

August 2019 | Draft Subsequent Environmental Impact Report
State Clearinghouse No. 2016081041

BALLOT INITIATIVE REGARDING VOTER APPROVED LAND USE INITIATIVES MEASURES U, N, AND PROPOSITION R

City of Redlands

Prepared for:

City of Redlands

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NOTICE OF AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT



NOTICE IS HEREBY GIVEN that the City of Redlands has completed an assessment of the possible environmental effects of the following-described project, and has determined that a Subsequent Environmental Impact Report (SEIR) is the appropriate environmental document. This determination has been made in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

The Draft SEIR has not identified any new or more severe significant environmental effects associated with the proposed project than those that have previously been identified and disclosed in the 2035 General Plan Environmental Impact Report (SCH No. 2016081041) certified by the Redlands City Council on December 5, 2017.

A copy of the Draft SEIR is available for public review at the following locations during regular business hours:

- City of Redlands City Clerk's Office, located at 35 Cajon Street, Suite 4, Redlands, CA 92373
- City of Redlands, Development Services Dept., located at 35 Cajon Street, Suite 20, Redlands, CA 92373
- A.K. Smiley Public Library, located at 125 W. Vine Street, Redlands, CA 92373

A copy of the Draft SEIR, the 2035 General Plan, General Plan Update EIR and related documents are available to the public for review at the following website:

- City of Redlands Planning Division website at 'www.cityofredlands.org/planning'

Inquiries regarding the proposed project and/or the Draft SEIR or requests for an electronic copy of the Draft SEIR should be directed to **Brian Desatnik, Development Services Director**, at (909) 798-7555 option 2. Written comments must be sent to the Development Services Department, Planning Division, to the attention of Brian Desatnik by the deadline specified below.

1. Project Name:

Ballot Measure Regarding Voter Approved Land Use Initiatives Measures U, N, and Proposition R

2. Project Description:

On June 4, 2019, the City Council directed staff to draft and place on the next municipal ballot, an initiative that would remove application of the existing City of Redlands 1978 voter-approved initiative measure commonly known as Proposition "R," as that proposition was amended by the City of Redlands 1987 voter-approved initiative measure commonly known as Measure "N", and the 1997 voter-approved Measure "U", from future development within the Transit Villages Planning Area (TVPA). The aforementioned voter-approved measures would continue to apply to the remainder of the City.

The proposed ballot initiative would result in the following changes to the following voter-approved initiatives (new text is shown in *italic and underline font*):

Section 1. Sub-section B2, entitled "Special Categories of Development," of Section 4.2 of the 2035 Redlands General Plan (Measure U), entitled "Principles of Managed Development," is hereby amended by the addition of subsection B2 G, which shall read as follows:

"2. Special Categories of Development. The provisions of this initiative shall not apply to the following:

- A.
- B.
- C.
- D.
- E.

F.

G. The geographical area of the City designated as the "Transit Villages Planning Area" as depicted in Exhibit "A," which is attached hereto and incorporated by reference into this ordinance."

Section 2. The 1987 voter-approved initiative ordinance commonly known as Measure N is hereby amended by the addition of a new Section 7 which shall read as follows:

"SECTION 7. EXEMPTION. The geographical area of the City designated as the "Transit Villages Planning Area" as depicted in Exhibit "A" is hereby deemed exempt from the provisions of this initiative ordinance and Measure R."

Section 3. A new section 15 is hereby added to the 1978 voter-approved initiative ordinance commonly known as Proposition R, as amended by the 1987 voter-approved initiative commonly known as Measure N, to read as follows:

"Section 15. The geographical area of the City designated as the "Transit Villages Planning Area," as depicted in Exhibit "A" which is attached hereto and incorporated herein by this reference, is hereby deemed exempt from the provisions of this initiative ordinance."

If the proposed ballot initiative is approved by the voters, it would allow the City Council to consider future projects within the Transit Villages Planning Area (TVPA) without the burden of the annual residential dwelling unit limitation. New residential units, specifically residential units in multi-family projects, within the TVPA could be financed more efficiently and constructed faster than the current regulations would permit. Future City discretionary actions relating to proposed development within the TVPA would not be constrained by the General Plan limitations contained in Measure U and the zoning restrictions in Proposition R, as amended by Measure N. Specifically, the proposed ballot initiative would permit the following:

- The City's 400 dwelling unit annual limitation on construction of residential dwelling units would not be applicable within the TVPA;
- Residential densities may be increased within the TVPA from 18 to 27 units/acre without the necessity of a super-majority vote of the members of the City Council and the necessity of making certain findings;
- The requirement for the maintenance of traffic levels of service "C" for all intersections would not apply within the TVPA;
- The prohibition against the creation of new land use designations would not apply within the TVPA;
- Socio-economic studies would not be required for development projects within the TVPA.

3. Project Location: The project site is the City of Redlands.

4. Lead Agency: City of Redlands, Development Services Department, 35 Cajon St., Suite 20, Redlands, CA 92373; Phone (909) 798-7555 option 2.

5. Project Proponent: City Council of the City of Redlands

PUBLIC COMMENT regarding the proposed project and/or adequacy of the Draft SEIR will be accepted in writing and will be considered by the City of Redlands.

The period for public review during which the City will receive written comments on the Draft SEIR will begin on August 26, 2019, and will end on October 9, 2019.

To Submit Comments by U.S. Mail or hand delivery:

City of Redlands, Development Services Dept., 35 Cajon Street, Suite 20, Redlands, CA 92373.
Attn: Brian Desatnik, Development Services Director

To Submit Comments by E-mail: bdesatnik@cityofredlands.org

Table of Contents

Contents	Page
1. INTRODUCTION AND SUMMARY	1-1
1.1 PROJECT OVERVIEW	1-1
1.2 PROJECT LOCATION	1-1
1.3 SCOPE OF EIR	1-2
1.3.1 Lead Agency.....	1-2
1.3.2 Purpose of EIR.....	1-2
1.3.3 General Plan EIR.....	1-2
1.3.4 Subsequent Environmental Review	1-7
1.3.5 Impacts Considered Less Than Significant	1-8
1.3.6 Unavoidable Significant Adverse Impacts	1-8
1.4 AREAS OF CONTROVERSY	1-9
1.5 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION.....	1-9
1.6 FINAL EIR CERTIFICATION	1-29
1.7 CEQA FINDINGS FOR PROJECT APPROVAL.....	1-29
1.8 MITIGATION MONITORING.....	1-30
1.9 REFERENCES.....	1-30
2. PROJECT DESCRIPTION.....	2-1
2.1 INTRODUCTION	2-1
2.1.1 Text of Ballot Initiative	2-1
2.2 PROJECT OBJECTIVES	2-2
2.3 CONSTRUCTION SCHEDULE.....	2-3
2.4 INTENDED USES OF THE SEIR	2-3
3. ENVIRONMENTAL SETTING	3-1
3.1 INTRODUCTION	3-1
3.2 EXISTING CONDITIONS.....	3-1
3.2.1 City of Redlands 2035 General Plan and General Plan EIR.....	3-3
3.3 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS	3-14
4. INTRODUCTION TO ENVIRONMENTAL ANALYSIS	4-1
4.1 LAND USE AND HOUSING	4-1-1
4.1.1 Environmental Setting.....	4-1-1
4.1.2 Thresholds of Significance.....	4-1-4
4.1.3 Summary of General Plan EIR Impacts.....	4-1-5
4.1.4 Environmental Impacts of the Proposed Project.....	4-1-6
4.1.5 Cumulative Impacts	4-1-17
4.1.6 References.....	4-1-18
4.2 TRANSPORTATION.....	4-2-1
4.2.1 Environmental Setting.....	4-2-1
4.2.2 Thresholds of Significance.....	4-2-6
4.2.3 Summary of Impacts Associated with the General Plan EIR	4-2-7
4.2.4 Environmental Impacts of the Proposed Project.....	4-2-7
4.2.5 Cumulative Impacts	4-2-10
4.3 UTILITIES AND SERVICE SYSTEMS	4-3-1
4.3.1 Environmental Setting.....	4-3-1
4.3.2 Methodology	4-3-10
4.3.3 Thresholds of Significance.....	4-3-10
4.3.4 Summary of Impacts Associated with the General Plan EIR	4-3-11
4.3.5 Environmental Impacts of the Proposed Project.....	4-3-11

Table of Contents

Contents	Page
4.3.6 Cumulative Impacts	4.3-15
4.3.7 References.....	4.3-16
5. IMPACTS FOUND NOT TO BE SIGNIFICANT.....	5-1
5.1 AESTHETICS	5-1
5.2 AGRICULTURE AND FORESTRY RESOURCES	5-3
5.3 AIR QUALITY	5-7
5.4 BIOLOGICAL RESOURCES	5-11
5.5 CULTURAL RESOURCES	5-16
5.6 ENERGY.....	5-18
5.7 GEOLOGY AND SOILS.....	5-19
5.8 GREENHOUSE GAS EMISSIONS.....	5-23
5.9 HAZARDS AND HAZARDOUS MATERIALS	5-24
5.10 HYDROLOGY AND WATER QUALITY	5-28
5.11 MINERAL RESOURCES.....	5-32
5.12 NOISE.....	5-33
5.13 PUBLIC SERVICES.....	5-34
5.14 RECREATION	5-37
5.15 TRANSPORTATION.....	5-37
5.16 TRIBAL CULTURAL RESOURCES	5-38
5.17 WILDFIRE.....	5-39
5.18 REFERENCES.....	5-41
6. ALTERNATIVES TO THE PROPOSED PROJECT	6-1
6.1 INTRODUCTION	6-1
6.1.1 Purpose and Scope.....	6-1
6.1.2 Project Objectives	6-2
6.2 ALTERNATIVES CONSIDERED AND REJECTED	6-2
6.2.1 Alternative Development Areas	6-2
6.2.2 Existing Exemptions of Measure U and Measure N/Proposition R.....	6-3
6.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS.....	6-4
6.3.1 Alternatives Comparison	6-4
6.4 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE	6-5
6.4.1 Land Use and Housing.....	6-6
6.4.2 Transportation	6-7
6.4.3 Utilities and Service Systems.....	6-8
6.4.4 Conclusion.....	6-8
6.5 THREE-YEAR UNIT TOTAL ALTERNATIVE.....	6-8
6.5.1 Land Use and Housing.....	6-9
6.5.2 Transportation	6-9
6.5.3 Utilities and Service Systems.....	6-10
6.5.4 Conclusion.....	6-10
6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE	6-11
7. CEQA-MANDATED SECTIONS.....	7-1
7.1 SIGNIFICANT IRREVERSIBLE CHANGES DUE TO THE PROPOSED PROJECT	7-1
7.2 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT	7-1
8. PERSONS PREPARING THE SUBSEQUENT EIR.....	8-1
LEAD AGENCY.....	8-1
CEQA CONSULTANTS TO THE CITY.....	8-1

Table of Contents

Contents	Page
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APPENDICES

Appendix 1	NOP and Comments
Appendix 2	2035 General Plan
Appendix 3	General Plan EIR
Appendix 4	General Plan EIR Policies Applicable to Proposed Project
Appendix 5	Tribal Consultation Responses

Table of Contents

Figure		Page
Figure 1	Regional Location.....	1-3
Figure 2	Transit Village Planning Area.....	1-5
Figure 3	Transit Village Land Use.....	5-5
Figure 4	Aerial Photograph.....	5-13

Table of Contents

Table		Page
Table 1-1	Summary of Draft SEIR Environmental Analysis Conclusions.....	1-11
Table 3-1	Existing Land Use Summary	3-2
Table 3-2	General Plan Designation for Vacant Parcels.....	3-2
Table 3-3	Zoning Designation for Vacant Parcels.....	3-3
Table 3-4	Projected Population at Buildout (2035)	3-3
Table 4.1-1	Applicability Between Proposed Project and Measures U, N, and Proposition R.....	4.1-8
Table 4.1-2	Population and Housing Units 2000 - 2019.....	4.1-14
Table 4.1-3	Maximum Potential Unit Yield within the TVPA Without 4/5ths Council Vote	4.1-16
Table 4.1-4	Projected Residential Buildout (2035).....	4.1-18
Table 4.2-1	Trip Generation With and Without 4/5ths Vote.....	4.2-6
Table 4.2-2	Future (Year 2035) Plus Project Intersections, Roadway and Freeway Segments Level of Service	4.2-11
Table 6-1	Measure U Exemptions	6-3
Table 6-2	Buildout Statistical Summary.....	6-5
Table 6-3	Comparison of No Project Alternative to General Plan EIR and Proposed Project.....	6-6
Table 6-4	Comparison of Three-Year Unit Total Alternative to General Plan EIR and Proposed Project.....	6-8
Table 6-5	Comparison of Three-Year Unit Total Alternative to Project Objectives	6-11

Abbreviations and Acronyms

ABBREVIATIONS AND ACRONYMS

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program

Abbreviations and Acronyms

CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L _{dn}	day-night noise level
L _{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M _w	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable

Abbreviations and Acronyms

mgd	million gallons per day
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMC	Redlands Municipal Code
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan

Abbreviations and Acronyms

SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model
tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
TVPA	Transit Village Planning Area
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

Abbreviations and Acronyms

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1. Introduction and Summary

1.1 PROJECT OVERVIEW

The proposed project is a City of Redlands (“City”) City Council sponsored ballot initiative regarding Voter Approved Land Use Initiatives Measures U, N, and Proposition R (hereinafter either the “proposed Project” the “Project”, or the “proposed Ballot Initiative”). The proposed Ballot Initiative is anticipated to be placed on the March 2020 election calendar for consideration by the City’s voters. If approved by the voters, the initiative would amend the 1978 voter-approved initiative zoning measure commonly known as Proposition R, as that measure was later amended by the 1987 voter-approved initiative measure commonly known as Measure N, and the 1997 voter-approved initiative ordinance commonly known as Measure U.

The intent of the City’s proposed Ballot Initiative is to remove certain development constraints from future development projects undertaken near three transit stations, located within the Transit Village Planning Area (“TVPA”). Specifically, the proposed Ballot Initiative would remove the following constraints on development within the TVPA: the 4/5ths vote requirement for residential buildings exceeding two stories or 35 feet in height and the 4/5ths vote requirement for residential density greater than 18 dwelling units per acre not to exceed 27 units per acre, the requirement for the maintenance of traffic levels of service “C” for all intersections, the prohibition against the creation of new land use designations, and the requirement of a socio-economic study for development projects, currently imposed by Measure U; and the 400-dwelling unit annual cap that applies to residential development citywide, currently imposed by Measure N and Proposition R. The proposed Ballot Initiative would not change the land use designations for any properties within the TVPA, or elsewhere in the City. All other provisions of the City’s 2035 General Plan (the “2035 General Plan”) and zoning ordinance will continue to apply to all development, regardless of its location. The proposed Project does not include any specific development project.

1.2 PROJECT LOCATION

Located in the City of Redlands (See Figure 1, Regional Location), the geographical area of the City affected by the proposed Ballot Initiative would be limited to the TVPA, an approximately 782 acre area that is roughly described as the land within one-half mile radius from any of the three planned rail transit stations within the City of Redlands. (See Figure 2, Transit Village Planning Area) Measures U, N, and Proposition R would continue to apply to the rest of the City in the way that these measures currently apply.

1. Introduction

1.3 SCOPE OF EIR

1.3.1 Lead Agency

Pursuant to Public Resources Code, section 21067, the lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.” Because the City proposes to adopt a resolution to place the proposed Ballot Initiative on the March 2020 ballot, the City is the lead agency for the proposed Project. As lead agency, the City is responsible for, among other things, preparing and certifying this Draft Subsequent Environmental Impact Report (“SEIR”), which analyzes the potential environmental impacts of the proposed Project. As explained in Section 3, “Project Description,” of this Draft SEIR, the proposed Project does not result in direct physical growth within the TVPA, but makes the following development standards inapplicable to development projects within the TVPA: the annual City-wide 400 dwelling unit limitation, the requirement for a 4/5ths vote to allow a maximum of 27 units to the acre or residential building height in excess of two-stories or 35 feet, requirement for a socio-economic study, and standards for roadway levels of service.

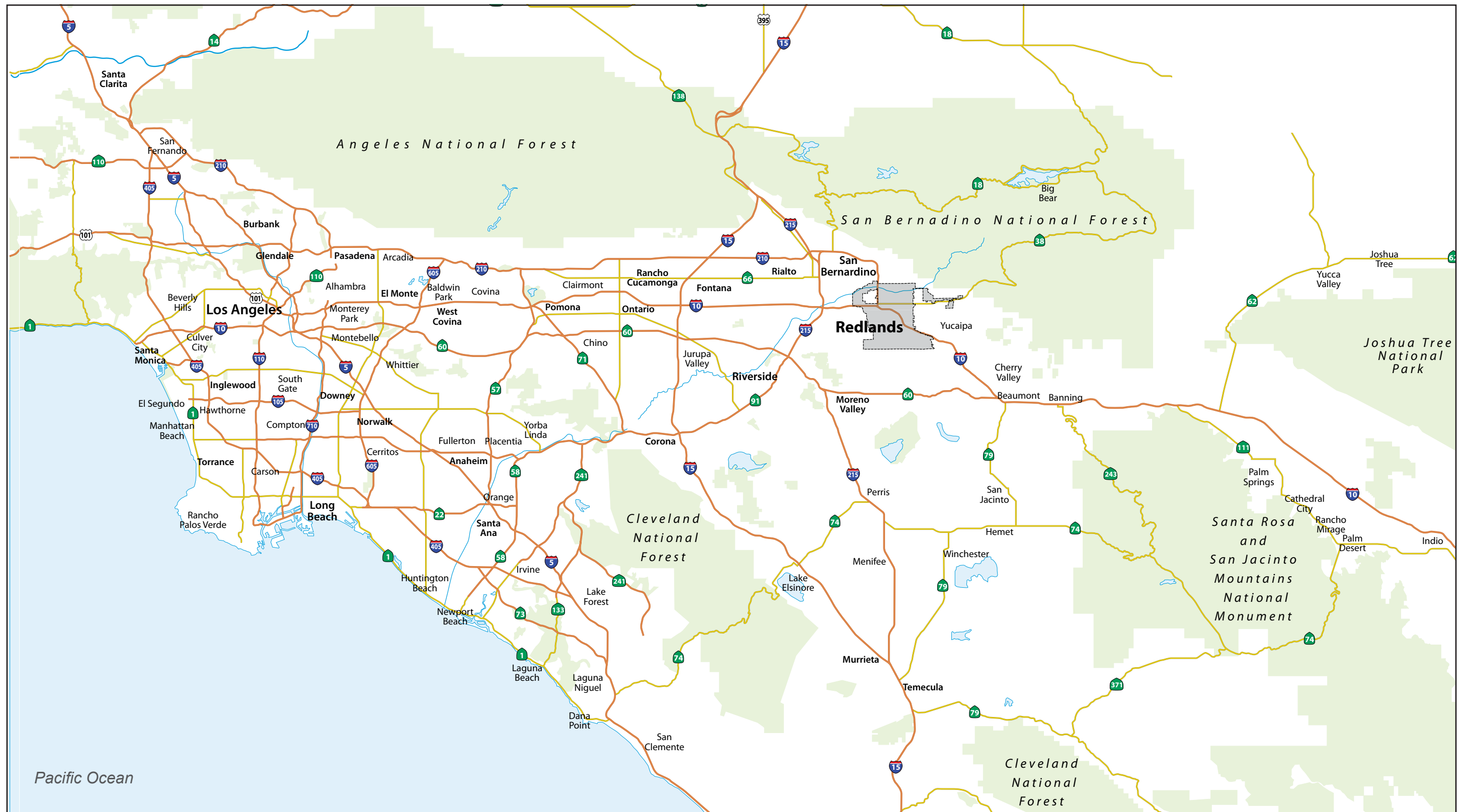
1.3.2 Purpose of EIR

The California Environmental Quality Act (Pub. Resources Code, §§ 21000 et seq.: “CEQA”) requires that local government agencies consider the environmental consequences of their decisions before acting on projects over which they have discretionary approval authority. An environmental impact report (“EIR”) is a disclosure document designed to provide the public, and state and local governmental agency decision makers, with an analysis of potential environmental consequences of a project to support informed decisions relating to the possible approval of that project. An EIR does not recommend either approval or denial of the project; but rather, is intended to provide a source of independent and impartial analysis of the foreseeable direct and indirect environmental impacts of a proposed course of action.

1.3.3 General Plan EIR

The 2035 City of Redlands General Plan (“2035 General Plan”) was adopted following certification of the City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report (SCH#2016081041). (“General Plan EIR”). The 2035 General Plan would result in a citywide increase of 3,422 dwelling units; 10,964 residents, as shown in Table 2.3-5, *Projected Population at Buildout (2035)*, of the General Plan EIR; and 14,561 jobs as shown in Table 2.3-6, *Projected Non-Residential Buildout (2035)*. The proposed Project would eliminate the 18-unit per acre density limit within the TVPA, and would allow the City to consider future projects up to the maximum 2035 General Plan density of 27-units to the acre. Even though there is a 9 unit difference between the current 18-unit per acre maximum and the 2035 General Plan 27-unit dwelling unit per acre maximum for the vacant multiple family residential land in the TVPA, the proposed Project would not increase the buildout totals shown in the General Plan EIR because the General Plan EIR assumed maximum buildout based on 27-units per acre (not 18). As the proposed Project does not change the land use designation, or development potential as established by the 2035 General Plan, this SEIR evaluates whether the change in how the City can consider future projects results in environmental impacts greater than those evaluated in the General Plan EIR.

Figure 1 - Regional Location

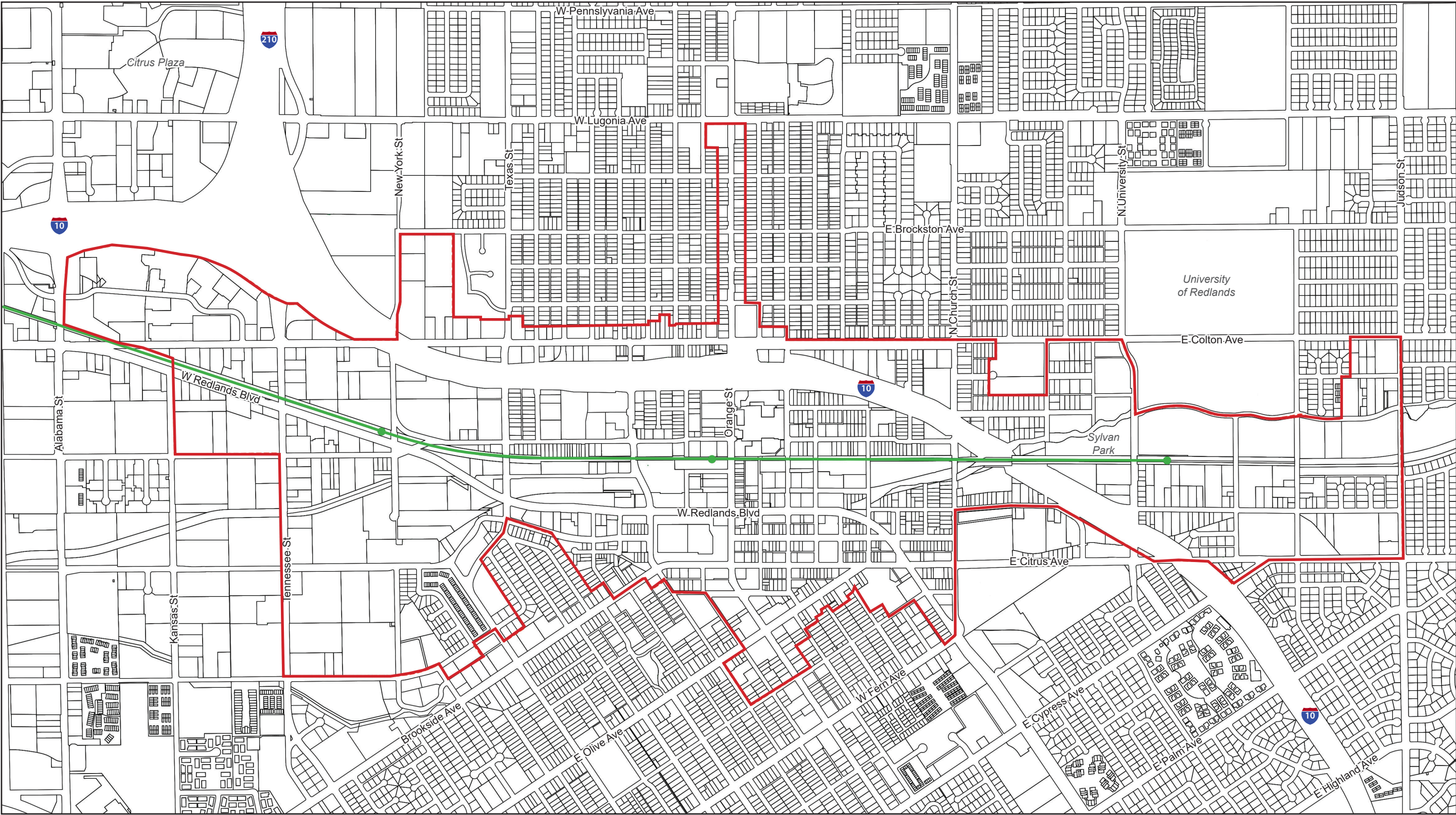


Source: Dyett and Bhatia, 2017

1. Introduction

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Figure 2 - Transit Village Planning Area



— Transit Village Planning Area (TVPA) ● Proposed Transit Stations

0 1,200
Scale (Feet)



Source: City of Redlands, June, 2019

1. Introduction

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1. Introduction

1.3.4 Subsequent Environmental Review

The City, as lead agency under CEQA, determined that a subsequent environmental impact report was appropriate to satisfy CEQA requirements (Pub. Resource Code, § 21166; State CEQA Guidelines, § 15162) by fully disclosing new impacts or changes in impacts that would occur as a result of project modifications and changes that would occur as a result of the Ballot Measure and since the certification of the General Plan EIR. This Draft SEIR has been prepared pursuant to the requirements of CEQA (California Public Resources Code, Division 13, Section 21000 et seq.), the State CEQA Guidelines (Title 14 of the California Code of Regulations, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to Public Resources Code, section 21166 and State CEQA Guidelines, section 15162, when an EIR has been certified for a project (here, the 2035 General Plan), no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- a. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- b. Substantial changes occur with respect to circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The City has determined that a Subsequent EIR is the proper CEQA document to address environmental impacts from the revised project (i.e., the Ballot Measure). The changes to the development constraints in the TVPA will require revisions to the General Plan EIR to address potentially significant environmental effects. This Draft SEIR makes modifications to the General Plan EIR to make the General Plan EIR applicable to the revised project that would result if the Ballot Measure passes. This Draft SEIR will rely upon the policies and programs in the 2035 General Plan, and as reported in the General Plan EIR, to address most of the environmental impacts.

This SEIR also considers alternatives to the revised project (i.e., the Ballot Initiative) in accordance with the following requirements:

1. Introduction

- a. State CEQA Guidelines, section 15126.6(a), which states “An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project”
- b. State CEQA Guidelines, section 15021(a)(2), which states “A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.”

1.3.5 Impacts Considered Less Than Significant

Chapter 5 of this Draft SEIR lists the environmental topics that would not result in any new, or more significant environmental effects, of the proposed Project when compared to the impacts disclosed in the General Plan EIR. Therefore, the topics are not discussed in detail in Chapter 4 of this Draft SEIR.

1.3.6 Unavoidable Significant Adverse Impacts

If the City, as the lead agency, determines that unavoidable significant adverse impacts would result from the proposed Project, the City must prepare a “Statement of Overriding Considerations” before it can approve the proposed Project. A Statement of Overriding Considerations is a statement made by the decision-making body indicating that it has balanced the benefits of the proposed Project against its unavoidable significant environmental effects and has determined that the benefits of the Project outweigh the adverse effects, and therefore, the adverse effects are considered acceptable.

The General Plan EIR identified the following significant and unavoidable adverse impacts, as defined by CEQA (*numbering is from the General Plan EIR*):

Impact

- 3.2-1 Buildout of the General Plan would 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.
- 3.2-2 Development under the General Plan would violate air quality standards or contribute substantially to an existing or projected air quality violation.
- 3.2-3 Development under the General Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the 2035 General Plan region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for O₃ precursors).
- 3.15-1 Implementation of the General Plan could result in conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant

1. Introduction

components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

- 3.15-2 Adoption of the General Plan would conflict with an applicable congestion management program (CMP) including, but not limited to level of service standards and travel demand measures, or standards established by the county congestion management agency for designated roads or highways.

This Draft SEIR assumes that development within the TVPA will be similar to that evaluated in the General Plan EIR, and that the significant and unavoidable environmental findings will be identical. The proposed Project does not exacerbate or add to the significant and unavoidable impacts disclosed in the General Plan EIR. Therefore, the revised project will not require a new statement of overriding considerations.

1.4 AREAS OF CONTROVERSY

Issues identified during the scoping meeting and public review period for the Notice of Preparation include:

- Building heights
- Residential densities (i.e. stack and pack apartments!)
- Speed of buildout of the General Plan

1.5 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft SEIR. For a full listing of all policies and actions referenced in the General Plan EIR that would continue to apply to the proposed Project, please see Appendix 4 of this SEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for any significant impacts. The level of significance after implementation of any mitigation measures is also presented.

1. Introduction

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1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
LAND USE AND HOUSING		
4.1-1 The proposed Project would not divide an established community, nor would the proposed Project directly or indirectly result in population growth in the project area.	<p>Distinctive City Element</p> <p><i>Small Town Feeling & Community Cohesion Principles & Actions</i></p> <p>2-P.3 Promote planning practices that mitigate the presence of physical barriers between communities (i.e. freeways) and foster greater connections between neighborhoods and uses.</p> <p>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.</p> <p>2-A.5 Develop new roadway connections, pedestrian paths, and bicycle routes that facilitate transportation in the north-south direction traversing the I-10 freeway.</p> <p>2-A.6 Improve and make more efficient traffic flow for all modes of transportation along corridors that link north/south thoroughfares through techniques such as signal timing, additional lanes, sidewalks, bike paths, and other improvements.</p> <p>2-A.7 Establish north-south trail linkages—including the Mountain View Trail, California Street, the Heritage Trail, the Lugonia Trail, and Church Street—to major east-west trails including the Santa Ana River Trail, the Orange Blossom Trail, and the planned San Timoteo Canyon Trail.</p> <p>2-A.14 Maintain continuity in land uses across barriers such as I-10.</p> <p>2-A.15 Through development standards, ensure smooth transitions for neighborhoods that border one another so that neighborhoods maintain their unique qualities while being compatible with one another.</p> <p>2-A.18² Use transit stations as focal points for interconnectivity, plan to equally serve travelers from north and south.</p> <p>2-A.19 Establish meeting areas in new neighborhoods and ensure a safe and secure environment.</p>	No Impact

¹ The numbering of some policies and actions in the General Plan EIR do not align with the numbering of the same policies and actions in the General Plan. All citations in this Draft SEIR are to the policy and action numbers listed in the General Plan EIR. To the extent that the City has identified a discrepancy between the numbering for a particular policy or action in the General Plan EIR with the numbering for that same policy or action in the General Plan, the City makes note of that in this Draft SEIR by dropping a footnote to indicate the corresponding numbering for the policy or action in the General Plan.

² The corresponding General Plan action is 2-A.16.

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>Vibrant Downtown Actions</p> <p>2-A.101³ Improve connections from Downtown to adjacent neighborhoods, including areas north of I-10, through streetscape enhancement and multi-modal improvements.</p> <p>Livable Community Element</p> <p>Transit Villages Principles</p> <p>4-P.42 Foster a connected, accessible, and active community by creating attractively designed pedestrian- and transit-oriented villages with a mix of uses in a compact area.</p> <p>4-P.47⁴ Improve connectivity between Transit Villages and existing neighborhoods.</p> <p>Healthy Community Element</p> <p>Parks and Recreational Open Space Actions</p> <p>7-A.13 Identify the needs of special user groups, such as the disabled and elderly, low-income individuals, and underserved and at-risk youth, and address these in park and recreation facility development.</p> <p>7-A.14 Seek any available State and federal grant assistance in implementing the parks and open space proposals of the General Plan.</p> <p>7-A.26 Partner with non-profit organizations such as the Redlands Conservancy and Crafton Hills Conservancy to assist in developing and managing the trails system and providing community outreach and education.</p> <p>7-A.27 Seek grants and alternative funding mechanisms for trail development and maintenance.</p> <p>7-A.29 Review new development proposals for compliance with the Trails Plan and provide for right- of-way dedication and improvement/development of trails.</p> <p>7-A.33 Design and install wayfinding signs for trails and scenic routes.</p> <p>7-A.34 Coordinate trail planning with other regional plans to ensure connectivity and access to the regional trail system.</p>	

³ The corresponding General Plan action is 2-A.102.

⁴ The corresponding General Plan policy is 4-P.46.

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
4.1-2 Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.	<p>Livable Community Element Growth Management Principles and Actions 4-A.4 Coordinate with San Bernardino County to ensure that land use designations and development standards in unincorporated portions of the Planning Area are consistent with those set forth in the Redlands General Plan.</p> <p>Healthy Community Element Safety Principles and Actions 7-P.30 Support implementation of San Bernardino County General Plan policies relating to geologic and seismic hazards in unincorporated areas and consult with the San Bernardino County Geologist where conflicting information exists or where no published information is available.</p>	No Impact
4.1-3 Project implementation would not result in displacing people and/or housing.	<p>Livable Community Element Growth Management Principles 4-P.2 Provide for the expansion of housing and employment opportunities while ensuring that a high quality of life is maintained in Redlands.</p> <p>Land Use Principles 4-P.16 Promote a variety of housing types to serve the diverse needs of the community</p>	Less Than Significant
TRANSPORTATION		
4.2-1 The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	<p>Connected City Element Layered, Multi-Modal Network Principles 5-P.2 Use the layered network approach to identify, schedule, and implement roadway improvements as development occurs in the future, and as a standard against which to evaluate future development and roadway improvement plans.</p> <p>5-P.3 Review the layered network with neighboring jurisdictions and seek agreement on actions needing coordination.</p> <p>5-P.5 Manage the city's transportation system to minimize traffic congestion, improve flow, and improve air quality.</p> <p>5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.</p>	Significant and Unavoidable

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p><i>Vehicular Movement and Standards for Traffic Service Principles and Actions</i></p> <p>5-P.21 Reduce vehicular congestion to portions of the layered network in the city's neighborhoods and neighborhood retail areas to the greatest extent feasible.</p> <p>5-P.23 Discourage the use of City streets as alternatives to congested regional highways.</p> <p>5-P.24 Review and coordinate circulation requirements with Caltrans as it pertains to the freeways and state highways.</p> <p>5-A.30 Monitor traffic service levels and strive to implement roadway improvements prior to deterioration in levels of service below the stated standard.</p> <p>5-A.32 Utilize transportation demand management strategies, non-automotive enhancements (bicycle, pedestrian, transit, train, trails, and connectivity), and traffic signal management techniques as part of a long-term transportation solution and traffic mitigation strategy.</p> <p>5-A.34⁵ Encourage the use of car share and car hire services within Redlands to provide vehicular transportation alternatives.</p> <p>5-A.38 Work with San Bernardino County, the City of San Bernardino, and Caltrans, where appropriate, to implement all intersection and roadway improvements as shown in Table 5-5 and Figure 5-4.</p> <p><i>Freeways Actions</i></p> <p>5-A.39 Work with State, regional, and federal transportation agencies in the continued improvement of freeways and interchanges within the city.</p> <p>5-A.40 Support improvements to I-10 and I-210 that improve capacity and flow.</p> <p><i>Boulevards and Arterials Actions</i></p> <p>5-A.42 Provide adequate capacity on boulevards and arterials to meet LOS standards, and to avoid traffic diversion to local streets or freeways.</p> <p>5-A.43 Locate high traffic-generating uses so that they have direct access or immediate secondary access to arterials or boulevards.</p> <p>5-A.44 Maximize the carrying capacity of arterials and boulevards by controlling the number of driveways and intersections, limiting residential access where applicable, and requiring sufficient on-site parking to meet the needs of proposed projects. <i>Additional guidelines for arterial and boulevard access include providing smooth</i></p>	

⁵ The corresponding General Plan action 5-A.37.

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p><i>ingress/egress to fronting development. This entails designing parking areas so that traffic does not stack up on the arterial roadway, combining driveways to serve small parcels, and maintaining adequate distance between driveways and intersections to permit efficient traffic merges. Implementation of these guidelines is especially important along Alabama Street, San Bernardino Avenue, and Redlands Boulevard.</i></p> <p>Collector and Local Streets Actions</p> <p>5-A.45 Discourage through-traffic on local streets.</p> <p>5-A.46 Avoid adding traffic to collector and local streets carrying volumes above capacity, and consider traffic control measures where volumes exceed the standard and perceived nuisance is severe.</p> <p>5-A.48 Provide for a network of collectors in the northwest areas to minimize traffic levels on San Bernardino Avenue, Lugonia Avenue, and Orange and Texas Streets.</p>	
4.2-2 Adopting of the General Plan would conflict with an applicable congestion management plan (CMP) including, but not limited to level of service standards and travel demand measures, or standards established by the county congestion management agency for designated roads or highways.	<p>Connected City Element</p> <p>Layered, Multi-Modal Network Principles</p> <p>5-P.2 Use the layered network approach to identify, schedule, and implement roadway improvements as development occurs in the future, and as a standard against which to evaluate future development and roadway improvement plans.</p> <p>5-P.3 Review the layered network with neighboring jurisdictions and seek agreement on actions needing coordination.</p> <p>5-P.5 Manage the city's transportation system to minimize traffic congestion, improve flow, and improve air quality.</p> <p>5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.</p> <p>Vehicular Movement and Standards for Traffic Service Principles and Actions</p> <p>5-P.21 Reduce vehicular congestion to portions of the layered network in the city's neighborhoods and neighborhood retail areas to the greatest extent feasible.</p> <p>5-P.23 Discourage the use of City streets as alternatives to congested regional highways.</p> <p>5-P.24 Review and coordinate circulation requirements with Caltrans as it pertains to the freeways and state highways.</p> <p>5-A.30 Monitor traffic service levels and strive to implement roadway improvements prior to deterioration in levels of service below the stated standard.</p>	Significant and Unavoidable

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>5-A.32 Utilize transportation demand management strategies, non-automotive enhancements (bicycle, pedestrian, transit, train, trails, and connectivity), and traffic signal management techniques as part of a long-term transportation solution and traffic mitigation strategy.</p> <p>5-A.34⁶ Encourage the use of car share and car hire services within Redlands to provide vehicular transportation alternatives.</p> <p>5-A.38 Work with San Bernardino County, the City of San Bernardino, and Caltrans, where appropriate, to implement all intersection and roadway improvements as shown in Table 5-5 and Figure 5-4.</p> <p>Freeways Actions</p> <p>5-A.39 Work with State, regional, and federal transportation agencies in the continued improvement of freeways and interchanges within the city.</p> <p>5-A.40 Support improvements to I-10 and I-210 that improve capacity and flow.</p> <p>Boulevards and Arterials Actions</p> <p>5-A.42 Provide adequate capacity on boulevards and arterials to meet LOS standards, and to avoid traffic diversion to local streets or freeways.</p> <p>5-A.43 Locate high traffic-generating uses so that they have direct access or immediate secondary access to arterials or boulevards.</p> <p>5-A.44 Maximize the carrying capacity of arterials and boulevards by controlling the number of driveways and intersections, limiting residential access where applicable, and requiring sufficient on-site parking to meet the needs of proposed projects. <i>Additional guidelines for arterial and boulevard access include providing smooth ingress/egress to fronting development. This entails designing parking areas so that traffic does not stack up on the arterial roadway, combining driveways to serve small parcels, and maintaining adequate distance between driveways and intersections to permit efficient traffic merges. Implementation of these guidelines is especially important along Alabama Street, San Bernardino Avenue, and Redlands Boulevard.</i></p> <p>Collector and Local Streets Actions</p> <p>5-A.45 Discourage through-traffic on local streets.</p> <p>5-A.46 Avoid adding traffic to collector and local streets carrying volumes above capacity, and consider traffic control measures where volumes exceed the standard and perceived nuisance is severe.</p>	

⁶ The corresponding General Plan action 5-A.37.

