CEQA FINDINGS OF FACT
FOR THE
REDLANDS RHNA REZONE PROJECT
CITY OF REDLANDS, CALIFORNIA
STATE CLEARINGHOUSE NO. 2016081041

Public Resources Code Section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which would avoid or substantially lessen such significant effects."

Agencies demonstrate compliance with Section 21002's mandate by adopting findings before approving projects for which EIRs are required. (See Pub. Resources Code, § 21081, subd. (a); State CEQA Guidelines § 15091, subd. (a).) The approving agency must make written findings for each significant environmental effect identified in an EIR for a proposed project and must reach at least one of three permissible conclusions.

- The first possible finding is that "[c]hanges 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." (State CEQA Guidelines § 15091, subd. (a)(1).)
- The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding" and that "[s]uch changes have been adopted by such other agency or can and should be adopted by such other agency." (State CEQA Guidelines § 15091, subd. (a)(2).)
- The third potential conclusion is that "[s]pecific 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." (State CEQA Guidelines § 15091, subd. (a)(3).)

Agencies must not approve a project with significant environmental impacts if feasible alternatives or mitigation measures would substantially lessen the significant impacts. Public Resources Code Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." State CEQA Guidelines Section 15364 adds "legal" considerations as another indicium of feasibility (See also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565). Project objectives also inform the determination of "feasibility." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.) Further, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Id.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) An agency need not, however, adopt *infeasible* mitigation measures or alternatives (State CEQA Guidelines § 15091, subds. (a), (b). Further, environmental impacts that are less than significant do not require the imposition of mitigation measures (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347).

Notably, Section 21002 requires an agency to "substantially lessen or avoid" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoid them, satisfy Section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 ("CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"); *Las Virgenes Homeowners Federation, Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300, 309 ("[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible").

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (State CEQA Guidelines § 15091, subds. (a), (b). The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors, supra,* 52 Cal.3d at p. 576).

The City of Redlands has determined that based on all the evidence presented, including, but not limited to, the Final EIR, written and oral testimony given at meetings and hearings on the Project, and submission of testimony from the public, organizations and regulatory agencies, the following environmental impacts associated with the Project are either:

(1) Less than significant and do not require mitigation; or
(2) Potentially significant and each of these impacts would be avoided or reduced to a level of insignificance through the identified mitigation measures.
(3) Significant and cannot be fully mitigated to a level of less than significant but will be substantially lessened to the extent feasible by the identified mitigation measures.

SECTION I

ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The Final EIR includes the Draft Subsequent Environmental Impact Report (EIR) dated January 2025, written comments on the Draft Subsequent EIR that were received during the public review period, written responses to those comments, changes to the Draft Subsequent EIR, and the Mitigation Monitoring and Reporting Program (MMRP). In conformance with CEQA and the State CEQA Guidelines, the City of Redlands conducted an extensive environmental review of the Redlands RHNA Rezone Project that includes the following:

- Completion of an Initial Study (IS) by the City of Redlands, which concluded that an EIR should be prepared, and the Notice of Preparation (NOP) released for a 30-day public review period. The NOP was posted on the City's website www.cityofredlands.org on July 1, 2024. The NOP was posted to the State Clearinghouse's ceqanet.opr.ca.gov for public review from July 1, 2024, through July 31, 2024. The NOP was also published in the Redlands Daily Facts newspaper on July 1, 2024. Copies of the NOP were mailed to neighbors within a 300-foot radius of the Project site. Copies of the IS were made available for public review and download via the City's website at: https://www.cityofredlands.org/post/environmental-documents
- Completion of a scoping process, in which agencies and the public were invited by the City of Redlands to participate. The public scoping meeting for the EIR was held on July 18, 2024, at 4:30 p.m. via Zoom. The notice of the public scoping meeting was included in the NOP distributed on July 1, 2024.
- Preparation of a Draft EIR by the City of Redlands was made available for a 45-day public review period (January 22, 2025, through March 7, 2025). The Notice of Availability (NOA) for the Draft Subsequent EIR was sent to all persons, agencies and organizations on the interested persons list, all neighbors within 300-feet of the Project site, published on the City's website, and filed with the County Clerk. The NOA was also published in the Redlands Daily Facts newspaper on January 22, 2025.
- The NOA of the Draft Subsequent EIR was posted to the State Clearinghouse's ceqanet.opr.ca.gov for public review from January 22, 2025, through March 7, 2025. Copies of the NOA and EIR were posted at the City of Redlands Development Service Department at 35 Cajon Street, Redlands, CA 92373 throughout the public review period. Copies of the Draft Subsequent EIR were made available for public review and download via the City's website at: https://www.cityofredlands.org/post/environmental-documents
- The Final EIR contains comments on the Draft Subsequent EIR, responses to those comments, revisions to the Draft Subsequent EIR if any, the Mitigation Monitoring and Reporting Program, and appended documents. The Final EIR was released more than 10 days prior to certification of the Final EIR.
- After considering the EIR and in conjunction with making these findings, the City of Redlands hereby finds that pursuant to Section 15092 of the CEQA Guidelines that approval of the Project will result in significant effects on the environment, however, the significant effects will be eliminated or substantially lessened where feasible and has determined that remaining significant effects are found to be acceptable under Section 15093.
- The Mitigation Monitoring and Reporting Program is hereby adopted to ensure implementation of feasible mitigation measures identified in the EIR. The City of Redlands finds that these mitigation measures are fully enforceable and shall be binding upon the City and affected parties.
- The City of Redlands finds that the Project is in the public interest and is necessary for the public health, safety, and welfare.
- The City of Redlands hereby certifies the Final EIR in accordance with the requirements of CEQA.
- Pursuant to CEQA Guidelines Section 15095, staff is directed as follows: a) copy of the Final EIR and CEQA Findings of Fact shall be retained in the Project files; b) copy of the Final EIR and CEQA Findings of Fact shall be provided to all CEQA "responsible" agencies.

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SECTION II

ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The City prepared an Initial Study that determined that potentially significant environmental effects could occur and that a Subsequent EIR should be prepared for the Project. The scope of the Subsequent EIR was determined based upon the Initial Study. Based upon the Initial Study, the City determined that the Project would have no impacts or a less than significant impact related to the following environmental topic areas and that no further analysis of these topics was required in the Subsequent EIR:

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

Section 15091 of the State CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as "less than significant" where no mitigation is required. These findings will nevertheless fully account for all such effects identified in the Initial Study and Draft Subsequent EIR in this Section II. Thus, the City hereby finds that the following potential environmental impacts of the Project are less than significant and do not require the imposition of mitigation measures:

A. Aesthetics

Impact AE-1 Finding: The Project would not have a substantial adverse effect on a scenic vista (Initial Study at p. 39). Impacts would be less than significant.

