Pioneer Avenue and southern frontage on West San Bernardino Avenue. The installation of utility connections to the proposed residential development would also be required to provide water, sewer, heating and electricity to residents. Additionally, the Project would install 1,100 linear feet of 8-inch non-potable water line within San Bernardino Avenue, connecting to existing non-potable lines east and west of the Project site, and 600 linear feet of 8-inch sewer main within Pioneer Avenue, that would tie into the existing sewer main west of the site. These utility improvements would all be underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed

and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. As such, none of the Project improvements would exacerbate fire risk or require the installation or maintenance of associated infrastructure that would increase fire hazards or result in temporary or ongoing environmental impacts. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk or that would result in impacts to the environment and impacts would be less than significant.

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

Less Than Significant Impact. As stated previously, the Project site is within a LRA designated as a High Fire Hazard Severity Zone (CAL FIRE, 2024). However, the Project site is located in an urbanized area predominantly surrounded by developed residential, industrial, and public/institutional uses. As such, the surrounding area lacks extensive combustible vegetation necessary for the uncontrolled spread of wildfire. Further, as an infill development, the Project would convert vacant land into residential use, removing existing combustible materials and reducing fire hazard risk on-site. The Project would be required to comply with the California Fire Code and would be reviewed by the City's Building and Safety Division during the permitting process to ensure that fire protection requirements are met. Since the proposed development would be consistent with existing uses in surrounding area, it would not exacerbate wildfire risk compared to existing conditions.

According to FEMA FIRM Map # 06071C8704J, the Project site is zoned as Flood Zone X, an area of minimal flood hazard outside the 0.2 percent annual chance floodplain (FEMA, 2024). As described in Section 5.10, *Hydrology and Water Quality* the proposed Project would be required to implement a SWPPP (included as PPP WQ-1) during construction. The SWPPP would implement construction BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, which would control and direct surface runoff to prevent flooding, and as such, Project construction would not expose people or structures to significant risks related to downslope and downstream flooding.

As detailed in Section 5.7, *Geology and Soils*, there are no landslide zones close to or within the boundaries of the Project site. The Project site is relatively flat and is not located near any substantial slopes or hillsides; therefore, the risk of slope failure represents a limited level of concern on the Project site. Therefore, with implementation of the CBC, the Project would not expose people or structures to significant risks, including downslope or downstream landslides, and impacts (if any) would be less than significant.

Existing Plans, Programs, or Policies

PPP WQ-1: General Construction Permit. As listed in Section 5.10, *Hydrology and Water Quality*.

Mitigation Measures

None.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?

Less Than Significant with Mitigation Incorporated. The proposed Project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 5.1, and would not result in excessive light or glare. The Project site is located within a developed area with no natural habitat on-site. The proposed Project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and nesting birds would be less than significant with adherence to existing regulations and incorporation of Mitigation Measures BIO-1 and BIO-2. There are no jurisdictional waters on the Project site.

Impacts to archaeological resources, buried human remains, and Tribal Cultural Resources would be reduced to less than significant with implementation of Mitigation Measures CUL-1, CUL-2, and TCR-1 through TCR-3. Based on the preceding analysis of potential impacts in the responses to items 5.1 through 5.20, no evidence is presented that this proposed Project would degrade the quality of the environment. Impacts related to degradation of the environment would be less than significant with incorporation of mitigation measures.

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

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

a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.
c) Cumulative impacts would be less than significant, as further discussed herein.

Aesthetics

Impacts related to aesthetics at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Agricultural Resources

The analysis provided in Section 5.2 found that no individual impacts would occur; therefore, the Project could not contribute considerably to local agriculture or forestry.

Air Quality

The analysis provided in Section 5.3 found that impacts would be less than significant. Per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. Therefore, the Project would not contribute to cumulatively considerable air quality impacts.

Biological Resources

The analysis provided in Section 5.4 found that no individual impacts to sensitive species or migratory birds would occur with implementation of Mitigation Measures BIO-1 and BIO-2; therefore, the Project would not contribute considerably to regional impacts on such species, and impacts would be less than significant. The analysis also found that the Project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts. As such, impacts would be less than significant on a cumulative basis.

Cultural Resources

The analysis provided in Section 5.5 found that impacts to archaeological resources and buried human remains would be less than significant with incorporation of Mitigation Measures CUL-1 through CUL-2. Therefore, the Project would not contribute to cumulatively considerable cultural resources impacts.

Energy

The analysis provided in Section 5.6 found that no individual impacts related to energy use would occur as a result of the proposed Project. Therefore, the Project would not contribute to cumulative energy impacts.

Geology and Soils

Impacts related to geology at the project-level have no potential for cumulative impacts. Therefore, the proposed Project would have no contribution to potential geological or soil degradation or other such impacts. The analysis in section 5.7 found that if during construction operations, paleontological resources are discovered, Mitigation Measure GEO-1 would establish proper care and attention to such discoveries. Therefore, the Project would not contribute to cumulative paleontological resources impacts.

Greenhouse Gas Emissions

As discussed in Section 5.8, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Executive Order S-3-05, Executive Order B-30-15, AB 32, and SB 32 recognizes that California is the source of substantial amounts of GHG emissions and recognizes the significance of the cumulative impact of GHG emissions from sources throughout the state and sets performance standards for reduction of GHGs.

The analysis of GHG emission impacts under CEQA contained in this Initial Study effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. Therefore, the Project would not contribute considerably to global climate change.