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	5-A.48 Provide for a network of collectors in the northwest areas to minimize traffic levels on San Bernardino Avenue, Lugonia Avenue, and Orange and Texas Streets.	
4.2-3 The proposed Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	<p>Connected City Element</p> <p>Layered, Multi-Modal Network Principles</p> <p>5-P.2 Use the layered network approach to identify, schedule, and implement roadway improvements as development occurs in the future, and as a standard against which to evaluate future development and roadway improvement plans.</p> <p>5-P.3 Review the layered network with neighboring jurisdictions and seek agreement on actions needing coordination.</p> <p>5-P.5 Manage the city's transportation system to minimize traffic congestion, improve flow, and improve air quality.</p> <p>5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.</p> <p>Vehicular Movement and Standards for Traffic Service Principles and Actions</p> <p>5-P.21 Reduce vehicular congestion to portions of the layered network in the city's neighborhoods and neighborhood retail areas to the greatest extent feasible.</p> <p>5-P.23 Discourage the use of City streets as alternatives to congested regional highways.</p> <p>5-P.24 Review and coordinate circulation requirements with Caltrans as it pertains to the freeways and state highways.</p> <p>5-A.30 Monitor traffic service levels and strive to implement roadway improvements prior to deterioration in levels of service below the stated standard.</p> <p>5-A.32 Utilize transportation demand management strategies, non-automotive enhancements (bicycle, pedestrian, transit, train, trails, and connectivity), and traffic signal management techniques as part of a long-term transportation solution and traffic mitigation strategy.</p> <p>5-A.34⁷ Encourage the use of car share and car hire services within Redlands to provide vehicular transportation alternatives.</p>	Less Than Significant

⁷ The corresponding General Plan action 5-A.37.

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>5-A.38 Work with San Bernardino County, the City of San Bernardino, and Caltrans, where appropriate, to implement all intersection and roadway improvements as shown in Table 5-5 and Figure 5-4.</p> <p>Freeways Actions</p> <p>5-A.39 Work with State, regional, and federal transportation agencies in the continued improvement of freeways and interchanges within the city.</p> <p>5-A.40 Support improvements to I-10 and I-210 that improve capacity and flow.</p> <p>Boulevards and Arterials Actions</p> <p>5-A.43 Locate high traffic-generating uses so that they have direct access or immediate secondary access to arterials or boulevards.</p> <p>5-A.44 Maximize the carrying capacity of arterials and boulevards by controlling the number of driveways and intersections, limiting residential access where applicable, and requiring sufficient on-site parking to meet the needs of proposed projects. <i>Additional guidelines for arterial and boulevard access include providing smooth ingress/egress to fronting development. This entails designing parking areas so that traffic does not stack up on the arterial roadway, combining driveways to serve small parcels, and maintaining adequate distance between driveways and intersections to permit efficient traffic merges. Implementation of these guidelines is especially important along Alabama Street, San Bernardino Avenue, and Redlands Boulevard.</i></p> <p>Collector and Local Streets Actions</p> <p>5-A.45 Discourage through-traffic on local streets.</p> <p>5-A.46 Avoid adding traffic to collector and local streets carrying volumes above capacity and consider traffic control measures where volumes exceed the standard and perceived nuisance is severe.</p> <p>5-A.48 Provide for a network of collectors in the northwest areas to minimize traffic levels on San Bernardino Avenue, Lugonia Avenue, and Orange and Texas Streets.</p>	
UTILITIES AND SERVICE SYSTEMS		
4.3-1 Existing and/or proposed facilities would be able to accommodate project-generated utility demands.	<p>Livable Community Element</p> <p>Public Facilities Principles and Actions</p> <p>4-P.56 Ensure that public facilities and services are provided in a timely manner to adequately serve new and existing development.</p> <p>4-A.145 Coordinate future development with the City's Capital Improvement Program to ensure adequate funding and planning for needed public services and facilities.</p>	Less Than Significant

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>4-A.146 Encourage the development of programs that enable concurrent provision of necessary public services and facilities prior to the approval of development projects that would require those services.</p> <p>4-A.148 Ensure that all utilities and public facilities are designed and constructed to preserve and enhance the perceived natural and historic character of the area, particularly on hillsides and in the canyon areas.</p> <p>Vital Environment Element</p> <p>Water Quality Principles and Actions</p> <p>6-A.39 Require measures during construction and post construction to limit land disturbance activities such as clearing and grading and cut-and-fill; avoid steep slopes, unstable areas, and erosive soils; and minimize disturbance of natural vegetation and other physical or biological features important to preventing erosion or sedimentation.</p> <p>6-P.19 Promote the protection of waterways in Redlands from pollution and degradation as a result of urban activities.</p> <p>6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.</p> <p>6-P.21 Work with regional organizations to manage groundwater resources of the Bunker Hill Basin.</p> <p>6-A.34 Update City development standards to improve the capture of runoff and stormwater management through innovative green and blue infrastructure solutions such as the use of permeable surfaces, vegetation areas, swales, BMPs, and other methods to recharge of the groundwater basin.</p> <p>6-A.35 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and on-site infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.</p> <p>6-A.36 Require measures during construction and post construction to limit land disturbance activities such as clearing and grading and cut-and-fill; avoid steep slopes, unstable areas and erosive soils; and minimize disturbance of natural vegetation and other physical or biological features important to preventing erosion or sedimentation.</p> <p>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.</p> <p>6-A.38 Encourage development that reflects an integrated approach to building design, civil engineering, and landscape architecture that maximizes rainwater harvesting and stormwater retention for landscape irrigation.</p> <p>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.</p>	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>6-A.40 Maximize the amount of pervious surfaces in public spaces to permit the percolation of urban runoff.</p> <p>6-A.41 Provide a comprehensive public outreach program to educate residents and local businesses about the importance of stormwater pollution prevention.</p> <p>6-A.42 Ensure that public areas, including streets and recreational areas, are routinely cleaned of litter, debris, and contaminant residue. Coordinate with and support efforts by other organizations or volunteer groups to promote clean-ups of parks and public open spaces. Require the City, property owners, or homeowners associations, as applicable, to sweep permitted parking lots and public and private streets frequently to remove debris and contaminated residue.</p> <p>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.</p> <p>6-A.44 Continue partnerships with other local agencies to implement the Area-Wide Urban Storm Water Runoff Management Program and the Integrated Regional Watershed Management Plan.</p> <p>Healthy Community Element</p> <p>Air Quality Principles</p> <p>7-A.149 Ensure that construction and grading projects minimize short-term impacts to air quality.</p> <ul style="list-style-type: none"> a. Require grading projects to provide a storm water pollution prevention plan (SWPPP) in compliance with City requirements, which include standards for best management practices (BMPs) that control pollutants from dust generated by construction activities and those related to vehicle and equipment cleaning, fueling, and maintenance; b. Require grading projects to undertake measures to minimize mono-nitrogen oxides (NOx) emissions from vehicle and equipment operations; and c. Monitor all construction to ensure that proper steps are implemented. <p>Sustainable Community Element</p> <p>Water Conservation Principles and Actions</p> <p>8-P.4 Promote residential and commercial water conservation using multiple strategies.</p> <p>8-P.5 Conserve the highest quality of water reasonably available for domestic use.</p>	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>8-P.6 Minimize dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non-potable water for irrigation of landscaping and agriculture, where feasible.</p> <p>8-A.22 Engage with the Santa Ana Watershed Project Authority (SAWPA) in preparation and periodic updating of the Integrated Regional Water Management (IRWM) Plan for surface and groundwater resources. Update the City of Redlands' Water Master Plan, within the structure and guidelines of the IRWM Plan, including an assessment of Redlands' position relative to regional demand and availability of water resources through buildout.</p> <p>8-A.23 Work with the SAWPA, Bear Valley Mutual Water Company, San Bernardino Valley Municipal Water District, and Western Heights Water Company to educate the public and implement water conservation measures. Update the Redlands' Water Conservation Plan, Ordinance No. 2151, to reflect current best practices for water conservation.</p> <p>8-A.24 Participate in regional efforts to clean up the Bunker Hill Groundwater Basin and maintain high water quality going forward so that it can be used to its full potential.</p> <p>8-A.25 Encourage water conservation through the following strategies:</p> <ul style="list-style-type: none"> • Establish water and wastewater rates that encourage conservation and provide for system maintenance. • Update the landscape irrigation ordinance to continue reducing the use of potable water for landscape irrigation to CALGreen requirements. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater. • Establish incentives for use of water efficient fixtures and fittings. • Expand the current landscaping ordinance for parking lots (Section 18.168.210 of the Municipal Code) to encourage the use of drought tolerant species. • Promote the use of permeable surfaces for hardscape. Impervious surfaces such as driveways, streets, and parking lots should be minimized so that land is available to absorb stormwater, reduce polluted urban runoff, recharge groundwater, and reduce flooding. • Incorporate water holding areas such as creek beds, recessed athletic fields, ponds, cisterns, and other features that serve to recharge groundwater, reduce runoff, improve water quality, and decrease flooding into the urban landscape. 	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>8-A.26 Implement the following programs to increase the use of reclaimed and other non-potable water and decrease the use of potable water for irrigation:</p> <ul style="list-style-type: none"> • Conduct rainfall runoff capture and other system research and pilot studies; • Develop guidebooks for irrigation Best Management Practices (BMPs) and other systems; • Update ordinances to allow for the use of reclaimed water for landscape irrigation; • Update ordinances to allow for use of various greywater sources for use as subsurface landscape irrigation per California Plumbing Code. • Require inclusion of dual plumbing that allows greywater from showers, sinks, and washers to be reused for landscape irrigation in the infrastructure of new development where appropriate. <p>8-A.28 Permit greywater use for irrigation, and adopt ordinance or other measures allowing for expanded use of graywater as permitted by the California Plumbing Code.</p> <p>8-A.29 Reduce consumption of carbon-based fuels for conveyance and treatment of water and wastewater.</p>	
4.3-2 Available water supplies are sufficient to serve the project and reasonable foreseeable future development during normal, dry, and multiple dry years.	<p>Sustainable Community Element</p> <p><i>Water Conservation Principles and Actions</i></p> <p>8-P.4 Promote residential and commercial water conservation using multiple strategies.</p> <p>8-P.5 Conserve the highest quality of water reasonably available for domestic use.</p> <p>8-P.6 Minimize dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non-potable water for irrigation of landscaping and agriculture, where feasible.</p> <p>8-A.22 Engage with the Santa Ana Watershed Project Authority (SAWPA) in preparation and periodic updating of the Integrated Regional Water Management (IRWM) Plan for surface and groundwater resources. Update the City of Redlands' Water Master Plan, within the structure and guidelines of the IRWM Plan, including an assessment of Redlands' position relative to regional demand and availability of water resources through buildout.</p> <p>8-A.23 Work with the SAWPA, Bear Valley Mutual Water Company, San Bernardino Valley Municipal Water District, and Western Heights Water Company to educate the public and implement water conservation measures. Update the Redlands' Water Conservation Plan, Ordinance No. 2151, to reflect current best practices for water conservation.</p>	Less Than Significant

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>8-A.24 Participate in regional efforts to clean up the Bunker Hill Groundwater Basin and maintain high water quality going forward so that it can be used to its full potential.</p> <p>8-A.25 Encourage water conservation through the following strategies:</p> <ul style="list-style-type: none"> • Establish water and wastewater rates that encourage conservation and provide for system maintenance. • Update the landscape irrigation ordinance to continue reducing the use of potable water for landscape irrigation to CALGreen requirements. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater. • Establish incentives for use of water efficient fixtures and fittings. • Expand the current landscaping ordinance for parking lots (Section 18.168.210 of the Municipal Code) to encourage the use of drought tolerant species. • Promote the use of permeable surfaces for hardscape. Impervious surfaces such as driveways, streets, and parking lots should be minimized so that land is available to absorb stormwater, reduce polluted urban runoff, recharge groundwater, and reduce flooding. • Incorporate water holding areas such as creek beds, recessed athletic fields, ponds, cisterns, and other features that serve to recharge groundwater, reduce runoff, improve water quality, and decrease flooding into the urban landscape. <p>8-A.26 Implement the following programs to increase the use of reclaimed and other non-potable water and decrease the use of potable water for irrigation:</p> <ul style="list-style-type: none"> • Conduct rainfall runoff capture and other system research and pilot studies; • Develop guidebooks for irrigation Best Management Practices (BMPs) and other systems; • Update ordinances to allow for the use of reclaimed water for landscape irrigation; • Update ordinances to allow for use of various greywater sources for use as subsurface landscape irrigation per California Plumbing Code. • Require inclusion of dual plumbing that allows greywater from showers, sinks, and washers to be reused for landscape irrigation in the infrastructure of new development where appropriate. <p>8-A.28 Permit greywater use for irrigation and adopt ordinance or other measures allowing for expanded use of graywater as permitted by the California Plumbing Code.</p>	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	<p>8-A.29 Reduce consumption of carbon-based fuels for conveyance and treatment of water and wastewater.</p> <p>Vital Environment Element Water Quality Principles and Actions</p> <p>6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.</p> <p>6-P.21 Work with regional organizations to manage groundwater resources of the Bunker Hill Basin.</p> <p>6-A.37 Protect and, where feasible, enhance or restore the city's waterways, including zanjias and ditches, preventing erosion along the banks, removing litter and debris, and promoting riparian vegetation and buffers.</p> <p>6-A.38 Encourage development that reflects an integrated approach to building design, civil engineering, and landscape architecture that maximizes rainwater harvesting and stormwater retention for landscape irrigation.</p> <p>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.</p> <p>Safety Element Hydrological Hazards</p> <p>7-P.27 Support a multi-use concept of flood plains, flood-related facilities, and waterways, including, where appropriate, the following uses:</p> <ul style="list-style-type: none"> • Flood control; • Groundwater recharge; • Mineral extraction; • Open space; • Nature study; • Habitat preservation; • Pedestrian, equestrian, and bicycle circulation; and • Outdoor sports and recreation. 	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	Sustainable Community Element Energy Efficiency and Conservation Actions 8-A.16 Complete a comprehensive review of City codes and standards for applicability for energy and water efficiency/conservation measures and make changes to modify them accordingly.	
4.3-3 Project-generated wastewater could be adequately treated by the wastewater service provider for the project.	Livable Community Element Public Facilities Principles and Actions 4-P.56 Ensure that public facilities and services are provided in a timely manner to adequately serve new and existing development. 4-A.145 Coordinate future development with the City's Capital Improvement Program to ensure adequate funding and planning for needed public services and facilities. 4-A.146 Encourage the development of programs that enable concurrent provision of necessary public services and facilities prior to the approval of development projects that would require those services. 4-A.148 Ensure that all utilities and public facilities are designed and constructed to preserve and enhance the perceived natural and historic character of the area, particularly on hillsides and in the canyon areas. Sustainable Community Element Water Conservation Principles and Actions 8-P.4 Promote residential and commercial water conservation using multiple strategies. 8-P.5 Conserve the highest quality of water reasonably available for domestic use. 8-P.6 Minimize dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non-potable water for irrigation of landscaping and agriculture, where feasible. 8-A.22 Engage with the Santa Ana Watershed Project Authority (SAWPA) in preparation and periodic updating of the Integrated Regional Water Management (IRWM) Plan for surface and groundwater resources. Update the City of Redlands' Water Master Plan, within the structure and guidelines of the IRWM Plan, including an assessment of Redlands' position relative to regional demand and availability of water resources through buildout. 8-A.23 Work with the SAWPA, Bear Valley Mutual Water Company, San Bernardino Valley Municipal Water District, and Western Heights Water Company to educate the public and implement water conservation measures.	Less Than Significant

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	Update the Redlands' Water Conservation Plan, Ordinance No. 2151, to reflect current best practices for water conservation.	
8-A.24	Participate in regional efforts to clean up the Bunker Hill Groundwater Basin and maintain high water quality going forward so that it can be used to its full potential.	
8-A.25	Encourage water conservation through the following strategies: <ul style="list-style-type: none"> • Establish water and wastewater rates that encourage conservation and provide for system maintenance. • Update the landscape irrigation ordinance to continue reducing the use of potable water for landscape irrigation to CALGreen requirements. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater. • Establish incentives for use of water efficient fixtures and fittings. • Expand the current landscaping ordinance for parking lots (Section 18.168.210 of the Municipal Code) to encourage the use of drought tolerant species. • Promote the use of permeable surfaces for hardscape. Impervious surfaces such as driveways, streets, and parking lots should be minimized so that land is available to absorb stormwater, reduce polluted urban runoff, recharge groundwater, and reduce flooding. • Incorporate water holding areas such as creek beds, recessed athletic fields, ponds, cisterns, and other features that serve to recharge groundwater, reduce runoff, improve water quality, and decrease flooding into the urban landscape. 	
8-A.26	Implement the following programs to increase the use of reclaimed and other non-potable water and decrease the use of potable water for irrigation: <ul style="list-style-type: none"> • Conduct rainfall runoff capture and other system research and pilot studies; • Develop guidebooks for irrigation Best Management Practices (BMPs) and other systems; • Update ordinances to allow for the use of reclaimed water for landscape irrigation; • Update ordinances to allow for use of various greywater sources for use as subsurface landscape irrigation per California Plumbing Code. • Require inclusion of dual plumbing that allows greywater from showers, sinks, and washers to be reused for landscape irrigation in the infrastructure of new development where appropriate. 	

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	8-A.28 Permit greywater use for irrigation and adopt ordinance or other measures allowing for expanded use of graywater as permitted by the California Plumbing Code.	
	8-A.29 Reduce consumption of carbon-based fuels for conveyance and treatment of water and wastewater.	
4.3-3 Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations.	Sustainable Community Element Waste Reduction and Recycling Principles and Actions 8-P.7 Reduce the generation of solid waste, including household hazardous waste, and recycle those materials that are used, to slow the filling of local and regional landfills. 8-A.30 Meet the State's policy goal that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020; and reduce landfill disposal of household hazardous waste as much as feasibly possible. 8-A.31 Develop programs to divert food waste and other biodegradable waste to composting facilities rather than disposing of them in the landfill. 8-A.32 Mitigate impacts associated with the expansion of existing landfills or development of new landfills to include effects on streets and highways, drainage systems, groundwater, air quality, natural resources, aesthetics, and property maintenance. 8-A.33 Improve commercial recycling diversion rates (including those for multi-unit housing) through education, including electronic and mailing campaigns, and partnerships with large employers, organizations, and institutions such as University of Redlands. 8-A.34 Work with private industry to encourage the reduction and reuse of construction and demolition materials through deconstruction and other methods. 8-A.35 Invest in new infrastructure and technology and partnerships that contribute to increased waste diversion and capture/reuse of methane gas emissions from the landfill. 8-A.36 Work with public and private entities to generate creative new opportunities that use solid waste as a resource. 8-A.37 Promote design in new development that incorporates space for recycling containers and other waste diversion facilities. 8-A.38 Explore the potential to generate energy using biomethane from the City's landfill and wastewater treatment plant.	Less Than Significant

1. Introduction

Table 1-1 Summary of Draft SEIR Environmental Analysis Conclusions

Impact	General Plan EIR Policies that Reduce the Impact ¹	Significance Level
	Green Building and Landscapes Policies 8-A.42 Adopt a construction and demolition waste recycling ordinance that requires, except in unusual circumstances, all construction, demolition and renovation projects that meet a certain size or dollar value to divert from landfills 100 percent of all cement concrete and asphalt concrete, and an average of at least 75 percent of all remaining non-hazardous debris.	

1. Introduction

1.6 FINAL EIR CERTIFICATION

This Draft SEIR is being circulated for a public review for a period of 45 days. Responsible agencies and members of the general public are invited to provide written comments on the Draft SEIR to the City address shown on the title page of this document. Upon completion of the 45-day review period, the City will review all written comments received and prepare written responses for each comment. A Final SEIR will then be prepared incorporating all comments received, responses to the comments, and any changes to the Draft SEIR that result from the comments received. The Final SEIR will then be presented to the Redlands City Council for potential certification as the environmental document for the proposed Project. All persons who commented on this Draft SEIR will be notified of the availability of the Final SEIR and the date of the public hearing before the Redlands City Council.

This Draft SEIR, its technical appendices, and the *City of Redlands 2035 General Plan* and the *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, along with its technical appendices, are available to the public for review at the following locations:

- City of Redlands, Development Services Department, 35 Cajon Street, Suite 20, Redlands, CA 92373
- A.K. Smiley Public Library, 125 W Vine St, Redlands, CA 92373
- City of Redlands, website at: <https://www.cityofredlands.org/development-services>

All agencies that submit comments during the 45-day public review period on this Draft SEIR will receive written responses to their comments at least 10 days prior to final action on the proposed Project. If the Redlands City Council decides to certify the Final SEIR, the City Council will make the necessary findings required by CEQA, the State CEQA Guidelines, and the City's Local CEQA Guidelines regarding the extent and nature of the impacts as presented in the Final SEIR. The Final SEIR must be certified by the City prior to considering the proposed Project. Public input is encouraged at all public hearings and meetings before the City Council concerning the proposed Project.

1.7 CEQA FINDINGS FOR PROJECT APPROVAL

CEQA and the State CEQA Guidelines require that the environmental impacts of the proposed Project be examined before it is approved. Specifically, State CEQA Guidelines, section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

1. Introduction

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Concurrent with its final action on the Final SEIR, the Redlands City Council will issue findings that comply with the requirements of Public Resources Code, section 21081 and State CEQA Guidelines, section 15091.

1.8 MITIGATION MONITORING

Public Resources Code, section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code, section 21081. Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR. To the extent that the City carries forward mitigation required by the General Plan EIR to this Draft SEIR for the proposed Project, those mitigation measures will be included in a Mitigation Monitoring and Reporting Program prepared for the proposed Project. A copy of the Mitigation Monitoring and Reporting Program will be presented to the City Council for consideration in connection with the Final EIR.

1.9 REFERENCES

In accordance with section 15150 of the State CEQA Guidelines, this Draft SEIR incorporates the following documents by reference:

- The City of Redlands General Plan 2035
- The City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report (SCH#2016081041).
- The City of Redlands Climate Action Plan

2. Project Description

2.1 INTRODUCTION

The term “project,” as defined by the State CEQA Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.” (State CEQA Guidelines, § 15378(a).) The State CEQA Guidelines further explain that a “project” refers to the activity that is being approved and that may be subject to several discretionary approvals by governmental agencies. (State CEQA Guidelines, § 15378(c)).

2.1.1 Text of Ballot Initiative

On June 4, 2019, the City Council directed staff to draft and place on the next municipal ballot, an initiative that would remove application of the existing City of Redlands 1978 voter-approved initiative measure commonly known as Proposition “R,” as that proposition was amended by the City of Redlands 1987 voter-approved initiative measure commonly known as Measure “N”, and the 1997 voter-approved Measure “U”, from future development within the TVPA. The aforementioned voter-approved measures would continue to apply to the remainder of the City.

The proposed ballot initiative would result in the following changes to the following voter-approved initiatives (new text is shown in *italic and underline font*):

Section 1. Sub-section B2, entitled “Special Categories of Development,” of Section 4.2 of the 2035 Redlands General Plan (Measure U), entitled “Principles of Managed Development,” is hereby amended by the addition of subsection B2 G, which shall read as follows:

“2. Special Categories of Development. The provisions of this initiative shall not apply to the following:

- A.
- B.
- C.
- D.
- E.
- F.

G. *The geographical area of the City designated as the “Transit Villages Planning Area” as depicted in Exhibit “A,” which is attached hereto and incorporated by reference into this ordinance.*”

2. Project Description

Section 2. The 1987 voter-approved initiative ordinance commonly known as Measure N is hereby amended by the addition of a new Section 7 which shall read as follows:

“SECTION 7. EXEMPTION. The geographical area of the City designated as the “Transit Villages Planning Area” as depicted in Exhibit “A” is hereby deemed exempt from the provisions of this initiative ordinance and Measure R.”

Section 3. A new section 15 is hereby added to the 1978 voter-approved initiative ordinance commonly known as Proposition R, as amended by the 1987 voter-approved initiative commonly known as Measure N, to read as follows:

“Section 15. The geographical area of the City designated as the “Transit Villages Planning Area,” as depicted in Exhibit “A” which is attached hereto and incorporated herein by this reference, is hereby deemed exempt from the provisions of this initiative ordinance.”

If the proposed ballot initiative is approved by the voters, it would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. New residential units, specifically residential units in multi-family projects, within the TVPA could be financed more efficiently and constructed faster than the current regulations would permit. Future City discretionary actions relating to proposed development within the TVPA would not be constrained by the General Plan limitations contained in Measure U and the zoning restrictions in Proposition R, as amended by Measure N. Specifically, the proposed ballot initiative would permit the following:

- The City’s 400 dwelling unit annual limitation on construction of residential dwelling units would not be applicable within the TVPA;
- Residential densities may be increased within the TVPA from 18 to 27 units/acre without the necessity of a super-majority vote of the members of the City Council and the necessity of making certain findings;
- The requirement for the maintenance of traffic levels of service “C” for all intersections would not apply within the TVPA;
- The prohibition against the creation of new land use designations would not apply within the TVPA;
- Socio-economic studies would not be required for development projects within the TVPA.

2.2 PROJECT OBJECTIVES

The underlying purpose of the Project is to remove existing voter-approved development restrictions from within the TVPA, which development restrictions constrain transit-oriented development within the City. The following represent the key project objectives of the proposed Project:

1. Encourage higher density residential development in the TVPA, consistent with the Transit Villages concepts identified in the 2035 General Plan for areas within a one-half mile radius of each rail transit

2. Project Description

station, to promote compact neighborhoods where people can live in close proximity to transit, and retail, office and entertainment uses..

2. Promote sustainable urban growth by encouraging development within the core areas of the City, where infrastructure already exists, at increased densities that translate into more efficient provision of municipal services, and that, by the virtue of close proximity of housing to jobs and services, will reduce vehicle miles travelled.
3. Promote transit ridership by allowing more residential development to be located within walking and biking distances from transit facilities.
4. Promote enhanced sense of community by encouraging higher density development in core areas of the City that can provide and promote public spaces for residents to use and congregate.
5. Encourage housing near jobs and entertainment opportunities in walkable environments.

2.3 CONSTRUCTION SCHEDULE

The proposed Project is a planning level action and it does not approve any specific development project. Therefore, there is no construction associated with the proposed Project, and consequently no construction schedule. The proposed Project is anticipated to be considered by the City Council on November 5, 2019, and if the City Council decides to move forward with the Ballot Measure it would be placed on the ballot in March 2020.

2.4 INTENDED USES OF THE SEIR

State CEQA Guidelines, section 15124(d) requires the lead agency to include in the project description a statement briefly describing the intended uses of the EIR. This Draft SEIR examines the environmental impacts of the proposed Project and is intended to be used by the voters when they cast their ballots on the proposed initiative measures. (*Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 233.) This Draft SEIR has been prepared to review the potential impacts of the proposed Project. Other than voter approval, no other approvals are anticipated to result from this action.

2. Project Description

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3. Environmental Setting

3.1 INTRODUCTION

This section provides a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective” (State CEQA Guidelines, § 15125[a].) However, the scope of environmental review in this SEIR is guided by the principle that a lead agency, when preparing an SEIR, must evaluate only the changes to the project, changes in circumstances, or new information that lead to the preparation of the further EIR. The purpose of CEQA’s subsequent review provisions is “to explore environmental impacts not considered in the original environmental document.” (*Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 949.) Under Public Resources Code, section 21166, the lead agency must examine the increment of impact resulting from the project revisions, which by design means that impacts of the proposed modification are compared against impacts disclosed in the General Plan EIR. (See *Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065, 1079.) Indeed, the project impacts as reviewed in the prior EIR (here the General Plan EIR) are to be treated as the environmental baseline in a subsequent EIR. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 542.)

3.2 EXISTING CONDITIONS

The proposed project is in the City of Redlands on the I-10 corridor between Loma Linda and Yucaipa, to the west and east, respectively, in San Bernardino County. The City of Redlands and its Sphere of Influence (SOI) encompass 46 square miles. The Transit Village Planning Area (TVPA) is located in the urbanized core areas of the City of Redlands. The TVPA is an urban infill site that is surrounded by development on all sides. The TVPA consists of a total of 782.49 acres, 71.29 of which are vacant parcels. Table 3-1, *Existing Land Use Summary*, identifies the land uses and their corresponding acreage in the TVPA.

3. Environmental Setting

Table 3-1 Existing Land Use Summary

Land Use Type	Acreage
Commercial and Services	280.52
Industrial	40.86
Mobile Home Park	8.36
Multi-Family Residential	109.82
Open Space and Recreation	27.95
Parking Lot	35.70
Public Facilities	36.58
Public Vacant	14.86
Schools	44.46
Single Family Residential	78.59
Transportation	26.96
Utilities	6.54
Vacant	71.29
Total	782.49

Table 3-2, *General Plan Designation for Vacant Parcels*, and Table 3-3, *Zoning Designation for Vacant Parcels*, indicate the General Plan and Zoning designations for the 71.29 acres of vacant parcels within the TVPA.

Table 3-2 General Plan Designation for Vacant Parcels

General Plan Designation	Acreage
Commercial	34.75
Commercial/Industrial	11.89
High Density Residential	16.43
Medium Density Residential	2.20
Office	5.24
Parks/Gold Courses	0.33
Public/Institutional	0.45
Total	71.29

As shown in Tables 3-1 through 3-3, the TVPA would have a total of 71.29 acres of vacant parcels to allow for the implementation of new development, in addition to redevelopment of existing developed parcels. Table 3-4, *Projected Population at Buildout (2035)*, indicates the total population size in the City by 2035.

3. Environmental Setting

Table 3-3 Zoning Designation for Vacant Parcels

Zoning Designation	Acreage
Administrative and Professional Office District	0.58
Commercial Industrial District	16.72
General Commercial District	6.11
Highway Commercial District	4.75
Light Industrial District	5.01
Multiple Family Residential District	19.03
Open Land District	1.20
Specific Plan 45 Service Commercial	9.74
Specific Plan 45 Town Center	8.08
Suburban Residential District	0.07
Total	71.29

Table 3-4 Projected Population at Buildout (2035)

	Redlands
Existing (2016) ¹	68,049
From Future Development ¹	10,964
Total at Buildout³	79,013

¹ Population is estimate assuming 2.65 persons per household.

Table 3-4 is from Table 2.3-4 on page 2-29 of the General Plan EIR, and includes buildout assumptions for land within the Transit Villages. In calculating buildout, page 2-31 of the General Plan EIR, states that three factors were applied that reduce the maximum mathematical buildout:

- The first assumed that only 3 of the 5 transit stations would be built during the 2035 General Plan horizon and therefore applied a factor of 70 percent.
- The second applied a factor of 80 percent because of the 500-foot AQMD buffer applied along the I-10 freeway.
- A five percent vacancy factor was applied to development occurring vacant land.

3.2.1 City of Redlands 2035 General Plan and General Plan EIR

3.2.1.1 BACKGROUND

The 2017 General Plan EIR (SCH# 2016081041) was prepared and certified for the City of Redlands 2035 General Plan, which was adopted on December 5, 2017. The 2017 General Plan was prepared to respond

3. Environmental Setting

directly to changes experienced in Redlands since the preparation of the 1995 General Plan, and to plan for future growth in the City. The 2035 General Plan establishes a long-range planning framework and policies for the City.

3.2.1.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The General Plan EIR identified significant and unavoidable impacts to the following topics: Agriculture and Forestry Resources, Air Quality, and Transportation. As identified in Chapter 4.2, *Transportation*, and Chapter 5, *Impacts Not Found to Be Significant*, of this SEIR, the proposed Project would not exacerbate these impacts; the level of significance would remain the same. As there are no agriculture or forestry resources within the TVPA, the proposed Project has no effect on these impacts. The proposed Project does not result in additional dwelling units beyond the buildout assumption in Table 2.3-4 on page 2-29, of the General Plan EIR. As the proposed Project does not change any land use designation, increase the buildout assumptions made in the General Plan EIR, or affect any of the traffic assumptions, the impacts to Air Quality would be identical to those of the General Plan EIR.

3.2.1.3 GENERAL PLAN POLICIES AND ACTIONS

The following list of 2035 General Plan policies and actions, some of which have been added since the certification of the General Plan EIR, will continue to apply to the TVPA if the proposed Project is approved:

Chapter 2 – Distinctive City

- **Action 2-A.16:** Use transit stations as focal points for interconnectivity; plan to equally serve travelers from north and south. Plan for each village around the transit stations to have a unique character that complements the adjacent neighborhoods.
- **Action 2-A.51:** Encourage new construction that ties the new with the old in a harmonious fashion, enhancing the historic pattern.
- **Policy 2-P.25:** Encourage a variety of uses and activities, such as a mix of commercial, office, restaurant, specialty retail, and residential uses, and civic, cultural, and entertainment activities to attract visitors and residents from across the community by creating a lively, interesting social environment.
- **Policy 2-P.26:** Foster transit-oriented development that is consistent/compatible with and sensitive to the historical structures in the vicinity of the proposed railway station.
- **Policy 2-P.27:** Conserve Downtown's character and historic assets while infusing it with new uses, buildings, and activities. New development should proportionately relate to and complement existing structures and the pedestrian environment.
- **Action 2-A.90:** Complete and adopt a Downtown Specific Plan as the guide for Downtown development that will establish guidelines or standards for roadways, building forms, architecture, signage, streetscape, parking, and public realm amenities.

3. Environmental Setting

- **Action 2-A.94:** Encourage mixed-use projects Downtown that integrate retail, restaurant, office, and residential uses. Permit urban housing at a density up to the High-Density Residential standard.
- **Action 2-A.95:** Enhance and extend the civic realm through vibrant streetscapes.
- **Action 2-A.96:** Promote redevelopment of the Redlands Mall with a vibrant mix of uses. Explore feasibility of re-extending the traditional street grid through the new development.
- **Action 2-A.97:** Seek an increased presence of both residents and activity in Downtown with new development—particularly residential as part of mixed-use development—as well as commercial, entertainment, and cultural uses that serve both residents and visitors.
- **Action 2-A.98:** Promote a variety of housing types to attract a spectrum of households to live Downtown.
- **Action 2-A.99:** Ensure that new development along Redlands Boulevard is pedestrian-oriented.
- **Action 2-A.101:** Address parking demand by finding additional areas to provide parking for Downtown, and by developing creative parking management strategies, such as shared parking, maximum parking standards, “smart” metering, utilizing on-street parking for reuse of existing buildings, paid parking, etc. Monitor the impacts of new technology such as the autonomous vehicle and car hire /car share services on the total demand for parking.
- **Action 2-A.102:** Improve connections from Downtown to adjacent neighborhoods, including areas north of I-10, through streetscape enhancement and multi-modal improvements.

Chapter 3 – Prosperous Economy

- **Action 3-A.10:** Encourage mixed-use projects within the Transit Villages that will attract a wide array of uses including retail, restaurant, entertainment, office, residential, and cultural offerings.
- **Action 3-A.14:** Encourage commercial development, neighborhood retail, and professional offices and services of the appropriate scale and business types along neighborhood commercial corridors, such as Orange Street and Colton Avenue.
- **Policy 3-P.12:** Promote Redlands as a destination where visitors can shop, dine, play, and stay, and help create opportunities for increased visitation, hotel stays, sales tax generation, and employment.
- **Policy 3-P.16:** Strengthen Downtown as a center of commerce and culture, with attractions for local residents, workers, and regional visitors year-round.
- **Action 3-A.33:** Support efforts to improve the economic and physical environment in the Downtown area by enhancing and expanding tourism-related activities and capital improvements, and generating external in-kind and monetary support for these efforts.

3. Environmental Setting

- **Action 3-A.36:** Support revitalization of underutilized commercial space throughout Downtown, including the Redlands Mall, which could create new opportunities for businesses and residents, and provide a critical link to rail.
- **Action 3-A.37:** Ensure adequate parking Downtown and efficiency in traffic flow to enable the continued revitalization of the commercial core.
- **Action 3-A.38:** Improve the safety and sense of safety throughout Downtown and the adjoining commercial areas.
- **Action 3-A.39:** Encourage and support the development of additional housing Downtown to increase the vitality and diversity of Downtown retail and services.
- **Action 3-A.40:** Enhance and expand the public spaces Downtown (streetscapes, plazas, parks) to improve the pedestrian experience.

Chapter 4 – Livable Community

- **Policy 4-P.3:** Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city.
- **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.
- **Action 4-A.6:** Provide for the extension of public services in a logical and functional manner to minimize impacts on service providers while focusing development in infill areas that can accommodate development in a timely manner.
- **Policy 4-P.7:** Promote a diversity of compatible land uses throughout the city, providing opportunities for the development of a range of businesses, services, residential types, and public facilities to meet the needs of the community.
- **Policy 4-P.8:** Provide for buffers and transitions between low- and high-intensity land uses.
- **Policy 4-P.9:** Locate medium- and high-density development near regional access routes, transit stations, employment centers, shopping areas, and public services.
- **Policy 4-P.10:** Ensure that the scale and character of new development is appropriate for surrounding terrain and the character of existing development.

3. Environmental Setting

- **Policy 4-P.12:** In areas planned to accommodate new growth, such as Downtown and the Transit Villages, use area plans, design standards and guidelines, and other tools to ensure cohesive transition in scale to existing neighborhoods.
- **Policy 4-P.13:** Encourage mixed-use development (two or more uses within the same building or in close proximity on the same site) in Downtown, the Transit Villages, and along Redlands Boulevard to promote vibrancy.
- **Policy 4-P.14:** Encourage mixed-use projects Downtown that integrate retail, restaurant, office, and residential uses. Permit urban housing at a density up to the High-Density Residential standard.
- **Policy 4-P.16:** Promote a variety of housing types to serve the diverse needs of the community.
- **Action 4-A.7:** Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.
- **Action 4-A.8:** Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.
- **Action 4-A.9:** Encourage the incorporation of residential units in Downtown mixed-use projects consistent with the Redlands Downtown Specific Plan.
- **Action 4-A.11:** Ensure that opportunities exist for the development of housing types that are affordable to all segments of the Redlands community and are distributed equitably throughout the community.
- **Action 4-A.12:** Support new residential development in Downtown, the Transit Villages, and other focused infill sites accessible to transit and in central parts of the community.
- **Action 4-A.20:** Establish new neighborhood commercial centers to serve the needs of community members in areas planned to accommodate new growth, such as Downtown and the Transit Village areas.
- **Policy 4-P.26:** Support the University of Redlands in the development of its campus and the surrounding area in a manner that enriches both the University and Redlands communities.
- **Action 4-A.23:** Support development of the campus in ways that both strengthen its ties to the community and enhance its status as a major activity center for the neighborhood.
- **Policy 4-P.39:** Promote infill and mixed-use development along Redlands Boulevard to create a cohesive commercial corridor connecting the Transit Villages and providing a retail and service destination for community members.

3. Environmental Setting

- **Action 4-A.87:** Promote clusters of mixed-use development along Redlands Boulevard near the Mixed-Use Cores of the proposed Transit Villages, providing opportunities for commercial, office, and residential development consistent with the needs and characteristics specific to each Transit Village.
- **Action 4-A.88:** Promote infill development along Redlands Boulevard where it is classified as a Boulevard to create a continuous corridor of mixed-use and commercial activity.
- **Action 4-A.89:** Complete and enhance the sidewalk system along both East and West Redlands Boulevard. Make pedestrian enhancements to facilitate the safe crossing of the street.
- **Action 4-A.90:** Extend and enhance the center median of Redlands Boulevard with landscaping, public art, and lighting to improve the aesthetics and enhance its function as a major east-west boulevard.
- **Policy 4-P.40:** Encourage the revitalization of the commercial corridors on Colton Avenue at Orange Street by providing opportunities for a variety of commercial uses and providing guidelines for site design to create a more welcoming visual environment.
- **Action 4-A.91:** Develop an area plan for the Colton Avenue and Orange Street corridors that will improve the public spaces, enhance the quality of architecture and landscape architecture, attract a mix of family-friendly retail and professional businesses to serve the neighborhoods, and improve the overall attractiveness of the areas.
- **Action 4-A.93:** Seek to improve the mix of office, professional, and service-related businesses along Colton Avenue and Orange Street that will serve the neighborhood.
- **Action 4-A.95:** Promote infill development to create a continuous corridor of mixed-use and commercial activity.
- **Action 4-A.96:** Encourage site designs that create an active street frontage and screen parking from the Colton Avenue and Orange Street frontages.
- **Action 4-A.97:** Encourage the development of bicycle, pedestrian, and transit access that reduces the need for on-site parking. Improve the pedestrian experience within these corridors through street trees and landscaping.