Facts in Support of Finding: Scenic vistas in the City consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives. The Project area (Sites 1-24) consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the Project are in or near already developed areas of the City and coincide with areas designated for development under the current General Plan land use designations. Additionally, structures resulting from the Project would be generally within the heights of the existing developed areas and within the development guidelines set forth in the Municipal Code to ensure they would not block views of or from these scenic vistas as the structures would be consistent with views presently found in the area.

Future individual development projects would still be subject to development and planning review and must therefore conform to zoning and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks. Due to the siting and nature of the proposed land use changes, and General Plan policies that ensure that new development will have minimal impact on scenic corridors and other scenic resources, the proposed Project will have a less than significant impact on the City's scenic vistas.

Impact AE-2 Finding: The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway (Initial Study at p. 40). Impacts would be less than significant.

Facts in Support of Finding: There are currently no designated State scenic highways within the vicinity of the Project site. However, State Route (SR) 38 is an eligible, however not officially designated, State scenic highway. SR 38 traverses between the two project areas, however neither is within the viewshed of the highway, as sites 1 through 16A and 24 are located approximately 1 mile southeast and sites 17 through

23 are located approximately one half to one mile north of the eligible highway, with various commercial and residential developments between the highway and the proposed Project site. The proposed Project site is not located adjacent to or within the viewshed of any of the City designated scenic/historical streets. As such, the Project would not result in the potential to damage scenic resources within a State or City-designated scenic highway or roadway.

Impact AE-3 Finding: The Project would not conflict with applicable zoning and other regulations governing scenic quality (Initial Study at p. 40). Impacts would be less than significant.

Facts in Support of Finding: Full buildout of the Project area would result in the development of 2,436 dwelling units and 151,048.46 SF of Public/Institutional space. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. Implementing projects pursuant to the proposed Project would undergo development review in order to ensure that the Project would meet all applicable development standards pursuant to the Redlands General Plan and Redlands Municipal Code. Overall, the proposed Project area is located within an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. Hence, the proposed Project would not degrade the visual character of the surrounding area; and impacts would be less than significant.

Impact AE-4 Finding: The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Initial Study at p. 41) Impacts would be less than significant.

Facts in Support of Finding:

Construction: Limited, if any, nighttime lighting would be needed during future construction projects allowed by the proposed Project because Redlands Municipal Section 8.06.120 limits construction activities to the hours of 7:00 a.m. and 6:00 p.m. on weekdays and Saturdays. Thus, most construction activity would occur during daytime hours, and construction-related low-level illumination would be used for safety and security purposes only. In addition, construction activities do not include any materials or machinery that would generate offsite glare. Therefore, impacts related to lighting and glare during construction activities would be less than significant.

Operation: All future projects would be required to comply with the applicable development standards for the site. Glare is not expected to result from the increase in pavement or from any future structures as non-reflective materials and architectural coatings would be utilized in the project design in accordance with Redlands Municipal Code Section 18.12.170(B)(7). Future projects would include specific setbacks, lighting standards, and building materials that would ensure the avoidance of potential lighting impacts. Therefore, the Project would result in a less than significant impact.

Aesthetics Cumulative Finding: The Project would not have a cumulative adverse impact related to aesthetics.

Facts in Support of Finding: Implementation of the Project would result in a coordinated development from implementation of the design guidelines and development standards that would be ensured through the City's development permitting process. Therefore, cumulative impacts would be less than significant.

The cumulative aesthetics study area for the Project includes the viewshed from public areas that can view the Project site as well as locations that can view the Project site. The Project area (Sites 1-24) consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the Project are in or near already developed areas of the City and coincide with areas designated for development under the current General Plan land use designations. Additionally, structures resulting from the Project would be generally within the heights of the existing developed areas and within the development

guidelines set forth in the Municipal Code to ensure they would not block views of or from these scenic vistas as the structures would be consistent with views presently found in the area.

Implementing projects pursuant to the proposed Project would undergo development review in order to ensure that the Project would meet all applicable development standards pursuant to the Redlands General Plan and Redlands Municipal Code. Overall, the proposed Project area is located within an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. Furthermore, the Project would comply with Municipal Code Section 18.12.170(B)(7) regarding outdoor lighting. Nearby projects would also be built in compliance with the Municipal Code and would therefore not result in a cumulative impact related to outdoor lighting. Thus, the Project would not result in an impact that could be cumulatively considerable related to scenic quality.

B. Agriculture and Forestry Resources

Impact AG-2 Finding: The Project would not conflict with existing zoning for agriculture use, or a Williamson Act contract (Initial Study at p. 44). Impacts would be less than significant.

Fact in Support of Finding: The Project site is not under an active Williamson Act contract. Therefore, the development of the Project would not result in the cancellation of the contract and impacts related to a Williamson Act contract would not occur. There is one site, Site 20, which is zoned for agricultural uses. However, the Site 20 has not been used for agricultural purposes since at least 1994 and since then the site has remained vacant. In addition, the site has an existing General Plan designation of Medium Density Residential. Therefore, impacts would be less than significant.

Impact AG-3 Finding: The Project would not conflict with existing zoning, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)) (Initial Study at p. 44). No impact would occur.

Facts in Support of Finding: The proposed Project area is an urbanized environment. None of the parcels within the proposed Project are currently zoned as forest land, timberland, or Timberland Production. Therefore, no impact would occur.

Impact AG-4 Finding: The Project would not result in the loss of forest land or conversion of forest land to non-forest use (Initial Study on p. 44). No impact would occur.

Facts in Support of Finding: No forest land exists in the Project area, and implementation will not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, no impact would occur.

C. Air Quality

Impact AQ-4 Finding: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Initial Study at p. 47). Impacts would be less than significant.

Facts in Support of Finding: During construction of future development allowed under the Project, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The Project would allow for the development of future residential and public/institutional uses and would not include any activities or operations that would generate objectionable odors once operational. Therefore, the proposed Project would not result in other emissions (such as those leading to odors) affecting a substantial number of people, and impacts would be less than significant.

D. Biological Resources

Impact BIO-4 Finding: The Project would not 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 (Initial Study at p. 51). Impacts would be less than significant.

Facts in Support of Finding: No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located within the Project site or in the surrounding area. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The U.S. Fish and Wildlife Service (USFWS) administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. Projects implemented under the Project would be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements, less than significant impacts would occur.

Impact BIO-5 Finding: The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Initial Study at p. 51). Impacts would be less than significant.

Facts in Support of Finding: The Project would not conflict with any local policies or ordinances protecting biological resources. The City has a Street Tree Policy and Protection Guidelines Manual (adopted January 2013) and a tree protection ordinance codified as Redlands Municipal Chapter 12.52 for street trees and trees in public places. Future development and/or redevelopment activities that would be permitted under the Project would be required to be reviewed by the City for consistency with the existing tree policies and guidelines. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impacts would occur.