Hazardous Materials

The analysis provided in Section 5.9 related to hazards and hazardous materials, and the associated Phase I Environmental Site Assessment found that impacts would be less than significant. Additionally, compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that impacts would be less than significant.

Land Use and Planning

The analysis provided in Section 5.11 related to land use and planning found that impacts would be less than significant; therefore, while the proposed Project would contribute to individual, localized, or regional cumulative impacts, its contribution would not be considerable.

Mineral Resources

The analysis provided in Section 5.12 related to mineral resources found that there would be less than significant impacts; therefore, while the Project would contribute to localized or regional cumulative impacts, the Project contribution would not be considerable.

Noise

The analysis provided in Section 5.13 found that impacts related to the construction and operation of the proposed Project would be less than significant. Therefore, the Project would not contribute considerably to cumulative noise impacts.

Population and Housing

The analysis provided in Section 5.14 related to population and housing found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

Public Services

The analysis provided in Section 5.15 related to public services found that impacts would be less than significant; therefore, while the proposed Project would contribute to localized cumulative impacts, the contribution would not be cumulatively considerable.

Recreation

The analysis provided in Section 5.16 related to recreation found that impacts would be less than significant; therefore, no cumulative impacts related to this topic would occur.

Transportation

Traffic conditions were analyzed in Section 5.17 and found to be less than significant. The proposed Oroject's contribution to cumulative impacts to local and regional transportation facilities would not be considerable.

According to the City's Guidelines, for projects that are inconsistent with the City's General Plan, if the project causes total daily VMT/SP within the City to be higher than the "no project" scenario under cumulative conditions, the project's effect on VMT would be cumulatively significant.

As shown in Table 5.21-1, the Redlands Citywide Boundary VMT/SP would be 0.58 percent lower with the Project added under cumulative conditions; therefore, the Project's effect on citywide VMT would be less than significant.

Table 5.21-1: Project's Effect on VMT Results per City's Guidelines

	Base Year 2019	Baseline 2026	Cumulative Year 2050
Citywide Boundary VMT With Project	2,723,407	2,876,659	3,402,096
City of Redlands Households with Project	25,926	27,191	31,526
City of Redlands Household Occupancy	2.65	2.65	2.65
City of Redlands Population With Project	68,704	72,055	83,544
City of Redlands Employment with Project	49,360	51,786	60,103
City of Redlands Service Population With Project	118,064	123,841	143,647
With Project Citywide Boundary VMT/SP	**23.07**	**23.23**	**23.68**
Citywide Boundary VMT No Project	2,720,232	2,874,646	3,404,067
City of Redlands Households No Project	25,644	26,909	31,244

	Base Year 2019	Baseline 2026	Cumulative Year 2050
City of Redlands Household Occupancy	2.65	2.65	2.65
City of Redlands Population No Project	67,957	71,308	82,797
City of Redlands Employment No Project	49,360	51,786	60,103
City of Redlands Service Population No Project	117,317	123,093	142,900
No Project Citywide Boundary VMT/SP	**23.19**	**23.35**	**23.82**
% Above/Below Threshold	-0.52%	-0.53%	-0.58%
Impact?	-	-	No

Tribal Cultural Resources

The analysis provided in Section 5.18 related to tribal cultural resources found that impacts would be less than significant with adherence to Mitigation Measures CUL-1 through CUL-2 and TCR 1 though 3.

Utilities and Service Systems

The analysis provided in Section 5.19 related to utilities and service systems found that impacts would be less than significant; therefore, while the Project would contribute to localized or regional cumulative impacts, the Project contribution would not be considerable.

Wildfire

The analysis provided in Section 5.20 related to wildfire found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

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

Less Than Significant with Mitigation Incorporated. As described in the analysis above, construction and operation of the proposed Project would not cause substantial adverse effects on human beings, either directly or indirectly. The impacts that the proposed Project could have on human beings have been reduced to below a level of significance via mitigation measures, existing regulations, and standard conditions of approval. Therefore, impacts related to adverse effects on human beings, either directly or indirectly, are considered less than significant.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 402. As listed in Section 5.3, *Air Quality*.

PPP AQ-2: Rule 403. As listed in Section 5.3, *Air Quality*.

PPP AQ-3: Rule 445. As listed in Section 5.3, *Air Quality*.

PPP AQ-4: Rule 113. As listed in Section 5.3, *Air Quality*.

PPP CUL-1: Discovery of Human Remains. As listed in Section 5.5, *Cultural Resources*

PPP WQ-1: General Construction Permit. As listed in Section 5.10, *Hydrology and Water Quality*.

PPP PS-1: Development Impact Fees. As listed in Section 5.15, *Public Services*.

PPP PS-2: Open Space and Park Fees. As listed in Section 5.15, *Public Services*.

Mitigation Measures

MM BIO-1: Pre-construction Nesting Bird Survey. As listed Previously in Section 5.4, *Biological Resources*.

MM BIO-2: Pre-construction Burrowing Owls Survey. As listed Previously in Section 5.4, *Biological Resources.*

MM CUL-1: Archeological Monitoring. As listed in Section 5.5, *Cultural Resources.*

MM GEO-1: PRIMP. As listed in Section 5.7, *Geology and Soils*.

MM TCR-1: Retain Native American Monitors Prior to Commencement of Ground-Disturbing Activities. As listed in Section 5.18, *Tribal Cultural Resources*.

MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). As listed in Section 5.18, *Tribal Cultural Resources*.

MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. As listed in Section 5.18, *Tribal Cultural Resources*.

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