Transit Villages Policies – Principles

- **Principle 4-P.41:** Foster a connected, accessible, and active community by creating attractively designed pedestrian- and transit-oriented villages with a mix of uses in a compact area.
- **Principle 4-P.42:** Provide for new jobs, housing, and entertainment opportunities in compact, walkable environments.
- **Principle 4-P.43:** Ensure that each Transit Village has a unique character and identity that reflects its existing assets and unique characteristics, and provides appropriate services at that location.

3. Environmental Setting

- **Principle 4-P.44:** Provide choices for travel options, including walking, biking, vehicular, and transit.
- **Principle 4-P.45:** Accommodate all appropriate modes of transportation in Transit Villages, and promote seamless transitions between modes.
- **Principle 4-P.46:** Improve connectivity between Transit Villages and existing neighborhoods.
- **Principle 4-P.47:** Provide for appropriate transitions between Transit Villages and surrounding neighborhoods.
- **Principle 4-P.48:** Provide development and infill opportunities as alternatives to building at the edges of the city.
- **Principle 4-P.49:** Allow residential and mixed-use projects in the Mixed-Use Core at densities up to the High-Density Residential standard.
- **Principle 4-P.50:** Allow for density bonuses in the Transit Village Overlay Zone contingent on the provision of public benefits. Density bonuses shall be a minimum of 25 percent within a quarter-mile of each transit station, and 10 percent in areas located between a quarter-mile and a half-mile radius of each transit station. Public benefits may include but are not limited to amenities such as a public park, plaza, or playground; enhanced streetscaping; public art; or participation in a voluntary transfer of development rights program.
- **Principle 4-P.51:** Complete a Transit Village Plan that will define: village character, design guidelines for architecture and site development, permitted and conditional uses, building setbacks and heights, yards, interfaces with the public streets and sidewalks, security measures, and transitions to existing neighborhoods.
- **Principle 4-P.52:** Encourage stops of larger trains (Metrolink) in stations that can adequately accommodate their size and have greater availability of and access to parking.

New York Street Transit Village Actions

- **Action 4-A.112:** Create an active and compact transit-oriented core with office uses that provide opportunities for jobs and innovation, as well as commercial and residential uses to serve the needs of the area's workers.
- **Action 4-A.113:** Provide streetscape improvements along the major corridors of Colton Avenue, Texas Street, and Redlands Boulevard to enhance comfort and safety for all modes of travel and increase accessibility to and from surrounding areas.
- **Action 4-A.114:** Establish boulevards along Redlands Boulevard and Colton Avenue with pedestrian-oriented streetscape improvements and ground-floor active uses.
- **Action 4-A.115:** Provide pedestrian routes between offices, neighborhoods, and Downtown.

3. Environmental Setting

- **Action 4-A.116:** Implement bicycle route improvements that provide strong east-west connections to other Transit Villages as well as north-south connections to improve access to existing neighborhoods to the north. Routes would include the Orange Blossom Trail, the Lugonia Trail on New York Street, and a route along Texas Street.
- **Action 4-A.117:** Implement intersection improvements, including pedestrian improvements, at the I-10 undercrossings at New York and Texas Street to increase comfort and safety for all modes of travel.
- **Action 4-A.118:** Ensure safe railway crossings at Tennessee Street, Texas Street, and New York Street for bicyclists and pedestrians.
- **Action 4-A.119:** Maintain single-family residential neighborhoods designated as low- and low medium-density residential in the General Plan within the TVOZ. Transition higher density housing when adjacent to these neighborhoods.

Downtown Redlands Transit Village Actions

- **Action 4-A.120:** Complete and implement an update of the Downtown Specific Plan to create a cohesive town center with amenities and pedestrian-oriented streets.
- **Action 4-A.121:** Encourage a centrally-located mix of uses to promote activity and economic vitality.
- **Action 4-A.122:** Maintain a distinctive character that builds on Downtown's many historic features and its citrus heritage.
- **Action 4-A.123:** Promote the reuse of citrus packing houses, historic warehouses, and other historic commercial buildings to create a destination for residents and tourists.
- **Action 4-A.124:** Ensure accessibility within the Transit Village to arts and cultural venues and programming.
- **Action 4-A.125:** Provide streetscape improvements along the major corridors of Colton Avenue, Texas Street, and Redlands Boulevard to enhance comfort and safety for all modes of travel and increase accessibility to and from surrounding areas.
- **Action 4-A.126:** Establish boulevards along Orange Street, Colton Avenue, and Redlands Boulevard with pedestrian-oriented streetscape improvements and ground-floor active uses.
- **Action 4-A.127:** Strengthen pedestrian and bicycle circulation routes within Downtown and to and from adjacent neighborhoods.
- **Action 4-A.128:** Implement bicycle route improvements that provide strong east-west and north-south connections. Routes would include the Orange Blossom Trail, the Mission Creek Zanja Trail, and routes on Colton Avenue, Orange Street, and Citrus Avenue.

3. Environmental Setting

- **Action 4-A.129:** Improve the I-10 undercrossing at Eureka Street, Orange Street, and 6th Street to increase comfort and safety for all modes of travel and enhance north-south circulation.
- **Action 4-A.130:** Maintain single-family residential neighborhoods designated as low- and low medium-density residential in the General Plan within the TVOZ. Transition higher density housing when adjacent to these neighborhoods.

University Transit Village Actions

- **Action 4-A.131:** Provide more multi-family housing for university students, staff, and other members of the community in the Mixed-Use Core and adjacent residential areas.
- **Action 4-A.132:** Create opportunities for ground-floor commercial uses, such as restaurants and cafes, retail, and professional services to serve university students, staff, and neighborhood residents in the Mixed Use Core.
- **Action 4-A.133:** Promote pedestrian circulation between the station, homes, schools, and parks, with primary routes along multi-purpose trails (the Orange Blossom and Mill Creek Zanja trails), Citrus Avenue, and University Street.
- **Action 4-A.134:** Implement bicycle route improvements that enhance circulation between the station, homes, schools, and parks and provide connections to Downtown. Routes would include the Orange Blossom Trail, the Mill Creek Zanja Trail, and routes on Citrus Avenue, University Street, and Colton Avenue.
- **Action 4-A.135:** Improve the I-10 undercrossing at Sylvan Boulevard to allow safe trail connections along the Mill Creek Zanja.
- **Action 4-A.136:** Improve the I-10 under-crossings at University Street and Citrus Avenue to allow safe and comfortable access for vehicles, pedestrians, and cyclists.
- **Action 4-A.137:** Establish a boulevard along University Street from I-10 to Colton Avenue.
- **Action 4-A.138:** Maintain single-family residential neighborhoods designated as low- and low medium-density residential in the General Plan within the TVOZ. Transition higher density housing when adjacent to these neighborhoods.

Chapter 5 – Connected City

Transportation

- **Policy 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 geo-graphic areas.

3. Environmental Setting

- **Policy 5-P.4:** Support transportation infrastructure improvements such as safer street crossings and attractive streetscapes to encourage bicyclists, walkers, and users of mobility devices.
- **Policy 5-P.9:** Design a layered transportation network for individuals of all ages and abilities.
- **Policy 5-P.11:** Implement standards for pavement design and roadway and intersection striping so streets are accessible by all users and all modes, and safety is improved.
- **Policy 5-P.13:** Ensure streets are designed to accommodate bicyclists per the Bicycle Master Plan.
- **Policy 5-P.14:** Design streets to accommodate various modes according to roadway classification and reduce conflicts and safety risks between modes per Figure 5-4.
- **Policy 5-P.15:** Incorporate green infrastructure into the design of new roadways and retro-fit existing roadways where appropriate.
- **Policy 5-P.16:** Strengthen active transportation circulation routes within Downtown and the Transit Villages, and to/from adjacent neighborhoods.
- **Action 5-A.2:** Integrate complete streets and a layered networks approach into all City streets, traffic standards, plans, and details.
- **Action 5-A.4:** Consider innovative design solutions to improve mobility, efficiency, connectivity, and safety through the use of traffic calming devices, roundabouts, curb extensions at intersections, separated bicycle infrastructure, high visibility pedestrian treatments and infrastructure, and signal coordination.
- **Action 5-A.5:** As part of street redesigns, plan for the needs of different modes – such as shade for pedestrians, lighting at pedestrian scale, mode-appropriate signage, transit amenities, etc.
- **Action 5-A.6:** Add bike and pedestrian facilities on roads with excess capacity where such facilities do not exist, using supporting transportation plans as guidance. Excess capacity includes street right-of-ways or pavement widths beyond the standards, or excess capacity in road-ways based on actual vehicular travel versus design capacity.
- **Action 5-A.7:** Add new streets to create a finer-grained, pedestrian-scaled road net-work where the roadway network is characterized by particularly long blocks, connecting residential areas to parks and Transit Village cores. Ensure the street systems in Transit Villages support development of connected and accessible communities.
- **Action 5-A.8:** Manage travel speeds in Downtown, at Transit Villages, and near schools, parks, and the University to enhance safety.
- **Action 5-A.9:** Adopt a “vision zero” approach to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all.

3. Environmental Setting

- **Policy 5-P.17:** Provide a safe, direct, and healthful pedestrian environment through means such as providing separate pedestrian-ways in parking lots, avoiding excessive driveway widths, and providing planting strips between side-walks and streets where feasible.
- **Policy 5-P.19:** Enhance street lighting for pedestrians where current lighting is inadequate.
- **Action 5-A.20:** Provide pedestrian routes between offices, neighborhoods, Downtown, and Transit Villages. Plan for direct connections from the interiors of residential tracts to neighboring parks, schools, retail, and other services using side-walks, trails, and paseos.
- **Action 5-A.21:** Strengthen trail connections to Downtown (such as Orange Blossom Trail, Lugonia Trail, Citrus Avenue, and Church Street).
- **Action 5-A.22:** Include amenities such as shade trees, transit shelters and other transit amenities, benches, trash and recycling receptacles, bollards, public art, and directional signage that can enhance the pedestrian experience.
- **Policy 5-P.21:** Develop bike routes that provide access to rail stations, Downtown, schools, parks, the University, employment, and shopping destinations.
- **Action 5-A.25:** Implement bicycle and trail improvements that provide strong east-west connections between Transit Villages and in the city's wider bicycle network. Routes would include the Orange Blossom Trail, the Mission Creek Zanja Trail, routes on Colton Avenue and Citrus Avenue, Santa Ana River Trail, and the San Timoteo Canyon Trail.
- **Action 5-A.27:** Implement safety improvements in mid-block areas that allow for bicycles to safely cross heavily traveled roads. Improvements can include stop signs for cyclists, warning beacons, and illuminated signs initiated by pedestrians and cyclists.
- **Action 5-A.36:** Allow for flexibility and creativity in the roadway standards, where appropriate, to preserve historic features, specimen trees and significant landscaping, accommodate turn lanes, parking, wider sidewalks, bike paths, turnouts for buses, public art, and landscaped medians.
- **Action 5-A.37:** Encourage the use of car share and car hire services within Redlands to provide vehicular transportation alternatives.
- **Action 5-A.38:** Plan for future innovations in vehicular transportation such as self-driving vehicles.
- **Action 5-A.44:** Establish new boulevards Downtown and in the Transit Villages that include planted center medians, accommodations for transit, wider sidewalks, and amenities for pedestrians.
- **Policy 5-P.27:** Support passenger rail as an alternative mode of regional transit.
- **Action 5-A.61:** Support investments in passenger rail by providing effective on-site circulation and multi-modal connections to transit stations.

3. Environmental Setting

- **Action 5-A.62:** Develop station area plans to determine the appropriate modes of transportation to be accommodated at each passenger rail station, the inter connections between those modes, and the facilities to be provided to support each mode.
- **Action 5-A.67:** Encourage convenient and safe pedestrian linkages to and from transit service to provide better first-mile and last-mile connectivity.

Parking

- **Action 5-A.17:** Locate public parking facilities to serve the downtown around the periphery so as not to draw additional vehicles into the core areas. Ensure that easily identifiable pedestrian connections exist between public parking areas and the downtown core.
- **Policy 5-P.29:** Ensure a balanced parking supply that adequately serves the community while employing strategies to reduce both the number of parking spaces needed, the area occupied by parking, and the number of vehicular trips needed within predominantly pedestrian oriented areas.
- **Action 5-A.70:** Locate Downtown public parking to encourage a park once approach. Provide pedestrian directional signage to direct persons from peripheral parking to downtown destinations.
- **Action 5-A.73:** Provide adequate parking availability Downtown for residents, commuters, visitors, and shoppers throughout the day.
- **Action 5-A.74:** Design parking to meet applicable urban design goals from area plans and minimize negative impacts on pedestrians, bicyclists, and transit users.
- **Action 5-A.75:** Consider techniques to reduce the amount of area in the Transit Villages occupied by parking, especially for developments located within easy walking distance of the Passenger Rail stations.
- **Action 5-A.77:** Encourage developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less.
- **Action 5-A.78:** Develop flexible on-site vehicle parking requirements. Such requirements would include implementation of innovative parking techniques, implementing effective TDM programs to reduce parking demand, and consideration of other means to efficiently manage parking supply and demand.
- **Action 5-A.80:** Design parking structures in a manner so that they can be adaptively reused if they become obsolete for parking needs in the future

3.3 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the State CEQA Guidelines states that cumulative impacts shall be discussed when a project's incremental effect is cumulatively considerable. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great detail as that necessary

3. Environmental Setting

for the project alone. Section 15355 of the State CEQA Guidelines defines cumulative impacts to be “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Cumulative impacts represent the change caused by the incremental impact of the revised project when added to effects of past projects, other current projects, and probable future projects in the vicinity.

State CEQA Guidelines Section 15130 (b)(1) states that the information used in an analysis of cumulative impacts should come from one of two sources:

1. A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
2. A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions.

The cumulative impact analyses in this Draft SEIR use source No. 2 (a summary of projections method). Consistent with Section 15130(b)(1)(B) of the State CEQA Guidelines, this Draft SEIR analyzes the environmental impacts of developments in accordance with buildout of the 2035 General Plan. As a result, this Draft SEIR addresses the cumulative impacts of development within the City of Redlands.

In general, the potential for cumulative impacts is contiguous with the City boundary, since the City is the service provider for various City services and public utilities. Cumulative impacts that have the potential for impacts beyond the City boundary (e.g., traffic, air quality, noise) have been addressed through cumulative growth in the City and region using the Air Quality and Transportation Analyses, which use regional growth projections to calculate future air emissions and traffic volumes. The growth projections adopted by the City and surrounding area and a list of projects producing related cumulative impacts are used for the cumulative impact analyses of this Draft SEIR. Please refer to Chapter 5 of this Draft SEIR for a discussion of the cumulative impacts associated with development and growth in the City and region.

3. Environmental Setting

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4. Introduction to Environmental Analysis

Chapter 4 examines the environmental setting, impacts, and mitigation measures associated with the proposed Project. This chapter is divided into sections for respective environmental topics that were determined to need further study in the Draft SEIR. Environmental issues and their corresponding sections are:

- Land Use and Housing
- Transportation
- Utilities and Service Systems

Sections 4.1 through 4.3 provide a detailed discussion of the environmental setting, impacts associated with the proposed Project, and mitigation measures designed to reduce significant impacts, where required, and when feasible. Any residual impacts following the implementation of any mitigation measure also are discussed.

Chapter 5 of this Draft SEIR determined that, for some specific issues under each of the environmental topics, implementation of the proposed project would not result in any new impacts or increase the severity of impacts compared to the General Plan EIR. Pursuant to Public Resources Code § 21166 and CEQA Guidelines § 15162, these issues are not discussed further in Chapter 4, *Environmental Analysis*, of this Draft SEIR.

Organization of Environmental Analysis

To assist the reader with comparing information between environmental topics, each section (Sections 4.1 to 4.10) is organized under these headings:

- Environmental Setting (Regulatory Setting and Existing Conditions)
- Thresholds of Significance
- Summary of Impacts Associated with the General Plan EIR
- Environmental Impacts of the Proposed Project
- Cumulative Impacts

In addition, Chapter 1, *Introduction*, includes a table that lists all the impacts, their level of significance, and any required mitigation.

Terminology Used in this Draft SEIR

The level of significance is identified for each impact in this Draft SEIR, consistent with Public Resources Code, section 21166 and State CEQA Guidelines, section 15162. Specifically:

- A finding of “No New Impact/No Impact” means that the potential impact was fully analyzed and/or mitigated in the prior CEQA document and no new or different impacts will result from the proposed activity. A brief explanation is required for all answers except “No New Impact/No Impact” answers that are

4. Environmental Analysis

adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No New Impact/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 New Impact/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).

- A finding of “New Mitigation is Required” means that the project has a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document and that new mitigation is required to address the impact.
- A finding of “New Potentially Significant Impact” means that the project may have a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document that cannot be mitigated to below a level of significance or be avoided.
- A finding of “Reduced Impact” means that a previously infeasible mitigation measure is now available, or a previously infeasible alternative is now available that will reduce a significant impact identified in the previously prepared environmental document.
- 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.
- Earlier analyses 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. State CEQA Guidelines, section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - **Earlier Analyses 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. 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 proposed action.
 - **Infeasible Mitigation Measures.** Since the previous EIR was certified or previous ND or MND was adopted, discuss any mitigation measures or alternatives previously found not to be feasible that would in fact be feasible or that are considerably different from those previously analyzed and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.
 - **Changes in Circumstances.** Since the previous EIR was certified or previous ND or MND was adopted, discuss any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause a change in conclusion regarding one or more effects discussed in the original document.

4. Environmental Analysis

4.1 LAND USE AND HOUSING

This section of the Draft SEIR evaluates the Project's consistency with applicable land use plans and policies in the City of Redlands.

4.1.1 Environmental Setting

4.1.1.1 REGULATORY BACKGROUND

State

General Plan

State planning law (California Government Code, § 65300 et seq.) requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city and of any land outside its boundaries (e.g., designated Sphere of Influence and Planning Area) that—in the planning agency's judgment—bears relation to its planning. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, including hazards and flooding.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a regional council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, which encompass over 38,000 square miles. SCAG is the federally recognized metropolitan planning organization (MPO) for this region and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. The City of Redlands is within the San Bernardino Council of Governments sub-region of SCAG.

Local

Proposition R

Beginning with Proposition R in 1978, the voters of the City of Redlands have adopted three initiative measures in response to residential development within the City. Residential development peaked during the

4. Environmental Analysis

LAND USE AND HOUSING

1980s, when 20 percent of the current housing stock was constructed in a single decade. Since that period, residential growth has slowed substantially.

Measure N

Measure N, a zoning ordinance that amended Proposition R, was approved by the voters in 1987. The measure limits the development of residential dwelling units to 400 units per calendar year. Of the 400 units, 50 units are reserved for single-family homes on existing lots of record, with the remainder to be allocated according to a competitive evaluation system which emphasizes design factors. The Measure also restricts changing land designations or zoning to a higher density than Rural Estate (R-E) for those lands designated as urban reserve agricultural on June 1, 1987, and limits development on steep slopes.

Measure U

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, implemented restrictions on noise, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. Measure U limits the development potential of this part of Redlands characterized by steep slopes and natural resources.

Measure U amended the Redlands General Plan Land Use Element to “plan for” a housing mix of 75 percent single-family and 25 percent multi-family dwelling units at buildout. The City Council has adopted a clarification of this policy determining that condominiums (which are considered multi-family dwellings by the Census and the Department of Finance) will be considered single-family dwellings for purposes of this calculation. The measure has not proved to be a hindrance for Redlands to achieve its regional housing fair share needs, and Redlands continues to have a certified Housing Element.

Measure U also includes traffic level of service standards, seeking to ensure that future growth can be adequately served by the transportation system. Certain types of development are exempted from Measure U, including single-family residential development on existing lots of record, remodeling of existing single-family homes, development directly related to “proposed Metrolink,” and development projects within Specific Plan no. 45 upon a super-majority vote of the City Council.

Redlands Downtown Specific Plan No. 45)

The City’s Downtown Specific Plan No. 45 was adopted in 1994 and amended several times through 2017. Its purpose is to provide a comprehensive set of standards for land use, development design, and public improvements for the Downtown area, and its primary goal is to create a compact, pedestrian-oriented environment that is consistent in character and density with the older Redlands core. The specific plan establishes the Town Center (TC), Town Center-Historic (TC-H), and Service- Commercial (S-C) land use districts to organize permitted land uses in the planning area. The specific plan also establishes standards for building aesthetics, including architectural guidelines and standards regarding height, floor area ratio (FAR), setbacks, facades, landscaping, lot coverage, building materials, and parking locations. For the area as a whole, the specific plan also addresses streetscape priorities and design, open space and parks, and historical preservation.

4. Environmental Analysis LAND USE AND HOUSING

Methodology of General Plan EIR

In computing the residential buildout for the 20-year horizon of the 2035 General Plan, existing residential development, currently proposed projects, and future development were considered. These were derived as follows:

- **Existing residential development.** These estimates were derived from the City's geographic information system (GIS) database. The database contains detailed information about the number of structures on each parcel, usage, and Assessor's information. It is highly accurate and is regularly updated by City staff. Data used to calculate buildout was gathered for existing residential development as of March 2016. The analysis produced a current population estimate of approximately 68,049 residents and 26,749 housing units within the City of Redlands. These numbers are consistent with 2015 population estimates from the California Department of Finance and the U.S. Census Bureau's 2010 housing estimates.
- **Currently proposed projects.** Projects currently under construction, entitled, going through the entitlement process, or in the early stages of development review in the City's Development Services Department as of November 2016. While it is possible that some of these projects may not be constructed, using real totals from approved and planned projects provides the most accurate buildout estimate for vacant parcels.
- **Future residential development.** Future residential development takes into account the realistic maximum number of potential units that could be built under the proposed land use designations (excluding any overlay districts such as the Housing Preservation Overlay Zone or the Transit Village Overlay Zones).

Future Development in Transit Villages

For residential areas within the Transit Villages, areas were identified that could be developed for mixed-use or residential uses. These areas consist of mostly vacant or underutilized parcels or areas planned for redevelopment such as the Redlands Mall. The associated acreage was then multiplied by the total maximum number of units permitted. For example, areas designated High Density Residential would permit 27 dwelling units per gross acre.

Two composite factors were then applied to account for the likelihood of buildout within the 20-year planning horizon and for development constraints that are present in any development or redevelopment of a site.

- In this instance, the likelihood of buildout within the planning horizon is also impacted by the timeline of the development of the rail stations, and associated infrastructure. As of 2016, only three of the five proposed stations are planned to be built and rail service to these three stations is not projected to begin until 2021. Therefore, a factor of 70 percent was applied to a potential maximum number of units given the associated timelines.

4. Environmental Analysis

LAND USE AND HOUSING

- Factors that reduce the number of potential units developed include: the limit on residential development within a 500-foot Air Quality Management District (AQMD) buffer applied along the I-10 freeway; parcels that are narrow, shallow, or oddly shaped; challenges of assembling parcels that can support a higher density project; development requirements for setbacks, yards, parking, and other factors that limit density; and the desire of some property owners to build projects with only commercial or office uses. A factor of 80 percent of the potential maximum units was applied to account for these limiting factors. An 80-percent factor translates to approximately 22 dwelling units per gross acre under the High Density Residential designation, which allows a maximum of 27 dwelling units per gross acre. Some developments are likely to be much lower density than projected given site constraints, and some may be higher if a density bonus is applied.

The General Plan EIR also applied a 5 percent vacancy factor to new development on vacant land. This factor was used to determine population at buildout. This SEIR does not apply this factor as the vacancy of developed homes occurs after construction and therefore after any physical impacts associated with the development.

Methodology in the Draft SEIR

The City's Geographic Information System division calculated the vacant land by land use designation and zoning within the TVPA as shown in Tables 3-2 and 3-3 of this Draft SEIR. As the voter-approved initiative measures primarily address single-family and multiple-family development, non-residential uses are not part of the analysis. The approximately 19.03 acres of vacant Multiple Family Residential Zoned land shown in Table 3-3 was multiplied by 27 units to the acre. This resulting figure is compared to the assumptions used in the 2035 General Plan EIR regarding buildout of the 2035 General Plan. Vacant multiple family residential land was chosen for the analysis because of its immediate availability for multiple family residential development. Redeveloping a site with existing buildings or seeking approval to place residential uses on a commercial site, is much more involved, and requires approval of a conditional use permit as well as a site plan review. Multiple Family Residential development is a permitted land use on multiple family residential zoned land and requires only a site plan review pursuant to RMC Section 18.60.250. A site plan review focuses only on the design of the project rather than the whether the land use is appropriate.

4.1.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LU-1 Physically divide an established community and 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).
- LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4. Environmental Analysis

LAND USE AND HOUSING

LU-3 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.1.3 Summary of General Plan EIR Impacts

By improving connectivity within and between existing and proposed neighborhoods, the 2035 General Plan would provide more linkages within the City and surrounding area. The 2035 General Plan describes specific improvements in street connectivity, bicycling, walking, and transit. The Transit Village concepts aim to extend the breadth of commercial clusters to nearby neighborhoods and across I-10. Finally, the trail system aims to provide a comprehensive pedestrian network throughout the entire City. The proposed Project does not change existing land use designations, nor does the Project eliminate the policies identified in the 2035 General Plan as addressing Land Use impacts.

The 20-year buildout projected in the 2035 General Plan assumes that the majority of development would occur on infill sites within urbanized areas of the City. As infill sites are scattered throughout the City and are generally already served by public services and facilities, there would not be a significant increase in population and business in one particular part of the City as a result of the proposed Ballot Initiative. The 2035 General Plan does not directly displace any housing units, businesses, or people. Redevelopment of existing uses would likely occur; however, such development would take place over time as the market allows and would result in a net increase in dwelling units. Though it is impossible to guarantee residents would not be displaced as a result of implementation of the 2035 General Plan, the 2035 General Plan policies seek to preserve existing neighborhoods.

Population

According to the California Department of Finance, the population of the City was estimated to be approximately 71,839 as of 2019, comprising approximately 3.7 percent of San Bernardino County's total population of 2,192,203. The 2035 General Plan, as shown in Table 5.1-1, *Projected Residential Population (2035)*, of the 2035 General Plan EIR, would accommodate a population of 79,013 people by buildout, within the City of Redlands, which is an increase of approximately 10 percent of the 2019 population. The projected population total for the City at buildout is less than SCAG's 2035 population projection of 83,400 residents.

Housing

By buildout, the 2035 General Plan is projected to result in a total of approximately 22,553 single-family dwelling units and 8,551 multifamily dwelling units, which is a total of 31,104 dwelling units in the City, as shown in Table 4-4 in the Livable Community chapter. SCAG projected approximately 31,600 households in the City by 2035. Most of the housing needs of this projected population would be met by housing units provided in Redlands under the 2035 General Plan. For those households in excess of the number of housing units projected, housing needs would likely be met in the City's Sphere of Influence outside of the Redlands' city limits. Dividing the 2035 General Plan buildout population for Redlands of 79,013 residents by the assumed person per household calculation of 2.65 results in 29,816 total projected households. Applying the same persons per household to SCAG's 2035 population projection of 83,400, Redlands would result in an estimate of 31,471 households.

4. Environmental Analysis

LAND USE AND HOUSING

4.1.4 Environmental Impacts of the Proposed Project

Impact 4.1-1: The proposed Project would not divide an established community, nor would the proposed Project directly or indirectly result in population growth in the project area. [Threshold LU-1]

Dividing an Established Community

The proposed Project will not result in construction; but the proposed Ballot Initiative would allow the City to consider taller buildings and more intense development (up to 27 dwelling units per acre) without a 4/5ths vote of the City Council.

A concern raised during the notice of preparation period was the potential for the proposed Project to allow larger buildings that could visually and physically divide parts of the TVPA. As shown in Table 3-1, *Existing Land Use Summary*, in Chapter 3, *Environmental Setting*, the 2035 General Plan already allows for a range of development types (e.g. commercial, industrial, single and multi-family residential) within the TVPA. Existing zoning standards established by the Redlands Municipal Code (RMC) that apply in the TVPA currently allow for taller buildings. For example, properties located within the boundaries of the existing Downtown Specific Plan (SP45) have a three stories or 55 foot height limit; properties that are zoned C-3, General Commercial have no height limit (§ 18.92.130 RMC); and properties that are zoned Industrial have a 50 foot height limit (§ 18.108.100 RMC). Relatedly, properties zoned R-3, Multiple Family Residential, may be constructed up to 4-stories (§ 18.60.120 RMC).

If approved, the proposed Project would eliminate the 4/5ths vote and findings required to allow residential projects with a density of more than 18 units to the acre to exceed 35 feet within the TVPA. While the 4/5ths vote and findings would allow a multiple family residential structure in excess of 35 feet, Section 18.60.120 would restrict the building to four stories. Typically, a four-story residential structure can be designed within a 40-foot height, although some design features may extend beyond 40 feet. Section 18.152.030 of the RMC governs the design elements that could exceed maximum height restrictions. As the existing condition allows projects to exceed the 35-foot height limit with a 4/5ths vote, and if this requirement is removed, the underlying multiple family residential zoning standards would still be applicable, and the resulting buildings would be similar in height with or without the proposed Project.

The 2017 General Plan EIR indicated that the General Plan would not result in uses or development that would physically divide any established community, nor would it propose new highways or infrastructure that would physically divide the community. The 2017 General Plan EIR indicated that no impacts would occur, as identified on page 3.10-11 of the General Plan EIR, and similarly, the proposed Project would result in no significant impacts, as the proposed Project would be required to comply with the policies and actions of the 2035 General Plan.

Inducing Population Growth

The 2035 General Plan would result in an increase of 3,422 dwelling units (not including currently proposed housing units); 10,964 residents, as shown in Table 2.3-5, *Projected Population at Buildout (2035)*, of the 2035

4. Environmental Analysis

LAND USE AND HOUSING

General Plan EIR; and 14,561 jobs as shown in Table 2.3-6, *Projected Non-Residential Buildout (2035)*. The proposed Project could result in a potential total of dwelling units by 171 (see Table 4.1-3) within the TVPA, by buildout of the 2035 General Plan. The 171 units represents a population of approximately 453 residents. Assuming that all residents are new to the City, this could increase the 2019 population by 0.63 percent. If applied to the projected 2035 population of 79,013, the total of 79,466 represents an increase of 0.57 percent, and remains below the SCAG 2035 population estimate of 83,400. The SCAG population estimate is used for regional planning.

According to Table 2.3-4, of the projected 3,422 dwelling units, 2,124 units would be single-family residential and 1,298 units would be multi-family residential at buildout. Additionally, of the 3,422 dwelling units, a total of 1,148 dwelling units (224 single-family and 924 multi-family units) would be constructed within the Transit Village.

As the proposed Project does not adopt any new policies that would change the design or intensity of development beyond what was evaluated in the 2035 General Plan EIR, there is no impact on the potential to divide an established community. Moreover, the proposed Project would not significantly affect the regional growth of the City and would be consistent with the overall population and employment growth forecasts evaluated in the 2035 General Plan EIR. As indicated on page 5-3 of the General Plan EIR, the impacts of the General Plan EIR would not be growth-inducing beyond regional forecasts, and the proposed Project would not result in new or more significant impacts in this regard.

Impact 4.1-2: Project Implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

Many of the provisions of the Measure U address annexation, expansion into the rural periphery of the City, and along the Santa Ana River. Focused on the TVPA, the proposed Project does not affect any of the existing measures that address these issues. Further, the growth management policies, and municipal code requirements continue to apply to areas of the City outside of the TVPA.

Measure N is a zoning ordinance that amended Proposition R to limit the development of residential dwelling units to 400 units per calendar year. Of the 400 units, 50 units are required to be reserved for single-family home on existing lots of record as of the date of the Measure, with the remainder to be allocated according to a competitive evaluation system which emphasizes design factors. The Measure also restricts changing land designations or zoning to a higher density than Rural Estate (R-E) for those lands designated as urban reserve agricultural on June 1, 1987, and limits development on steep slopes. The proposed Project would amend Measure N and Proposition R to remove the TVPA from the annual dwelling unit limitation, but retain the annual dwelling unit limitation for the remainder of the City.

Table 4.1-1, *Applicability Between Proposed Project and Measures U, N, and Proposition R*, includes a column identifying policies established by Proposition R, as amended by Measure N; and by Measure U. In the adjacent column, the applicability of those policies to the proposed Project is stated as follows:

4. Environmental Analysis

LAND USE AND HOUSING

- **Continues to Apply.** Policies that would continue to apply to proposed development within the TVPA if the proposed Project is approved.
- **Would not Apply.** Policies that would not apply to proposed development within the TVPA if the proposed Project is approved.
- **Not Applicable.** Policies that would not apply to proposed development within the TVPA because they are inapplicable to the TVPA, if the proposed Project is approved.

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
MEASURE U	
1A.10 Principle One – The cost of infrastructure required to mitigate the effects of new development shall be paid by that new development.	
a) Development Fee Policy – In accord with the provisions of California Government Code Sections 66000 et seq., all development projects as defined therein shall be required to pay development fees to cover 100% of their pro rata share of the cost of any public infrastructure, facilities or services, including without limitation police and fire services, necessitated as a result of such development. The City Council shall set and determine development fees sufficient to cover 100% of the estimated cost of such public infrastructure, facilities and services based on appropriate cost-benefit analyses as required by the provisions of California law.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
b) Socio-Economic Cost/Benefit and Findings Required – Every development project proposal requiring a General Plan Amendment, Zoning Amendment, Subdivision Map, Specific Plan, or for projects involving structures larger than 5,000 square feet, Conditional Use Permit approval, shall submit a socio-economic analysis and cost/benefit study, which shall also be included in all environmental documents submitted to the extent permitted by law, identifying the source of funding for necessary public infrastructure and reflecting the effect of such development on the City, as part of the application process. The City Council shall publish notice of and hold at least one public hearing at which the public may appear and be heard to consider the socio-economic cost/benefit study. Approval of the development project shall only occur if the socio-economic study finds and determines to the satisfaction of the City Council that the development project 1) will not create unmitigated physical blight within the City or overburden public services, including without limitation the sufficiency of police and fire protection, and 2) the benefit of the development project to the City outweighs any direct cost to the City that may result. The City Council may, however, approve a development project for which the socio-economic study fails to make the required findings or determinations if the City Council finds and determines upon a 4/5ths votes of its total authorized membership that the benefits to the City from the development project outweigh the negative socio-economic effects that may result.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.

4. Environmental Analysis LAND USE AND HOUSING

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
c) 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 school 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.	Would not Apply. See above. Socio-economic studies, including an analysis therein of school impacts by proposed development, would not be required for development proposed within the TVPA. California Government Code 65995 establishes the method for addressing school impacts related to future development that preempts any City mitigation. This provision of the Government Code remains unaffected by the proposed Project.
1A.20 Principle Two – Development within the planning area and sphere of influence of the City of Redlands shall conform to development standards within the City.	
a) 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 (12/12/1997) of this initiative measure as defined in Section 3 hereof, shall conform to the policies contained in the Redlands General Plan.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
b) 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: <ol style="list-style-type: none"> 1. The area to be served is not contiguous to the City of Redlands; and, 2. 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, 3. The land owner agrees as a condition of extension of utility facilities to serve the proposed development to pay the full cost of such extension of such utility facilities. 	Not Applicable. The proposed Project is located within the TVPA which is completely within the City limits; therefore, no extension of utility services outside of the City's boundaries is needed to serve proposed development within the TVPA.
1A.30 Principle Three – Land use classification set forth in the Redlands General Plan provide for an appropriate range of densities for residential development and intensity of commercial and industrial development in the City of Redlands.	
a) Number of Land Use Classifications and Density Standards Shall Not Be Increased – The density standards set forth in Paragraph 4.40, "Residential Land Use Classifications," of Section 4.0, Land Use Element, of the Redlands General Plan shall not be increased and no new residential land use classification shall be added, without a vote of the people.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
b) Prohibition on Transfer of Density – In order to assure that development occurs in a rational way, no transfer of residential development rights from lands other than those designated for single-family residential shall be permitted, and then such transfers of single-family residential density shall only be permitted to create or preserve agricultural, open space, school or park uses.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.

4. Environmental Analysis

LAND USE AND HOUSING

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
1A.40 Principle Four – Agricultural uses of land are important to the culture, economy, and stability of the City of Redlands and shall be preserved to the greatest extent consistent with the will of the people as expressed in Proposition R and Measure N, and consistent with the policies of the State of California set forth in Government Code Section 51220.	Not Applicable. There are no agricultural lands within the TVPA.
1A.50 Principle Five – Preservation of San Timoteo Canyon as a water conservation, recreational, equestrian and wildlife refuge resource for residents of the City of Redlands is essential to the health, safety and general welfare of the community. Development in this area shall only occur in a manner that preserves the area in as natural a state as possible, whether such development is for residential, commercial or flood control purposes.	Not Applicable. The proposed Project does not encompass the San Timoteo Canyon area.
1A.60 Principle Six – Limitations on traffic levels of service and use of designated roadways, restrictions on permanent outdoor advertising signs and the proliferation of billboards, imposition of reasonable noise standards in residential areas and control of slope densities are essential to managing growth within the City by preventing undue urbanization and its attendant urban blight, the degradation of public services and over-intensive development of land.	
a) Levels of Traffic Service throughout the City Shall be Maintained – To assure the adequacy of various public services and to prevent degradation of the quality of life experienced by the citizens of Redlands, all new development projects shall assure by appropriate mitigation measures that, at a minimum, traffic levels of service are maintained at a minimum of LOS C throughout the City, except where the current level of service is lower than LOS C, or as provided in Section 5.20 of the Redlands General Plan where a more intense LOS is specifically permitted. In any location where the level of service is below LOS C at the time an application for a development project is submitted, mitigation measures shall be imposed on that development project to assure, at minimum, that the level of traffic service is maintained at levels of service that are no worse than those existing at the time of an application for development is filed, except as a provided in Section 5.20b.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
b) Collector and Local Street Standards Shall be Maintained – No development shall be approved which will generate traffic volume on residential collector streets or local residential streets in excess of the standards set forth in the Redlands General Plan at Sections 5.32a and 5.32b. Roadways shall be designed and designated for use in accord with the standards set forth in GP Figure 5.3 of the Redlands General Plan.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
c) Circulation Patterns Shall Protect Residential Neighborhoods from Increase Traffic Congestion – Traffic circulation patterns shall be established and maintained within the City in a manner that protects the character of residential neighborhoods as set forth at Sections 5.30i, 5.30j, and 5.30k of the Redlands General Plan. Major infrastructure improvements within the City designed to accommodate regional traffic needs shall be designed, constructed and financed in a manner which discourages increased traffic flows through residential neighborhoods, encourages traffic flows to existing freeway system and makes prudent use of federal and local taxpayer dollars. The City Council shall coordinate with	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.