Impact BIO-6 Finding: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Initial Study at p. 51). No impact would occur.

Facts in Support of Finding: The Project is within an urbanized area, and there are no adopted regional conservation plans in the City. The Upper Santa Ana Wash Land Management and Habitat Conservation Plan, known also as the Wash Plan is the culmination of over a decade of coordination to develop an integrated approach to permit and mitigate all construction and maintenance activities within the Santa Ana River wash area, including water conservation, wells and water infrastructure, aggregate mining, transportation, flood control, agriculture, trails, and habitat enhancement. The Wash Plan was adopted in 2020. The Project area is located approximately 0.75 miles southwest of the nearest Wash Plan boundaries, with residential and commercial development in between the Project and the Wash Plan boundaries. Implementation of the Project would not conflict or otherwise impact the Wash Plan policies or objectives. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan and no impacts would occur.

E. Cultural Resources

Impact CUL-3 Finding: The Project would not disturb any human remains, including those interred outside of formal cemeteries (Initial Study at p. 55). Impacts would be less than significant.

Facts in Support of Finding: There are no known human remains on or near the Project area, including formal cemeteries. Additionally, the sites are located within an urbanized environment. Because the area has

already been previously disturbed and developed, it has been subject to construction and ground-disturbing activities. The likelihood that human remains may be discovered during further site clearing and grading activities is considered extremely low. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains. In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 states that if human remains are discovered, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition. This regulation is applicable to any project where ground disturbance would occur. Section 7052 of the California Health and Safety Code makes the willful mutilation, disinterment, or removal of human remains a felony. Therefore, compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels

F. Energy

Impact E-1 Finding: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation (Draft Subsequent EIR at p. 5.4-7). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction activities related to the Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Construction contractors are required to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. Thus, impacts related to construction energy usage would be less than significant.

Operation: Once operational, the Project would generate demand for electricity, natural gas, as well as gasoline or diesel for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be used. As shown in Draft Subsequent EIR Tables 5.4-2 and 5.4-3, the Project would result in a total of 11,493,948 kWh/year of electricity, 2,081,210 gallons of vehicle fuel, and 30,522,697 kBTU/year of natural gas. This would result in a decrease in energy uses compared to the existing approved General Plan buildout, which would result in 19,869.824 kWh/year of electricity, 4,330,815 gallons of vehicle fuel, and 31,062,419 kBTU/year of natural gas.

Each future project would be reviewed for inclusion of solar infrastructure as required by CALGreen regulations through the City's development review and permitting process. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources from operational activities would be less than significant.

Impact E-2 Finding: The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency (Draft Subsequent EIR at p. 5.4-9). No impact would occur.

Facts in Support of Finding: The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Likewise, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Future buildings pursuant to the proposed zoning would have solar infrastructure as required by CCR Title 24 requirements. Thus, the Project would not obstruct use of

renewable energy or energy efficiency. Overall, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy Cumulative Finding: The Project would not result in cumulative energy consumption which would be cumulatively wasteful, inefficient, or unnecessary (Draft Subsequent EIR at p. 5.4-9). Impacts would be less than significant.

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

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

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

G. <u>Geology and Soils</u>

Impact GEO-1i Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Initial Study at p. 60). No impact would occur.

Facts in Support of Finding: The closest fault is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue/Fifth Avenue (approximately 2.25 miles from Site 24). Therefore, future development projects constructed under the proposed Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur.

Impact GEO-1ii Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking (Initial Study at p. 60). Impacts would be less than significant.

Facts in Support of Finding: A major earthquake along the Redlands Fault of the Crafton Hills Fault Zone could cause substantial seismic ground shaking at the site. However, structures built in the City are required to be built in compliance with the CBC (California Code of Regulations, Title 24, Part 2) that provides provisions for earthquake safety based on factors including building occupancy type, the types of soils on-site, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of: (1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; (2) proper building footings and foundations; and (3) construction of the building structure so that it would withstand the effects of strong ground shaking. The City's permitting process would ensure that all required CBC seismic safety measures are incorporated into the building. Compliance with the CBC as verified by the City's review process, would reduce impacts related to strong seismic ground shaking to a less than significant level.

Impact GEO-1iii Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (Initial Study at p. 61). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would increase the potential residential buildout within the City; however, the Project site and the immediate surrounding areas are not located in an area that is susceptible to liquefaction. Furthermore, the Project would be developed in compliance with construction requirements under CBC and building designs as a condition of construction permit approval. Therefore, potential impacts related to hazards from seismic-related ground failure would be less than significant.

Impact GEO-1iv Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides (Initial Study at p. 61). Impacts would be less than significant.

Facts in Support of Finding: The Project site is located in a seismically active region subject to strong ground shaking. However, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not create large slopes. Additionally, the sites are not located in an area susceptible to landslides, as mapped in Figure 3.6-3 of the General Plan EIR, and are not in the path of any potential landslides. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and potential impacts related to landslides would not occur. Thus, there would be no impact.

Impact GEO-2 Finding: The Project would not result in soil erosion or the loss of topsoil (Initial Study at p. 61). Impacts would be less than significant.

Facts in Support of Finding: Construction of the Project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities would be required that would expose and loosen topsoil, which could be eroded by wind or water. However, to reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the Regional Water Quality Control Board (RWQCB) regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP is required to identify potential sources of erosion and sedimentation loss of topsoil during construction, identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. With implementation of the SWPPP, construction impacts related to erosion and loss of topsoil would be less than significant. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced. Therefore, the potential for adverse soil erosion and topsoil loss would be less than significant.

Impact GEO-3 Finding: The Project would not 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 (Initial Study at p. 62). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would increase the potential residential buildout within the City; however, the proposed sites are within a generally flat area that is not subject to landslides, and due to the flat topography, the potential for lateral spreading is also considered very low. The proposed Project area is not identified as being located on a geologic unit or soil that is unstable, or that would become unstable because of development activities. Project construction would be developed in compliance with the CBC and the recommendations of the Geotechnical Investigation related to construction on soils of varying strengths. Therefore, potential impacts would be less than significant.

Impact GEO-4 Finding: The Project would not 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 (Initial Study at p. 62). Impacts would be less than significant.

Facts in Support of Finding: The Geotechnical Investigation (Appendix A of the Initial Study) described that the soils within the Project site have a low potential for expansion. Any potential hazards related to unstable soils would be addressed through the integration of geotechnical information and design recommendations in the design and construction process for future individual development projects in accordance with the CBC requirements which minimize the risk associated with soils hazards. Therefore, less than significant impacts related to expansive soils would occur.

Impact GEO-5 Finding: The Project would not 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 (Initial Study at p. 63). No impact would occur.

Facts in Support of Finding: The development of the Project site would not involve use of septic tanks or alternative methods for disposal of wastewater into subsurface soils. Future development projects would include connection to existing wastewater infrastructure. Therefore, the Project would not result in any impacts related to septic tanks or alternative wastewater disposal methods.

Plans, Policies and Programs (PPP)

PPP HYD-1: SWPPP. As listed in Section II, Subsection I, *Hydrology and Water Quality*.

H. <u>Hazards and Hazardous Materials</u>

Impact HAZ-1 Finding: The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Initial Study at p. 67). Impacts would be less than significant.

Facts in Support of Finding:

<u>Construction:</u> The construction activities that would occur by the Project would involve transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by county, State, and federal regulations, which construction activities are required to strictly adhere to. As a result, the routine transport, use or disposal of hazardous materials during construction activities for the Project would be less than significant.

<u>Operation:</u> The types of materials customarily used by residential and public/institutional uses are not acutely hazardous and would only be used and stored in limited quantities. The normal routine use of these products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project site. Therefore, buildout pursuant to the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.

Impact HAZ-2 Finding: The Project would not 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 (Initial Study p. 68). Impacts would be less than significant.

Facts in Support of Finding:

<u>Construction:</u> Construction of the Project would involve the limited use and disposal of hazardous materials. Equipment that would be used in construction of the Project has the potential to release gas, oils, greases, solvents; and spills of paint and other finishing substances. However, the amount of hazardous materials on-site would be limited, and construction activities would be required to adhere to all applicable regulations

regarding hazardous materials storage and handling, as well as to implement construction best management practices (through implementation of a required SWPPP implemented by City conditions of approval) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. With compliance to existing laws and regulations, which is mandated by the City through construction permitting, the Project's potential construction-related impacts would be less than significant.

Operation: Future operation of up to 2,436 residential units and 237,619.5 SF of public/institutional use would include use of limited hazardous materials, such as solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. Normal routine use of typical residential products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the Project. Further, the Project would result in an overall decrease in nonresidential development. As a result, operation of the proposed Project would not create a reasonably foreseeable upset and accident condition involving the release of hazardous materials into the environment, and impacts would be less than significant.

Impact HAZ-3 Finding: The Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (Initial Study at p. 69). Impacts would be less than significant.

Facts in Support of Finding: There are eight schools located within a quarter mile of the proposed Project site. Prior to construction, a SWPPP would need to be prepared and implemented, which would ensure hazardous materials are properly handled during construction and BMPs would be in place to avoid potential contaminated runoff from leaving the future development sites (PPP HYD-1). During operation, these hazardous materials would be limited and used and disposed of in compliance with federal, State, and local regulations, which would reduce the potential for accidental release into the environment near a school. Therefore, buildout pursuant to the proposed Project would not emit or handle acutely hazardous materials, substances, or waste near a school, and impacts would be less than significant.

Impact HAZ-4 Finding: The Project would not 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 create a significant hazard to the public or the environment. (Initial Study at p. 70). No impacts would occur.

Facts in Support of Finding: According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the area are located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would not be located on a hazardous materials site pursuant to Government Code Section 65965.5.

Impact HAZ-5 Finding: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport (Initial Study at p. 70). Impacts would be less than significant.

Facts in Support of Finding: The nearest airports to the proposed Project area are Redlands Municipal Airport (approximately 1.75 miles to the northeast of Sites 17-23) and San Bernardino International Airport (approximately 2.33 miles northwest of Sites 17-23). Only Site 23 is within the airport compatibility Zone D for the Redlands Municipal Airport, and none of the proposed sites are within the modeled noise contours for the Redlands Municipal Airport or San Bernardino International Airport. According to the Redlands Airport Land Use Compatibility Plan (ALUCP), Zone D does not have any development restrictions. Additionally, future development pursuant to the proposed Project would be developed pursuant to the City's and applicable Airport Land Use Compatibility Plan development guidelines to ensure that future development would not pose a hazard to airport operations, flight patterns, or otherwise result in substantial aviation-related safety risks. Therefore, impacts would be less than significant.

Impact HAZ-6 Finding: The Project would not impair implementation of an adopted emergency response plan or emergency evacuation plan (Initial Study at p. 70). Impacts would be less than significant.

Facts in Support of Finding: The Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Physical development pursuant to the proposed Project, including roadway improvements, is not expected to create obstacles to the implementation of emergency response or evacuation plans adopted for the City. Emergency access and circulation during construction and operation of individual development projects under the proposed Project would be part of each project's review and approval by the City. Therefore, as existing City development standards would require new development within the proposed Project to be designed so as to not interfere with an adopted emergency response plan or emergency evacuation plan, impacts from implementation of the proposed Project would be less than significant.

Impact HAZ-7 Finding: The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (Initial Study at p. 70). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project site, as with most of the City, is characterized as having a moderate fire threat level. Further, the proposed sites are located in an urbanized environment that does not contain wildlands. In addition, the sites are already designated for urban development pursuant to the current General Plan land use designations for each site. Chapter 15.04 of the Redlands Municipal Code requires all development to adhere to safety standards provided in the CBC and Chapter 15.20 adopts the California Fire Code, including construction and design methods that effectively reduce the risk of structure fires. The City's close coordination of the Redlands Fire Department with the fire services of neighboring jurisdictions ensures the safety of new development from wildland fires. Therefore, impacts related to exposure of people or structures to wildland fire hazards would not occur.

Hazards and Hazardous Materials Cumulative Finding: The Project would not result in cumulative impacts related to hazards or hazardous materials.

Facts in Support of Finding: The cumulative hazards materials impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0 of the Draft Subsequent EIR. Cumulative development within the City would have the potential to expose residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. All hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety. Thus, if hazardous materials are found to be present on future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations. Compliance with the relevant federal, State, and local regulations during operation and construction throughout the Project site, as well as during the construction and operation of related projects would ensure that cumulative impacts from hazardous materials would be less than significant.

Plans, Policies and Programs (PPP)

PPP HYD-1: SWPPP. As listed in Section II, Subsection I, *Hydrology and Water Quality*.

I. Hydrology and Water Quality

Impact HYD-1 Finding: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Initial Study at p. 72). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of the Project would be required through City permitting to implement of a grading and erosion control plan that is compliant with the Construction Activities General Permit, which requires preparation of a SWPPP by a Qualified SWPPP Developer. Adherence to the existing requirements and implementation of the appropriate BMPs per the permitting process would ensure that activities associated with construction would not violate any water quality standards. As a result, impacts related to the degradation of water quality during construction activities would be less than significant.

Operation: Potential pollutants associated with the proposed uses include various chemicals from cleaners, pathogens from pet wastes, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, in accordance with State Water Resources Board Order R8-2010-0036, NPDES No. CAS618033, each development would be required to incorporate a WQMP with post-construction (or permanent) Low Impact Development (LID) site design, source control, and treatment control BMPs. The LID site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

Implementation of practices required by the NPDES permit would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring on-site for the development projects, which would improve the quality of stormwater before it enters the City's stormwater system. Compliance with federal, State, and local water quality regulations will ensure that water quality is protected to the maximum extent practicable. Therefore, impacts would be less than significant.