4. Environmental Analysis LAND USE AND HOUSING

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
the San Bernardino Association of Governments (SANBAG), the inland Valley Development Authority (IVDA) and the City of San Bernardino with regard to all Santa Ana river crossings, except the Orange Street crossing, to assure the development of California Street/Mountain View Avenue as a major arterial providing access to the San Bernardino International Airport.	
d) Designated Scenic Highways within the City Shall be Maintained – Where improvement of any scenic or historic drive highway or roadway is required, the City shall take all action authorized by California law to ensure that those roadways retain characteristics which justify their designation as scenic or historic roadways, including without limitation, capacity restrictions.	Would not Apply. Presently, there are no designated scenic or historic highways or roadways located within the TVPA. To the extent such highways or roadways were designated in the future within the TVPA, they would not be constrained by this provision of Measure U.
e) Permanent Outdoor Commercial Signs Shall Be Limited in Size – To accommodate the need for permanent outdoor commercial signs in a manner that provides the least intrusion on the community and the least risk of visual blight, no permanent outdoor commercial sign shall be approved that exceed 120 square feet in size except by variance and/or conditional use permit approved by a four-fifths (4/5) vote of the entire authorized membership of the City Council. No “readerboards” or “billboards” shall be permitted.	Would not Apply. Proposed development within the TVPA would not be subject to this constraint.
f) Noise Standards in Residential Areas Shall be Established to Protect Residential Use of that Land – Among the most damaging aspects of high density residential development is a degradation of residential noise standards. Accordingly, noise standards must be stringent enough to assure residents reasonable quietude in their homes.	Continues to Apply. The Noise Element of the 2035 General Plan will apply within the TVPA. All future development must comply with the City of Redlands Community Noise Control Ordinance (Chapter 8.06).
g) Slope Density Limitations Shall be Maintained – To preserve hillside vistas and character of the City of Redlands, no development projects shall be approved in the Hillside Overlay areas that is inconsistent with the slope density standards set forth in Section 4.42m of the Redlands General Plan.	Not Applicable. There are no Hillside Overlay areas within the TVPA.
PROPOSITION R, as amended by MEASURE N	
Annual Development Limitations (Section 3, Proposition R). Henceforth, further residential development shall be limited to four hundred (400) dwelling units per calendar year. In any given year, if less than four hundred (400) units are approved or constructed, the unused number may not be carried forward to any future year.	Would not Apply. The 400 dwelling units per calendar year limitation would not be applicable to development within the TVPA, but the 400 dwelling unit limitation would apply within the remainder of the City.
Subdivision Applications; Competitive Evaluation and Selection Process (Section 4, Proposition R). The City shall accept subdivision development applications in final approval form for each calendar year at a prescribed time. The City shall competitively evaluate the submitted applications for quality in at least: tract design, architecture and construction proximity and access to available city and school services, preservation of agricultural land, low income and minority housing requirements, senior citizen needs and price. The City shall select those applications, within the limits of section 19.04.030 of this chapter, which are superior in overall evaluation, for building permit approval. The City shall amend the existing procedure for competitive evaluation within ninety (90) days from the date of adoption of the	Would not Apply. Neither subdivision projects nor single family infill development projects proposed within the TVPA would be subject to this constraint.

4. Environmental Analysis

LAND USE AND HOUSING

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
ordinance codified herein to make the procedure and evaluation system consistent with Measure N.	
To encourage construction of single-family infill housing, the City Council shall reserve until October 1 of each year, fifty (50) of the four hundred (400) authorized building permits for the construction of single-family homes on existing lots of record as of the effective date of Measure N.	
Water and Sewer Service Extensions; Annual Limitations (Section 6, Proposition R). The City shall not make water or sewer service allocations or connections to more than one hundred fifty (150) dwelling units outside its corporate boundaries in any calendar year. Water or sewer service shall not be extended to any dwelling unit which is not within the city's adopted sphere of influence and which is not zoned or pre-zoned consistent with the Redlands general plan or plan for development of the sphere of influence area. Water or sewer service connections made pursuant to this provision which are not used or allocated within a given calendar year may not be carried forward to any future year.	Not Applicable. The proposed Project is located in the TVPA, which is entirely within the City limits. This provision of Proposition R, as amended by Measure N, has no application to the TVPA.
Urban Reserve (Agricultural) Lands (Section 10, Proposition R). No lands designated as urban reserve (agricultural) on the Redlands general plan map as the same existed on June 1, 1987, shall be rezoned or changed to a different general plan designation which would permit a density higher than the R-E designation as the same existed on June 1, 1987, in the Redlands city zoning ordinance unless the city council finds, by four-fifths ($\frac{4}{5}$) affirmative vote by the total authorized council membership, that each and all of the following is true: A. There are specific overriding benefits to the city and its residents and taxpayers from the proposed density increase; B. The proposed density increase will not cause any adverse environmental impacts, either individually or cumulatively, directly or indirectly; C. The proposed density increase will not convert viable agricultural lands to nonagricultural uses; D. The proposed density increase will not have a growth inducing effect on other property.	Would not Apply. The TVPA does not contain any agricultural lands, and if it did, development of such lands would not be subject to this constraint.
Policy to Preserve and Foster Agriculture. It is declared to be the policy of the City of Redlands to preserve and foster agriculture as a vital industry and a desirable open space use because of our high soil quality, favorable climate, low water costs and economic benefit to our community. It is further declared to be the policy of the city to retain, wherever feasible, agricultural lands in private ownership and to encourage and assist the maintenance and formation of locally owned farms. The City shall forthwith adopt such policies, ordinances and resolutions as may be necessary to achieve these goals, including, but not limited to, the following: a. The City shall establish programs to encourage and assist owners in the replanting of dying groves and/or vacant agricultural land, for the installation of water conserving irrigation systems and/or for the protection of agricultural land from theft,	Would not Apply Presently, no lands within the TVPA are designated as agriculture. If lands within the TVPA were designated as agricultural in the future, they would not be subject to this constraint.

4. Environmental Analysis LAND USE AND HOUSING

Table 4.1-1 Applicability Between Proposed Project and Measures U, N, and Proposition R

Provisions	Applicability to Proposed Project
<p>vandalism and dumping. Total cost of this assistance shall be borne by those directly benefited;</p> <p>b. Plan and implement programs wherever feasible in appropriate areas for recreational opportunities for biking, equestrian and hiking uses, consistent with farming needs, agricultural uses and wildlife protection;</p> <p>c. Develop and implement public service and infrastructure standards compatible with and appropriate to agricultural and rural living purposes.</p>	
<p>Planning to Minimize Adverse Impacts to the City's Sphere of Influence Area. The City shall forthwith initiate a planning process leading to the development and adoption of a plan for the ultimate development of the City's sphere of influence area. Until such plan is adopted by the City, the city shall not, unless compelled by law to do so, initiate or approve any annexations to the City. Upon adoption of the plan required by this section, the City may initiate and/or approve annexations consistent with the plan.</p> <p>The City's plan for sphere of influence area shall meet, at minimum, all of the following criteria:</p> <p>a. The plan shall extend, at minimum, the provisions of Proposition R and of Measure N to the sphere of influence area;</p> <p>b. The plan shall identify and make provision to protect sensitive wildlife, open space, and agricultural lands;</p> <p>c. The process leading to adoption of the plan and its implementation shall include residents of the sphere of influence area and shall include notice and public hearing; and</p> <p>d. The plan shall require that upon annexation, new development in the sphere of influence area shall pay all costs of providing public services and urban infrastructure to such development.</p>	<p>Not Applicable. The proposed Project is not within the City's Sphere of Influence.</p>
<p>Conformance of General Plan and Code. The Redlands City General Plan and this code shall be amended forthwith to conform with the requirements of Measure N. To the extent that any policy or provision of Measure N is not self-executing the City Council shall promptly enact such regulation and ordinances as may be necessary to carry out the purposes, intent and directives hereof. The provisions of Measure N are expressly declared to be minimum requirements.</p>	<p>Would not Apply. Proposed development projects within the TVPA would not be required to comply with Proposition R, as amended by Measure N.</p>

Multiple Family / Single Family Unit Mix

If the proposed Project is approved, housing units within the TVPA would not count toward the Measure U planning goal of achieving a mix of 75 percent single family and 25 percent multiple family housing units citywide. As a result, future projects could increase density within the TVPA changing the overall percentage of single and multiple family residential units in the City. The housing units shown in Table 4.1-2, *Population and Housing Units 2000 – 2019*, shows that the existing ratio of conventional

4. Environmental Analysis

LAND USE AND HOUSING

single-family homes to other housing types may currently exceed the 75/25 percent expectation outlined in the 2035 General Plan. Encouraging more density in the TVPA may reduce expectations to build higher density in the remainder of the community allowing the ratio in those areas of the City to remain unchanged or move closer to the citywide goal of 75/25 multiple-/single-family residences.

Table 4.1-2 Population and Housing Units 2000 - 2019

Year	POPULATION			HOUSING UNITS					Units per Year	Persons per Household
	Total	Household	Group Quarters	Total	Single Detached	Two to Five+	Mobile Homes	% Two To Five+		
2000	64,308	62,312	1,996	24,982	16,868	7,197	917	28.81%		2.63
2001	65,678	63,642	2,036	25,205	17,018	7,251	936	28.77%	223	2.66
2002	66,753	64,676	2,077	25,423	17,164	7,304	955	28.73%	218	2.69
2003	67,641	65,524	2,117	25,580	17,331	7,273	976	28.43%	157	2.72
2004	68,471	66,314	2,157	25,874	17,630	7,248	996	28.01%	294	2.72
2005	68,738	66,541	2,197	26,182	17,832	7,336	1,014	28.02%	308	2.71
2006	68,670	66,433	2,237	26,370	17,977	7,362	1,031	27.92%	188	2.69
2007	68,726	66,448	2,278	26,539	18,085	7,406	1,048	27.91%	169	2.68
2008	68,617	66,299	2,318	26,604	18,159	7,381	1,064	27.74%	65	2.67
2009	68,752	66,394	2,358	26,636	18,201	7,354	1,081	27.61%	32	2.68
2010	68,747	66,379	2,368	26,634	18,203	7,346	1,085	27.58%	-2	2.68
2011	69,418	67,050	2,368	26,664	18,233	7,346	1,085	27.55%	30	2.70
2012	69,843	67,475	2,368	26,685	18,235	7,365	1,085	27.60%	21	2.71
2013	70,026	67,658	2,368	26,703	18,234	7,384	1,085	27.65%	18	2.70
2014	70,185	67,817	2,368	26,703	18,236	7,382	1,085	27.64%	0	2.72
2015	70,827	68,459	2,368	26,762	18,294	7,382	1,086	27.58%	59	2.74
2016	71,033	68,665	2,368	26,787	18,319	7,382	1,086	27.56%	25	2.74
2017	71,236	68,868	2,368	26,903	18,350	7,467	1,086	27.76%	116	2.76
2018	71,441	69,073	2,368	26,973	18,420	7,467	1,086	27.68%	70	2.77
2019	71,839	69,471	2,368	27,045	18,496	7,463	1,086	27.59%	72	2.78

Source: California Department of Finance Demographic Research Unit, E-8 and E-5 Reports

Density and Height Limitation

Without making all of the following findings, and a 4/5ths vote of the total authorized membership of the City Council to approve a project, a development project is limited to a density of 18 units per acre and 35 feet in height:

1. There are substantial and overriding economic or social benefits to the City and its residents and taxpayers from the proposed density or height increase.

4. Environmental Analysis

LAND USE AND HOUSING

2. The proposed density or height increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly.
3. The proposed density increase will not have a growth-inducing effect on other property.
4. The resulting use will be compatible with uses on adjacent land.
5. The proposed density increase will not require substantial expansion of public infrastructure, facilities or services.

The proposed Project would remove the requirement for these findings within the TVPA allowing the 2035 General Plan maximum of 27-units to the acre to apply without the need for a 4/5ths vote. The RMC however, will still apply to multiple family residential development larger than a fourplex within the TVPA. The Architectural Review Criteria (RMC Section 18.20.170) establish the following must be considered by the Commission in review of the project:

1. Site layout, orientation, location of structures and relationship to one another, as well as open spaces and topography;
2. Harmonious relationship of building with existing and proposed adjoining developments;
3. Maximum height, area, setbacks and overall mass of buildings, as well as other structures such as walls, screens, towers or signs, and effective concealment of all mechanical equipment;
4. Harmony of construction materials and colors in relation to all exterior elevations;
5. Location and type of planting, with due regard for the preservation of specimen trees upon a site;
6. Design and appropriateness of signs in relation to the architectural style of the building;
7. Glazing or image reflective surfaces (specular reflectance) shall be limited to a maximum reflectance value of twenty five percent (25%).

The findings for approval of a site plan in the RMC are similar to those in Measure U and will continue to apply to projects within the TVPA. The difference is that if the proposed Project is approved, the Council can approve projects with a simple majority rather than a 4/5ths vote.

If the proposed Project is approved, a 4/5ths vote would not be necessary to exceed the 35-foot height limitation of Measure U within the TVPA. However, the 4-story limit established in the R-3 Multiple-Family Residential District would apply. zoning standard established by Section 18.60.120 of the RMC.

As shown in Table 4.1-3, *Maximum Potential Unit Yield within the TVPA Without 4/5ths Council Vote*, there are approximately 19.03 acres of land zoned for multiple family residential. Table 4.1-3 calculates the change in the number of units that could be built if all the available land was able to accommodate the maximum density allowable in the 2035 General Plan.

4. Environmental Analysis

LAND USE AND HOUSING

Table 4.1-3 Maximum Potential Unit Yield within the TVPA Without 4/5ths Council Vote

Zoning	Acres	Existing Yield	Proposed Project	Difference
Multiple Family Residential	19.03	353	514	171

If the buildout methodology in the 2035 General Plan EIR is followed, the unit yield would be approximately 80 percent of the maximum allowable density resulting in approximately 137 more units that could occur without a 4/5ths vote of the Council. The estimated 514 multiple family units is below the 924 units estimated in Table 2.3-4 on page 2-29 of the 2035 General Plan EIR for Transit Village Housing by 2035. The 2035 General Plan EIR evaluated environmental impacts associated with the full 27-units to the acre. No mitigation measures are included in the 2035 General Plan EIR for Land Use and Housing and as the proposed Project is within the development assumptions for the 2035 General Plan EIR. Thus, because the proposed Ballot Initiative does not alter the maximum buildout potential for properties within the TVPA, or the City, and because the land use designations remain the same and the total maximum intensity development remains unchanged, the proposed Ballot Initiative would not have new or more significant impacts with respect to conflicts with existing land use plans.

Annual Residential Unit Cap

The provision of Proposition R which restricts the number of residential permits that could be issued in a single calendar year would not apply within the TVPA if the proposed Project is approved. Table 4.1-2 shows the population growth from 2000 to 2019 as estimated by the California Department of Finance who bases growth, in part, by the numbers of building permits reported by jurisdictions annually. Table 4.1-2 shows that on average, the City added 109 new homes per year. The proposed Project does not represent a significant increase in the number of housing units and does not exceed the estimates in the General Plan EIR used for evaluating buildout of the 2035 General Plan. Therefore, the proposed Ballot Initiative would not result in new or more significant impacts in this regard.

The General Plan EIR indicated on pages 3.10-14 and 3.10-15 that no impacts would occur if the 2035 General Plan does not conflict with any other agencies' land use policies or plans and if amendments to City policies and regulations are detailed in the General Plan. Similarly, as the proposed Project would not result in new or more significant impacts, no impact would occur.

Impact 4.1-3: Project implementation would not result in displacing people and/or housing. [Threshold LU-3]

The 2035 General Plan EIR indicated that the majority of development in the 2035 General Plan area is composed of residential uses, which are not anticipated to undergo substantial land use changes. The 2035 General Plan focuses on infill residential development opportunities in vacant areas in the City, while policies seek to preserve existing neighborhoods. The 2035 General Plan EIR indicated that it would be possible that some homes may be lost in the event of redevelopment of sites where housing currently exists. However, under the 2035 General Plan, the overall number of dwelling units would increase and provide housing to

4. Environmental Analysis

LAND USE AND HOUSING

serve the diverse needs of the community, meaning that potentially displaced people would be able to find housing elsewhere in the community. As indicated in Impact 4.1-2, there would be an increase of 3,422 dwelling units in the City, and of these dwelling units, 1,148 dwelling units would be located in the TVPA.

As stated previously, the proposed Project is a ballot initiative that, if approved by voters, would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. The proposed Project does not propose any specific development. The proposed Project would not increase or change the overall land use buildout assumed and analyzed in the 2035 General Plan EIR, therefore, the proposed Project would not affect population in the City or regional growth as the proposed Project would be consistent with the overall growth forecast assumed in the 2035 General Plan EIR. 2035 General Plan Policy 4-P.2 (“Provide for the expansion of housing and employment opportunities while ensuring a high quality of life is maintained in Redlands”) and Policy 4-P.16 (“Promote a variety of housing types to serve the diverse needs of the community”) would continue to be applicable under the proposed Project. As indicated on page 3.10-16 of the General Plan EIR, the General Plan EIR had less than significant impacts on the displacement of people and housing, and similarly, the proposed Project would not result in new or more significant impacts related to the displacement of people or housing.

4.1.5 Cumulative Impacts

The land use effects of the proposed Project are limited to the TVPA, with all other provisions of the 2035 General Plan applying to the remainder of the City. Cumulative population and housing impacts are assessed relative to the City’s 2035 General Plan and regional plans, including SCAG’s 2016-2040 RTP/SCS population, housing, and employment projections.

The cumulative current and future projects in the City would include projects with residential components. Full build out under the 2035 General Plan would result in an increase of 4,355 dwelling units, which include pipeline housing units and future development under the 2035 General Plan. Therefore, the future buildout scenario within the City would be 31,104 dwelling units, 79,013 residents, and 31,471 households by 2035. Approval of the proposed Project would allow up to a total of 171 dwelling units within the TVPA without a 4/5ths vote of the City Council.

Table 4.1-4, *Projected Population Buildout (2035)*, shows the existing (2016) and projected residential and population growth in the City of Redlands at buildout, as indicated in the General Plan EIR.

4. Environmental Analysis

LAND USE AND HOUSING

Table 4.1-4 Projected Residential Buildout (2035)

	Single-Family Residential	Multi-Family Residential	Total
1. Existing (2016) ¹	19,877	6,872	26,749
2. Pipeline ²	552	381	933
3. Future Development - Total	2,124	1,298	3,422
4. Future Development – Outside of Transit Villages ³	1,900	374	2,274
5. Future Development – Transit Village Housing ⁴	224	924	1,148
Total at Buildout	22,553	8,551	31,104

¹ Data for existing residential housing units was derived from the City's GIS databased as of March 2016.

² Pipeline housing units include projects that were under construction, had been entitled, or were in the planning stage as of November 2016.

³ Future buildout outside of the Transit Villages was estimated for the 20-year horizon of the General Plan. These figures were derived by analyzing the maximum number of potential units that can be built based on proposed land use designations considering historical density growth patterns.

⁴ Housing estimates in the Transit Village areas were calculated separately from the rest of the Planning Area owing to their priority in the planning process. It should be noted that certain factors limit the amount of residential development with the Transit Villages. The most significant of these is the 500-foot AQMD buffer applied along the I-10 freeway. The process of calculating Transit Villages buildout was similar to the process for future buildout outside of the Transit Villages.

As shown in Table 4.1.4, lines 1, 2 and 4 of this table represent existing housing, plus housing approved but not constructed, plus future development outside of the TVPA. If the figures on these three lines are totaled, they represent approximately 74.5 percent single-family and 25.5 percent multiple family. As the target percentages are excluded from the TVPA, line 5 is excluded from the calculations. As calculated, the proposed Project does not result in a change in multiple family/single family percentage in the City as a whole. Measure U only requires that the City "plan for a housing mix at buildout" of 75% single-family and 25% multi-family, for purposes of this SEIR, the calculated 74.5/25.5 percent ratio is acceptable.

As noted in this section, the City can currently approve the maximum allowable density of 27-units to the acre (i.e., the total of 171 dwelling units), as permitted under the 2035 General Plan, by making a series of findings and a 4/5ths vote of the Council. Page 2-31 of the General Plan EIR states that the numbers in Table 4.1.4 evaluated environmental impacts of the 2035 General Plan using the density of 27-units per acre for properties within the TVPA. The result of the proposed Project would be to eliminate the super-majority requirement and potentially allow for more than 400 residential building permits to be issued in a calendar year within the TVPA. The maximum potential buildout of 514 units from Table 4.1-3 of this SEIR, represents less than two years of buildout under the 2035 General Plan. The proposed Project has the potential of accelerating the buildout of the 2035 General Plan by two years. However, no significant cumulative impact is anticipated, as the total unit yield is within the estimates evaluated in the 2035 General Plan EIR and below the regional population estimates for the City. The proposed Project's contribution to land use, population and housing, is not considered cumulatively considerable.

4.1.6 References

Southern California Association of Governments (SCAG). 2016, April 7. Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life.
<http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>.

4. Environmental Analysis

4.2 TRANSPORTATION

This section of the Draft SEIR evaluates the potential transportation impacts of the proposed Project compared to the transportation impacts of the General Plan EIR.

4.2.1 Environmental Setting

4.2.1.1 REGULATORY BACKGROUND

Federal

Surface Transportation Assistance Act (STAA)

The federal government passed the STAA in 1982. STAA requires states to allow larger trucks on the “national network,” which is comprised of the interstate system plus the non-interstate federal-aid primary system. “Larger trucks” include (1) doubles with 28.5-foot trailers, (2) singles with 48-foot semi-trailers and unlimited kingpin-to-rear axle distance, (3) unlimited length for both vehicle combinations, and (4) widths up to 102 inches. I-5 and SR-78 are defined as STAA routes.

State

California Department of Transportation (Caltrans)

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its jurisdiction, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities, but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

California Transportation Commission (CTC)

The CTC consists of nine members appointed by the Governor of California. Responsibilities of the CTC include the programming and allocation of funds for the construction of highway, passenger rail, and transit improvements throughout the state. The CTC is also responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

California Complete Streets Act (AB 1358)

The California Complete Streets Act (AB 1358) of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 requires circulation element updates to address the transportation system from a multi-modal perspective. The Act indicates that streets, roads, and highways must “meet the needs of all users in a manner suitable to the rural, suburban, or urban context of the general plan.” The Act requires a

4. Environmental Analysis

TRANSPORTATION

circulation element to plan for all modes of transportation where appropriate, including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act, or SB 375, provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing GHG emissions by AB 32.

SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth, called a Sustainable Communities Strategy (SCS), to its transportation plan. The SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower GHG emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the emissions target for their region. The Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and SCS were adopted in 2016.

Senate Bill 743 (SB 743)

On December 28, 2018, the California Natural Resources Agency adopted revised State CEQA Guidelines. One revision that the Natural Resources Agency made to the State CEQA Guidelines was to add language regarding how lead agencies should determine the significance of transportation impacts. Specifically, According to State CEQA Guidelines, section 15064.3, generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. Lead agencies can opt into the revised transportation guidelines now, but the new guidelines must be used starting July 1, 2020. Once adopted, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099(b)(2)). The City has not adopted revised traffic impact analysis guidelines. The SB 743 Legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements that require evaluation of LOS, but starting July 1, 2020, these metrics may no longer constitute the sole basis for determining transportation impacts under CEQA.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a regional council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, which encompass over 38,000 square miles. SCAG is the federally recognized metropolitan planning organization (MPO) for this region and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed

4. Environmental Analysis TRANSPORTATION

development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. The City of Redlands is within the San Bernardino Council of Governments sub-region of SCAG.

2016 Regional Transportation Plan / Sustainable Communities Strategy

The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016. Major themes in the 2016 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems management; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection and economic opportunity; and incorporating the principles of social equity and environmental justice into the plan.

The SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that would achieve the regional GHG emissions reduction targets identified by the California Air Resources Board. However, the SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

San Bernardino Congestion Management Plan (CMP)

The CMP was enacted by Proposition 111, passed by voters in 1990, to address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California. The intent of the CMP is to provide the analytical basis for transportation decisions through the Statewide Transportation Improvement Program (STIP) process, a multi-year capital improvement program for transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources.

The San Bernardino County CMP, published and periodically updated by SANBAG, defines a network of state highways and arterials in the County and provides guidelines regarding level of service standards, impact criteria, and a process for mitigation of impacts on CMP facilities in the County. The minimum acceptable level of service (LOS) for CMP facilities is LOS E, with certain exceptions. The 2016 Congestion Management Program was updated in June 2016.

Local

Measure U

Voters in the City of Redlands passed Measure U in 1997. Principle 6 of the Measure states:

- a) Levels of Traffic Service throughout the City Shall be Maintained – To assure the adequacy of various public services and to prevent degradation of the quality of life experienced by

4. Environmental Analysis

TRANSPORTATION

the citizens of Redlands, all new development projects shall assure by appropriate mitigation measures that, at a minimum, traffic levels of service are maintained at a minimum of LOS C throughout the City, except where the current level of service (LOS) is lower than LOS C, or as provided in Section 5.20 of the Redlands General Plan where a more intense LOS is specifically permitted. In any location where the LOS is below C at the time an application for development project is submitted, mitigation measures shall be imposed on that development project to assure, at a minimum, that the level of traffic service is maintained at levels of service that are no worse than those existing at the time an application for development is filed, except as provided in Section 5.20b.

- b) Collector and Local Street Standards Shall be Maintained – No development project shall be approved which will generate traffic volume on residential collector streets or local residential streets in excess of the standards set forth in the Redlands General Plan at Sections 5.32a and 5.32b. Roadways shall be designed and designated for use in accordance with the standards set forth in GP Figure 5.3 of the Redlands General Plan.

Certain categories of development are exempt from the requirements of Measure U as listed in Section 2, B. For the non-exempt categories of development, there is little flexibility in modifications to the existing LOS policy.

City of Redlands Bicycle Master Plan

The City of Redlands Bicycle Master Plan which was adopted in 2015 outlines an extensive network with over one hundred additional miles of bicycle facilities (over two hundred lane miles). The City of Redlands Bicycle Master Plan provides a vision for improving the bicycling environment by providing direction for the expansion of the existing bikeway network, connection of gaps, recommendations for bicycle support facilities, and education and awareness programs. The implementation of facilities and programs identified in the Bicycle Master Plan will create a bicycle-friendly environment, and thereby encourage residents and visitors to bike more frequently, which will subsequently lower GHG and create a healthier environment for residents and visitors.

4.2.1.2 EXISTING CONDITIONS

Motor Vehicle Circulation

Motor Vehicle Facilities

Motor vehicles in the 2035 General Plan Area are accommodated by a number of facilities, due in part to its location at the confluence of two major regional freeway facilities, Interstate 10 (I-10) and Interstate 210 (I-210).

Freeways

Freeways are high-speed facilities that serve intercity or regional traffic, with access generally limited to grade-separated interchanges. Highways are also higher-speed, regional facilities, but access is provided at-grade in most cases. The freeways through Redlands are I-10 and I-210.

4. Environmental Analysis TRANSPORTATION

Arterial Roadways

Arterial streets provide accessibility between major activities centers and residential areas, as well as connectivity to freeways. Most arterials also serve as truck routes. State Route 38 (SR-38) (Lugonia Avenue, Mill Creek Road), Alabama Street, Redlands Boulevard, California Street, and Brookside Avenue are arterial roadways within the 2035 General Plan Area.

Major arterial roadways typically provide four to six travel lanes. They usually provide service for the highest volumes and the longest trips and are reasonably higher-speed routes. Minor arterial roadways enhance the major arterial network and are typically two to four travel lanes. They provide service to trips of moderate lengths.

Collector Streets

Collector streets link residential and commercial areas to each other and to the arterial street system. Two travel lanes are typically provided on collector streets, and the maximum acceptable volumes may be based on neighborhood concerns rather than traffic capacity.

Local Streets

Local streets accommodate low volumes of local traffic and primarily provide access to individual parcels. Local streets typically have two travel lanes (one in each direction) and allow parking on both sides. Through traffic is generally discouraged.

Signalized Intersections

There are 93 signalized intersections within the Redlands city limits, as shown in Figure 3.15-2, *Signalized Intersections*, of the General Plan EIR. The City of Redlands operates and maintains 68 of the traffic signals; the remainder are owned by either Caltrans or the County.

Motor Vehicle Level of Service

Methodology

As the General Plan EIR evaluated full buildout of the 2035 General Plan, this Draft SEIR evaluates the potential unit yield that could result with approval of the proposed Project. If the proposed Project is approved, the City could approve multiple family residential development at 27 units per acre without a 4/5ths vote of the Council. As shown in Table 4.2-1, the proposed Project could generate approximately 930 daily trips, or roughly 62/75 AM/PM peak hour trips respectively. These trips were compared to the analysis in the General Plan EIR to determine if the proposed Project would change the conclusions of the analysis. For purposes of this Draft SEIR these units are considered “new” even though the General Plan EIR evaluated buildout at the maximum 27 units per acre, and the units could be approved currently with a 4/5ths vote.

4. Environmental Analysis

TRANSPORTATION

Table 4.2-1 Trip Generation With and Without 4/5ths Vote

Land Use	Units		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Multifamily Housing (Mid-Rise) ¹		DU	5.440	0.094	0.266	0.360	0.268	0.172	0.440
Project Trip Generation									
Existing Yield (Current TVPA) With 4/5 Vote	343	DU	1866	32	91	123	92	59	151
Proposed Project Without 4/5 Vote	514	DU	2796	48	137	185	138	88	226
Allowed with Simple Majority	171	DU	930	16	46	62	46	29	75

DU = Dwelling Unit

¹ Trip rates from the Institute of Transportation Engineers, *Trip Generation*, 10th Edition, 2017. Land Use Code 221 - Multifamily Housing (Mid-Rise).

4.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2.a Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- T-2.b Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). (VMT)
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

Threshold T-2.a is the threshold that was analyzed on the General Plan EIR, under the previous version of Appendix G of the CEQA Guidelines. As of 2019, the Appendix G checklist of the CEQA Guidelines was updated, and Threshold T-2.b replace T-2.a. This Draft SEIR analyzes both thresholds.

As no development is proposed by the Project, and none of the growth management policies affect design requirements for safety and access, there is no impact to thresholds T-3 and T-4, and they are not discussed further in this section, but are included in Chapter 5 of the Draft SEIR.

4. Environmental Analysis TRANSPORTATION

4.2.3 Summary of Impacts Associated with the General Plan EIR

Implementation of the 2035 General Plan is anticipated to increase traffic volumes on the study intersections, roadway segments and freeway segments. For purposes of determining the significance of impacts, the impact analysis of the General Plan EIR compared the 2035 General Plan in year 2035 to existing conditions in year 2015.

- Within the cities of Redlands and Loma Linda, none of the study intersection or roadway segment levels of service are forecast to degrade from acceptable LOS C or worsen at a facility currently operating unacceptably. Based on Caltrans significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by adding traffic to deficient facilities at two intersections, two roadway segments, and four freeway segments. Based on County of San Bernardino significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by worsening LOS at deficient facilities at two intersections (Intersections of Alabama Street and Lugonia Avenue, and Orange Street and Lugonia Avenue) and one roadway segment (Alabama Street – Palmetto Avenue and Pioneer Avenue). Based on County of San Bernardino significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by worsening LOS at deficient facilities at the Alabama Street from Palmetto Avenue and Pioneer Avenue intersection.
- Without the implementation of the roadway improvement policies of the 2035 General Plan, one of the CMP study roadway segment's LOS worsens at a facility already operating at LOS F, which results in a significant and unavoidable impact.

The 2035 General Plan would result in less than significant impacts according to Criteria 3, 4 and 5. For Criterion 3, the proposed General Plan would not result in a change in air traffic patterns. For Criterion 4, the proposed General Plan would not result in inadequate emergency access. Lastly, for Criterion 5, the 2035 General Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

4.2.4 Environmental Impacts of the Proposed Project

Impact 4.2-1: The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. [Threshold T-1]

Impacts of the 2035 General Plan on the vehicular network were forecasted for intersection, roadway, and freeway analysis. According to Table 3.15-9, *Future (Year 2035) plus Project Intersection Level of Service*, of the General Plan EIR, the following intersections, which are within the TVPA, would result in traffic levels of service (LOS) of less than "C:" #19 Colton Avenue and Eureka Street, #21 Colton Avenue and University Street, and #22 Colton Avenue and Judson Street in the year 2035. The General Plan EIR states that using the relevant impact criteria, and assuming the implementation of improvements in the 2035 General Plan, none of the intersections would expect significant impacts with the full 2035 General Plan buildout.

4. Environmental Analysis

TRANSPORTATION

Moreover, Table 3.15-11, *Future (Year 2035) plus Project Roadway Segment Level of Service*, of the General Plan EIR, shows that none of the study roadway segments in 2035 would operate at unacceptable levels of service, assuming full implementation of the 2035 General Plan improvements. Additionally, segment #54 of I-10, from Tennessee Street to Orange Street, would operate at a LOS C or better in 2035, while segment #55 of I-10, from 6th Street to University St, which is within the TVPA would operate at a LOS E in 2035, as shown in Table 3.15-13, *Future (Year 2035) plus Project Freeway Segment Level of Service*, of the General Plan EIR.

The 2035 General Plan includes policies and actions addressing changes in vehicle LOS resulting from buildout. Additionally, the 2035 General Plan includes policies and actions that strengthen and expand the non-motorized transportation system and would not conflict with any established plans, ordinances, or policies establishing measures of effectiveness for these forms of circulation.

Upon implementation of the proposed Project, the requirement for the maintenance of traffic levels of service “C” for all intersections when considering new development, would no longer apply within the TVPA. However, the General Plan EIR indicated that the intersections within the TVPA would not result in significant impacts if improvements are implemented, and, as shown in Table 3.15-11, none of the roadway segments would result in a LOS of less than C. Segment #55 of the I-10 would be the only freeway segment in the TVPA that would result in a LOS of less than C in 2035. Because the freeway system is not within the City of Redland’s jurisdiction, as impacts on the freeway system would occur due to regional growth, regardless of the implementation of the 2035 General Plan, impacts would be significant and unavoidable. The proposed Project would implement the following policies and actions of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.42, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Policy 5-P.10 requires developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network, which would ensure sufficient funds are allocated for roadway improvements. As indicated on page 3.15-34 of the General Plan EIR, the impacts of the General Plan EIR are significant and unavoidable as eight of the proposed improvements are located on facilities that are partially or fully controlled by other jurisdictions, and the City cannot guarantee implementation. As the proposed Project would not result in new or more significant impacts in this regard, impacts of the General Plan EIR and the proposed Project would be the same.

Impact 4.2-2: Adoption of the General Plan would conflict with an applicable congestion management plan (CMP) including, but not limited to level of service standards and travel demand measures, or standards established by the county congestion management agency for designated roads or highways. [Threshold T-2.a]

Page 3.15-27 of the General Plan EIR, states that the performance criteria used for facilities in the SANBAG San Bernardino County CMP facilities are as follows:

- LOS E is the minimum acceptable level of service
- Projects that degrade LOS E to LOS F, or worsen conditions at facilities already operating at LOS F will result in a significant impact.

4. Environmental Analysis

TRANSPORTATION

If all the proposed 2035 General Plan improvements were to be implemented, then six CMP intersections and 14 CMP roadway segments within the 2035 General Plan Area would not degrade existing levels of service below acceptable levels or further degrade existing unacceptable level of service. However, as stated on page 3.15-49 of the General Plan EIR, some improvements of the General Plan EIR are partially or fully within the control of other jurisdictions and cannot be guaranteed by the City, and without the proposed improvements, the LOS would worsen at a roadway segment, Alabama Street from Palmetto Avenue and Pioneer Avenue, already operating at LOS F. This would result in a significant and unavoidable impact under the General Plan EIR. However, as this roadway segment is not within the TVPA, and the proposed Project does not increase density or intensity of development beyond what was analyzed in the General plan EIR, impacts of the proposed Project would not result in new or more significant impacts. Moreover, the proposed Project would implement the following policies and actions of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.42, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Action 5-A.46 calls for the avoidance of adding traffic to collector and local streets carrying volumes above capacity, and to consider traffic control measures where volumes exceed the standard and perceived nuisance is severe.

Impact 4.2-3: The proposed Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Threshold T-2.b]

The proposed Project would remove the requirement for the maintenance of traffic levels of service “C” for all intersections within the TVPA, or for areas where LOS C is already exceeded, assure that it does not degrade as a result of development. Even though, beginning July 1, 2020, the City will generally measure transportation impacts using VMT instead of LOS, LOS remains relevant to the City’s analysis of a subsequent project’s merits because projects must still comply with the Circulation Element of the General Plan that has policies regarding level of service.

The proposed Project would not increase or change the overall land use buildout assumed and analyzed in the General Plan EIR. Therefore, the proposed Project would not affect the projected traffic assumed in the 2035 General Plan and remains consistent with the regional growth forecast. The proposed Project would continue to implement the following policies and actions of the 2035 General Plan as stated in the discussion beginning on page 3.15-57 of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Action 5-A.46 calls for the avoidance of adding traffic to collector and local streets carrying volumes above capacity and requires consideration of traffic control measures where volumes exceed the standard and perceived nuisance is severe.

The proposed Project is intended to allow the City to consider future projects that would be designed to maximize access to planned transit stops within the TVPA. The expectation is that future residents would use the transit stops in lieu of at least some of the vehicle trips ordinarily associated with development. No physical project or change in land use density is part of the proposed Project. Instead, the proposed Project removes existing impediments to City consideration of transit-oriented design (TOD) features such as higher density, mid-rise buildings, and new general plan designations, within the TVPA. With the combination of

4. Environmental Analysis

TRANSPORTATION

appropriate project design, oriented around future transit stations, the City anticipates a reduction in VMT as future residents will have more transportation options within the TVPA than currently exist.

As the proposed Project does not provide for more development than currently projected in the 2035 General Plan and analyzed in the General Plan EIR, and as future development can take advantage of currently planned transit routes allowing for a reduction in VMT, the proposed Project is consistent with CEQA Guidelines Section 15064.3, subdivision (b) and with the conclusion in on page 3.15-60 of the General Plan EIR, this impact is less than significant impact.

4.2.5 Cumulative Impacts

While the proposed Project is limited to the TVPA, traffic may have impacts that extend outside of the Project area. As the proposed Project does not increase any land designation or result in the approval of any development, the analysis of the 2035 General Plan contained in the General Plan EIR remains unchanged. Future development requests that may follow the proposed Project would likely be evaluated under both the LOS and VMT standards as the former remains in the General Plan Circulation Element and the latter is the new method for measuring transportation impacts. The City has latitude in considering compliance with the 2035 General Plan.

While not part of the proposed Project, its approval may lead to projects that help realize the vision of the 2035 General Plan as stated in Section 4.5 Transit Villages:

“These are intended as a foundation for realizing the goal of a connected, accessible, and active community by creating pedestrian- and transit-oriented villages that reflect each station area’s existing assets and unique characteristics. Components of the strategy serve to improve connectivity between the proposed Transit Villages and the city’s existing neighborhoods; provide new jobs, housing, and entertainment opportunities in compact, walkable environments; support multiple modes of transit, car travel, walking, and bicycling; and provide new development and infill opportunities as alternatives to building at the edges of the city.”

The General Plan EIR evaluated buildout of the TVPA within a 20-year horizon and as shown in Table 4.2-2, *Future (Year 2035) Plus Project Intersections, Roadway and Freeway Segments Level of Service*, determined that all intersections, and roadway and freeway segments would operate at a LOS of C or better in 2035, except for freeway Segment #55, which would continue to operate at a LOS of E in 2035.