Impact HYD-2 Finding: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin (Initial Study at p. 74). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would result in buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. Future residential development associated with the proposed Project would result in similar permeable surface areas as what is considered in the General Plan. Similar to Projects that would be implemented under the approved General Plan, future implementing projects under the proposed Project would be required to implement the policies and regulations within the General Plan that would help conserve groundwater in the area. In addition, none of the proposed Project sites are currently zoned for open space or other land uses that would preserve any permeable surfaces. Many of the sites are planned to be developed with Commercial/Industrial uses and would similarly introduce impervious surfaces to the Project area. However, as discussed in the General Plan EIR, any future projects would be required to implement the policies of the General Plan which would reduce any impacts to the groundwater supply to a less than significant level. Thus, impacts would be less than significant.

Impact HYD-3i Finding: The Project would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site (Initial Study at p. 74). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of the Project has the potential to contribute to soil erosion and siltation. Grading and excavation activities would be required that would expose and loosen topsoil, which could be eroded by wind or water. However, the NDPES Storm Water Permit that all projects in the City are required to conform to. To reduce the potential for soil erosion and the loss of topsoil, a SWPPP is required by the RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP is required

to identify potential sources of erosion and siltation during construction, identify erosion control BMPs to reduce or eliminate the erosion and siltation. With implementation of the SWPPP, construction impacts related to erosion and siltation would be less than significant.

Operation: As the Project site is already slated for urban development, buildout pursuant to the Project would not result in an increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. The on-site drainage features that would be installed by future projects would be designed to slow, filter, and infiltrate stormwater, which would also reduce the potential for stormwater to erode soil. Furthermore, implementation of the Project requires City approval of a site-specific WQMP, which would ensure that appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion and sedimentation to occur. As a result, potential impacts related to substantial soil erosion or sedimentation would be less than significant.

Impact HYD-3ii Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site (Initial Study at p. 76). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of the Project has the potential to temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site. Grading and excavation activities would be required that would expose and loosen topsoil, which could be eroded by wind or water. However, the NDPES Storm Water Permit that all projects in the City are required to conform to. To reduce the potential for soil erosion and the loss of topsoil, a SWPPP is required by the RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP is required to identify potential sources of erosion and siltation during construction, identify erosion control BMPs to reduce or eliminate erosion and siltation. With implementation of the SWPPP, construction impacts related to erosion and siltation would be less than significant.

Operation: In addition, As the Project site is already slated for urban development, buildout pursuant to the Project would not result in an increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. The Project area contains areas of flood risk. Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within FEMA flood zones. Per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new "occupiable" finished floor must be at least two feet above the one percent (100-year) base flood elevation. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, adherence to the existing NPDES permit regulations and Municipal Code would ensure that impacts related to alteration of a drainage pattern or flooding from operational activities related to future developments would be less than significant.

Impact HYD-3iii Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (Initial Study at p. 77). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of future developments pursuant to the Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. Implementation of future developments would require a SWPPP (included as PPP HYD-1) that would address site-specific pollutant and drainage issues related to construction of future developments pursuant to the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities.

Operation: As the Project site is already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Projects proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows. Overall, adherence to the existing NPDES permit regulations and Municipal Code would ensure that impacts related to exceeding the capacity of existing or planned stormwater drainage systems or creating additional sources of polluted runoff from operational activities related to future developments would be less than significant.

Impact HYD-3iv Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows (Initial Study at p. 77). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of future developments pursuant to the Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. Implementation of future developments would require a SWPPP (included as PPP HYD-1) that would address site specific pollutant and drainage issues related to construction of future developments pursuant to the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities.

Operation: The Project site contains areas of flood risk. Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within FEMA flood zones. Per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new "occupiable" finished floor must be at least two feet above the one percent (100-year) base flood elevation. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, adherence to the existing NPDES permit regulations and Municipal Code would ensure that impacts related to alteration of a drainage pattern or flooding from operational activities related to future developments would be less than significant.

Impact WQ-4 Finding: The Project would not risk release of pollutants due to Project inundation within a flood hazard zone (Initial Study at p. 78). Impacts would be less than significant.

Facts in Support of Finding:

Construction: Construction of future developments pursuant to the Project could require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. Implementation of future developments would require a SWPPP (included as PPP HYD-1) that would address site specific pollutant

and drainage issues related to construction of future developments pursuant to the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities.

Operation: As the Project site is already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. Projects proposed in implementation of the RHNA Rezone would be required to be consistent with the City's drainage plans and the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code). Projects proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows.

The City is approximately 50 miles inland from the Pacific Ocean. Therefore, the proposed Project area is not at risk of inundation from a tsunami and the proposed Project area is not located adjacent to any water retention facilities, lakes, or other bodies of water. Therefore, the proposed Project is not at risk of inundation from seiching.

Impact WQ-5 Finding: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Initial Study at p. 79). Impacts would be less than significant.

Facts in Support of Finding: Construction activity within the City is required to comply with the NPDES Stormwater Discharge Permit. The City's Pretreatment and Regulation of Wastes Ordinance and its Storm Drains Ordinance further protect water quality in the City and would be applicable to development projects under the RHNA Rezone. Implementation of practices required by the NPDES permit and verified through City construction and operational permitting would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring on-site for the development projects, generally improving the quality of stormwater before it infiltrates into the groundwater basin. Project specific WQMPs required for development pursuant to the Project would address quality and quantity of stormwater runoff and provide BMPs for construction and operation to ensure compliance with the current General Stormwater Permit. Therefore, buildout pursuant to the Project would not conflict with a water quality control plan or sustainable groundwater management plan, impacts would be less than significant.

Hydrology and Water Quality Cumulative Finding: The Project would not result in cumulative impacts related to hydrology and water quality.

Facts in Support of Finding:

Water Quality: The cumulative water quality impact assessment considers the development of the Project in conjunction with other development projects in the context of the Santa Ana River watershed. The geographic scope for cumulative impacts related to hydrology and water quality includes the Santa Ana River watershed because cumulative projects and developments could incrementally exacerbate the existing impaired condition and could result in pollutant related impairments. However, related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a Low Impact Development plan (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration, in areas permitted. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable with compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the Project would be implemented in compliance with all regulations, as would be verified by the City during the development permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above, with implementation of the Project the on-site pervious surfaces would increase, and stormwater runoff would be accommodated by the stormwater drainage basin infrastructure. As a result, the Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively impact drainage. Thus, cumulative impacts related to drainage would be less than significant.

Plans, Policies and Programs (PPP)

PPP HYD-1: SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be prepared by the Project applicant and submitted to and approved by the City Public Works Department. The WQMP shall identify all Post-Construction, Site Design. Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

J. Land Use and Planning

Impact LU-1 Finding: The Project would not physically divide an established community (Initial Study at p. 81). Impacts would be less than significant.

Facts in Support of Finding: The potential displacement of persons residing on an infill or redevelopment parcel (if any) would be short-term, and the proposed Project would result in a greater number of residential units to house residents of the area. The proposed Project would not require the extension of any roads that could potentially divide an established community, only roads necessary for internal circulation. Therefore, impacts related to displacement of housing or persons that would physically divide an established community would less than significant.

Impact LU-2 Finding: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Draft Subsequent EIR at p. 5.6-4). Impacts would be less than significant.

Facts in Support of Finding: The Project would not conflict with the adopted Connect SoCal 2020 policies nor the 2024 SCAG RTP/SCS. The Project would meet both criteria for compliance with the SCAQMD AQMP. The Regional MS4 permit would be obtained which requires compliance with NPDES standards for stormwater management and pollution prevention measures.

Future developments within the Redlands RHNA Rezone area would be consistent with the Redlands General Plan, based on the proposed General Plan Amendment, and all residential developments would be within the appropriate density allowed under the Municipal Code. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Rezone sites and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial and industrial development. Furthermore, as shown in Table 5.6-3 of the Draft Subsequent EIR, the proposed Project would be consistent with the applicable City General Plan Policies adopted to avoid or mitigate an environmental effect. The proposed Project would not cause a significant environmental impact

due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect, and impacts would be less than significant.

Land Use and Planning Cumulative Finding: The Project would not result in cumulative impacts related to land use and planning (Draft Subsequent EIR at p. 5.6-20). Impacts would be less than significant.

Facts in Support of Finding: Cumulative projects in the City of Redlands would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Cumulative projects in the City of Redlands would utilize regional planning documents such as Connect SoCal 2024 during entitlement planning, and the City's General Plan would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in the City would be required to comply with the applicable land use plan or they would not be approved without a General Plan Amendment. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would not occur.

K. Mineral Resources

Impact MIN-1 Finding: The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state (Initial Study at p. 82). Impacts would be less than significant.

Facts in Support of Finding: Sites 17 through 23 of the RHNA rezone area are within MRZ-2. Portions of Sites 1 through 16A and 24 of the RHNA Rezone area are within MRZ-1. The Project site is currently designated for urban development under the current General Plan land use designations and has not historically included mineral extraction, nor does the proposed Project area currently support mineral extraction or confirmed the identification mineral resources on the sites. Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource of value to the region and state.

Impact MIN-2 Finding: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the General Plan, specific plan or other land use plan (Initial Study at p. 83). No impacts would occur.

Facts in Support of Finding: The proposed Project area does not include areas designated for mining in any land use plan. Also, as described previously, implementation of the proposed Project would not result in the loss of availability of a known mineral resource recovery site. Therefore, there would be no impact from implementation of the proposed Project.

Mineral Resources Cumulative Finding: The Project would not result in cumulative impacts related to mineral resources.

Facts in Support of Finding: The Project area has not historically included mineral extraction, nor does the Project area currently support mineral extraction. Thus, implementation of the Project would not result in significant impacts to mineral resources and impacts would not be cumulatively considerable.

L. Noise

Impact N-3 Finding: The Project would not expose people residing or working in the Project area to excessive noise levels, 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 (Initial Study at p. 85). Impacts would be less than significant.

Facts in Support of Finding: The nearest airports to the proposed Project site are San Bernardino International Airport, approximately 2.5 miles to the northwest of Site 17, and Redlands Municipal Airport, approximately 1.85 miles northeast of Site 23. Site 23 is the only Rezone Site within airport compatibility Zone D for the Redlands Municipal Airport, but none of the proposed Project sites are within the modeled noise contours for the Redlands Municipal Airport or San Bernardino International Airport. Thus, individual development projects under the proposed Project would not expose people residing or working in the area to excessive noise levels from airport operations and impacts would be less than significant.

M. Population and Housing

Impact POP-1 Finding: The Project would not induce substantial unplanned population growth in an area, either directly or indirectly (Draft Subsequent EIR at p. 5.8-9). Impacts would be less than significant.

Facts in Support of Finding: The maximum development that would occur from buildout of the proposed Project is 2,436 residential units and 151,048.46 SF of public/institutional development. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development compared to buildout of the existing General Plan. The site is located in a developed area of the City adjacent to existing roads and in close proximity to infrastructure and utilities.

Using the Redlands General Plan EIR growth induction rate of 2.65 people per household, buildout of the proposed residential units would generate up to 6,456 residents. Employee generation for the proposed Project would result in a generation of 550 jobs. Full buildout of the Project would represent approximately 54.5 percent of the projected population growth and 36.3 percent of the projected housing stock growth in the City if built out and at full capacity in 2045.

The City's 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of additional housing units for the City to meet its estimated housing growth needs identified in the SCAG's RHNA allocation. Of the Housing Element inventory sites, 23 of them were identified as necessary for rezoning under Housing Element Program 1.1-1 to allow for high and medium density residential development. Thus, while the proposed Project would result in an increase of population, the Project would in part satisfy the State requirements to provide new housing opportunities to increase housing supply.

Employment Growth: Buildout of the proposed Project would result in the loss of 2,057,992.20 SF of nonresidential development and a reduction of 1,713 employees in the area. Since the Project would result in a net loss of future employment opportunities, the Project would not result in any unplanned employment growth.

Jobs-Housing Balance: The City of Redlands is jobs rich, with an existing jobs-housing ratio of 1.75. The proposed Project would reduce (improve) the jobs-housing ratio slightly by adding 2,325 residential units and reducing the employment square footage of the Project area at buildout. The proposed Project would provide a beneficial effect of providing the opportunity for housing in a jobs-rich area, where employees can easily travel to nearby employment opportunities.

Construction: According to the U.S. Census Bureau, 1,322 individuals are employed in the construction industry in the City of Redlands and 80,351 individuals are employed in the construction industry in San Berardino County as a whole. In addition, buildout of the proposed Project would not occur all at one time; developments would occur one project at a time in response to market conditions and would not result in a constraint on the construction workforce. Therefore, implementation of the Project would not induce substantial unplanned population growth directly or indirectly through construction employment.

Infrastructure: As outlined in Section 3.0, *Project Description,* specific infrastructure improvements required to support residential development within the proposed rezone sites are not known at this time and would not be known until development projects are proposed. Future development associated with allowed uses in accordance with the proposed zoning would be required to undergo project-level environmental review under CEQA on a case-by-case basis. As such, future development projects would be required to analyze project-specific needs related to infrastructure improvements

Impact POP-2 Finding: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Initial Study at p.86). Impact would be less than significant.