4. Environmental Analysis TRANSPORTATION

Table 4.2-2 Future (Year 2035) Plus Project Intersections, Roadway and Freeway Segments Level of Service

INTERSECTIONS									
#	North/South Street	East/West Street	Control	Jurisdiction	Peak Hour	Existing		Future Plus Project	
						Delay	LOS	Delay	LOS
19	Eureka St.	Colton Ave.	Signal ¹	City of Redlands	AM	9.9	A	6.4	A
					PM	43.8	E	11.6	B
21	University St.	Colton Ave.	AWSC	City of Redlands	AM	>50	F	12.8	B
					PM	>50	F	10.6	B
22	Judson St.	Colton Ave.	AWSC	City of Redlands	AM	37.9	E	7.9	A
					PM	15.9	C	7.0	A
ROADWAY SEGMENTS									
#	Roadway	Extent	Classification	Jurisdiction	Capacity	Existing		Future Plus Project	
						ADT	LOS	ADT	LOS
8	Cajon St.	Vine St. and Olive St.	2-Lane Minor Arterial	City of Redlands	16,500/18,1003	10,110	C or better	10,500	C or better
12	Church St.	Stuart Ave. and Central Ave.	2-Lane Collector	City of Redlands	16,100	7,222	C or better	7,300	C or better
13	Citrus Ave.	6th St. and Olive St.	2-Lane Minor Arterial	City of Redlands and CMP	16,500/18,1003	9,262	C or better	9,500	C or better
19	Eureka St.	North of Redlands Blvd.	4-Lane Minor Arterial	City of Redlands	33,100	14,844	C or better	15,400	C or better
37	Redlands Blvd.	Cypress St. and Palm Ave.	4-Lane Major Arterial	City of Redlands and CMP	33,100/36,4003	12,834	C or better	15,900	C or better
44	Tennessee St.	I-10 and Colton Ave.	4-Lane Minor Arterial	City of Redlands ²	33,100/36,4003	22,322	C or better	25,200	C or better
45	Tennessee St.	State St. and Orange St.	4-Lane Minor Arterial	City of Redlands	33,100/36,4003	12,725	C or better	12,800	C or better
FREEWAY SEGMENTS									
#	Freeway	Extent	Classification	Capacity	Existing		Future Plus Project		
					ADT	LOS	ADT	LOS	
54	I-10	Tennessee St. to Orange St.	10-Lane Freeway	161,100/201,400	104,000	C or better	126,100	C or better	
55	I-10	6th St. to University St.	10-Lane Freeway	161,100/201,400	157,000	E	181,900	E	

Source: General Plan EIR (Tables 3.15-9, 3.15-11, 3.15-13)

AWSC = All Way Stop Controlled

CMP = San Bernardino County Congestion Management Plan

¹ This intersection is assumed to be signalized in future scenarios

² Segment is within the "donut hole"

While the requirement for the maintenance of traffic levels of service "C" for all intersections would no longer apply within the TVPA, as shown in Table 4.2-2, buildout of the 2035 General Plan all intersections and roadways within the TVPA would operate at or better than LOS C. Additionally freeway segment # 54 would also operate at a LOS of C or better, and only freeway segment #55 would continue to operate at a LOS of E. The freeway system is not within the City's jurisdiction and impacts on the freeway system are related to regional growth that would occur regardless of the implementation of the 2035 General Plan. The General Plan EIR determined that impacts to this portion of the freeway would be significant and unavoidable. As the proposed Project does not change land use or density of that would change the buildout calculations of the 2035 General Plan, the impact analysis summary contained on page 3.15-33 of the

4. Environmental Analysis

TRANSPORTATION

General Plan EIR remains unchanged. Therefore, the proposed Project does not result in cumulatively considerable impacts beyond those evaluated in the General Plan EIR.

4. Environmental Analysis

4.3 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Subsequent Environmental Impact Report (Draft SEIR) evaluates the potential impacts to utilities and service systems as a result of the proposed Project, as compared to the General Plan EIR.

4.3.1 Environmental Setting

4.3.1.1 REGULATORY BACKGROUND

Federal

Clean Water Act and National Pollution Elimination Discharge System

Wastewater treatment, before effluent is discharged to Waters of the United States, is required by the federal Clean Water Act (United States Code, Title 33, Sections 1251 et seq.) Requirements for waste discharges from publicly owned treatment works to navigable waters are addressed in National Pollution Elimination Discharge System (NPDES) regulations under the Clean Water Act. NPDES permits for such discharges in the project region are issued by the Santa Ana Regional Water Quality Control Board.

Federal Safe Drinking Water Act

The o Act, which is administered by the United States Environmental Protection Agency (EPA), ensures the quality of drinking water. Under this Act, the EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The Department of Public Health administers the Federal Safe Drinking Water Act's regulations in California.

United States Environmental Protection Agency (EPA)

The 1986 amendments to the Safe Drinking Water Act and the 1987 amendments to the Clean Water Act established the Environmental Protection Agency (EPA) as the primary authority for water programs. The EPA is the federal agency responsible for providing clean and safe surface water, groundwater, and drinking water, and protecting and restoring aquatic ecosystems. The City of Redlands is in EPA Region 9 (Pacific Southwest).

State

California Urban Water Conservation Council

The San Bernardino Valley Municipal Water District (SBVMWD) is a signatory to the California Urban Water Conservation Council (CUWQCC) Memorandum of Understanding (MOU) Regarding Urban Water Conservation in California; the City of Redlands is a retail agency within the SBVMWD service area (SBVMWD 2017). The CUWCC was established to increase efficient water use statewide through partnerships among urban water agencies, public interest organizations, and private entities. The CUWCC's goal is to integrate urban water conservation best management practices (BMPs) into planning and managing

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

California's water resources. Those signing the MOU pledge to develop and implement 14 comprehensive BMPs.

State Updated Model Landscape Ordinance (Assembly Bill 1881 (2006))

The State's updated Model Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by January 31, 2010. In 2009, the City of Redlands passed Ordinance No. 2724 adopting a Drought Response Plan and Water Conservation Program that has been implemented in the City's Municipal Code Chapter 15.54, *Water Efficient Landscape Requirements*, in response to Assembly 1881.

California State Water Resources Control Board

The State Water Resources Control Board (SWRCB) and nine regional water quality control boards address water quality and rights regulation. Created in 1967, the five-member SWRCB protects water quality by setting statewide policy, coordinating and supporting the Regional Water Quality Control Board (RWQCB) efforts, and reviewing petitions that contest the actions of the RWQCB. The SWRCB is also solely responsible for allocating surface water rights. On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (WDR) (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipe. The Order provides a consistent statewide approach to reducing sanitary sewer overflows (SSOs) by requiring public sewer system operators to take all feasible measures to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a sewer system management plan. In 2009, the Redlands City Council approved the City's Sewer System Management Plan (SSMP) and includes an overflow emergency response plan; operation and maintenance program; fats, oils, and grease plan; design and performance standards; system capacity plan; and communications program.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

Senate Bills 610 and 221

To assist water suppliers, cities, and counties in integrating water and land use planning, the state passed Senate Bill (SB) 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001), effective January 1, 2002. SB 610 and SB 221 improve the link between information of water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 are companion measures that promote more collaborative planning between local water suppliers, cities, and counties. Both require detailed

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

information regarding water availability to be provided to city and county decision makers prior to approval of specified large development projects. This detailed information must be included in the administrative record as the evidentiary basis for an approval action by the city or county on such projects. The statutes recognized local control and decision making regarding the availability of water for projects and the approval of projects. SB 610 and SB 221 are not applicable to general plans, however, future projects subject to SB 610 and SB 221 are required to provide a water supply assessment. Under SB 610, water supply assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA, as defined in Water Code Section 10912[a]. Under SB 221, approval by a city or county of certain types of residential subdivision requires an affirmative verification of sufficient water supply. SB 221 is intended as a fail-safe to ensure collaboration on finding the needed water supplies to serve a new large subdivision before construction begins. General plans serve as an important planning tool for the local water supply when they prepare the 20-year vision for the Urban Water Management Plan (UWMP).

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983, California Water Code Sections 10610 et seq., requires preparation of a plan that:

- Plans for water supply and assesses reliability of each source of water, over a 20-year period, in 5-year increments.
- Identifies and quantifies adequate water supplies, including recycled water, for existing and future demands in normal, single-dry, and multiple-dry years.
- Implements conservation and the efficient use of urban water supplies. Significant new requirements for quantified demand reductions have been added by the Water Conservation Act of 2009 (SBX7-7), which amends the act and adds new water conservation provisions to the Water Code.

The Urban Water Management Planning Act states that every urban water supplier that provides water to 3,000 or more customers or provides over 3,000 acre-feet of water per year (afy) should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The UWMP is identified as a planning document that can be used by a water supplier to meet the standards in both SB 210 and SB 221.

Principles Governing CEQA Analysis of Water Supply

In *Vineyard Area Citizens for Responsible Growth, Inc., v. City of Rancho Cordova* (February 1, 2007), the California Supreme Court articulated the following principles for analysis of future water supplies for projects subject to CEQA:

- To meet CEQA's informational purposes, the EIR must present sufficient facts to decision makers to evaluate the pros and cons of supplying the necessary amount of water to the project.
- CEQA analysis for large, multiphase projects must assume that all phases of the project will eventually be built, and the EIR must analyze, to the extent reasonably possible, the impacts of providing water to the

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

entire project. Tiering cannot be used to defer water supply analysis until future phases of the project are built.

- CEQA analysis cannot rely on “paper water.” The EIR must discuss why the identified water should reasonably be expected to be available. Future water supplies must be likely rather than speculative.
- When there is some uncertainty regarding future availability of water, an EIR should acknowledge the degree of uncertainty, include a discussion of possible alternative sources, and identify the environmental impacts of such alternative sources. Where a full discussion still leaves some uncertainty about long-term water supply, mitigation measures for curtailing future development in the event that intended sources become unavailable may become a part of the EIR’s approach.
- The EIR does not need to show that water supplies are definitely ensured, because such a degree of certainty would be “unworkable, as it would require water planning to far outpace land use planning.” The requisite degree of certainty of a project’s water supply varies with the stage of project approval. CEQA does not require large projects, at the early planning phase, to provide a high degree of certainty regarding long-term future water supplies.
- The EIR analysis may rely on existing urban water management plans, as long as the project’s demand was included in the water management plan’s future demand accounting.
- The ultimate question under CEQA is not whether an EIR establishes a likely source of water, but whether it adequately addresses the reasonably foreseeable impacts of supplying water to the project.

California Emergency Graywater Regulations

In 2009, as part of the Governor’s declared State of Emergency, Chapter 16A, *Nonpotable Water Reuse System*, was incorporated into the 2007 California Plumbing Code. Chapter 16A establishes minimum requirements for installing graywater systems in residential occupancies regulated by the California Department of Housing and Community Development, and provides guidance and flexibility designed to encourage the use of graywater. The purpose of the regulations is to conserve water by facilitating greater reuse of discharge from laundry, shower, sink, and similar sources for irrigation and/or indoor use; to reduce the number of noncompliant graywater systems by making legal compliance easily achievable; to provide guidance for avoiding potentially unhealthful conditions; and to provide an alternative way to relieve stress on private sewage disposal systems.

California Integrated Waste Management Act (AB 939)

California’s Integrated Waste Management Act of 1989 (AB 939, Public Resources Code 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Solid Waste Diversion (AB 341)

AB 341, which came into effect on July 1, 2012, requires that commercial enterprises that generate four cubic yards or more of solid waste on a weekly basis participate in recycling programs. This requirement also includes multifamily housing complexes of five units or more, regardless of the amount of solid waste generated each week. AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses.

California Department of Resources Recycling and Recovery

California Department of Resources Recycling and Recovery (CalRecycle) is the state's leading authority on recycling, waste reduction, and product reuse. Mandated responsibilities of CalRecycle include reducing waste, promoting the management of all materials to their highest and best use, and protecting public health and safety and the environment.

California Solid Waste Reuse and Recycling Act of 1991

The California Solid Waste Reuse and Recycling Access Act (AB 1327, California Public Resources Code Sections 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The Act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Disposal Measurement System Act of 2008 (SB 1016)

SB 1016 maintains the 50 percent diversion rate requirement established by AB 939, while establishing revised calculations for those entities who did not meet the 50 percent diversion rate. SB 1016 also established a per capita disposal measurement system to make the process of goal measurement as established by AB 939 more accurate. The new disposal-based indicator – the per capita disposal rate – uses two factors: a jurisdiction's population (or sometimes employment) and its disposal as reported by disposal facilities.

California Green Building Standards Code

Section 5.408 of the 2013 California Green Building Standards Code (Title 24, California Code of Regulations, Part 11) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Regional

Upper Santa Ana River Watershed Integrated Regional Water Management Plan (IRWMP)

The most current Integrated Regional Water Management Plan (IRWMP) was developed in 2015; the City was involved in developing and updating the IRWMP. The IRWMP's goals include improving water supply reliability, balancing flood management and increasing stormwater recharge, improving water quality, and improving habitat and open space.

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

San Bernardino Valley Regional Urban Water Management Plan (RUWMP)

The 2015 Regional Urban Water Management Plan (RUWMP) provides a summary of supplies and demand anticipated for the years 2015 to 2040; the City of Redlands is one of the 10 agencies included in the RUWMP. The RUWMP was prepared consistent with SBX7-7, the California Management Planning Act, and the 2015 DWR Guidebook for Urban Water Suppliers.

Local

City of Redlands Water Conservation Plan

The City of Redlands Municipal Code, Chapter 13.06, *Water Conservation Plan*, establishes ways to reduce the nonessential use of water in order to minimize the effects of a water supply shortage due to emergency conditions or droughts. The Plan provides for mandatory cutbacks in water use so as to not endanger the welfare, health, and safety of citizens and property owners within the City. The Water Conservation Plan includes four stages based on the water shortage severity – Stage I, Voluntary Conservation; Stage II, Mandatory Compliance (Water Alert); Stage III, Mandatory Compliance (Water Warning); and Stage IV, Mandatory Compliance (Water Emergency). The Plan may be enacted by the City Council following a public hearing or, if the City Council cannot meet in time, by the City Manager.

City of Redlands Recycling Ordinance

Chapter 13.66, *Recycling Requirements for Specified Development Activity*, of the City's Municipal Code sets forth requirements for recycling for specific development activities to facilitate the City's compliance with state recycling mandates, remove architectural barriers to recycling, and ensure construction and demolition debris is recycled. Chapter 13.66 is applicable to applicants for the demolition of any structure; construction, additions, or improvements to any building other than a single-family residential building; and re-roofing activities. As a condition of approval, applicants are required to submit for review and approval a completed Site and Building Recycling Plan to the Facilities and Community Services Department (formerly the Quality of Life Department), which should include the location and design of all existing and proposed recycling and trash enclosures, design of site access points for solid waste and recycling collection vehicles, site grading design, operational criteria for the proposed use of the property, and capacity requirements for the waste generation of the building. Additionally, Chapter 13.66 specifies requirements for Construction and Demolition Recycling Plans.

City of Redlands Water Efficient Landscape Requirements

The City's Municipal Code, Chapter 15.54, *Water Efficient Landscape Requirements*, establishes requirements to promote the benefits provided by landscapes while recognizing the need to use water as efficiently as possible. Chapter 15.54 requires applicable landscaping projects to submit a landscape documentation package that contains project information; hydrozone information table; water budget calculations; soil management report; and landscape, irrigation, and grading design plans. The Chapter establishes requirements that include provisions for recycled water irrigation systems, and encourages BMPs to increase on-site retention and infiltration.

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

2016 California Plumbing Code

The City has adopted the 2016 California Building Standards Code, which includes the California Plumbing Code (California Code of Regulations, Title 24, Part 5). The Code includes provisions for the design, materials, and installation of water supply and distribution fixtures, sanitary drainage, indirect waste, storm drainage, and non-potable water sources for projects.

4.3.1.2 EXISTING CONDITIONS

Water and Wastewater Systems

Water Supply

The City provides water to the Project area. The City's water system is maintained by its Municipal Utilities and Engineering Department (MUED) and covers most of the City, a small portion of Loma Linda, the unincorporated "Donut Hole," Mentone, and most of Crafton. The City receives its water from the Mill Creek Watershed, Santa Ana River Watershed, local ground water, and the California State Water Project (Redlands 2019a).

Domestic water sources for the City consist of surface water and groundwater production. The City is entitled to surface water from Mill Creek and the Santa Ana River. Water from Mill Creek is available on the basis of rights owned directly by the City, and by virtue of the City's direct and indirect stock ownership in the Crafton Water Company, which has established rights on the remainder of Mill Creek flows. The City's entitlement to Santa Ana River flows has a basis in direct and indirect stock ownership in Bear Valley Mutual Water Company (BVMWC) and other mutual water companies. Water from the Santa Ana River is treated at the Horace Hinckley Surface Water Treatment Plant and water from Mill Creek is treated at the Henry Tate Water Treatment Plant (Redlands 2019a). The City receives its water supply from four sources: imported water, groundwater, surface water, and recycled water (SBVMWD 2017).

Imported Water

Imported State Water Project (SWP) water is available to the City. The San Bernardino Valley Municipal Water District (SBVMWD) has an entitlement of approximately 102,600-acre feet per year (afy) of SWP water (SBVMWD 2015). This water is transported from the Feather River in northern California, along the California Aqueduct, and to the Aqueduct's East Branch, where it is conveyed to the City via the 17-mile Foothill Pipeline.

SBVMWD is the agency responsible for delivering water to its customers and for groundwater recharge in an area extending from Fontana to Yucaipa. The City of Redlands may purchase SWP water from SBVMWD. The City has no entitlement to a set amount of water, but may request it in competition with other cities served by SBVMWD. From the various private and mutual water companies that supply water to the City, the City has the highest shares in the BVMWC (Redlands 2019b). When required, SWP water is treated at the Hinkley and Tate WTPs (Redlands 2019a). Based on a 10-year average, purchased imported water, used by the City at its treatment plants, totals 3 percent of the City's annual water production (SBVMWD 2017).

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Groundwater

The City owns 15 wells that pump directly into the system or into reservoirs, which are adequately separated from sewage facilities (Redlands 2019a). These wells are free from serious flooding hazard. The City also receives water from two wells that are owned by the South Mountain Water Company (Redlands 2019a). The City draws from the Bunker Hill and Yucaipa subbasins of the Upper Santa Ana Valley Groundwater Basin. The Bunker Hill and Yucaipa subbasins have a surface area of approximately 89,600 acres and 25,300 acres, respectively (SBVMWD 2015). The Bunker Hill and Yucaipa subbasins have a groundwater storage capacity of 5,976,000 acre feet (af) and 808,000 af, respectively (SBVMWD 2015).

On July 21, 2004, SBVMWD, Western Municipal Water District of Riverside County, EVWD, Dear Valley Mutual Water Company, Lugonia Water Company, North Fork Water Company, the City of Redlands, and the Redlands Water Company, signed a settlement known as the Seven Oaks Accord; the Accord calls for SBVMWD and Western Municipal Water District of Riverside County to recognize the prior rights of the water users for a portion of the natural flow of the Santa Ana River. The Accord requires SBVMWD and Western Municipal Water District of Riverside County to develop a groundwater spreading program in cooperation with other parties that is intended to maintain groundwater levels (SBVMWD 2017).

Moreover, due to the significance of groundwater management in the IRWM Region, the following three groundwater management needs were established for the Region:

1. **Maximize Conjunctive Use:** The BTAC has developed Conjunctive Use Guidelines for the SBBA that are intended to optimize the storage potential in this basin. Conjunctive use potential should also be evaluated for the other basins in the Region.
2. **Reduce the Risk of Liquefaction:** A significant portion of the SBBA—generally, the downtown and southern portions of the City of San Bernardino—is an area of historically high groundwater. Groundwater levels in this area have been artesian in the past. When high groundwater is combined with the thick layer of sand in the aquifer it can cause liquefaction in an earthquake.
3. **Protect Groundwater Quality:** Groundwater management is currently influenced by the presence of contamination plumes. Most of these plumes resulted from historic military and industrial operations in the Region.

Because groundwater is such an important supply for the Region, these needs were incorporated into the overall IRWM Objectives (SBVMWD 2015).

Surface Water

The City receives its surface water from the Mill Creek Watershed, Santa Ana River Watershed, and SWP water, which totals 45.9 percent of the City's annual water production, based on a 10-year average (SBVMWD 2017).

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Wastewater and Recycled Water

The City owns and operates a wastewater collection system subject to a California Regional Water Quality Control Board: Santa Ana Region (RWQCB), waste discharge requirements established by Order No. R8-2006-0008. The Redlands Wastewater Treatment Facility can treat 9.5 million gallons per day of wastewater and is currently processing approximately 6 million gallons per day (Redlands 2019c). Additionally, recycled water from the Redlands Wastewater Treatment Plant is used for basin recharge, and irrigation and industrial purposes, including supplying water to the Southern California Edison Mountainview Power Plant (SBVMWD 2015). The Redlands Wastewater Treatment Facility has a 7.2-million-gallon tertiary treatment capacity (SBVMWD 2017). All wastewater collected and treated is from the City's service area and discharged within the City's service area; the City utilizes all wastewater collected and treated at the Redlands Wastewater Treatment Facility in its service area for distribution to customers and percolation into Bunker Hill (SBVMWD 2017). Treated wastewater distributed to customers is tertiary treated, which is deemed recycled water (SBVMWD 2017). Based on 2015 volumes, approximately 45 percent of treated wastewater was used as recycled water supply for customers, and 55 percent was used for recharge (SBVMWD 2017).

Water Infrastructure

Potable and Raw Water

The City operates two water treatment plants and uses 15 wells, 37 booster pumps, and 18 reservoirs (SBVMWD 2017; Redlands 2019a). The City serves approximately 24,000 customers with a 5-year average potable water demand of 26,165 acre feet per year (SBVMWD 2017). The City also owns other facilities that are currently not in use due to age, contamination, or other factors (SBVMWD 2017).

The Tate Water Treatment Plant (WTP)'s primary raw water source is Mill Creek (Redlands 2019a). The Tate WTP treats water with two contact clarification type clarifiers, which provide flocculation and sedimentation treatment, and four dual media gravity filters. The design capacity is 20 million gallons per day (Redlands 2019a). The City has added enhancements to the Tate WTP that provide more water supply reliability by allowing SWP water to be mixed with Mill Creek water for treatment (Redlands 2019a).

Distribution System

Existing water transmission and distribution pipelines in the system range in size from 1 to 36 inches in diameter (Redlands 2019a). There are approximately 400 miles of pipeline and 21,500 metered connections that serve domestic water. The system has a 54.5 million gallon maximum storage capacity (Redlands 2019a). The City's service area varies in elevation from approximately 1,100 to 2,600 feet above sea level. This large range of elevation requires a total of seven major pressure zones and two sub-zones to adequately serve all consumers with reasonable water pressures (Redlands 2019a).

Water Consumption

The City's average daily water consumption is 27 million gallons per day with a maximum daily of 50 million gallons per day in the summer (Redlands 2019a). The average consumption per capita is approximately 320 gallons per day (Redlands 2019a).

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Stormwater System

The City has a long history of flooding during moderate to severe storm events; one of the main causes for flooding is the lack of conveyance capacity in the historical channel of Mission Zanja (Redlands 2014). The Mission Zanja is a surface channel that flows from the Crafton Hills area, west to 9th Street, near Downtown Redlands, where it transitions into a box culvert (Redlands 2014). The City's stormwater drainage system serves an approximately 37 square miles. The Downtown drainage system is composed of reinforced concrete pipe and corrugated metal pipe which range in diameter from 8 inches to 96 inches, box culverts, covered rubble rock and concrete channels, and concrete and natural drains. The City's 2014 Master Plan of Drainage identifies infrastructure necessary to help protect the City from a major storm, provides long-range planning for implementation and development of citywide drainage facilities, and determines the cost of implementing the facilities to add capacity to the existing stormwater drainage infrastructure.

Solid Waste

Solid waste collection services are provided by the City for areas within the City limits, including the Project area. The City's Facilities and Community Services Department provides solid waste collection, green waste collection, and curbside recycling. Hazardous waste is managed by the Redlands Fire Department which operates a household hazardous disposal site on a weekly basis.

4.3.2 Methodology

The proposed Project does not increase the number of potential housing units within the TVPA beyond the number evaluated in the General Plan EIR. The proposed Project eliminates the requirements of a 4/5ths vote to approve a project with 27 units to the acre, or a structure in excess of two stories or greater than 35 feet height. For purposes of the Draft SEIR, the difference between the current 18 units per acre permitted with a majority vote, and the 27 units to the acre equals 171 dwelling units within the High Density Residential Zone. These are not considered additional units as the maximum of 27 units to the acre was evaluated in the General Plan EIR but are considered likely if the proposed Project is approved. According to Table 4.1-2 in Chapter 4.1, *Land Use and Housing*, of this SEIR, the change in the number of multi-family dwelling units, if all the available land zoned High Density Residential in the TVPA was able to accommodate the maximum density (27 units/acre) allowable under the 2035 General Plan, is a total of 171 units, or 453 people. The assumptions for utility demand made in the General Plan EIR have been applied to these figures and compared to the conclusions in the General Plan EIR.

4.3.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, would the Project:

- U-1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

- U-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- U-3 Result in a determination by the waste water 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?
- U-4 Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- U-5 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

4.3.4 Summary of Impacts Associated with the General Plan EIR

The General Plan EIR concluded that the 2035 General Plan would result in less than significant impacts to utilities and service systems, including the need for the relocation or construction of water, wastewater treatment, storm drainage, and other facilities; sufficient water supplies; and adequate wastewater treatment facility and landfill capacities. The General Plan EIR indicated that future development would generate additional demand for water, wastewater, stormwater, and solid waste services; however, compliance with federal, state, and local regulations, as well as the 2035 General Plan policies and actions would ensure that the impacts of the 2035 General Plan would be less than significant. The General Plan EIR also indicated that compliance with federal, state, and local water and wastewater regulations and the 2035 General Plan policies and actions would reduce potential impacts on water and wastewater infrastructure needs to less than significant levels. According to the General Plan EIR, compliance with City's grading, drainage, and stormwater regulations would ensure any new facilities required to manage stormwater would have a less than significant impact on the environment. The General Plan EIR stated that potential impacts on solid waste would be reduced through compliance with solid waste regulations such as AB 341 which has been set by CalRecycle to provide 75 percent recycling, composting, or source reduction of solid waste by 2020. Additionally, the General Plan EIR indicated that the implementation of the 2035 General Plan policies and actions would assist the City in complying with this new waste reduction goal; therefore, impacts of the 2035 General Plan Update on solid waste would be less than significant.

4.3.5 Environmental Impacts of the Proposed Project

Impact 4.3-1: Existing and/or proposed facilities would be able to accommodate project-generated utility demands. [Threshold U-1]

The General Plan EIR projected future water supply and demand for the 2015 San Bernardino Valley Regional Urban Water Management Plan (RUWMP) based on existing water system infrastructure. For the General Plan buildout year of 2035, the City assumed a service population of 95,000 which is greater than the 2035 Planning Area population of 93,624 projected for the 2035 General Plan. As stated in the General

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Plan EIR, the 2035 demand for potable and raw water is projected to be 30,313 acre feet (af¹), or an average of 27 million gallons per day (mgd); this amount can sufficiently be accommodated by the City's existing water treatment plants and delivery infrastructure which have a capacity of 35 mgd. The City's 2015 water use was 234 gallons per capita per day (GPCD) (SBVMWD 2017). The 171 housing units would result in approximately 453 residents in the TVPA by buildout of the 2035 General Plan, which was analyzed in the General Plan EIR, the water use would 106,002 GPCD², or roughly 0.11 MGD. This water use is within the 35 MGD capacity of the City's existing water treatment plants and distribution infrastructure.

Additionally, according to the General Plan EIR, the City has a projected average wastewater flow of 6.75 mgd at buildout of the 2035 General Plan; as the projected flow is within the 9.5 mgd secondary capacity and 7.2 mgd tertiary capacity, no new or expanded treatment facilities are required to serve the 2035 General Plan population at buildout. Monthly effluent reports to the RWQCB show that the discharge permit levels for sodium and chloride are exceeded. The City has determined that the exceedances are as a result of wear on filtration media at the plant. The filtration media is a wear-item at the facility and needs to be replaced periodically to remain within discharge requirements. Replacement of the media is considered an on-going operation and maintenance issue for the facility. The physical permitted capacity of the wastewater treatment plant does not need to be expanded to accommodate the projected population in the 2035 General Plan.

Moreover, as stated in the General Plan EIR, development proposed under the 2035 General Plan would allow for the redevelopment of existing developed areas that would generate increased stormwater volumes, which in turn could create a need for new infrastructure. The General Plan EIR indicates that land use designations in the 2035 General Plan would focus new development within the developed footprint of the City, allowing infill projects to take advantage of existing stormwater infrastructure; where most sites that may be developed or redeveloped in the future are already built with impervious surfaces.

The proposed Project would be consistent with the overall growth forecast assumed in the General Plan EIR, as land uses are limited to those in the 2035 General Plan. Therefore, the proposed Project would not require or result in the relocation or construction of existing or proposed facilities beyond what was considered in the General Plan EIR, and no new or substantially greater impacts would occur when compared to those identified in the General Plan EIR. Similar to the General Plan EIR, the proposed Project would comply with state and local regulations, as well as implement the policies and actions of the General Plan EIR: 4-P.56, 4-A.145, 4-A.146, 4-A.148, 6-A.39, 7-A.149, 8-P.4, 8-P.5, 8-P.6, 8-A.22, 8-A.23, 8-A.24, 8-A.25, 8-A.26, 8-A.28, 8-A.29, 6-P.19, 6-P.20, 6-P.21, 6-A.34, 6-A.35, 6-A.36, 6-A.37, 6-A.38, 6-A.39, 6-A.40, 6-A.41, 6-A.42, 6-A.43, and 6-A.44. For example, Action 6-A.39 requires that new development provides landscaping and revegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants. Overall, the proposed Project would be consistent with the less than significant impacts identified in the General Plan EIR, as indicated on pages 3.14-19 through 3.14-21 and page 3.14-25 of the General Plan EIR, and the proposed project would have no new or more significant impacts in this regard.

¹ Acre Foot = 325,851 gallons

² 234 GPCD x 453 people = 106,002 GPCD

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Impact 4.3-2: Available water supplies are sufficient to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. [Threshold U-2]

The General Plan EIR stated that the demand for potable and raw water at buildout for a population of 95,000 in 2035 is projected to be 30,313 af, and demand for recycled water is projected to be 5,402 af; the total demand would be 35,715 af in 2035. The additional 106,002 GPCD represents a total demand of 0.33 af. According to the 2015 RUWMP, the City's projected water supply for 2035 is 64,098 af from existing sources and entitlements (SBVMWD 2017).

According to the General Plan EIR, the City has identified adequate supplies from existing water sources and entitlements to meet demand through 2035. The General Plan EIR indicated that the projected surface water diversions and groundwater extractions from the San Bernardino Basin Area (Bunker Hill Subbasin) in 2035 would be 34,549 af for a population of 101,644. The General Plan EIR stated that the 2015 IRWMP found that this volume, in addition to the requirements of other agencies relying on the Basin Area, could be accommodated as long as extractions over safe yield are recharged to the Basin. The IRWMP showed that projected extractions from the Yucaipa Subbasin by the City of 1,816 af in 2035, would be within the safe yield amount for Yucaipa Subbasin, even when combined with the demands from other agencies, as indicated in the General Plan EIR. Moreover, the City would have adequate supply for multiple dry years; in the event of a water shortage, the City would rely on its Water Conservation Plan. While a series of dry years would reduce supply, the City has the potential to utilize multiple sources and offset normal supplies with additional groundwater and conservation efforts without seeking additional entitlements or water sources, as stated in the General Plan EIR.

The proposed Project does not propose any specific development projects and would not result in an increase or change in the overall buildout land use assumptions analyzed in the General Plan EIR. The proposed Project would not result in any new impacts or increase the severity of impacts, with respect to water supplies. As with the General Plan EIR, the proposed Project would implement the applicable policies and actions of the 2035 General Plan, and would be in compliance with local and regional water management plans, as well as with SBx7-7. Therefore, no new or substantially greater impacts to water supplies would occur under the proposed Project when compared to those identified in the General Plan EIR. The General Plan EIR policies and actions, 8-P.4, 8-P.5, 8-P.6, 8-A.22, 8-A.23, 8-A.24, 8-A.25, 8-A.26, 8-A.28, 8-A.29, 6-P.20, 6-P.21, 6-A.36, 6-A.38, 6-A.39, 7-P.27, and 8-A.16, would continue to be implemented. For example, Action 6-A.39 calls for the maximization of the amount of pervious surfaces in public spaces to permit the percolation of urban runoff. The proposed Project would not result in any new or more significant impacts in this regard, beyond the less than significant impacts identified in the General Plan EIR, on page 3.14-29 of the General Plan EIR.

Impact 4.3-3: Project-generated wastewater could be adequately treated by the wastewater service provider for the project. [Threshold U-3]

According to the General Plan EIR, future residential uses in the City could generate additional wastewater, which would result in an increase in wastewater conveyance, collection, and treatment needs over current levels. As discussed in Impact 4.3-1, the existing wastewater treatment capacity would be adequate to serve

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

the 6.75 mgd flows projected for 2035; therefore, new or expanded facilities would not be required. The General Plan EIR indicated that the goals and policies of the 2035 General Plan that aim to conserve water, by curbing demand for domestic and commercial purposes, ensure coordinated planning for the provision of public facilities including water infrastructure, and ensure that utilities be designed and constructed to preserve the natural character of an area; these policies would assist in reducing the demand on existing treatment infrastructure and allow for meaningful consideration of potential impacts of any future decisions regarding the provision of new infrastructure. In addition to the policies and goals of the 2035 General Plan, current regulations require compliance with water quality standards and would not allow for the development of proposed projects without adequate utility capacity, including wastewater treatment capacity.

Monthly effluent reports to the RWQCB show that the discharge permit levels for sodium and chloride are exceeded. The City has determined that the exceedances are as a result of wear on filtration media at the plant. The filtration media is a wear-item at the facility and needs to be replaced periodically to remain within discharge requirements. Replacement of the media is considered an on-going operation and maintenance issue for the facility. The physical permitted capacity of the wastewater treatment plant does not need to be expanded to accommodate the projected population in the 2035 General Plan. The proposed Ballot Initiative would allow the City Council to consider future development projects within the TVPA without the burden of the annual residential dwelling unit limitation. The proposed Project does not propose specific development projects and would not result in an increase or change in the overall buildout of land use assumptions analyzed in the General Plan EIR. The proposed Project would not result in any new impacts or increase the severity of impacts, with respect to wastewater capacity. Future development allowed under the 2035 General Plan would be reviewed by the City and the applicable wastewater providers to determine that sufficient capacity exists to serve the development. As with the General Plan EIR, the proposed Project would implement the applicable General Plan policies and actions, A-P.56, 4-A.145, 4-A.146, 4-A.148, 8-P.4, 8-P.5, 8-P.6, 8-A.22, 8-A.23, 8-A.24, 8-A.25, 8-A.26, 8-A.27, 8-A.28, 8-A.29, and would comply with federal, state, and local regulations. Therefore, the proposed Project would not result in new or more significant impacts in this regard, beyond the less than significant impacts of the General Plan EIR, as identified on page 3.14-30 of the General Plan EIR.

Impact 4.3-4: Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations. [Thresholds U-4 and U-5]

The City provides solid waste collection services for the Project area. Solid waste is primarily disposed of at the California Street Landfill and the San Timoteo Sanitary Landfill operated by the City of Redlands and the County of San Bernardino, respectively, both within the City limits. The daily maximum throughput of the California Street Landfill is 829 tons/day, and 2,000 tons/day for the San Timoteo Sanitary Landfill (CalRecycle 2019a; CalRecycle 2019b). The California Street Landfill has a maximum permitted capacity of 10,000,000 cubic yards, and a remaining capacity of 6,800,000 cubic yards; the Landfill has an estimated cease operation date of January 1, 2042 (CalRecycle 2019a). The San Timoteo Sanitary Landfill has a maximum permitted capacity of 20,400,000 cubic yards, and a remaining capacity of 11,402,000 cubic yards; the Landfill has an estimated cease operation date of January 1, 2043 (CalRecycle 2019b).

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

AB 939 mandated California to generate a 25 percent diversion rate by 1995 and a 50 percent diversion rate by 2020; California diverted 52 percent of its waste from landfills in 2005. Therefore, the state, including the City of Redlands, reached this goal and is in compliance with the law, according to the General Plan EIR. Chapter 13.66, *Recycling Requirements for Specified Development Activity*, of the City's Municipal Code establishes requirements for recycling, including access points for solid waste and recycling collection vehicles, design of recycling and trash enclosures, as well as capacity requirements for waste generation of buildings, in order to facilitate compliance with state recycling mandates.

According to the General Plan EIR, if the City produces 60,000 tons of disposal per year for the next 20 years, it would only fill 24 percent of the remaining space in the landfills (5,000,000 tons). The 171 multi-family dwelling units, that could be built if all the available land zoned High Density Residential within the TVPA was able to accommodate the maximum density allowable in the 2035 General Plan, would generate 872 lbs/day³ of solid waste which would be 5,093,064 lbs or 2,547 tons of disposal, over the next 16 years. As the General Plan EIR included the unit potential from the proposed Project, approval of the Project would not result in adverse impacts on landfill facilities.

As previously indicated, the proposed Project does not propose any specific development projects and would not result in an increase or change in the overall buildout land use assumptions analyzed in the General Plan EIR. The proposed Project would not result in any new impacts or increase the severity of impacts, with respect to solid waste. As with the General Plan EIR, development of future land uses, as designated in the 2035 General Plan, would be required to comply with federal, state, and local statutes and regulations pertaining to solid waste and recycling, as well as the applicable 2035 General Plan policies and actions, 8-P.7, 8-A.30, 8-A.31, 8-A.32, 8-A.33, 8-A.34, 8-A.35, 8-A.36, 8-A.37, 8-A.38, 8-A.42, which would further ensure compliance with applicable regulations. For example, Policy 8-P.7 calls for the reduction of the generation of solid waste, including household hazardous waste, and recycle those materials that are used, to slow the filling of local and regional landfills, which would reduce impacts to landfills.

Therefore, no new or substantially greater impacts to solid waste would occur under the proposed Project when compared to those identified in the General Plan EIR. The proposed Project would not result in new or more significant impacts in this regard, beyond the less than significant impacts identified in the General Plan EIR on page 3.14-33, in regard to landfill capacity, and the no impact level of significance identified on page 3.14-35 of the General Plan EIR, in regard to violating regulations related to solid waste.

4.3.6 Cumulative Impacts

Cumulative impacts are limited to the TVPA, and all other measures of the 2035 General Plan and growth management ordinance would continue to apply for the remainder of the City. Implementation of future projects would require project-specific environmental analyses to evaluate utility facilities, wastewater capacities, water supplies, and landfill capacities that would serve the individual projects. Table ES-2 on page ES-5 of the General Plan EIR shows that cumulative current and future projects in the City would result in

³ 5.1 lbs/dwelling unit/day (average of multifamily disposal rate, CalRecycle 2019c)

171 units x 5.1 lbs/dwelling unit/day = 872.1 lbs/dwelling unit/day

872 lbs/dwelling unit/day x 365 days = 318,316.5 lbs/dwelling unit/year

318,316.5 lbs/dwelling unit/year x 16 years (year 2035 – year 2019) = 5,093,064 lbs/dwelling unit = 2546.532 tons/dwelling unit

4. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

an increase of 4,355 dwelling units. The proposed Project represents approximately 4 percent of the total estimated units from vacant. High Density Residential land within the TVPA.

The 2035 General Plan projected an increase in dwelling units and residents within the City and the General Plan EIR determined that future growth would result in an increased demand for utilities. However, no significant impacts are anticipated, as the increase in the demand for utilities is within the estimates evaluated in the General Plan EIR. Furthermore, as noted on page 3.14-18 of the General Plan EIR, compliance with federal, state, and local regulations, as well as the 2035 General Plan policies and actions would ensure that potential environmental impacts of individual projects would be reduced to less than significant. The proposed Project does not include development projects and would not result in an increase or change in the overall buildout of land use assumptions analyzed in the General Plan EIR. Overall, no significant cumulative impact is anticipated, and the proposed Project's contribution is not considered cumulatively considerable.

4.3.7 References

California Department of Resources Recycling and Recovery (CalRecycle). 2019a, July 12. Facility/Site Summary Details: California Street Landfill (36-AA-0017).