Facts in Support of Finding: The proposed Project provides for infill development and redevelopment and would provide up to 2,325 additional residential dwelling units (that provides for approximately 6,162 additional residents) within the City compared to the General Plan. Individual development projects pursuant to the proposed Project may result in temporary displacement of residents during construction activities. However, development projects would occur at a parcel-by-parcel project level. The potential displacement of persons residing on an infill or redevelopment parcel (if any) would be short-term, and the proposed Project would result in a greater number of residential units to house residents of the area. Therefore, impacts related to displacement of housing or persons that would require replacement housing elsewhere would not occur.

Population and Housing Cumulative Finding: The Project would not result in cumulative impacts related to population and housing (Draft Subsequent EIR at p. 5.8-11).

Facts in Support of Finding: Buildout of the proposed zoning would represent approximately 47.1 percent of projected employment growth and 41.5 percent of projected housing growth in the City through 2050, and is consistent with SCAG RHNA allocation needs and the City's Housing Element. Thus, the Project is within the regional and local growth projections, and would not result in an exceedance that could become cumulatively considerable. Therefore, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

N. Public Services

Impact PS-1 Finding: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities (Draft Subsequent EIR at p. 5.9-69). Impacts would be less than significant.

Facts in Support of Finding: Construction and operation of the Project would increase the demand for fire protection and emergency medical services. The threshold is whether the Project would result in inadequate staffing levels or require additional equipment, response times, and/or increase the demand for services that would then require the construction or expansion of fire station facilities that would have an adverse physical effect on the environment.

While there would be an increase in 6,162 residents compared to the existing General Plan Buildout, which may increase the demand for fire protection and emergency medical services, the Project would also result in a large decrease in non-residential development which would lead to a decrease in demand for fire and emergency services for those uses. In addition, the Project would be required to adhere to the California Fire Code which would minimize the demand on fire stations, personnel, and equipment. Additionally, site access would be subject to plan check review by the City Building Division and the Redlands Fire Department (RFD) to ensure compliance with fire protection standards. The buildings would be equipped with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent waterless fire suppression systems pursuant to the California Fire Code, California Building Code, and other existing regulations regarding fire safety.

The RFD is currently considering relocating Station 264 to the east side of Alabama Street just south of Orange Avenue. This new station would be approximately 0.25 miles south of Site 1 through 16A and 24 and would serve those sites. The Fire Department is also considering the expansion of Station 263 to provide expanded services to the northern portion of the City. Development Impact Fees, included as PPP PS-1 in Draft Subsequent EIR Section 5.9.8, would serve to ensure the maintenance of existing facilities and the timely provision of new facilities as needed. Development impact fees collected would ensure the level of fire protection services are maintained and response times are improved and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of new facilities. Therefore, with the payment of development fees included as PPP PS-1, Project impacts to fire services would be less than significant.

Impact PS-2 Finding: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered police facilities. (Draft Subsequent EIR p. 5.9-10). Impacts would be less than significant.

Facts in Support of Finding: The increased residential population from the buildout of the proposed Project could increase the frequency of emergency and non-emergency calls to the Redlands Police Department (RPD), as compared to existing conditions. However, implementation of the proposed Project would result in a decrease of approximately 2,057,992.20 SF of nonresidential development and would thus result in a decrease in calls related to those types of uses. Thus, compared to the buildout of the existing General Plan which includes significantly more non-residential development, buildout of the proposed Project's residential uses is not expected to generate an increase in the frequency of emergency and non-emergency calls to the RPD.

Currently, the RPD is in the development of an additional police station to meet future demand. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Payment of development impact fees included as PPP PS-1 would serve to ensure the maintenance of existing facilities. In addition, property tax revenue generated by development of the Project would provide funding for police services and would help to offset the Project's increase in the demand for services. Therefore, impacts to police protection facilities would be less than significant.

Impact PS-3 Finding: The Project would not result in substantial adverse physical impacts associated with schools. (Draft Subsequent EIR p. 5.9-11). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project is expected to generate 906 school aged children by full buildout in 2035. As discussed above, the Project site is located within the Redlands Unified School District (RUSD) and is served by four elementary schools, two middle schools, and two high schools. According to the RUSD, the school district currently has an enrollment of 19,773 students with an excess capacity of 1,676 students. Pursuant to California Government Code Section 65995.5-7, the RUSD has instituted school facility fees that would apply to future developments pursuant to the future developments pursuant to the Project, specifically fees for new residential construction based on square footage. Accordingly, future project applicants would be required to pay school fees to the RUSD to offset the impact of additional student enrollment at schools serving the individual development project site. Pursuant to State law, payment of the school fees established by the RUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed Project's impacts on school facilities. Therefore, impacts to school facilities would be less than significant.

Impact PS-4 Finding: The Project would not result in substantial adverse physical impacts associated with parks (Initial Study p. 89). Impacts would be less than significant.

Facts in Support of Finding: The City of Redlands has 424.2 acres of parkland, or a ratio of 5.9 acres of parkland per 1,000 residents which exceeds the State law requirement of 5.0 acres per 1,000 residents. As such, buildout of the proposed Project would result in a demand for 32.26 acres of parkland. The addition

of 6,162 new residents would increase the use of recreational facilities and would require approximately 30.81 acres of new parkland based on the parkland/recreational space standard of 5.0 acres per 1,000 residents. However, with a total of 79,152 residents, the City of Redlands would need 392.93 acres of parkland to meet the City's requirement which would be exceeded by the already existing 424.2 acres. Furthermore, the City's mechanism for addressing parkland needs are its development impact fees as set forth in Municipal Code Chapter 3.32 included as PPP PS-2. Based on the existing parkland within the Project area and the incremental population increase resulting from buildout of the proposed Project, the Project would not result in overuse of existing parks and facilities that would result in substantial deterioration of existing facilities.

Impact PS-5 Finding: The Project would not result in substantial adverse physical impacts associated with other public facilities (Initial Study p. 90). Impacts would be less than significant.

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

Public Services Cumulative Finding: The Project would result in less than significant cumulative impacts related to public services (Draft Subsequent EIR at p. 5.9-11).

Facts in Support of Finding: The Project applicant would pay the required City development impact fees included as PPP PS-1. Additionally, as discussed above, the Project is not anticipated to impact acceptable service ratios, staffing levels, adequate equipment, response times, or other performance objectives to the extent that new or expanded government services and facilities would be needed. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees. Therefore, the proposed Project would not contribute to a cumulative impact related to the provision of public services.

Plans, Policies and Programs (PPP)

PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the proposed Project, and prior to issuance of any building permits for the implementing project, the project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.

PPP PS-2: As a Condition of Approval for implementing projects within the proposed Project, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.