<https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0017/>

_____. 2019b, July 12. Facility/Site Summary Details: San Timoteo Sanitary Landfill (36-AA-0087).

<https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0087/>

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<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

Redlands. City of. 2014, May. City of Redlands Master Plan of Drainage.

https://www.cityofredlands.org/sites/main/files/file-attachments/chapters_1-2.pdf

_____. 2019a. Water System. <https://www.cityofredlands.org/post/water-system>

_____. 2019b. Water Stock. <https://www.cityofredlands.org/post/water-stock>

_____. 2019c. Wastewater Treatment. <https://www.cityofredlands.org/post/wastewater-treatment>

San Bernardino Valley Municipal Water District (SBVMWD). 2015, January. Upper Santa Ana River Watershed Integrated Regional Water Management Plan.

<http://www.sbvmd.com/home/showdocument?id=1468>

_____. 2017, June. 2015 San Bernardino Valley Regional Urban Water Management Plan.

https://www.cityofredlands.org/sites/main/files/file-attachments/sbv_ruwmp_rev_with_appendices_0.pdf

5. Impacts Found Not to Be Significant

California Public Resources Code, section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State CEQA Guidelines, section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed Project" and section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment."

State CEQA Guidelines, section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant. This chapter includes an environmental analysis and finding of no impact or less than significant impact for the topics not included in Chapter 4, *Environmental Analysis*, of this Draft SEIR.

The proposed Project, as compared to the General Plan EIR, would not result in any new significant impacts or an increase in the severity of significant impacts to the following topics: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Tribal Cultural Resources, and Wildfire. The following sections provide the thresholds of significance and a brief analysis supporting the determination of no impact or less than significant impact.

5.1 AESTHETICS

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

Less Than Significant Impact. According to the General Plan EIR, scenic vistas consist of scenic corridors and views to and from open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains, as well as the scenic views found along scenic and historic drives within the urbanized areas of the City. The General Plan EIR stated that land use changes would occur through the City, majority of which would occur in or near already developed areas and coincide with areas designated for development. The policies and actions included in the General Plan EIR, 2-P.8, 2-P.13, 2-A.28, 2-A.29, 2-A.32, 2-A.34, 4-A.17, and 6-P.6, would reduce the impact on scenic vistas would be applicable to the proposed Project. For example, Action 2-A.29 calls for the retention of existing easements and rights of way for use as viewpoints, turnouts, and scenic walkways; and Action 4-A.17 calls for the reliance on strong landscape treatments, setbacks, sign controls, which would ensure that impacts to scenic vistas are less than significant.

For buildings in the R-2 Multiple-Family Residential District, the maximum building height is designated at 2 ½ stories or 35 feet, according to Redlands Municipal Code Chapter 18.52, R-2 *Multiple-Family Residential*

5. Impacts Found Not to Be Significant

District. Chapter 18.60, *R-3 Multiple-Family Residential District*, states that the maximum height of buildings in the R-3 Zone is four stories. If the proposed Project is approved, the future development must comply with the maximum height restriction of the zoning code. Chapters 18.52 and 18.60, for both the R-2 and R-3 Zones, requires that site plans and elevations be submitted to the Planning Commission for review and approval whenever three or more dwelling units are proposed for any building site. This requirement remains unchanged with approval of the proposed Project. As the proposed Project would not change existing land use or zoning designations, and all development will be subject to the municipal code regarding Planning Commission review, impacts to scenic vistas, as a result of the proposed Project, would be less than significant, similar to the findings of the General Plan EIR, as shown on page 3.1-10 of the General Plan EIR.

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

Less Than Significant Impact. There are no officially designated state scenic highways in the City of Redlands; however, the segment of Interstate 10 (I-10) between State Route 210 (SR-210) and SR-38 is an eligible state scenic highway in the California Scenic Highway Mapping System (Caltrans 2011). A portion of SR-38, within the Angeles National Forest, approximately 14.5-miles east of the City of Redlands is designated as an official state scenic highway. Action 2-A.34 from the General Plan EIR, which states upholding the designation of the following streets listed in the policy within the City, as scenic highways, drives, and historic streets, would continue to be applicable under the proposed Project and would reduce impacts to scenic resources within a state scenic highway to less than significant. Therefore, impacts are less than significant for the proposed Project and the General Plan EIR as indicated on page 3.1-10 of the General Plan EIR.

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

Less Than Significant Impact. The transit villages and surrounding areas would experience the most densification in the land use Element of the 2035 General Plan; however, the policies and actions in the General Plan EIR would ensure that any development or redevelopment is visibly compatible with the surrounding environment. These policies and actions recognize the sensitivity of preserving the visual character of existing neighborhoods and open spaces, including investment in ongoing maintenance and improvements which is unlikely to lead to visual degradation, according to the General Plan EIR. The action listed in Impact 5.1(a) – 4-A.17 – as well as the following policies, 2-P.9, 2-P.11, 2-P.14, 2-P.15, 2-A.23, 2-A.24, 2-A.25, 2-A.26, 2-A.30, 2-A.36, 2-A.37, 2-A.51, 2-A. 67, 2-P.18, 2-A.77, 2-A.78, 2-A.79, 2-A.80, 2-A.81, 2-P.26, 2-P.27, 2-A.100, 4-P.10, 4-A.13, 4-A.22, and 4-A.32, would be implemented for the proposed Project.

For example, Action 2-A.25 requires any application that would alter or demolish an undesignated and non-surveyed 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; Policy 2-P.18 calls for the reinforcement of Redlands' identity

5. Impacts Found Not to Be Significant

as a “Tree City” through cohesive streetscapes that enhance its sense of place and its heritage, and that promote pedestrian comfort; and Policy 2-P.27 calls for the conservation of Downtown’s character and historic assets while infusing it with new uses, buildings, and activities, where new development should proportionately relate to and complement existing structures and the pedestrian environment. Therefore, compliance with these policies would ensure that impacts to the existing visual character or quality of public views are reduced to less than significant as a result of the implementation of the proposed Project. Impacts of the proposed Project and General Plan EIR are less than significant, as indicated on page 3.1-12 of the General Plan EIR.

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

Less Than Significant Impact. New development would necessitate the use of additional light fixtures, would contribute to the existing conditions of light and glare, and that most new development would take place in or near developed and urbanized areas where moderate light and glare already exist, and would not be out of character with the urban environment. The proposed Project would occur within the TVPA, which is urbanized and already has streetlights, building security lighting, and windows that emit light. The implementation of the following Actions, 2-A.35, which establishes standards for the evaluation of exterior lighting for new development and redevelopment to ensure that exterior lighting is minimized and concealed to the maximum feasible extent, and 8-A.12, which calls for exploring the use of high-efficiency technology, would ensure that impacts to light and glare, as a result of future development would be less than significant. Therefore, impacts of the proposed Project and General Plan EIR are less than significant, as shown on page 3.1-16 of the General Plan EIR.

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 forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. Approximately 7 percent of the total land in the Planning Area represents the overall agricultural land use, where Prime and Unique Farmland, as well as Farmland of Statewide Importance is scattered throughout the City, mostly on the periphery where development is less intense. According to maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of

5. Impacts Found Not to Be Significant

Conservation, the Project site is designated “Urban and Built-Up Land” (CDC 2016a). According to Figure 2.3-1, *General Plan Land Use*, of the General Plan EIR, no portions of the Project area is designated as agriculture. Figure 3.2-1, *Farmland Classifications*, of the General Plan EIR, the Project area is classified as “Urban and Built Up.” However, General Plan EIR Actions 2-A.84, which calls for the establishment of new groves at the City’s entrances/gateways to announce the City’s citrus heritage, where practical, and Action 2-A.87, would continue to apply. As shown in Figure 3, *Transit Village Land Use*, the areas affected by the proposed Project are not adjacent to agricultural areas and are developed with urban uses. Therefore, no impact would occur. The General Plan EIR, on page 3.2-12, identified this impact as significant and unavoidable; however, as there is no land designated as agriculture in the TVPA, this impact, under the proposed Project, would have no impact, and therefore, would not exacerbate this impact beyond what was identified in the General Plan EIR.

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

No Impact. Williamson Act contracts are spread throughout the periphery of the City, where most contracted land is located in Crafton, San Timoteo Canyon, and north of the City near the Santa Ana River Wash. According to the California Department of Conservation, the Project site is designated “Urban and Built-Up Land” (CDC 2016b). Therefore, the proposed Project would not conflict with an existing Williamson Act contract. No impact would occur. The General Plan EIR identified this impact as being less than significant, on page 3.2-16 of the General Plan EIR; however, as there are no Williamson Act contracts in the project area, this impact, under the proposed Project, would have no impact, and therefore, would not exacerbate this impact beyond what was identified in the General Plan EIR.

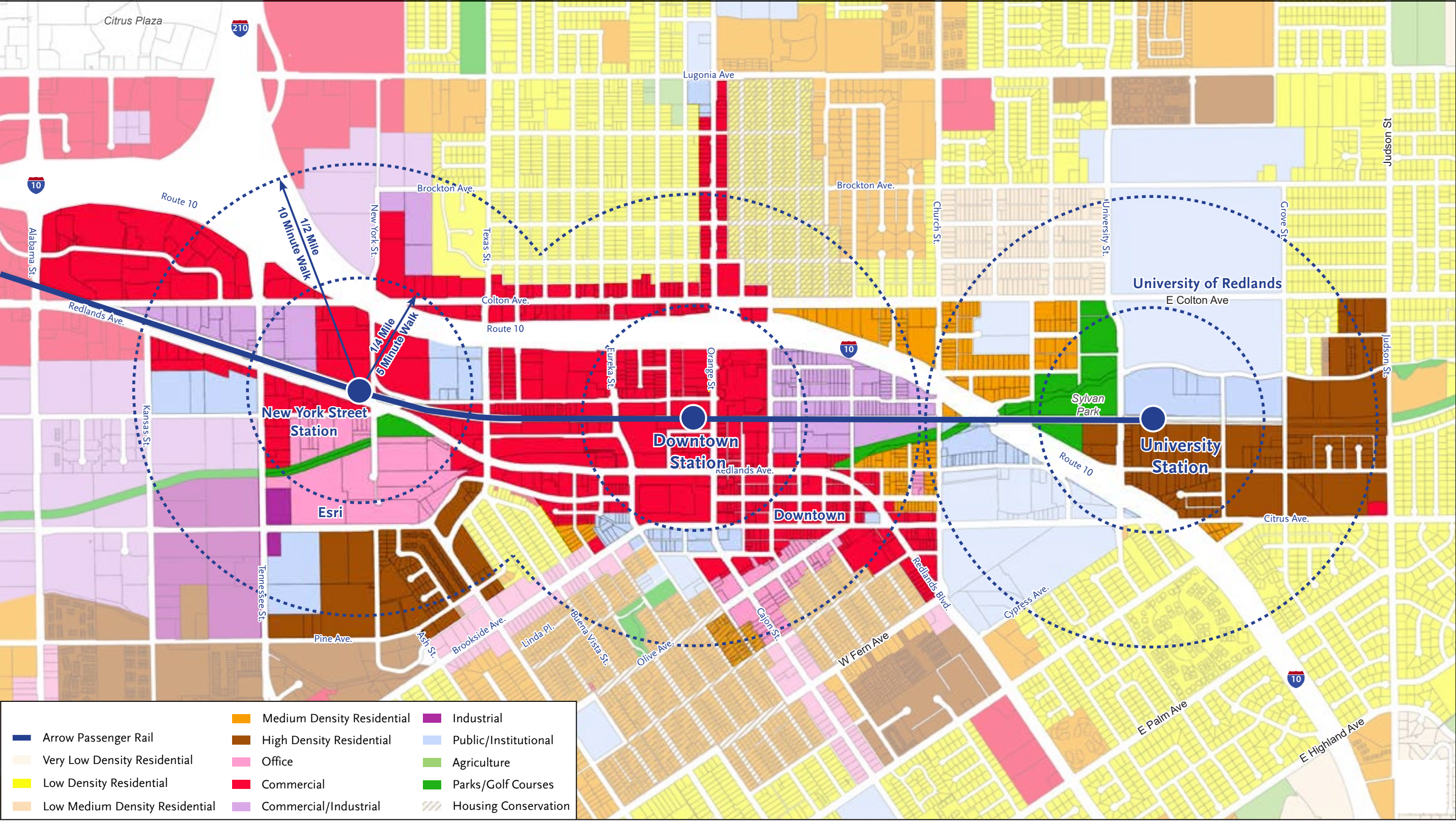
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The proposed Project would not change existing land use or zoning designations. Therefore, no rezoning of forest land or timberland is proposed or would result from Project implementation. No impact would occur, and the policies and actions mentioned in General Plan EIR would continue to be implemented. As with the General Plan EIR, which identified that no impacts would occur as the General Plan area does not have forest resources or land zoned for forest use on page 3.16-1 of the General Plan EIR, the proposed Project would also result in no impact.

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

No Impact. The Project site is located in an urbanized area within the City of Redlands. No land in the Project site is designated as forest land. Therefore, no forest land would be lost or converted due to Project implementation. No impact would occur. As with the General Plan EIR, which identified that no impacts would occur as the General Plan area does not have forest resources or land zoned for forest use on page 3.16-1 of the General Plan EIR, the proposed Project would also result in no impact.

Figure 3 - Transit Village Land Use



Source: City of Redlands, 2018

0 1,200
Scale (Feet)



5. Impacts Found Not to Be Significant

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5. Impacts Found Not to Be Significant

- 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 Project site does not contain forest land. Implementation of the proposed Project would not change existing land use or zoning designations and would not result in the conversion of farmland to nonagricultural use or forest land to non-forest use (see response to Impacts 5.2[a] and 5.2[d]). Therefore, no impact would occur. The General Plan EIR, on page 3.2-16, identified this impact as less than significant; however, as there is no land designated as agriculture in the project area, this impact, under the proposed Project, would have no impact, and therefore, would not exacerbate this impact beyond what was identified in the General Plan EIR. Moreover, as with the General Plan EIR, which identified that no impacts would occur as the General Plan area does not have forest resources or land zoned for forest use on page 3.16-1 of the General Plan EIR, the proposed Project would also result in no impact.

5.3 AIR QUALITY

Would the project:

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

No Impact. The South Coast Air Quality Management District (SCAQMD) adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017. Regional growth projections are used by SCAQMD to forecast future emission levels in the South Coast Air Basin (SoCAB). For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and regionally significant projects. The General Plan EIR determined that the General Plan would be consistent with the AQMP based on two key indicators of consistency. One indicator of consistency is whether a project would result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of the AAQS. The other indicator of consistency is whether a project would exceed the growth assumptions of the AQMP.

The proposed Project is a ballot initiative that, if approved by voters, would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. No specific development project is proposed under the proposed Project. In addition, the proposed Project would not increase or change the overall land use buildout assumed and analyzed in the General Plan EIR. Thus, the proposed Project would not affect the regional growth of the City and would be consistent with the overall growth forecast assumed in the General Plan EIR. Furthermore, the proposed Project would not result in generation of emissions beyond the emissions considered in the General Plan EIR. Therefore, the proposed Project would not obstruct implementation of the AQMP and no new or substantially greater impacts would occur when compared to those identified in the General Plan EIR. The policies and actions in the General Plan EIR would continue to be implemented under the proposed Project:

5. Impacts Found Not to Be Significant

4-P.44, 5-P.4, 5-P.5, 5-A.19, 5-P.19, 5-P.20, 5-A.27, 5-A.32, 5-A.34, 5-A.37, 5-P.25, 5-P.26, 5-P.27, 5-A.66, 7-A.44, 7-A.46, 7-P.44, 7-P.45, 7-P.46, 7-P. 47, 7-P.48, 7-A.144, 7-A.145, 7-A.146, 7-A.147, 7-A.148, 7-A.149, 7-A.150, 7-A.151, 7-A.152, 8-P.1, 8-P.2, 8-P.3, 8-A.1, 8-A.2, 8-A.4, 8-A.7, 8-A.8, 8-P.8, 8-A.39, 8-A.40, 8-A.41, 8-A.45, 8-A.46. For example, Action 7-A.46 encourages the provision of bike lockers, bike-sharing, and other methods of supporting active transportation that can contribute to healthy lifestyles, which in turn would lessen impacts to air quality due to lowered reliance on vehicles. Overall, the proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (less than significant) remains unchanged, as indicated on page 3.3-20 of the General Plan EIR.

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

No Impact. Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Due to the extent of the SoCAB area and the large number of cumulative project emissions, a project would be cumulatively significant if project-related emissions exceed the SCAQMD regional significance emissions thresholds (SCAQMD 1993). The following describes project-related impacts from short-term construction activities and long-term operation of the proposed modification.

Construction

Construction activities produce combustion emissions from various sources, such as onsite heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions (PM₁₀ and PM_{2.5}) from demolition and soil-disturbing activities, such as grading and excavation. Air pollutant emissions from construction activities would vary daily as construction activity levels change. The General Plan EIR determined that while state (e.g., California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM) and regional (e.g., SCAQMD Rule 403) regulations in addition to existing and proposed City policies and General Plan EIR principles would contribute in minimizing construction-related emissions, these regulations and policies would not guarantee that emissions would be reduced to below the SCAQMD regional significance thresholds. Thus, regional construction-related impacts were determined to be significant and unavoidable.

As stated, the proposed Project does not propose any specific development project and would not result in increasing or changing the overall buildout land use assumptions analyzed in the General Plan EIR. Thus, the proposed Project would not result in any new impacts, or increase the severity of impacts, with respect to violation of air quality standards or contributing substantially to an existing or projected air quality violation from construction activities. Therefore, no new or substantially greater short-term regional air quality impacts would occur under the proposed Project when compared to those identified in the General Plan EIR. The proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (significant and unavoidable) remains unchanged.

5. Impacts Found Not to Be Significant

Operation

Typical long-term air pollutant emissions generated by development projects are from area sources (e.g., consumer cleaning products and paints), energy usage (i.e., natural gas used for heating and cooking), and mobile sources (i.e., vehicle trips). Regional long-term impacts were determined to be significant and unavoidable in the General Plan EIR as the 2035 General Plan would result in emissions that exceed the SCAQMD regional significance thresholds.

The proposed Project would not increase or change the overall buildout land use assumptions as analyzed in the General Plan EIR and does not propose a specific development project. Thus, the proposed development would not introduce additional land use developments beyond those considered in the General Plan EIR and would not result in new additional sources of emissions. While, the ballot initiative would consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation, impacts in the 2017 General Plan EIR are based on the worst-case day at full buildout. Therefore, the emissions estimate identified in the 2017 General Plan EIR would remain unchanged with the proposed Project. The policies and actions in the General Plan EIR, including those mentioned in Impact 5.3(a), as well as 7-A.35 and 7-A.38, would continue to be implemented. Action 7-A.149 states that construction and grading projects should minimize short-term impacts to air quality by requiring grading projects to provide a storm water pollution prevention plan (SWPPP) in compliance with City requirements which include best management practices (BMPs) that control pollutants from construction activities; requiring grading projects to undertake measures to minimize NO_x emissions from vehicle and equipment operations; and monitoring all construction to ensure that proper steps are implemented. Therefore, it would not result in new or substantially greater long-term regional air quality impacts compared to those identified in the General Plan EIR. Overall, the proposed Project is consistent with the project and cumulative impacts identified in General Plan EIR, and the level of impacts (significant and unavoidable) remain unchanged, as shown on page 3.3-29 of the General Plan EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. Unlike the mass construction and operational emissions (pounds per day), localized concentrations refer to the amount of pollutant in a volume of air (ppm or µg/m³) and can be correlated to potential health effects.

Construction

The General Plan EIR concluded that sensitive receptors would not be exposed to substantial pollutant concentrations from construction activities as emissions from off-road construction equipment and heavy-duty diesel trucks are regulated by CARB's ACTMs. Thus, the General Plan EIR determined localized construction-related air quality impacts to be less than significant.

As discussed in Impact 5.3(b), no new additional development would occur if the proposed ballot initiative is approved by voters compared to the land uses considered in the General Plan EIR. Furthermore, development would not occur outside of the areas designated for development as analyzed in the General Plan EIR. Thus, the proposed Project would not potentially result in additional construction activities beyond that considered in the General Plan EIR. Therefore, the proposed Project would not result in new, or

5. Impacts Found Not to Be Significant

substantially increase the severity of short-term localized and health risk impacts compared to that identified in the General Plan EIR. Overall, the proposed Project is consistent with the impact identified in the General Plan EIR, and the level of impact (less than significant) remains unchanged.

Operation

Types of land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses that would require a permit from SCAQMD, such as manufacturing and chemical processing facilities, and warehousing operations where substantial truck could occur onsite. Operation of non-industrial and non-warehousing development projects (e.g., office, retail, residential, etc.) would generate onsite emissions from use of standard onsite mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for property management. However, onsite criteria air pollutant emissions generated from these sources are generally nominal. In addition to onsite emissions, proposed development projects also have the potential to create pockets of carbon monoxide (CO) called hotspots in areas of high vehicle congestion. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The General Plan EIR determined localized operation-related air quality impacts to be less than significant. Per the General Plan EIR, stationary sources that have the potential to generate substantial pollutant concentrations would be controlled through the SCAQMD permitting process per Rule 1401. Additionally, emissions associated with heavy-duty diesel trucks would be controlled through compliance with CARB standards for diesel engines.

The proposed Project does not propose a specific development project and would not result in a net increase or change in the overall buildout land use assumptions identified in the General Plan EIR. Thus, no new land use developments would occur, and no additional vehicle trips would be generated beyond what was considered in the General Plan EIR. Therefore, compared to that identified in the General Plan EIR, the proposed Project would not result in new, or substantially increase the severity of operation-related localized air quality impacts with respect to exposure of sensitive receptors to substantial pollutant concentrations from operational activities. The policies and actions of the General Plan EIR, 5-P.5, 7-P.44, 7-P.45, 7-P.46, 7-P.47, 7-P.48, 5-A.27, 5-A.37, 5-A.66, 7-A.144, 7-A.145, 7-A.146, 7-A.147, 7-A.148, 7-A.150, 7-A.151, 7-A.152, 7-P.49, 7-A.153, and 7-A.154 would continue to be implemented under the proposed Project in order to lessen impacts to air quality. For instance, Action 7-A.148 calls for the development of requirements for retrofitting existing residential buildings within the 500 foot AQMD buffer along the freeway to abate air pollution, and limitations on new residential developments within the buffer, thereby reducing impacts to air quality for those living within the AQMD buffer. Overall, the proposed Project is consistent with the impacts identified in the General Plan EIR, and the level of impacts (less than significant) would remain unchanged, as indicated on page 3.3-31 of the General Plan EIR.

5. Impacts Found Not to Be Significant

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

No Impact. The type of facilities that are considered to have 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. Additionally, during construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. The General Plan EIR determined odor impacts would be less than significant as construction-related odors would be temporary and occur at magnitudes that would not affect a substantial number of people and because developments under the 2035 General Plan would be in compliance with all local, state, and federal regulations related to control of operation-related odors.

As stated, the proposed Project does not propose a specific development project and would neither increase nor change the overall buildout land use assumptions identified in the General Plan EIR. Thus, no new and additional developments and construction activities would result related to the proposed Project. Therefore, no new or substantially greater odor impacts would occur with implementation of the proposed Project when compared to those identified in the General Plan EIR. The policies and actions mentioned in the General Plan EIR, 7-P.44, 7-P.48, 7-A.144, 7-A.147, 7-A.148, and 7-A.149 would reduce impacts to air quality, and would continue to be implemented by the proposed Project. Overall, the proposed Project is consistent with the impacts identified in the General Plan EIR, and the level of impacts (less than significant) would remain unchanged, as shown on page 3.3-32 of the General Plan EIR.

5.4 BIOLOGICAL RESOURCES

Would the project:

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

Less Than Significant Impact. There are 19 species that are state or federally listed as rare, threatened, or endangered species that have been or were identified as potentially present within the General Plan Area. Vegetation types within the Project site are designated as Developed/Ruderal and Annual Grassland, as shown in Figure 3.4-1, *Existing Vegetation*, of the General Plan EIR, where future development in these areas are expected to have a lower impact on sensitive species and their habitats as these vegetation types have limited value. As shown in Figure 4, *Aerial Photograph*, the TVPA is an urban area with little biological value. While much of the area is built it is possible that some biological resources exist and therefore implementation of the policies and actions of the General Plan EIR would reduce potential impacts to less than significant: 6-P.7, 6-P.8, 6-A.11, 6-A.12, 6-A.13, 6-A.14, 6-A.36, and 6-A.37. For example, Action 6-A.11 requires 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. Therefore, the

5. Impacts Found Not to Be Significant

proposed Project would have a less than significant impact to biological resources upon the implementation of the General Plan EIR policies and actions. Impacts are less than significant for the proposed Project and General Plan EIR as indicated on page 3.4-25 of the General Plan EIR.

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

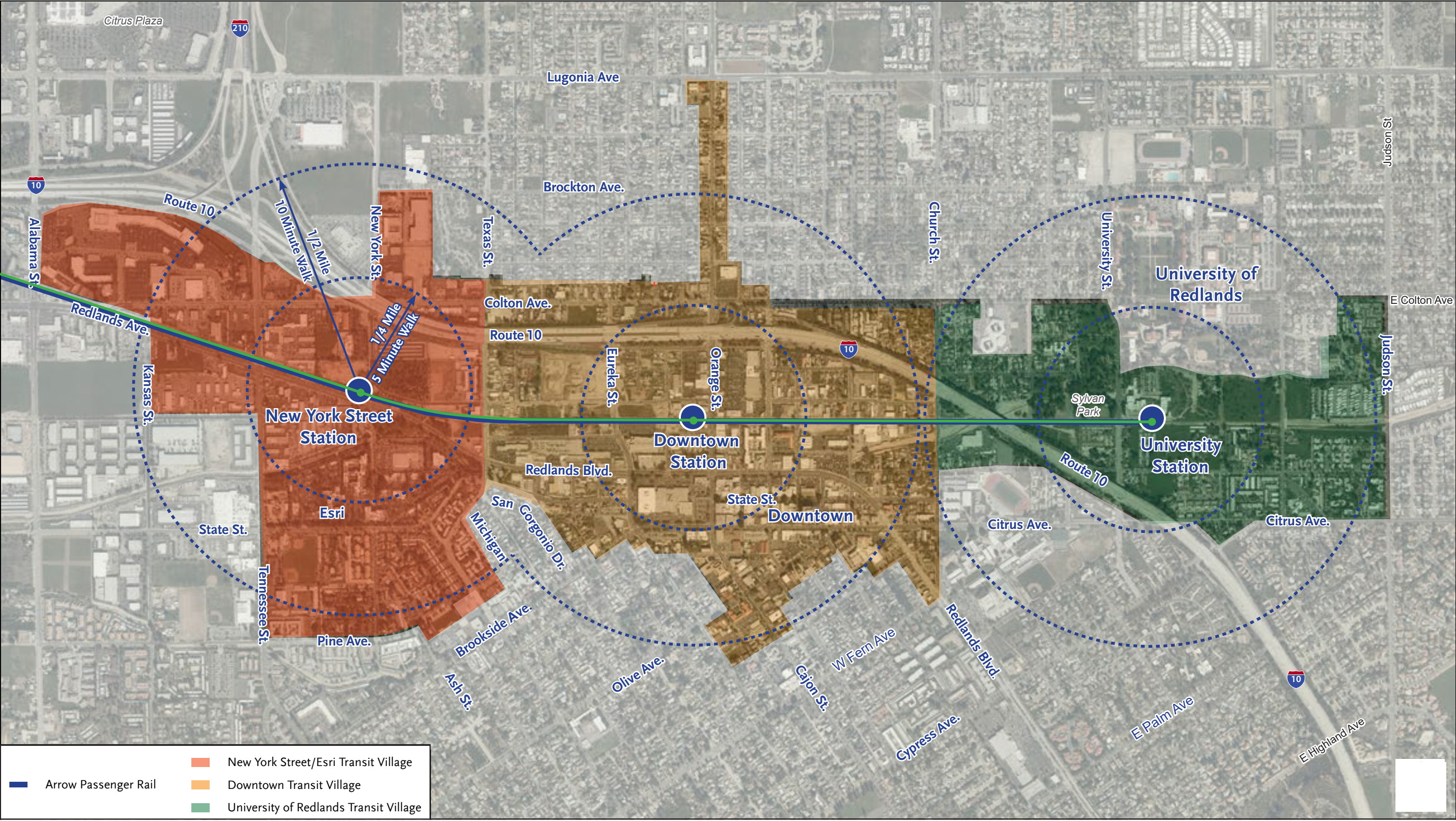
No Impact. As stated in the General Plan EIR, future development may result in significant impacts on riparian vegetation or other sensitive natural communities, especially on land with native vegetation adjacent to or immediately upstream of the Santa Ana River, Mill Creek, and San Timoteo Creek. However, most riparian areas are designated Open Space, and would be protected from direct impacts from development. According to Figure 3.4-1, there are no riparian habitats on the Project site. The Project site is located in a highly urbanized area. Therefore, no impact would occur. The General Plan EIR identified this impact as less than significant, as indicated on page 3.4-28 of the General Plan EIR, however, as there are no riparian habitats in the project area, no impacts would occur under the proposed Project.

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?

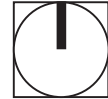
No Impact. The General Plan EIR stated that several of the natural watercourses in Figure 3.4-2, *Critical Habitat and Principal Waters*, would likely be considered under the federal jurisdiction of the USACE as waters of the U.S. These areas may include smaller drainages particularly in the hilly areas in the southern and eastern portions of the General Plan Area, and the Zanja and Morey Arroyo artificial ditches. The 2035 General Plan does not plan for development on any federally protected wetlands. However, according to Figure 3.4-2, there are no principal waters in the Project site, and therefore, no impact would occur. The General Plan EIR identified this impact as less than significant, as indicated on page 3.4-29 of the General Plan EIR, however, as there are no wetlands in the project area, no impacts would occur under the proposed Project.

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?

Figure 4 - Aerial Photograph



Source: City of Redlands, 2018



5. Impacts Found Not to Be Significant

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5. Impacts Found Not to Be Significant

No Impact. The General Plan EIR indicated that many drainages, canyons, and extensive hillsides with native vegetation can provide corridors or areas for travel for local wildlife, especially where such drainages or areas connect to larger areas of undisturbed native vegetation, all of which can provide a variety of resources and protection for native wildlife. The proposed Project is in a highly urbanized area within the City; according to Figure 3.4-1, the Project area is classified as predominantly developed/ruderal, with small portions of annual grassland. Additionally, Figure 3.4-2 indicates that there are no critical habitats in the Project area; critical habitats are found in the northern portion of the City. Due to the Project site's highly urbanized environment, and the lack of large contiguous undisturbed native vegetation and critical habitat areas, it is unlikely that development in the TVPA would impact migratory wildlife and corridors; therefore, no impact would occur. The General Plan EIR identified this impact as less than significant, as indicated on page 3.4-30 of the General Plan EIR, however, as there are no wildlife corridors or critical habitats in the project area, no impacts would occur under the proposed Project.

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

Less Than Significant Impact. The proposed Project would not change the existing policies and actions of the 2035 General Plan that promote the health and maintenance of street trees. Nor would the proposed Project affect implementation of Municipal Code Chapter 12.52, *Trees and Tree Protection Along Streets and in Public Places*. The 2035 General Plan is consistent with the Upper Santa Ana Wash Land Management and Habitat Conservation Plan (Wash Plan) and the San Bernardino County General Plan. Implementation of the proposed Project would be required to comply with ordinances and programs to protect biological resources, and the following policies would reduce impacts of the proposed Project to less than significant: 2-A.70, 2-P.18, 2-P.19, 2-P.20, 2-A.77, 2-A.78, 2-A.79, 2-A.80, 2-A.81, 2-P.23, 2-A2-A.78, 2-A.79, 2-A.80, 2-A.81, 2-A, 2-A.87, and 6-A.10. For example, Action 2-P.20 of the General Plan EIR calls for the use of street trees to differentiate arterials and to reduce the apparent width of wide streets, and Action 2-A.79 of the General Plan EIR calls for the avoidance of sound walls as a standard on arterial streets in residential areas. Implementation of the proposed Project would be required to comply with ordinances and programs to protect biological resources, as well as with the policies and actions of the General Plan EIR, which would reduce impacts of the proposed Project to less than significant. Impacts are less than significant for the proposed Project and the General Plan EIR, as indicated on page 3.4-33 of the General Plan EIR.

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

No Impact. There are no adopted regional HCPs or natural community conservation plans, however, the City participates in the Wash Plan which has a habitat conservation plan component. The Project site is located in a highly urbanized portion of the City, and is not located within the Santa Ana River Wash. Therefore, no impacts would occur.

5. Impacts Found Not to Be Significant

5.5 CULTURAL RESOURCES

Would the project:

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

Less Than Significant Impact. The CEQA Guidelines § 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. A resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- ii) Is associated with the lives of persons important in our past.
- iii) 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.
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The implementation of the 2035 General Plan would not directly result in the destruction of, or damage to, historical resources; however, future development and redevelopment permitted under the 2035 General Plan could result in changes that affect historic resources. According to Figure 3.8-1, *Historic Resources*, of the General Plan EIR, the Project area contains local historic landmarks and resources, national/state historic district (Santa Fe Depot District), national/state district contributors, sites on the national register (US Post Office and Redlands Central Railway Company Car Barn), and portions of local district contributors (HD8 Smiley Park Neighborhood District and Scenic District). The impact of such activities would be considered significant if they were to cause a substantial adverse change to the historical resources as defined by CEQA Guidelines 15064.5; at the time of development or redevelopment, project-level CEQA document would need to identify potential impacts on known or potential historic sites and structures.

In addition to the CEQA Guidelines that require a project with potentially adverse impacts to conform with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and the Redlands Historic and Scenic Preservation Ordinance (Ordinance 1954 § 1, 1986) as found in Redlands Municipal Code Chapter 2.62, *Historic and Scenic Preservation*, the policies and actions of the 2035 General Plan would avoid or minimize impacts on historical resources: 2-P.8, 2-P.9, 2-P.10, 2-P.11, 2-P.12, 2-P.14, 2-P.15, 2-A.23, 2-A.24, 2-A.25, 2-A.26, 2-A.27, 2-A.28, 2-A.30, 2-A.31, 2-A.32, 2-A.33, 2-A.34, 2-A.36, 2-A.37, 2-A.38, 2-A.39, 2-A.40, 2-A.41, 2-A.42, 2-A.43, 2-A.44, 2-A.45, 2-A.46, 2-A.47, 2-A.48, 2-A.49, 2-A.50, 2-A.51, 2-A.52, 2-A.53, 2-A.54, 2-A.55, 2-A.56, 2-A.57, 2-A.58, 2-A.59, 2-A.60, 2-A.61, 2-A.62, 2-A.63, 2-A.64, 2-A.65, 2-A.66, 2-A.67, 2-A.68, and 2-A.70. For example, Action 2-A.25 requires any application that would alter or demolish an undesignated and non-surveyed resource over 50 years old to be assessed in the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission. The Project site includes historic

5. Impacts Found Not to Be Significant

resources, as depicted in Figure 3.8-1, *Historic Resources*, of the General Plan EIR. With the implementation of the policies and actions of the 2035 General Plan, and the appropriate CEQA project-level analysis, impacts to historic resources would be less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.8-18 of the General Plan EIR.

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

Less Than Significant Impact. The records search conducted for the 2035 General Plan indicated the presences of 11 area prehistoric resources within one mile of the 2035 General Plan Area. As the records search area has not been 100 percent studied and there are areas within the 2035 General Plan Area that have never been examined or researched, there is potential for new archaeological resources to be discovered in the future. Future development allowed under the 2035 General Plan may involve grading, excavation, overland vehicle travel, or other ground-disturbing activities, or could facilitate public access to archaeological sites which could disturb or damage unknown archaeological resources. Although the implementation of the proposed Project may result in actions that could adversely affect archaeological resources, the policies and actions of the General Plan EIR would ensure that impacts to archaeological resources would be reduced to less than significant: 2-P.17, 2-A.71, 2-A.72, 2-A.73, and 2-A.74. For example, Action 2-A.72 requires that applicants for projects identified by the South Central 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 mitigation measures are implemented. Therefore, the implementation of the proposed Project would result in less than significant impacts to archaeological resources. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.8-24 of the General Plan EIR.

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

Less Than Significant Impact. The General Plan EIR indicated that human remains, particularly those interred outside formal cemeteries could be disturbed during grading, excavation, or other ground-disturbing activities associated with future development or redevelopment projects allowed under the 2035 General Plan. The treatment of Native American Human remains is regulated by Public Resources Code Section 5097.98, as amended by Assembly Bill (AB) 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. Health and Safety Code 7050.5 includes specific provisions for the protection of human remains in the event of discovery. Although the 2035 General Plan does not include any goals or policies that directly address the disturbance of human remains, future development and redevelopment projects, as a result of the proposed Project, would be required to adhere to the appropriate laws and regulations, including AB 52 and Senate Bill (SB) 18, which require consultation with California Native American Tribes. The City has completed consultation with Native American tribes for the proposed Project. On February 15, 2019, the City sent Consultation Request letters to 22 tribes; responses were received from the following tribes: Agua Caliente Band of Cahuilla Indians, San Manuel Band of Mission Indians, and Augustine Band of Cahuilla Mission Indians (see Appendix 5, *Request for Tribal Consultation Responses*, of this SEIR). The Agua Caliente Band of Cahuilla Indians and San Manuel Band of Mission Indians concluded consultation stating that there would be no conflict as a result of the

5. Impacts Found Not to Be Significant

proposed Project. The Augustine Band of Cahuilla mission Indians had no concerns and did not request consultation. Thus, the implementation of the proposed Project would result in less than significant impacts. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.8-28 of the General Plan EIR.

5.6 ENERGY

Would the project:

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

Less Than Significant Impact. The General Plan EIR indicated that development would increase future energy consumption within the 2035 General Plan area which would result in additional demand for electricity and natural gas supply and services. Although the implementation of the proposed Project would increase the population and employment in the City, the increase would not exceed the estimates shown in Table 2.3-5, *Projected Population at Buildout (2035)* and Table 2.3-6, *Projected Non-Residential Buildout (2035)* of the General Plan EIR, and associated energy demand above existing conditions. Compliance with the state's current and future energy code, Title 24 energy, and the policies and actions of the General Plan EIR would minimize wasteful, inefficient energy consumption: 7-A.44, 8-P.1, 8-P.2, 8-P.3, 8-A.1, 8-A.2, 8-A.3, 8-A.4, 8-A.5, 8-A.7, 8-A.8, 8-A.9, 8-A.10, 8-A.11, 8-A.12, 8-A.13, 8-A.14, 8-A.15, 8-A.16, 8-A.17, 8-A.18, 8-A.20, 8-A.27, 8-A.29, 8-A.35, 8-A.38, 8-A.39, 8-A.40, 8-A.41, 8-A.43, 8-A.44, and 8-P.10. For example, Action 8-A.5 calls for the acceleration of the adoption of solar power and/or other alternative energy usage in Redlands through actions such as developing guidelines, recommendations, and examples for cost-effective solar and/or other alternative energy-based installation, which would ensure efficient use of energy. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on 3.5-18 of the General Plan EIR.

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

Less Than Significant Impact. As indicated in the General Plan EIR, all future development under the 2035 General Plan would be required to comply with the latest CBC requirements, including CBC Energy Efficiency Standards, as well as federal, state, and local rules and regulations pertaining to energy consumption and conservation. The General Plan EIR includes policies and actions (See Impact 5.6[a]) that emphasize energy reduction strategies. The Climate Action Plan (CAP), which is intended for implementation through 2035, includes an inventory of citywide greenhouse gas (GHG) emissions; forecasts of future citywide GHG emissions; monitoring and reporting processes to ensure State GHG targets are met; and options for reducing GHG emissions beyond State requirements. Through the implementation and compliance with federal, state, and local regulations as well as the General Plan EIR policies and actions, the proposed Project would not conflict with or obstruct plans for energy or energy efficiency : 7-A.44, 8-P.1, 8-P.2, 8-P.3, 8-A.1, 8-A.2, 8-A.3, 8-A.4, 8-A.5, 8-A.7, 8-A.8, 8-A.9, 8-A.10, 8-A.11, 8-A.12, 8-A.13, 8-A.14, 8-A.15, 8-A.16, 8-A.17, 8-A.18, 8-A.20, 8-A.35, 8-A.38, 8-A.39, 8-A.40, 8-A.41, 8-A.43, 8-A.44, 8-P.10, 2-A.5, 2-A.6, 2-A.18, 2-A.34, 2-A.69, 2-A.77, 2-A.80, 2-A.92, 2-A.99, 4-P.9, 4-A.12, 4-A.18, 4-A.95, 4-P.41, 4-P.44,

5. Impacts Found Not to Be Significant

4-P.45, 4-A.99, 4-A.104, 4-A.105, 4-A.106, 4-A.108, 4-A.110, 4-A.112, 4-A.113, 4-A.114, 4-A.115, 4-A.116, 4-A.118, 4-A.124, 4-A.125, 4-A.126, 4-A.131, 4-A.132, 4-A.134, 5-P.13, 5-P.14, 5-A.3, 5-A.4, 5-A.5, 5-A.6, 5-A.7, 5-P.16, 5-P.17, 5-P.18, 5-A.17, 5-A.18, 5-A.19, 5-A.21, 5-P.19, 5-P.20, 5-A.22, 5-A.23, 5-A.24, 5-A.25, 5-A.26, 5-A.27, 5-A.28, 5-A.29, 5-A.32, 5-A.33, 5-A.41, 5-A.47, 5-P.25, 5-P.26, 5-A.54, 5-A.55, 5-A.56, 5-A.57, 5-A.58, 5-A.59, 5-A.60, 5-A.61, 5-A.62, 5-A.63, 5-A.64, 5-A.65, 5-P.27, 5-A.66, 5-A.69, 5-A.72, 5-A.73, 7-P.17, 7-A.38, 7-A.39, 7-A.40, 7-A.42, 7-P.47, and 7-A.146. For example, Action 8-A.40 of the General Plan EIR calls for the promotion of Leadership in Energy and Environmental Design (LEED) certification program for the design, operation, and construction of high-performance green buildings. Impacts of the proposed Project and the General Plan EIR are less than significant as identified on page 3.5-22 of the General Plan EIR.

5.7 GEOLOGY AND SOILS

Would the project:

- 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.**

Less Than Significant Impact. As indicated in the General Plan EIR, the 2035 General Plan Area is located within a seismically active area where several faults and fault zones are considered active; Alquist-Priolo Earthquake Fault Zones have been established for the majority of these faults and fault zones. As indicated in Figure 3.6-2, *Faults*, of the General Plan EIR, the location of the proposed Project is not within a fault zone. In addition to adhering to the requirements of the CBC, the proposed Project would implement the following policies and actions to reduce impacts to less than significant: 7-P.29, 7-A.110, 7-A.111, 7-A.112, 7-A.116, 7-A.117, and 7-A.132. For instance, Policy 7-P.29 calls for the investigation and mitigation of geologic and seismic hazards or to locate development away from such hazards in order to preserve life and protect property. The potential for impacts from fault rupture is less than significant for both proposed Project and the General Plan EIR, as stated on page 3.6-15 of the General Plan EIR.

- ii) **Strong seismic ground shaking?**

Less Than Significant Impact. The General Plan EIR indicated that earthquakes in and near the 2035 General Plan Area have the potential to cause ground shaking of significant magnitude. The General Plan allows for additional development within the City, which could expose people and property to strong seismic ground shaking. However, as indicated in the General Plan EIR, new buildings would be constructed in compliance with the CBC. Compliance with the CBC as well as the following General Plan EIR policies and actions would reduce impacts to less than significant: 7-P.29, 7-A.110, 7-A.111, 7-A.112, 7-A.116, 7-A.117, and 7-A.132. Action 7-A.110 calls for the use of the building inspection program to

5. Impacts Found Not to Be Significant

inventory and evaluate earthquake hazards in existing buildings, the use of the most current seismic design standards and hazards reduction measures, and to continue the project for the systematic upgrading of seismically unsafe buildings. The potential for impacts from ground shaking are less than significant for both the proposed Project and the General Plan EIR as indicated on page 3.6-16 of the General Plan EIR.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. During intense shaking, any structures on these sediments may float, sink, or tilt as if on water. Liquefaction potential varies based on three main factors: 1) cohesionless, granular soils with relatively low densities (usually of Holocene age); 2) shallow groundwater (less than 50 feet); and 3) moderate to high seismic ground shaking. Lateral spreading refers to lateral displacement of large, surficial blocks of soil as a result of pore-pressure buildup or liquefaction in a subsurface layer.

According to Figure 3.6-4, *Liquefaction Susceptibility*, of the General Plan EIR, locations within the 2035 General Plan Area are considered prone to liquefaction hazards, including the areas in the northern portion of the 2035 General Plan Area around the Santa Ana River, Mentone Boulevard, and Mill Creek Road. Most of the areas susceptible to liquefaction have been designated as Open Space, however, some industrial, commercial, and low-density residential development are allowed in these areas. The location of the proposed Project, according to Figure 3.6-4, is not located within a liquefaction susceptibility zone. As stated in the General Plan EIR, ground failure including liquefaction from development would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements and standard industry practices. In addition to complying with these standards, the proposed Project would implement the following policies and actions to ensure that impacts to liquefaction are reduced to less than significant: 6-A-36, 6-A-39, 7-P-29, 7-A-109, 7-A-114, 7-A-116, 7-A-117, and 7-A-132. For example, Policy 7-P-29 calls for the investigation and mitigation of geologic and seismic hazards or to locate development away from such hazards, in order to preserve life and protect property. Potential impacts from liquefaction are less than significant for both the proposed Project and the General Plan EIR as indicated on page 3.6-16 of the General Plan EIR.

iv) Landslides?

Less Than Significant Impact. Susceptibility of slopes to landslides and other slope failures depends on several factors that are usually present in combinations—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, seismic activity, etc.

The General Plan EIR stated that highly landslide-susceptible areas are primarily located in various parts of southern Redlands and some smaller parts in the eastern portion of the 2035 General Plan Area. According to Figure 3.6-3, *Landslide Potential*, of the General Plan EIR, the location of the proposed Project is not within a landslide potential zone. Future development would be required to address the impacts of landslides through site-specific geotechnical studies prepared in accordance with the CBC requirements and will implement the following policies and actions to ensure that impacts are reduced to

5. Impacts Found Not to Be Significant

less than significant: 6-A-36, 6-A.39, 7-P.29, 7-A.114, 7-A.116, 7-A.117, and 7-A.132. For instance, Action 7-A.114, states that for new construction and exterior building expansions including multi-story additions or lateral expansions, require the preparation of a geotechnical/soils/geologic report by a registered civil geotechnical/soils engineer and a certified engineering geologist. The potential impacts from landslides are considered less than significant for both the proposed Project and the General Plan EIR as indicated on page 3.6-17 of the General Plan EIR.

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. Precipitation, water, waves, and wind are all agents of erosion.

As indicated in the General Plan EIR, development associated with the 2035 General Plan would likely include earthwork activities that could expose soils to the effects of erosion or loss of topsoil. Generally, earthwork and ground-disturbing activities require a grading permit, compliance with which minimizes erosion, and the City's grading permit requirements ensure that construction practices include measures to protect exposed soils, such as limiting work to dry seasons, covering stockpiled soils, and use of straw bales and silt fences to minimize offsite sedimentation. Furthermore, as stated in the General Plan EIR, development that disturbs more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit, including the implementation of best management practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. As the proposed Project would include ground disturbing activities that may cause erosion or loss of topsoil, the proposed Project would comply with the aforementioned regulations and permits, and implement the following General Plan EIR policies and actions to reduce impacts: 6-A.36, 6-A.39, 7-A.114, 6-A.37, and 7-A.115. Action 7-A.115 requires soil erosion mitigation during construction. Therefore, impacts to erosion or loss of topsoil as a result of Project implementation would be reduced to less than significant upon implementation of these policies and actions. Impacts of the proposed Project and the General Plan EIR would be less than significant as indicated on page 3.6-20 of the General Plan EIR.

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

Less Than Significant Impact. The General Plan EIR indicated that some improvements associated with implementation of the 2035 General Plan could be located on geologic units or soils that are unstable, or that could become unstable and result in geologic hazards if not addressed appropriately. Soils that exhibit expansive properties when exposed to varying moisture content over time could result in damage to foundations, walls, or other improvements. Structures could be damaged as a result of settlement, and construction of new structures in the vicinity of relatively steep slopes could provide additional loading causing landslides or slope failure from unstable soils. As noted in the General Plan EIR, the potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical

5. Impacts Found Not to Be Significant

information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements. In addition to preparing a geotechnical report and complying with CBC requirements, future development must also follow General Plan EIR policies and actions 7-P.29, 7-P.30, 6-A.36, 6-A.39, 7-A.107, 7-A.109, 7-A.110, 7-A.114, 7-A.115, 7-A.116, 7-A.117, and 7-A.132, that ensure that impacts as a result of unstable or expansive soils are reduced to less than significant. For instance, Action 7-A.117, which calls for the use of the Local Hazard Mitigation Plan and Emergency Operations Plan to address issues related to seismic hazards, emergency response preparedness and recovery, and minimum road-width/clearance around structures, to reduce impacts to less than significant. Impacts of the proposed Project and the General Plan EIR would be less than significant as indicated on page 3.6-21 of the General Plan EIR.

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

Less Than Significant Impact. See response to 5.7(c). This impact is 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 City of Redlands Public Services Ordinance (Ord. 1000 § 11, 1955) of Chapter 18.04, *General Provisions*, prevents well drilling near septic tanks. As the proposed Project is located in a highly urbanized area within the City with adequate wastewater collection system, the proposed Project would not require the installation of a septic tank or alternative wastewater disposal system. The proposed Project would connect to existing sewer main lines and service lines within the Project area. Therefore, no impact would occur. The General Plan EIR identified this impact as less than significant, on page 3.6-22 of the General Plan EIR, however, due to the highly urbanized nature of the project area, no impacts would occur.

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

Less Than Significant Impact. Some portions of the City, especially in San Timoteo Canyon, are underlain by geologic formations that have yielded fossiliferous materials, and it is possible that future development within the City could cause significant impacts on these resources if they are disturbed during grading or excavation activities. Construction activities such as grading, excavation, and ground disturbing activities may result in the accidental destruction or disturbance of paleontological sites. However, the majority of development anticipated under the 2035 General Plan would involve redevelopment of or new development within existing developed areas. Substantial excavation activities for installation of new infrastructure would be limited to new development in undeveloped areas; potential for this type of development does exist but is limited by the 2035 General Plan. Thus, the likelihood of finding new or undiscovered paleontological resources would be limited. As the location of the proposed Project is in a highly urbanized area of the City, it is unlikely that new or undiscovered paleontological resources would be discovered. Further, with the implementation of the General Plan EIR policies and actions 2-P.17, 2-P.16, 2-A.75, and 2-A.76, impacts to paleontological resources would be less than significant. For example, Action 2-A.75 requires, as a standard condition of approval, that project applicants provide an assessment as to whether grading for a proposed

5. Impacts Found Not to Be Significant

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. Therefore, impacts would be less than significant with the implementation of these policies and actions. Impacts of the proposed Project and the General Plan EIR are less than significant as identified on page 3.8-26 of the General Plan EIR.

5.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

No Impact. Typical long-term greenhouse gas (GHG) emissions generated by development projects are from area sources (e.g., landscaping equipment), energy usage (i.e., natural gas and electricity), and mobile sources (i.e., vehicle trips) in addition to water demand, wastewater generation, and solid waste disposal. The General Plan EIR concluded that GHG emissions impacts would be less than significant as the 2035 General Plan would meet the state mandated GHG emissions reduction targets through year 2035.

As described in Section 2.1.1 of this SEIR, if the proposed ballot initiative is approved by the voters, it would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. The proposed Project would not introduce a specific development project, or would it result in an increase or change to the overall buildout land use assumptions analyzed in the General Plan EIR. While, the ballot initiative would consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation, impacts in the General Plan EIR are based on annual emissions at full buildout. Therefore, the emissions estimate identified in the General Plan EIR would remain unchanged with the proposed Project. Thus, the proposed Project would not result in new or additional GHG emissions compared to the emissions identified in the General Plan EIR. The policies and actions in the General Plan EIR would continue to be implemented: 2-A.5, 2-A.6, 2-A.18, 2-A.34, 2-A.69, 2-A.77, 2-80, 2-A.92, 2-A.99, 4-P.9, 4-A.12, 4-A.18, 4-A.95, 4-P.41, 4-P.44, 4-P.45, 4-A.99, 4-A.104, 4-A.105, 4-A.106, 4-A.108, 4-A.110, 4-A.112, 4-A.113, 4-A.114, 4-A.115, 4-A.116, 4-A.118, 4-A.124, 4-A.125, 4-A.126, 4-A.131, 4-132, 4-A.134, 5-P.13, 5-P.14, 5-A.3, 5-A.4, 5-A.5, 5-A.6, 5-A.7, 5-P.16, 5-P.17, 5-P.18, 5-A.17, 5-A.18, 5-A.19, 5-A.21, 5-P.19, 5-P.20, 5-A.22, 5-A.23, 5-A.24, 5-A.25, 5-A.26, 5-A.27, 5-A.27, 5-A.28, 5-A.29, 5-A.32, 5-A.33, 5-A.41, 5-A.47, 5-P.25, 5-P.26, 5-A.54, 5-A.55, 5-A.56, 5-A.57, 5-A.58, 5-A.59, 5-A.60, 5-A.61, 5-A.62, 5-A.63, 5-A.64, 5-A.65, 5-P.27, 5-A.66, 5-A.69, 5-A.72, 5-A.73, 7-A.24, 7-P.17, 7-A.38, 7-A.39, 7-A.40, 7-A.42, 7-P.47, and 7-A.146. For example, Action 5-A.72 encourages developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less. Therefore, the proposed Project would not result in new or increase the severity of GHG emissions impacts identified in the General Plan EIR. Overall, the proposed Project is consistent with the impact identified in the General Plan EIR, and the level of impact (less than significant) would remain unchanged as identified on page 3.5-18 of the General Plan EIR.

5. Impacts Found Not to Be Significant

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include the California Air Resources Board's (CARB) Scoping Plan and the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The General Plan EIR determined impacts to be less than significant as the goals and policies of the 2035 General Plan, which incorporated the City's Climate Action Plan, would be consistent with the overall goals local, regional, and state plans to reduce GHG emissions.

The proposed Project would neither introduce a new specific development project nor increase or change the overall buildout land use assumptions considered in the General Plan EIR. Thus, the proposed Project would not obstruct or interfere with implementation of the CARB Scoping Plan or SCAG's RTP/SCS. Therefore, no new or substantially greater impacts would occur with implementation of the proposed Project when compared to those identified in the General Plan EIR. The policies and actions from Impact 5.8(a) would continue to be implemented under the proposed Project. Action 5-A.73, for example, calls for the development of flexible on-site vehicle parking requirements, which would reduce impacts to GHG. Overall, the proposed Project is consistent with the impact identified in the General Plan EIR, and the level of impact (less than significant) would remain unchanged as indicated on page 3.5-22 of the General Plan EIR.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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. As stated in the General Plan EIR, the implementation of the 2035 General Plan would allow for the development of land uses that may require the routine use, transport, and disposal of hazardous material and waste within the 2035 General Plan Area. Additionally, future construction associated with buildout of the 2035 General Plan may generate hazardous materials and waste. Compliance with federal and state regulations regarding the use, transportation, disposal, and accidental release of hazardous materials would be required. Locally, facilities requiring a hazardous materials permit would be subject to routing inspection by the SBFD. Transportation of hazardous waste in connection with construction and operations of future development under the 2035 General Plan would be subject to USDOT's requirements for hazardous materials transport and would require carriers to register with the DTSC. As stated in the General Plan EIR, there are no permitted hazardous waste facilities in the 2035 General Plan Area. Future construction could require the use of hazardous materials during construction and/or operation, the implementation of the applicable federal, state, and local regulations, in addition to the General Plan EIR policies and actions 4-P.8, 4-P.18, 4-P.19, 4-P.20, 4-A.29, 4-P.59, 4-P.60, 4-A.150, 4-A.152, 4-A.154, 5-P.1, 5-P.8, 5-P.23, 5-A.38, 5-A.39, 5-A.44, 5-P.28, 5-P.29, 5-P.30, 5-A.73, 5-A.74, 5-A.75, 5-A.76, 5-A.77, 7-P.31, 7-P.32, 7-A.119, and 7-A.120. For example, Policy 4-P.19, which calls for the provision of lands to accommodate a wide range of light industrial uses including research and development, manufacturing,

5. Impacts Found Not to Be Significant

agricultural processing, and logistics near transportation corridors in areas where low- to moderate-intensity operations would be sufficiently buffered, would reduce impacts to less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-36 of the General Plan EIR.

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

Less Than Significant Impact. As stated in Impact 5.9(a), future development of land uses would involve the use, transportation, disposal, and storage of hazardous materials which could cause personal injury, property damage, environmental degradation, or death from the release of hazardous materials caused by upset or accident conditions. Although risk of upset and accident conditions involving the release of hazardous materials into the environment cannot be completely eliminated, it can be reduced to a manageable level. Existing regulations at the federal, state, and local levels serve to minimize the potential for upset during routine transportation, use, and disposal, as discussed in Impact 5.9(a). Proper implementation of the SBFD's CUPA programs would assist in ensuring documentation of releases and threatened releases as well as the development of risk management and hazardous materials release response plans. As construction and/or operation of future development could release hazardous materials into the environment, future projects would implement existing federal, state, and local regulations, in addition to the General Plan EIR policies and actions 4-P.8, 4-P.18, 4-P.19, 4-P.20, 4-A.29, 4-P.59, 4-P.60, 4-A.150, 4-A.152, 4-A.154, 5-P.1, 5-P.8, 5-P.23, 5-A.38, 5-A.39, 5-A.44, 5-P.28, 5-P.29, 5-P.30, 5-A.73, 5-A.74, 5-A.75, 5-A.76, 5-A.77, 7-P.31, 7-P.32, 7-A.119, 7-A.120, and 7-A.123, to reduce impacts to less than significant. For example, Policy 4-P.20, which calls for the provision of the concentration of office, industrial, and commercial uses in appropriate locations near transportation corridors to encourage the development of employment center and reduce the potential for land use conflicts with sensitive use such as residential and schools, would reduce impacts to less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-39 of the General Plan EIR.

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

Less Than Significant Impact. The 2035 General Plan would allow land uses that would be reasonably expected to handle hazardous materials or generate hazardous emissions. Under the land use designations of the 2035 General Plan, there would be a range of land uses potentially allowed within a quarter mile of existing schools (there are no proposed schools in the 2035 General Plan). The most intense uses allowed under the 2035 General Plan, under the Light Industrial or Commercial/Industrial designations, include manufacturing, distribution, research and development, and ancillary commercial uses for the former; and auto services, commercial retail and services, manufacturing for the latter. Heavy industries would only be permitted in areas designated by the Santa Ana River Wash Plan, located away from schools.

Of the 21 public and private schools in the 2035 General Plan Area, there are four schools that are located in areas where the 2035 General Plan contains only designations for residential, park, or other schools within a

5. Impacts Found Not to Be Significant

quarter mile of the property; two schools have 2035 General Plan designations for residential, park, or agricultural uses within a quarter mile; six schools have 2035 General Plan designations for residential, commercial, office, agriculture, parks, and public uses within a quarter mile; and the remaining nine schools all have 2035 General Plan designations for Light Industrial or Commercial/Industrial within a quarter mile of the property. As indicated in the General Plan EIR, individual users of hazardous materials would continue to be regulated by local disclosure, permitting, and notification requirements of the “Disclosure of Hazardous Materials” program consistent with all federal, state, and local laws. Public schools are also required to evaluate and potentially amend their school safety plan on an annual basis. In the case that any new schools or alterations to existing schools would be required in the future, the siting of schools, including existing facilities and upgrading construction projects, would be regulated by the California Department of Education (CDE); and new facilities would not be constructed within a quarter mile of facilities emitting or handling materials consistent with CDE requirements. In addition to these regulations, future development would also comply with General Plan EIR policies and actions 4-P.8, 4-P.20, 4-P.21, 4-A.30, 7-A.118, 7-A.127, and 7-A.124, that will ensure impacts are less than significant. For example, Action 7-A.124 prohibits the development of projects that would reasonably be anticipated to emit hazardous air emissions or handle extremely hazardous substances within a quarter mile of a school, and therefore, would ensure that impacts to schools are less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-41 of the General Plan EIR.

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

Less Than Significant Impact. There are numerous sites in the 2035 General Plan Area, including in the TVPA, that are included on a list of hazardous material sites compiled pursuant to Government Code Section 6592.5 or that need further investigation, as shown on Figure 3.71, *Hazardous Materials Sites*, and Table 3.7-1, *Permitted Hazardous Materials Facilities*, Table 3.7-2, *DTSC Cleanup Sites (EnviroStor)*, and Table 3.7-3, *SWRCB Geotracker Sites*, of the General Plan EIR. As indicated in the General Plan EIR, several of the sites have been reported releases to the ground result in soil and groundwater contamination and which are subject to various state and federal laws, including CERCLA, EPA, DTSC, and the RWQCB, and are in various stages of cleanup. Redevelopment of sites with existing soil or groundwater contamination in accordance with the 2035 General Plan could potentially pose a significant hazard to the public of environment through the release of hazardous materials. However, as discussed in Impact 4.7-1 of the General Plan EIR, these sites are regulated by existing federal and state policies and have been or are being investigated and remediated. For future projects, CEQA requires developers to reference the Cortese List and state if the project or any alternatives would be located on a listed site complying with the applicable federal, state, and local regulations and programs, as well as the General Plan EIR policies and actions 4-P.8, 4-P.18, 4-P.19, 4-P.20, 4-A.29, 4-P.59, 4-P.60, 4-A.150, 4-A.152, 4-A.154, 5-P.1, 5-P.8, 5-P.23, 5-A.38, 5-A.39, 5-A.44, 5-P.28, 5-P.29, 5-P.30, 5-A.73, 5-A.74, 5-A.75, 5-A.76, 5-A.77, 7-P.31, 7-P.32, 7-A.119, 7-A.120, 7-A.123, 7-A.127, and 7-A.124, which would reduce impacts to less than significant. Action 7-A.127 calls for the City of Redlands Local Hazard Mitigation Plan to be used as a guide for identifying hazard risks and vulnerabilities, identifying and prioritizing mitigation actions, encouraging the development of local mitigation, and providing technical support for

5. Impacts Found Not to Be Significant

these efforts, and would reduce impacts to less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-41 of the General Plan EIR.

- 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?**

No Impact. The 2035 General Plan Area includes portions that are within the airport land use plan area of the Redlands Municipal Airport or within two miles of the SBIA. The 2035 General Plan does not include policies or land use changes that would conflict with the Redlands Municipal Airport ALUCP or the guidelines for SBIA's compatibility zones as provided in the California Airport Land Use Planning Handbook. The TVPA is outside of the land use compatibility zone of for the Redlands Municipal Airport as shown in Figure 7-7, *Airport Hazards*, of the 2035 General Plan. The Project site is located in a highly urbanized area where development currently exists, and is not within the land use compatibility zone, therefore no impact would occur. The General Plan EIR identified this impact as less than significant on page 3.7-43 of the General Plan EIR, however, as the proposed Project is outside the land use compatibility zone, no impact would occur.

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

Less Than Significant Impact. The General Plan EIR stated that relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan, and to the extent that they mitigate potential disasters in the 2035 General Plan Area, the Redlands HMP and the San Bernardino County MJHMP. Physical development under the 2035 General Plan, including roadways, land uses, and increased densities, could create obstacles to the implementation of emergency response or evacuation plans adopted for the 2035 General Plan Area. However, the policies and actions in the General Plan EIR would eliminate or reduce these impacts by seeking to use the Redlands HMP, which is consistent with the MJHMP, as a guide for emergency planning, thus taking into account hazards and promoting means to reduce risks as well as improve emergency access, ingress, egress, emergency preparedness, and inter-jurisdictional cooperation throughout the 2035 General Plan Area. Future development could interfere with an adopted emergency response plan or emergency evacuation program, the implementation of General Plan EIR policies and actions 7-A.119, 7-A.127, 5-P.7, 5-A.15, 7-A.90, 7-A.91, 7-A.96, 7-A.117, 7-P.37, 7-P.38, 7-A.128, 7-A.129, 7-A.130, 7-A.131, 7-A.132, and 7-A.133 would ensure that impacts would be reduced to less than significant. For instance, Action 5-A.15 calls for the maintenance of access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code, which would ensure reduce impacts to emergency vehicles. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-44 of the General Plan EIR.

5. Impacts Found Not to Be 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. According to Figure 3.7-3, *Fire Hazards and Fire Safety Services*, of the General Plan EIR, the majority of Redlands is designated by CalFire as having a Moderate fire threat level, with areas of High, Very High, and Extreme threat found on the periphery of the City and in the SOI outside of the City limits in the canyonlands, Crafton, Mentone, and in the Santa Ana Wash. As indicated in the General Plan EIR, new development that occurs pursuant to the 2035 General Plan would generally occur within areas shown with Moderate fire threat, which covers most of the already urbanized portions of the 2035 General Plan Area accessible to emergency services and managed vegetation. The Project site is located within areas classified as Moderate fire threat, according to Figure 3.7-3 of the General Plan EIR. The policies require all development to adhere to safety standards provided in the CBC and California Fire Code, and promote close coordination with the Redlands Fire Department and the fire services of neighboring jurisdictions to ensure the safety of new development. Therefore, new development would be required to comply with state building and fire codes, as well as General Plan EIR policies and actions 7-A.90, 7-A.91, 7-A.96, 7-A.117, 5-P.7, 5-A.15, 6-A.35, 7-P.12, 7-P.28, 7-A.87, 7-A.88, 7-A.89, 7-A.93, 7-A.95, 7-A.101, 7-A.102, 7-A.103, 7-A.04, 7-A.105, 7-A.106, and 7-A.82, to ensure that impacts are less than significant. For example, Action 7-A.89 requires adherence to applicable building codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code, and therefore compliance with these codes and standards would reduce impacts involving wildland fires to less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-47 of the General Plan EIR.

5.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. Development that occurs in the 2035 General Plan Area would increase impervious surfaces from the placement of roads, parking lots, buildings, and other infrastructure. Other sources of water quality impacts include direct discharge associated with industrial/commercial activities, automobiles, agriculture, and herbicides. The increase in impervious surfaces as a result in additional development and redevelopment under the 2035 General Plan could increase the amount of runoff and associated pollutants during construction and/or operation. However, every construction activity as a result of the proposed Project, that has the potential to negatively affect water quality is required to comply with the NPDES Stormwater Discharge Permit. The City's Pretreatment and Regulation of Wastes Ordinance (Ord. 2268 § 1, 1995) codified as Redlands Municipal Code Chapter 13.52, *Pretreatment and Regulation of Wastes*, and its Storm Drains Ordinance (Ord. 2274 § 1, 1995) codified as Redlands Municipal Code Chapter 13.54, *Storm Drains*, would further protect water quality in the Project site. As stated in the General Plan EIR, the policies promote the protection of the City's natural water bodies, prevent water pollution, ensure preparation and implementation of applicable water quality plans, require incorporation of BMPs, and otherwise ensure

5. Impacts Found Not to Be Significant

compliance with the City's NPDES Permit and other related regulations. Further, development would be subject to the RWQCB requirements and the City of Redlands Municipal Code. The Project site is highly urbanized and is mostly developed with impervious surfaces. All development is required to adhere to these regulations, and with the implementation of General Plan EIR policies and actions 6-P.19, 6-P.20, 6-A.35, 6-A.40, 6-A.41, 6-A.42, 6-A.44, and 8-A.32. For example, Action 6-A.35 calls for the use of Low Impact Development strategies, BMPs, pervious paving materials, and on-site infiltration for treating and reducing storm water runoff before it reaches the municipal storm water system, which would ensure that water quality standards are not violated. Therefore, impacts would be reduced to less than significant upon implementation of these policies and actions. Impacts of the proposed Project and the General Plan EIR are less than significant, as identified on page 3.9-28 of the General Plan EIR.

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

Less Than Significant Impact. The 2035 General Plan Area is in the Upper Santa Ana Valley Groundwater Basin. The City's domestic water wells contribute approximately 50 percent of the water supply; additional development under the 2035 General Plan would increase demands for water. The City's Well Drilling Ordinance (Ord. 2110 § 1, 1990) as codified in Redlands Municipal Code Chapter 13.42, *Well Drilling*, protects groundwater from potential sources of contamination resulting from well drilling. Future development that would increase the demands of water supplies would follow General Plan EIR policies and actions: 6-P.20, 6-A.35, 6-A.40, 6-A.41, 8-A.32, 6-P.21, 6-A.34, 8-P.6, 8-A.22, and 8-A.25. For instance, Policy 8-P.6 calls for minimizing dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non-potable water for irrigation of landscaping and agriculture, where feasible, which would reduce reliance on groundwater supplies. Therefore, these policies and action would reduce impacts to less than significant. As identified on page 3.9-30 of the General Plan EIR, the General Plan EIR and the proposed Project would result in less than significant impacts.

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

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Future development or redevelopment allowed under the 2035 General Plan could impact the existing drainage system. Increases to impervious surfaces would lead to increase stormwater flow, which could increase runoff into local storm drains. Increased runoff volumes could result in erosion, siltation, or flooding. The Project site is located in a highly urbanized area that is mostly developed with impervious surfaces. All development would be subject to the City's Flood Damage Prevention Ordinance (Ord. 2837, 2016) codified as Redlands Municipal Code Chapter 15.32, *Flood Damage Prevention*, City's Storm Drains Ordinance (Ord. 2274 §1, 1995) codified as Redlands Municipal Code Chapter 13.54, *Storm Drains*, and General Plan EIR policies and actions 6-P.19, 6-A.35, 6-A.40, 6-A.44, 6-A.12, 6-A.36, 6-A.37, 6-A.39, 7-A.77, 7-A.78, and 7-A.80. For example, Action 6-A.39 requires

5. Impacts Found Not to Be Significant

that new development provides landscaping and revegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants, in order to prevent erosion. Therefore, impacts of the proposed Project, to erosion and siltation, would be reduced to less than significant as with the General Plan EIR, as identified on page 3.9-32 of the General Plan EIR.

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

Less Than Significant Impact. See response to Impact 5.10(c.i). This impact would be less than significant.

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

Less Than Significant Impact. Increases in impervious surfaces would lead to increased stormwater flow. The RWQCB ensures compliances with NPDES Permit requirements, and construction activities within the Project site that has the potential to negatively affect water quality must prepare a construction SWPPP. Projects that disturb one acre or more of impervious surface would be subject to the NPDES Stormwater Discharge Permit and stormwater pollution prevention requirements. The Project site is located in a highly urbanized area and is mostly developed with impervious surfaces. The proposed Project would implement the NPDES Permit, BMPs, and other related regulations, as well as General Plan EIR policies and actions 6-P.20, 6-A.35, 6-A.40, 6-A.41, 6-A.44, 6-A.34, 7-A.77, 7-A.78, 6-A.38, 6-A.43, 7-A.76, and 8-A.10. For example, Action 6-A.43 ensures that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate. Therefore, impacts of the proposed Project on the capacity of stormwater drainage systems would be less than significant as with the General Plan EIR, as identified on page 3.9-34 of the General Plan EIR.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The 2035 General Plan designated land for commercial and residential development within 100-year flood hazard areas, as identified in Figure 3.9-2, *Flood Hazards*. Pursuant to Municipal Code Chapter 15.32, *Flood Damage Prevention*, the City of Redlands requires a special use permit for any development proposed in areas of special flood hazards. Redevelopment of sites within the 100-year flood hazard areas are required to meet current stormwater management regulations. Portions of the Project site are located within the 100-year floodplain, as shown in Figure 3.9-2, *Flood Hazards*, of the General Plan EIR. Future development must comply with the municipal code and the following General Plan EIR policies and actions 7-P.26, 7-A.74, and 7-A.81. For example, 7-A.74 calls for the continued participation in the National Flood Insurance Program (NFIP) and the Community Rating System to ensure that the City is incentivized to reduce the risk of damage from flooding and improve flood preparedness, which would ensure that impacts to impeding or redirecting flood flows are less than significant. Impacts of the proposed Project and the General Plan EIR would be less than significant as identified on page 3.9-37 of the General Plan EIR.

5. Impacts Found Not to Be Significant

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

Less Than Significant Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. 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. Although there are no large water tanks in the area that could impact the Project site, there are dams in the region that could create flooding impacts. Thirteen dams in the greater Los Angeles area moved or cracked during the 1994 Northridge earthquake. However, none were severely damaged. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act.

The 2035 General Plan Area is located sufficiently inland to be out of what would be considered a potential hazard area for seiches, tsunamis, and sea level rise; therefore, implementation of the proposed Project would not risk the release of pollutants. The proposed Project would be required to be in compliance with the City's existing regulations pertaining to flooding hazards, along with General Plan EIR policies and actions 7-A.77, 7-A.78, 7-A.76, 7-A.74, 7-A.81, 2-A.92, and 7-A.132. For example, 7-A.78 calls for the use of the Drainage Master Plan to implement improvements to the drainage system in order to address flooding impacts; where feasible, "green initiatives" such as site infiltration basins and bioretention should be used in places where they would be most effective. Therefore, the City's regulations and 2035 General Plan policies and goals would ensure that impacts associated with the risk release of pollutants due to flood inundation would be less than significant, as with the General Plan EIR, as identified on page 3.9-39 of the General Plan EIR.

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

Less Than Significant Impact. See response to Impact 5.10(a). The proposed Project would be required to comply with federal, state, and local regulations and plans, as well as General Plan EIR policies and actions 7-A.123, 8-A.32, 6-P.21, 6-A.34, 8-P.6, 8-A.22, 8-A.24, and 7-P.27. For example, Action 8-A.32 calls for the mitigation of impacts associated with the expansion of existing landfills or development of new landfills to include effects on streets and highways, drainage systems, groundwater, air quality, natural resources, aesthetics, and property maintenance which would ensure compliance with water quality control and groundwater management plans. The Project area is largely covered with urban uses and streets, affording minimal groundwater recharge. Compliance with the City's existing regulations, along with General Plan EIR policies and actions would ensure that impacts associated with water quality control and groundwater management plans would be less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant, as identified on page 3.9-28 of the General Plan EIR.

5. Impacts Found Not to Be Significant

5.11 MINERAL RESOURCES

Would the project:

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

No Impact. Changes to land use designations in areas designated by the California State Mining and Geology Board (SMGB) as containing regionally significant aggregate resources classified as MRZ-2 (areas where geologic data indicate that significant PCC-Grade aggregate resources are present). These changes included the reclassification of all areas designated as Flood Control/Construction Aggregates Conservation/Habitat Preservation to the Open Space designation, as well as a change in designation of an 86-acre property at the northeast corner of Crafton Avenue and Madeira Avenue in Mentone from Flood Control/Construction Aggregates Conservation/Habitat Preservation to Light Industrial.

According to Figure 3.11-1, *Mineral Resources*, of the General Plan EIR, portions of the Project site are located in the MRZ-2 Zone, while the majority of the Project site is in the MRZ-3 Zone (areas containing known or inferred mineral occurrences of undetermined mineral resource significance). The Project site is currently developed and is located in a highly urbanized portion of the City with no possibility of developing mineral extraction uses because of noise, transportation, and proximity to homes. Page 3.11-10 of the General Plan EIR identified this impact as less than significant, however, as the project area is within the MRZ-2 and MRZ-3 zones, and the project site is highly urbanized and built out, impacts of the proposed Project would be less than significant.

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

No Impact. See response to section 5.11(a). The 2035 General Plan does not contain land use changes or policies that would affect existing mining operations within or adjacent to the 2035 General Plan Area. The 2035 General Plan does not designate any locally important mineral resource recovery sites in the 2035 General Plan Area, though it does include the Flood Control/Construction Aggregates Conservation/Habitat Preservation land designation which applies to land that would potentially be used for aggregate mining activities. The Project site is currently developed and is located in a highly urbanized portion of the City. The proposed Project would not change existing land use or zoning designations therefore there would be no impact on locally important mineral resource recovery sites. As identified on page 3.11-12 of the General Plan EIR, the General Plan EIR and the proposed Project would result in no impact.

5. Impacts Found Not to Be Significant

5.12 NOISE

Would the project:

- 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?**

No Impact. Noise is regulated at the federal, state and local level depending on the noise source. The General Plan EIR analyzed potential noise impacts both from construction activities and from operation at full build-out. The proposed Project is a ballot initiative that, if approved by voters, would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. No specific development project is proposed under the proposed Project. As discussed in the General Plan EIR, the City regulates noise associated with construction equipment and activities through its noise ordinance in the Municipal Code and, since compliance with the City's noise ordinance in Municipal Code Section 8.06.090 would be required for any future construction, the noise impacts from construction activities was found to be less than significant. Since this would also be the case under the proposed Project, no new or substantially greater impacts would occur when compared to those identified in the General Plan EIR, and the level of impact (less than significant) remains unchanged.

The proposed Project would not increase or change the overall land use buildout assumed and analyzed in the General Plan EIR. The General Plan EIR identified permanent traffic noise increases of up to 1.2 dBA CNEL with future build-out plus project traffic conditions. The proposed Project would not affect the regional growth of the City and would be consistent with the overall growth forecast analyzed under the General Plan EIR. The overall traffic noise increase would not be greater than analyzed under the General Plan EIR. The TVPA is oriented around three of the future transit stations identified in the General Plan along the Redlands Passenger Rail line, which, as discussed in the General Plan EIR, could expose people to noise from railway operations. However, the rail line will have quiet zones at its street crossings. For all future developments within the City that fall within the required noise screening distances as specified in the FTA Noise and Vibration Manual (FTA 2018), a detailed noise analysis would be required. The screening distance for commuter rail is 750 feet with no obstruction between the rail line and receptor and 375 feet with intervening buildings. This would also be required for future development under the proposed Project. Stationary sources (including but not limited to HVAC equipment and truck loading docks) that may be part of future projects developed under the proposed Project would be subject to the City's noise ordinance contained in the Municipal Code Sections 8.06.070 and 8.06.080. The following General Plan EIR policies and actions are applicable to reducing noise impacts: 7-P.39, 7-P.40, 7-P.41, 7-P.42, 7-A.135, 7-A.136, 7-A.137, 7-A.138, 7-A.139, 7-A.140, and 7-A.141. For example, Policy 7-P.41 indicates, "Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure criterion in land use planning." The proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (less than significant) remains unchanged, as identified on pages 3.12-32 through 3.12-49 of the General Plan EIR.

5. Impacts Found Not to Be Significant

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

No Impact. As discussed in the General Plan EIR, construction vibration would be less than significant. The proposed Project is a ballot initiative that, if approved by voters, would allow the City Council to consider future projects within the TVPA without the burden of the annual residential dwelling unit limitation. No specific development project is proposed under the proposed Project. Overall, the proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (less than significant) remains unchanged.

The TVPA is oriented around three of the future transit stations identified in the General Plan along the Redlands Passenger Rail line, which, as discussed in the General Plan EIR, could expose people to vibration from railway operations. As discussed in the General Plan EIR, all future developments within the City that fall within the required screening distances as specified in the FTA Noise and Vibration Manual (FTA 2018), a detailed vibration analysis would be required. Overall, the proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (less than significant) remains unchanged, as indicated on pages 3.12-52 and 3.12-53 of the General Plan EIR.

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

No Impact. As discussed in the General Plan EIR, the Redlands Municipal Airport is located in the northeast part of the city. However, the TVPA is not located within the published noise contours for the Redlands Municipal Airport or the San Bernardino International Airport and would not expose people residing or working in the project area to excessive noise levels. The proposed Project would be consistent with the impacts identified in General Plan EIR, and the level of impact (less than significant) remains unchanged, as identified on page 3.12-56 of the General Plan EIR.

5.13 PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. The demand for fire protection services would increase due to the additional residents proposed under the 2035 General Plan buildout period. Population increases could result in increased alarms and call volumes that could negatively impact the Fire Department response times. The majority of new development would be located in infill sites in urbanized areas of the City, most of which are in areas of low fire hazard severity. However, residential development near the Resource Preservation land use category in the canyons presents challenges for fire service. New residential and commercial development

5. Impacts Found Not to Be Significant

throughout the 2035 General Plan Area may increase the likelihood of fire and the response time of fire services. According to the General Plan EIR, the Fire Department determined that it would need to increase the number of fire stations in order to meet the increased future service demands. Due to the minimal effects that the development of new facilities would have on the environment, the concentration of most new development in areas already well-served by fire protection services, and the addition of policies to reduce fire hazards in the City, impacts to fire protection would be less than significant, according to the General Plan EIR. The following policies and actions of the General Plan EIR would continue to be applicable to the proposed Project: 4-P.56, 4-P.57, 4-A.145, 4-A.146, 4-A.148, 6-A.36, 6-A.39, 7-A.149, 8-A.9, 8-A.17, 8-A.39, 8-A.40, 4-P.59, 4-P.60, 4-A.150, 4-A.152, 4-A.154, 7-P.28, 7-A.84, 7-A.85, 7-A.87, 7-A.88, 7-A.89, 7-A.91, 7-A.93, 7-A.94, 7-A.95, 7-A.96, 7-A.101, 7-A.102, 7-A.103, 7-A.104, 7-A.105, and 7-A.106. For example, Action 4-A.154 calls for the inclusion of Police and Fire Departments in the review of new developments to provide feedback on building and site design safety. Therefore, as the proposed Project focuses on the TVPA of the City, which is highly urbanized and no Resource Preservation land uses are within or adjacent to the TVPA, impacts of the proposed Project on fire protection would be less than significant, as with the General Plan EIR which identified less than significant impacts as seen on page 3.13-27.

b) Police protection?

Less Than Significant Impact. The Redlands Police Department would need to grow in order to accommodate the increases in demand from the growing population and meet service standards in the future. The Redlands Police Department anticipates the need for significant improvements in staffing and facility capacity in order to serve the 2035 population of 79,000 residents. Meeting facilities needs for an expanded Police Department would likely require new construction or physically altering an existing facility. Development impact fees from new development would serve to ensure that improvements are made in a timely manner so as to avoid deterioration of existing facilities, according to the General Plan EIR. The following policies and actions of the General Plan EIR would continue to be applicable to the proposed Project: 4-P.56, 4-P.57, 4-A.145, 4-A.146, 4-A.148, 6-A.36, 6-A.39, 7-A.149, 8-A.9, 8-A.17, 8-A.39, 8-A.40, 4-P.59, 4-P.60, 4-P.61, 4-A.150, 4-A.151, 4-A.152, 4-A.153, 4-A.154, 7-P.23, 7-P.24, 7-A.68, 7-A.69, 7-A.70, 7-A.71, 7-A.72, and 7-A.73. For instance, Action 7-A.68, calls for the incorporation of Crime Prevention through Environmental Design principles and best practices into the Zoning Ordinance and project review for new development and major renovations. The policies and actions of the General Plan EIR would reduce impacts to the demand for police protection services, including physical demands, and therefore, the proposed Project would have a less than significant impact on police protection services, as with the General Plan EIR, as identified on page 3.13-28 of the General Plan EIR.

c) Schools?

Less Than Significant Impact. The school-aged population is expected to increase which would impact enrollment totals in Redlands Unified School District (RUSD) facilities within the 2035 General Plan Area. The General Plan EIR stated that although ongoing demographic trends are causing reductions in the percentage of school-aged children compared to the total population, the projected population increase, for the 2035 General Plan, would result in the number of elementary school students exceeding school capacity. The General Plan EIR indicated that RUSD could utilize trailers and portable classrooms to accommodate

5. Impacts Found Not to Be Significant

students in the interim, however, a new school may be required. RUSD owns land north of Mission Road in Loma Linda which would be utilized to construct a new school if necessary. The following General Plan EIR policies and actions would be applicable to the proposed Project: 4-P.56, 4-A.145, 4-A.146, 4-A.148, 6-A.36, 6-A.39, 7-A.149, 8-A.9, 8-A.17, 8-A.39, 8-A.40, 4-P.62, 4-A.156, 4-A.157, 4-A.158, and 4-A.159. For example, Action 4-A.145 calls for the coordination of future development with the City's Capital Improvement Program to ensure adequate funding and planning for needed public services and facilities. Impacts of the proposed Project and the General Plan EIR are less than significant, as identified on page 3.13-25 of the General Plan EIR.

d) Parks?

Less Than Significant Impact. Without the development of new parks, the increase in population would place additional physical demands on existing parks. An increase in the number of park users would cause parks to be in active use for longer periods of time and/or used more intensively other the course of a typical day. As indicated in Table 3.13-6, *Parkland Comparison (City of Redlands 2015 and 2035)*, of General Plan EIR, in 2035, with the development of 140.9 acres of proposed parkland as designated in the 2035 General Plan, and the addition of 10,355 residents, the parkland ratio would be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people. Additionally, the City's development impact fees would ensure that new parkland is distributed evenly throughout the 2035 General Plan Area, which would prevent the overuse and physical deterioration of facilities. The following policies and actions would reduce impacts to parks: 4-P.56, 4-P.57, 4-A.145, 4-A.146, 4-A.148, 6-A.36, 6-A.39, 7-P.4, 7-P.5, 7-P.6, 7-P.7, 7-P.8, 7-P.9, 7-P.10, 7-P.11, 7-P.15, 7-A.1, 7-A.2, 7-A.3, 7-A.4, 7-A.5, 7-A.6, 7-A.7, 7-A.8, 7-A.9, 7-A.10, 7-A.11, 7-A.12, 7-A.13, 7-A.14, 7-A.15, 7-A.16, 7-A.17, 7-A.18, 7-A.19, 7-A.20, 7-A.21, 7-A.22, 7-A.23, 7-A.24, 7-A.25, 7-A.26, 7-A.27, 7-A.28, 7-A.29, 7-A.30, 7-A.31, 7-A.32, 7-A.33, 7-A.34, 7-A.149, 8-A.9, 8-A.17, 8-A.39, and 8-A.40. For example, Policy 7-P.8 calls for minimizing substitution of private recreation facilities for developer fee payment or park dedication to ensure that a public park system will be permanently available to the entire community. Impacts of the proposed Project and General Plan EIR, as identified on page 3.13-19 of the General Plan EIR, are less than significant.

e) Other public facilities?

Less Than Significant Impact. The increase in residents, within the 2035 General Plan Area, would likely increase demand for library and other community services. The General Plan EIR indicated that a portion of this increase in demand can be accommodated by extending the hours of operation of the Smiley Library. Development impact fees from new development would serve to ensure that improvements are made in a timely manner so as to avoid the deterioration of existing library facilities. Similar to the General Plan EIR, with the implementation of the following policies and actions, impacts to library facilities would be less than significant: 4-P.56, 4-P.57, 4-A.145, 4-A.146, 4-A.148, 6-A.36, 6-A.39, 7-A.149, 8-A.9, 8-A.17, 8-A.39, and 8-A.40, as identified on page 3.13-26 of the General Plan EIR.

5. Impacts Found Not to Be Significant

5.14 RECREATION

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

Less Than Significant Impact. See response to Impact 5.13(d), above. An increase in population could increase the demands on existing neighborhood and regional parks or other recreational facilities that could accelerate substantial physical deterioration of these facilities. However, with the implementation of policies and actions from the General Plan EIR, as well as the use of development impact fees, impacts to the physical deterioration of existing neighborhood and regional parks or other recreational facilities, as a result of project implementation, would be less than significant, as with the General Plan EIR impacts, as identified on page 3.13-19 of the General Plan EIR.

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

Less Than Significant Impact. See response to Impact 5.14(a). As stated, the proposed Project does not propose any specific development project and would not result in increasing or changing the overall buildout land use assumptions analyzed in the General Plan EIR. Thus, the proposed Project would not result in any new impacts, or increase the severity of impacts, with respect to recreational facilities. Impacts of the proposed Project and the General Plan EIR are less than significant, as identified on page 3.13-19 of the General Plan EIR.

5.15 TRANSPORTATION

Would the project:

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

Less Than Significant Impact. The proposed Project does not propose the development of specific projects, and none of the growth management policies affect design requirements for safety and access. The General Plan EIR provides policies and actions to ensure a compatible and safe transportation network, and to ensure that roadway facilities consider the needs of users of all modes. The proposed Project would continue to implement the following General Plan EIR policies and actions: 5-P.1, 5-P.4, 5-P.8, 5-P.11, 5-P.14, 5-A.1, 5-A.2, 5-A.3, 5-A.4, 5-A.5, 5-A.8, 5-A.9, 5-A.10, 5-A.12, 5-P.16, 5-A.17, 5-A.18, 5-A.25, 5-A.36, 5-A.50, 5-P.29, 5-P.30, 5-A.76, 5-A.77, 5-A.78, 5-A.79, and 5-A.80. For example, Policy 5-P.29 of the General Plan EIR calls for the update and implementation of a truck route map to ensure it serves shipping needs in the City while considering potential conflicts with preferred modes and other sensitive land uses in the City, consistent with the layered network, and therefore, would reduce conflicts between incompatible uses and between all transportation networks. As with the General Plan EIR, impacts of the proposed Project would be less than significant with the incorporation of the General Plan EIR policies and actions, as identified on page 3.15-52 of the General Plan EIR.

5. Impacts Found Not to Be Significant

b) Result in inadequate emergency access?

Less Than Significant Impact. None of the growth management policies affect design requirements for safety and access, and design review, including that for emergency access, would be required on a project-by-project basis. As stated in the General Plan EIR, emergency vehicles take the fastest route to access an emergency; primary routes include Redlands Boulevard, Fern Avenue, Terracina Boulevard, and Barton Road. Of the primary evacuation routes, West Redlands Boulevard is located within the Project area. Implementation of current state and federal regulations, as well as the policies and actions of the General Plan EIR, which include 5-A.3, 5-P.7, 5-A.15, 7-A.90, 7-A.96, and 7-A.101 would reduce the potential impacts on intersections and roadway segments along emergency access routes in the City. For example, Action 5-A.15 calls for the maintenance of access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code. Impacts of the proposed Project and the General Plan EIR, as stated on page 3.15-55 of the General Plan EIR, are less than significant.

5.16 TRIBAL CULTURAL RESOURCES

Would the project:

- a) **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:**

Less than Significant Impact. Section 21074 defines tribal cultural resource as site features, places, cultural landscapes, sacred places, and objects of cultural value to a California Native America tribe that is included or determined to be eligible in the California Register of Historic Resources and included in local register of historical resources; or a resource determined by the lead agency to be pursuant to criteria set forth in subdivision (c) of § 5024.1.

As stated in the General Plan EIR, the City of Redlands contacted the California Native American Heritage Commission (NAHC) in July 2016 to request a search of its Sacred Lands File, pursuant to SB 18 and AB 52. The NAHC provided a list with 13 California Native American tribes to contact in accordance with SB 18. Of these tribes, the Agua Caliente Band of Cahuilla Indians and the San Manuel Band of Mission Indians indicated that they did not identify any cultural resources but requested drafts of the 2035 General Plan policies and the cultural section of the General Plan EIR. The following General Plan EIR policies and actions would be applicable to tribal cultural resources and the protection of such resources 2-P.17, 2-A.71, 2-A.72, 2-A.73, and 2-A.74. Compliance with the actions includes Action 2-A.72 that requires applicants for projects identified by the South Central 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; and, Action 2-A.73 that requires 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. The 2035

5. Impacts Found Not to Be Significant

General Plan policies and actions, coupled with compliance with AB-52 and SB-18, will ensure coordination with the area's native tribes in the review and protection of tribal cultural resources at development sites. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.8-25 of the General Plan EIR.

- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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 Impact. See discussion of Impact 5.5(a) in regard to state and local historical resources. There are no known tribal cultural resources in the 2035 General Plan Area, however, the 2035 General Plan Area has the potential to contain tribal cultural resources from past Native American activities. Sensitive areas include lands along water sources and the many rock outcroppings and boulders in the upland portions of the 2035 General Plan Area. As the proposed Project would require grading, overland vehicle travel, and other ground-disturbing activities, compliance with state and federal regulations regarding the protection of tribal cultural resources, such as AB 52 and SB 18, as well as the following General Plan EIR policies and actions, would ensure that impacts to tribal cultural resources as a result of Project implementation would be less than significant: 2-P.17, 2-A.71, 2-A.72, 2-A.73, and 2-A.74. These policies and actions would ensure that potential tribal cultural resources are protected and that tribes are included in the review and protection process of these resources. The City has completed consultation with Native American tribes. On February 15, 2019, the City sent Consultation Request letters to 22 tribes; responses were received from the following tribes: Agua Caliente Band of Cahuilla Indians, San Manuel Band of Mission Indians, and Augustine Band of Cahuilla Mission Indians (see Appendix 5, *Request for Tribal Consultation Responses*, of this SEIR). The Agua Caliente Band of Cahuilla Indians and San Manuel Band of Mission Indians concluded consultation stating that there would be no conflict as a result of the proposed Project. The Augustine Band of Cahuilla mission Indians had no concerns and did not request consultation. Therefore, impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.8-25 of the General Plan EIR.

5.17 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

Less Than Significant Impact. In the event of an evacuation, emergency vehicles use the following primary routes, if available: Redlands Boulevard, Fern Avenue, Terracina Boulevard, and Barton Road. Of the primary evacuation routes, West Redlands Boulevard is located within the Project area. The proposed Project would not impair an adopted emergency response plan or emergency evacuation plan, as future development

5. Impacts Found Not to Be Significant

would be required to comply with the General Plan EIR policies and actions aimed at ensuring that adequate emergency access is provided for existing and future development. Additionally, with the implementation of current state and federal regulations, combined with General Plan EIR policies and actions 5-A.3, 5-P.7, 5-A.15, 7-A.90, 7-A.96, and 7-A.101, the proposed Project would reduce potential impacts along emergency access routes. For example, Action 5-A.17 calls for the maintenance of access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code, and therefore, future development would continue to provide emergency access during and post-construction. As with the General Plan EIR, as identified on page 3.15-55 of the General Plan EIR, impacts of the proposed Project would also 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. There are three primary factors used in accessing wildfire hazards – topography, weather, and fuel. The Project area is generally flat and is in a highly urbanized environment. According to Figure 3.7-3, *Fire Hazards and Fire Safety Services*, of the General Plan EIR, the Project area is in a moderate threat level area. There are no slopes in or adjacent to the Project area, and because it is urban there are fire hydrants and access to the entire TVPA. As noted above, emergency access during and post-construction will be in compliance with the 2035 General Plan. Additionally, the following General Plan EIR action aims to reduce impacts to slopes: 7-A.93. Action 7-A.93 requires that new development minimize risks to life and property through fire hazards through multiple techniques, such as assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns, etc. The combination of urban development that reduces fire fuel, existing fire hydrants and water supply for suppression, coupled with multiple access points, ensure that uncontrolled wildfire impacts are less than significant. As identified on page 3.7-46 of the General Plan EIR, the General Plan EIR, as well as the proposed Project would have less than significant impacts pertaining to exposing people or structures to fire risks, and the proposed Project and General Plan EIR have less than significant impacts on landslides, as identified on page 3.6-17 of the General Plan EIR.

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

Less Than Significant Impact. The proposed Project may require new infrastructure for electricity, natural gas, telecommunications, and cable services. The utilities would be installed to meet service requirements. The Project area is highly urbanized and is located in a moderate fire hazard area; the proposed Project would not add infrastructure such as roads or overhead power lines in areas with wildland vegetation. Therefore, impacts to exacerbating fire risks to the environment would be less than significant for the proposed Project as well as the General Plan EIR, which identified that the project area is within a moderate fire hazard area, on page 3.7-46 of the General Plan EIR.

5. Impacts Found Not to Be 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. See responses to Impact 5.7(a.iv) on landslides, Impact 5.10(c.iv) on flood flows, and Impact 5.17(b) on slopes. The Project area is generally flat, is located in a highly urbanized portion of the City and is within a moderate fire hazard zone. According to Figure 3.6-3, *Landslide Potential*, of the General Plan EIR, the location of the proposed Project is not within a landslide potential zone. Moreover, according to Figure 3.9-2, *Flood Hazards*, of the General Plan EIR, portions of the Project area are located within the 100-year floodplain zone. Therefore, it is unlikely that the Project area would be susceptible to downslope or downstream flooding or landslides as a result of post-fire slope instability. Therefore, impacts would be less than significant, for the proposed Project, as with the General Plan EIR, which identified less than significant impacts to landslides, flood flows, and slopes on pages 3.6-17 and 3.9-37 of the General Plan EIR.

5.18 REFERENCES

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5. Impacts Found Not to Be Significant

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6. Alternatives to the Proposed Project

6.1 INTRODUCTION

6.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable range of project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (State CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the State CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])

6. Alternatives to the Proposed Project

- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

6.1.2 Project Objectives

As described in Section 2.3, the following objectives have been established for the proposed Project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

1. Encourage higher density residential development in the TVPA, consistent with the Transit Villages concepts identified in the 2035 General Plan for areas within a one-half mile radius of each rail transit station, to promote compact neighborhoods where people can live in close proximity to transit, and retail, office and entertainment uses.
2. Promote sustainable urban growth by encouraging development within the core areas of the City, where infrastructure already exists, at increased densities that translate into more efficient provision of municipal services, and that, by the virtue of close proximity of housing to jobs and services, will reduce vehicle miles travelled.
3. Promote transit ridership by allowing more residential development to be located within walking and biking distances from transit facilities.
4. Promote enhanced sense of community by encouraging higher density development in core areas of the City that can provide and promote public spaces for residents to use and congregate.
5. Providing new jobs, housing and entertainment opportunities in walkable environments.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

The following is a discussion of the alternatives considered during preparation of the Draft SEIR, and an explanation of why they were not selected for detailed analysis.

6.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first

6. Alternatives to the Proposed Project

step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). The location of the TVPA is unique in that it is focused on maximizing access to the planned transit stations. As the transit stations have been planned for some time and will be constructed by San Bernardino County Transit Authority (SBCTA) rather than the City of Redlands, moving the transit stations was also rejected as infeasible. No other location in the City would have a similar orientation, therefore changing the location was not considered feasible.

6.2.2 Existing Exemptions of Measure U and Measure N/Proposition R

During the SEIR process, assertions were made that the proposed Project was unnecessary because an exemption for transit-oriented projects already exists within the Measures and Proposition R. Table 6-1 shows all existing exemptions could be used in lieu of the proposed Project.

Table 6-1 Measure U Exemptions

Measure U Exemption	Applicability to Proposed Project
1. Vested Projects. This initiative measure shall not apply to or affect any property on which a vested right has been legally perfected and acquired prior to the Effective Date pursuant to state law.	Not Applicable. There are no vested properties within the TVPA, and any property that would have a vested right on it would have acquired it after the Effective Date (December 12, 1997); thereby, this exemption would not apply.
2. Special Categories of Development. The provisions of this initiative measure shall not apply to the following:	
1. New individual infill construction of single-family homes on existing lots of record bounded by developed property as of March 1, 1997;	Not Applicable. There are no single-family homes being proposed under the proposed Project, and all new infill construction that would occur, would be constructed after March 1, 1997; therefore, this exemption is not applicable to the proposed Project.
2. Rehabilitation, remodeling, or additions to existing single-family residential structures;	Not Applicable. The proposed Project would not result in the rehabilitation, remodeling, or addition to existing single-family residential structures. Therefore, this exemption is not applicable.
3. Reconstruction or replacement of any uses to the same density, intensity, and classification of use as existed on the Effective Date, including legal non-conforming uses;	Not Applicable. The proposed Project would not propose densities or intensities that existed on the Effective Date (December 12, 1997); the proposed Project would propose higher densities and intensities (27 dwelling units/acre as evaluated in the 2035 General Plan). Therefore, this exemption is not applicable.
4. Development directly related to proposed Metrolink stations in the City of Redlands, including one at the University of Redlands;	Not Applicable. In Resolution 7173, adopted in June 2012, the City Council determined that this exemption applied to the establishment of a "Transit-Village Overlay" land use classification for the purposes of developing the Metrolink stations. The Council also determined that Measure "U" prohibited adding new land use classifications to the General Plan without a vote of the people. Consequently, this exemption would not apply to proposed Project.

6. Alternatives to the Proposed Project

Table 6-1 Measure U Exemptions

Measure U Exemption	Applicability to Proposed Project
5. New development projects subject to the Downtown Specific Plan 45, upon a four-fifths (4/5ths) vote of the total authorized membership of the City Council; and	Potentially Applicable. New development in the Downtown Specific Plan 45 is exempt from Measure U. Specific Plan 45 limits buildings to 3-stories or 55 feet in height. Multiple Family development is a permitted use in Specific Plan 45 (Table 1), however no density is provided. General Plan Policy 4-P.14 establishes High Density Residential standard at up to 27 du/ acre.
6. Special, temporary, or occasional uses of public streets including parades, local sporting and cultural events, graduation ceremonies, approved school activities, and other occasional public gatherings.	Not Applicable. The proposed Project does not propose special, temporary, or occasional uses. Therefore, this exemption would not apply to the proposed Project.
3. Exemptions from Traffic and Socio-Economic Study Requirements Only. Development projects that directly further the primary institutional purposes of churches, hospitals, schools (including private schools and universities), and organizations such as the YMCA and YWCA, on sites held by such entities as of March 1, 1997, are exempt from the traffic level of service requirements and the requirement for a socio-economic study established by this initiative measure so long as such development projects are either 1) non-residential in character, or 2) provide only dormitory, staff housing or senior congregate care facilities for those exempt entities.	Not Applicable. The proposed Project proposes changes to residential uses, including removing the requirement for socio-economic studies for future development within the TVPA. Currently, the Council can waive the requirement with a 4/5ths vote if the project is located within Specific Plan 45. The Council also has the ability to require a socio-economic study as part of any future project. Pursuant to Section 15131 of the CEQA Guidelines, socio-economic impacts are not generally an environmental issue. Therefore, this exemption is not applicable to the proposed Project.

The exemptions of Measure U, as stated above, would not meet the project objectives, therefore it was determined that there are no existing exemptions that could be used in lieu of the proposed Project.

6.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following two alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the proposed Project, but which may avoid or substantially lessen any of the significant effects of the Project. These alternatives are analyzed in detail in the following:

- No Project/Existing General Plan Alternative
- Exemption of Measure U and Modification of Measure N and Proposition R

6.3.1 Alternatives Comparison

Table 6-2 shows that the existing buildout projections from the 2035 General Plan would not change as a result of the proposed Project or the two alternatives evaluated in this chapter of the SEIR. The proposed Project changes how the City can evaluate future projects within the TVPA, but there is nothing in the proposed Project that changes land use density and intensity.

6. Alternatives to the Proposed Project

Table 6-2 Buildout Statistical Summary

	Proposed Project	No Project/Existing General Plan Alternative	Exemption of Measure U and Modification of Measure N and Proposition R
Dwelling Units	31,104	31,104	31,104
Population	79,013	79,013	79,013
Employment	42,769	42,769	42,769
Jobs-to-Housing Ratio	1.20	1.20	1.20

6.4 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

The No Project alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the proposed Project is not approved (CEQA Guidelines, Section 15126.6(e)). Pursuant to CEQA, this alternative is also based on the existing 2035 General Plan. The No Project/Existing General Plan Alternative assumes that the proposed Project would not be adopted, and the TVPA would not be exempt from Measures U and N, and Proposition R. From a practical standpoint, this alternative would not allow for more than 400 housing units to be built citywide during any calendar year, establishes 18 units to the acre as the maximum density without a 4/5ths vote, and keeps building height for multiple family residential to 35 feet.

This alternative would assume that future development would occur consistent with the 2035 General Plan, and all growth management policies would remain in place. Impacts from development of the 2035 General Plan were evaluated in the General Plan EIR. All policies and programs intended to address environmental impacts would be implemented with any future development. Table 6-3 shows the General Plan EIR environmental determination for each of the environmental issue areas and compares the No Project alternative as well as the proposed Project.

6. Alternatives to the Proposed Project

Table 6-3 Comparison of No Project Alternative to General Plan EIR and Proposed Project

Environmental Issue	General Plan EIR	No Project Alternative	Proposed Project
Aesthetics	LS	LS	LS
Agriculture and Forestry Resources	SU	NI	NI
Air Quality	SU	SU	SU
Biological Resources	LS	LS	LS
Cultural Resources	LS	LS	LS
Energy	LS	LS	LS
Geology and Soils	LS	LS	LS
Greenhouse Gas	LS	LS	LS
Hazards and Hazardous Materials	LS	LS	LS
Hydrology and Water Quality	LS	LS	LS
Land Use and Housing	LS	LS	LS
Mineral Resources	LS	LS	LS
Noise	LS	LS	LS
Public Services	LS	LS	LS
Recreation	LS	LS	LS
Transportation	SU	LS	LS
Tribal and Cultural Resources	LS	LS	LS
Utilities and Service Systems	LS	LS	LS
Wildfire	LS	LS	LS

NI = No Impact, LS = Less Than Significant Impact, LSM = Less Than Significant with Mitigation Incorporated, SU = Significant and Unavoidable

As shown in Table 6-3, the environmental determination for each of the issue areas remains the same and will therefore not be discussed further in this Chapter. The impact of the proposed Project on the following environmental issue areas were evaluated in the SEIR and are included below for comparison with the No Project Alternative.

6.4.1 Land Use and Housing

Unlike the proposed Project, the No Project/Existing General Plan Alternative would not exempt the TVPA from Measures U and N, and Proposition R. While this alternative would result in development of the 2035 General Plan as adopted, it may be more difficult to implement the vision for the TVPA articulated in Chapter 4.5 Transit Villages of the 2035 General Plan, however the changes to voting requirements and the City's ability to consider future projects, do not rise to the level of environmental impacts.

Similar to the proposed Project, the No Project alternative does not change the buildout assumptions contained in the 2035 General Plan and evaluated in the General Plan EIR. Similarly, this alternative does not change any

6. Alternatives to the Proposed Project

regional plans based on the existing general plan designations or population projections. Unlike the proposed Project, this alternative does not allow the City flexibility in the consideration of future housing types or allow a new general plan designation that may have a larger range of densities. This alternative may also make it more difficult for developers to invest in development in the TVPA because of the uncertainty in obtaining building permits in any given year.

As neither the proposed Project nor the No Project alternative would result in land uses different than those in the 2035 General Plan and evaluated in the General Plan EIR concluding a less than significant impact, the impact of the No Project alternative would also be less than significant.

6.4.2 Transportation

As described in Section 4.2, *Transportation*, the requirement for the maintenance of traffic levels of service “C” for all intersections would no longer apply within the TVPA. Although the No Project/Existing General Plan Alternative would require the continued maintenance of traffic levels of service “C” for all intersections in the TVPA, the intersections within the TVPA that would operate below LOS C would not result in significant impacts if improvements are implemented. Also, none of the roadway segments in the TVPA would operate at a LOS of less than C in 2035. Segment #55 of I-10 would result in a LOS of less than C in 2035, however, because the City of Redlands does not have jurisdiction over freeways, impacts would be significant and unavoidable.

The adoption of SB 743 in 2013, eliminated the use of LOS as a determiner for significant environmental impacts associated with development. The new method of evaluation emphasizes a reduction in vehicle miles travelled and includes consideration of methods of transportation that do not require use of a personal automobile. (e.g. train, bus, bicycle, walking, ride share) The transition to VMT will occur in June 2020, shortly after consideration of the proposed Project by the voters. As such, the environmental analysis of future development projects in the City will include consideration of VMT, with a goal of reduction the number of miles travelled. One method of reducing miles travelled is to incorporate alternative transportation methods near homes. In this instance, the TVPA is uniquely suited to encourage development where residents could make maximum use of transit thereby reducing VMT. One effect of the transition to VMT will be that a project that does not maintain LOS C, will no longer automatically trigger an environmental analysis. If the 2035 General Plan policy remains intact, future projects might be denied for inconsistency with the General Plan but would not necessarily trigger an EIR. In this regard, both the No Project alternative and the proposed Project impact to LOS standards in the TVPA would be identical.

The No Project alternative would maintain the existing policies and requirements for consideration of projects within the TVPA. This alternative would not allow for greater flexibility in the consideration of development near the transit stations or recognize different transportation systems that can occur with a more comprehensive mixed-use design. However, like the proposed Project, this alternative does not change the density and intensity of development, therefore impacts would be identical to those of the proposed Project and evaluated in the General Plan EIR.

6. Alternatives to the Proposed Project

6.4.3 Utilities and Service Systems

The proposed Project and the No Project/Existing General Plan Alternative do not propose specific development projects, however, the buildout of both would result in an increased demand for water, wastewater treatment, storm drainage, solid waste disposal, and other services. Compared to the proposed Project, impacts to utilities and service systems would be the same; impacts would be less than significant.

6.4.4 Conclusion

The No Project/Existing General Plan Alternative would result in similar impacts to all the topical areas compared to the proposed Project, as the proposed Project would not result in an increase or change to the overall buildout land use assumption or growth of the 2035 General Plan. As this alternative does not allow the City to consider a range of development options near the proposed transit stations, and does not reflect changes in state law emphasizing a reduction in vehicle miles travelled, the No Project alternative would result in greater impacts to transportation than the proposed Project.

6.5 THREE-YEAR UNIT TOTAL ALTERNATIVE

Rather than eliminate the 400-dwelling unit per year cap within the TVPA, this alternative would:

1. Exempt the TVPA from Measure U; and,
2. Amend Measure N and Proposition R to eliminate the annual 400-dwelling unit cap citywide and replace it with a 1,200 unit citywide cap per every three-year period, without rollover of unused dwelling units.

Table 6-4 compares the Three-Year Unit Total alternative to the General Plan EIR and the proposed Project.

Table 6-4 Comparison of Three-Year Unit Total Alternative to General Plan EIR and Proposed Project

Environmental Issue	General Plan EIR	Three-Year Unit Total	Proposed Project
Aesthetics	LS	LS	LS
Agriculture and Forestry Resources	SU	NI	NI
Air Quality	SU	SU	SU
Biological Resources	LS	LS	LS
Cultural Resources	LS	LS	LS
Energy	LS	LS	LS
Geology and Soils	LS	LS	LS
Greenhouse Gas	LS	LS	LS
Hazards and Hazardous Materials	LS	LS	LS
Hydrology and Water Quality	LS	LS	LS
Land Use and Housing	LS	LS	LS

6. Alternatives to the Proposed Project

Table 6-4 Comparison of Three-Year Unit Total Alternative to General Plan EIR and Proposed Project

Mineral Resources	LS	LS	LS
Noise	LS	LS	LS
Public Services	LS	LS	LS
Recreation	LS	LS	LS
Transportation	SU	LS	LS
Tribal and Cultural Resources	LS	LS	LS
Utilities and Service Systems	LS	LS	LS
Wildfire	LS	LS	LS

NI = No Impact, LS = Less Than Significant Impact, LSM = Less Than Significant with Mitigation Incorporated, SU = Significant and Unavoidable

As shown in Table 6-4, the environmental determination for each of the issue areas remains the same and will therefore not be discussed further in this Chapter. The impact of the proposed Project on the following environmental issue areas were evaluated in the SEIR and are included below for comparison with the Three-Year Unit Total alternative.

6.5.1 Land Use and Housing

Unlike the proposed Project, the Three-Year Unit Total would require that development in the TVPA compete with the remainder of the City for the 1,200 dwelling unit allotment over each three-year period. As shown in Table 4.1-2 of this SEIR, the City has not met or exceeded the 400-unit annual cap in the last 19 years and averaged 109 units annually during the same period. However, the pace and pressure for residential development has significantly increased in the past couple of years as evidenced by the number of applications pending with the City. Since development throughout the City would be included in the three-year 1,200 dwelling unit calculation, this alternative has the potential to limit future development outside of the TVPA if one or more projects are entitled within the TVPA that equal the three-year unit total. Conversely, a large development project outside of the TVPA could limit the residential development potential within the TVPA as the total city-wide unit count would apply. The proposed Project would allow the City to approve development within the TVPA consistent with the Transit Villages component of the 2035 General Plan. This alternative could allow more development outside of the TVPA which could slow implementation of the Transit Village component of the 2035 General Plan.

As with the proposed Project this alternative would not increase the development potential as established in the 2035 General Plan and analyzed in the General Plan EIR.

6.5.2 Transportation

As described in Section 4.2, *Transportation*, the requirement for the maintenance of traffic levels of service “C” for all intersections would no longer apply within the TVPA. As this alternative would exempt the TVPA from

6. Alternatives to the Proposed Project

the provisions of Measure U, the impacts would be identical to those of the proposed Project as discussed in Section 4.02 of this SEIR.

The adoption of SB 743 in 2013, eliminated the use of LOS as a determiner for significant environmental impacts associated with development. The new method of evaluation emphasizes a reduction in vehicle miles travelled and includes consideration of methods of transportation that do not require use of a personal automobile. (e.g. train, bus, bicycle, walking, ride share) The transition to VMT will occur in June 2020, shortly after consideration of the proposed Project by the voters. As such, the environmental analysis of future development projects in the City will include consideration of VMT, with a goal of reduction the number of miles travelled. One method of reducing miles travelled is to incorporate alternative transportation methods near homes. In this instance, the TVPA is uniquely suited to encourage development where residents could make maximum use of transit thereby reducing VMT. One effect of the transition to VMT will be that a project that does not maintain LOS C, will no longer automatically trigger an environmental analysis. In this regard, both the Three-Year Unit Total alternative and the proposed Project impact to LOS standards in the TVPA would be identical.

Unlike the proposed Project, this alternative could lead to the consideration of large residential projects outside of the TVPA. Projects outside of the TVPA would be further from the transit stations and unlikely to realize the vision for the Transit Villages as expressed in the 2035 General Plan. Like the proposed Project, this alternative does not change the density and intensity of development, therefore impacts would be identical to those of the proposed Project and evaluated in the General Plan EIR.

6.5.3 Utilities and Service Systems

No specified development projects are proposed under the proposed Project or the Three-Year Unit Total. However, buildout under both the proposed Project and this alternative would result in a demand for water, wastewater treatment storm drainage, solid waste disposal, and other services as evaluated in the General Plan EIR. Compared to the proposed Project, impacts to utilities and service systems would be the same; impacts would be less than significant.

6.5.4 Conclusion

The Three-Year Unit Total alternative would result in similar impacts to all the topical areas compared to the proposed Project and the General Plan EIR. If the 1,200 dwelling units are entitled over several projects outside of the TVPA, this alternative may discourage development within the TVPA as there would be added risk for developers and lenders in pursuing projects that may have to wait several years to obtain residential allocations needed to start construction. Consequently, this alternative might restrict development within the TVPA and thus fail to meet the Project objectives such as focusing on higher density near the transit stations and sustainable urban growth reducing vehicle miles travelled. These issues do not affect the environmental conclusions in the General Plan EIR, or in this SEIR.

6. Alternatives to the Proposed Project

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. In this instance there are no new environmental impacts beyond those evaluated in the General Plan EIR. As a result, the proposed Project, and each of the alternatives, consider changes to the development review process, and increase in flexibility permitted for consideration of future projects. From an environmental perspective, the proposed Project furthers the goals of the 2035 General Plan, as well as allowing greater flexibility in future design of projects within the TVPA. This is considered beneficial and maximizing use of transit and encouraging walkable communities, is considered an environmental benefit. Reducing vehicle miles travelled is both a regional and statewide initiative. The proposed Project would allow the City to consider future projects that would further these concepts.

The Three-Year Unit Total alternative would only address the dwelling unit issued over a three-year period and would leave the remainder of the growth management policies intact. This alternative would address only the ability of a developer (or several developers) to obtain a building permit for residential uses and does not address the other policies that could hinder future designs. Unlike the proposed Project this alternative could result in large residential development outside of the TVPA and further away from the transit stations. Table 6-5 compares each alternative to the proposed Project objectives.

Table 6-5 Comparison of Three-Year Unit Total Alternative to Project Objectives

	No Project	Three-Year Unit Total
1. Encourage higher density residential development in the TVPA, consistent with the Transit Villages concepts identified in the 2035 General Plan for areas within a one-half mile radius of each rail transit station, to promote compact neighborhoods where people can live in close proximity to transit, and retail, office and entertainment uses.	No	No
2. Promote sustainable urban growth by encouraging development within the core areas of the City, where infrastructure already exists, at increased densities that translate into more efficient provision of municipal services, and that, by the virtue of close proximity of housing to jobs and services, will reduce vehicle miles travelled.	No	No
3. Promote transit ridership by allowing more residential development to be located within walking and biking distances from transit facilities.	No	No
4. Promote enhanced sense of community by encouraging higher density development in core areas of the City that can provide and promote public spaces for residents to use and congregate.	No	Yes
5. Encourage housing near jobs and entertainment opportunities in walkable environments.	No	Yes
Overall		

6. Alternatives to the Proposed Project

The No Project alternative fails to meet any of the proposed Project objectives. The Three-Year Unit Total alternative could result in large residential projects outside of the TVPA which does not further the intent of the Transit Villages as expressed in the 2035 General Plan. As the proposed Project does not result in any new or worsened environmental impacts as reported by the General Plan EIR, and since the alternatives fail to obtain most of the project objectives, the proposed Project is considered the environmentally superior alternative.

7. CEQA-Mandated Sections

This section describes various CEQA-mandated topics—alternatives to the proposed project, significant irreversible changes due to the proposed project, and growth-inducing impacts. However, since this is a Subsequent EIR, these topics will only be reanalyzed if the prior analysis from the General Plan EIR is determined to be inadequate for the current proposed Project conditions.

7.1 SIGNIFICANT IRREVERSIBLE CHANGES DUE TO THE PROPOSED PROJECT

Section 15126.2(c) of the State CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed Project should it be implemented. Specifically, the State CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The proposed Project would not result in significant and irreversible environmental changes beyond what was identified in the General Plan EIR. The proposed Project does not result in the development of specific projects and all future projects in the TVPA would be required to conduct a project-specific environmental analysis. Additionally, the proposed project is consistent with the growth forecasts of the General Plan EIR.

7.2 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Pursuant to Sections 15126(d) and 15126.2(d) of the State CEQA Guidelines, this section examines ways that the proposed Project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities that could affect the environment, individually or cumulatively.

Economic and Population Growth

As discussed in the General Plan EIR, the City of Redlands was estimated to have a population of approximately 68,049 as of 2015, and the City's population would increase to 79,013 people by 2035. In 2016, the City had 27,248 jobs, which is projected to increase to 42,769 jobs in 2035. By buildout, the City would have a total of 31,104 dwelling units, which is an increase of 4,355 dwelling units from the 2015 total number

7. CEQA Mandated Sections

of dwelling units (26,749 dwelling units). While the proposed Project would eliminate the requirement for a 4/5ths vote to allow a maximum of 27 units to the acre within the TVPA, the 2035 General Plan and the General Plan EIR, assumed the maximum density in both planning and environmental analysis respectively. The proposed Project does not change any land use a designation or zoning.

Removal of Obstacles to Growth

The 4/5ths vote requirement, building height restrictions, maintaining traffic levels of service “C,” prohibiting the creation of new land use designations, and 400-dwelling unit annual cap, are considered obstacles to realizing the 2035 General Plan vision for the TVPA. Removing these requirements within the TVPA would allow the City to consider future projects that are transit oriented and have higher density. It is expected that future projects would request a Specific Plan or similar planning approval that would require Planning Commission and City Council approval. Future projects would also require project-specific environmental analysis through compliance with CEQA. While the proposed Project will reduce the approval requirements and allow a greater deal of design flexibility than currently exists, there is no certainty that future projects will be approved, or that new general plan designations will be created.

As the proposed Project does not result in construction or require extension of services, the Project would not remove a physical obstacle to growth within or outside of the TVPA.

8. Persons Preparing the Subsequent EIR

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8. Persons Preparing the Supplemental EIR

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