O. Recreation

Impact REC-1 Finding: The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated (Initial Study p. 91). Impacts would be less than significant.

Facts in Support of Finding: At the estimated 2023 population of 72,696 residents, the ratio of existing parkland acres per 1,000 residents is 5.9, which exceeds the GP's parkland/recreational space standard of 5.0 acres per 1,000 residents. The General Plan designates areas for parkland, recreational facilities, and trails to serve the City's population as it grows. The City's mechanism for addressing parkland and

recreational facility needs is its development impact fees, as set forth in the Redlands Municipal Code Chapter 3.32, included as PPP PS-2. Development impact fees are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. Fees are used for the acquisition, construction, and improvement of public facilities demanded by new development. Individual future development projects under the proposed Project would be subject to the payment of these development impact fees to the City. Thus, the Project would not significantly increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated.

Impact REC-2 Finding: The Project will include employee recreational facilities but will not require the construction or expansion of recreational facilities in a manner which will have an adverse physical effect on the environment (Initial Study p. 92). Impacts would be less than significant.

Facts in Support of Finding: The precise timing of open space or other public improvements associated with buildout of the Project are not known with certainty, as improvements would likely depend on the timing of future developments, buildout of private development projects, future availability and amounts of public grant funding or other public funds, and other factors. The development of future parkland and recreational facilities would be subject to existing building and construction regulations and environmental review that would ensure that future construction activities have a minimal effect on the surrounding environment. Adherence to existing regulations and mitigation measures included in the Subsequent EIR would ensure that the Project would not result in construction or expansion of recreational facilities which might have an adverse impact on the environment, and impacts would be less than significant.

Recreation Cumulative Finding: The Project would result in less than significant cumulative impacts related to recreation.

Facts in Support of Finding: The cumulative area of recreation impacts for the proposed Project includes the City of Redlands. Based on 5 acres of public park and/or recreational space per 1,000 residents, buildout of the proposed Project results in a need for approximately 30.81 acres of parkland to serve the 6,162 residents of the Project site, which would be provided through on-site recreation facilities and/or payment of in-lieu fees. Implementation of future development projects would also be required to provide adequate park facilities or pay in lieu fees, in accordance with Redlands Municipal Code Chapter 3.32. Therefore, the proposed Project's impacts related to the amount of parkland within the City would not result in a cumulatively considerable impact related to parks and recreational facilities.

Plans, Policies and Programs (PPP)

PPP PS-2: As listed in Section II, Subsection N, *Public Services*.

P. <u>Transportation</u>

Impact TR-1 Finding: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Draft Subsequent EIR at p. 5.10-8). Impacts would be less than significant.

Facts in Support of Finding:

<u>Project Trip Generation:</u> Buildout pursuant to the Project is forecasted to generate a net decrease of 27,450 average daily trips, net increase of 1,034 AM trips, and net decrease of 1,716 PM trips. As such, buildout pursuant to the Project would result in decreased daily vehicle trips in the City of Redlands compared to buildout pursuant to the existing General Plan.

<u>Roadway Facilities:</u> The proposed Project would continue to provide vehicular access to the proposed rezoning parcels from the adjacent roadways and there would be no changes to the roadway access points. Any future development under the proposed rezoning may include driveway and roadway improvements.

Specific roadway improvements required to support future development within the Project site are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.

Transit Facilities: There are three bus routes that currently serve the Project area, and there are various Omnitrans bus stops throughout the Project area. This existing transit service would continue to serve its ridership and new riders from implementation of future development under the proposed rezoning. Buildout of the proposed rezoning would be incremental in response to market needs and within the area currently served by Omnitrans and SBCTA. As a result, the Project would not result in any conflicts with the existing and planned pedestrian network and impacts related to pedestrian facilities would not occur.

Bicycle Facilities: Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue currently contain bicycle lanes. In addition, the City's General Plan Figure 5-3, *Bicycle Facilities*, identifies Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue as planned bicycle routes. This existing bicycle lane infrastructure would be used by future residents and employees of new uses under the proposed RHNA rezone. The General Plan has new facilities along Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue; and future projects would be required, as deemed necessary, to construct these planned bicycle facilities as part of driveway and infrastructure improvements.

Pedestrian Facilities: The Project does not propose a specific infrastructure improvements; however, future development facilitated by the Project may be required to include sidewalk improvements. Specific sidewalk improvements required to support development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits. Therefore, the proposed Project would not conflict with pedestrian facilities.

Policies: As discussed in Section 5.10, *Transportation*, of the Draft Subsequent EIR, the Project would be consistent with all applicable goals and policies. Thus, impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system of the Project site and surrounding area would not occur. As such, Project impacts would be less than significant.

Impact TR-3 Finding: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Initial Study at p. 94). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would not alter the design of current roadways and streetscapes. Most of the development pursuant to the proposed Project would result in infill development and would not create hazards from incompatible uses in the Project site or within the surrounding area. Future development projects under the proposed Project would be subject to the typical development review process, which includes Planning and Engineering review, and compliance with standard engineering design requirements would ensure no hazardous design conditions. Thus, no impacts related to vehicular circulation design features would occur from the Project.

Impact TR-4 Finding: The Project would not result in inadequate emergency access (Initial Study at p. 94). Impacts would be less than significant.

Facts in Support of Finding: Development pursuant to the proposed Project would not alter the design of current roadways or streetscapes in a manner which would result in inadequate emergency access.

Construction of development projects under the proposed Project may require the presence of construction equipment and materials adjacent to roadways. Construction activities and future development designs would be required to ensure emergency access in accordance with California Fire Code Section 503 (CCR Title 24, Part 9), which would be confirmed and approved through the City's standard development review and permitting process. As such, the Project would not result in inadequate access, and impacts would be less than significant.

Transportation Cumulative Finding: Impacts related to transportation would be less than significant with compliance with existing regulations and mitigation measures (Draft Subsequent EIR at p. 5.10-19).

Facts in Support of Finding:

Roadway, Transit, Bicycle, and Pedestrian Networks: Cumulative development in the City and surrounding jurisdictions, as shown on Draft Subsequent EIR Table 5-1, would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would not allow potential cumulatively considerable impacts related to alternative transportation. Therefore, the Project would not cumulatively combine with other projects to result in impacts related to alternative transportation. The Project would be consistent with all applicable plans and policies. Therefore, the Project would not contribute to a cumulatively considerable impact associated with conflict with a program, plan, ordinance, or policy addressing the circulation system including roadway, transit, bicycle, or pedestrian networks.

Vehicle Miles Traveled: As shown in Draft Subsequent EIR Table 5.10-10, with buildout of the Project, the cumulative Redlands Citywide boundary VMT/SP would be 3.1 percent lower than cumulative VMT/SP without the Project. As such, the Project's impact on citywide VMT would be less than significant and cumulative impacts related to VMT would be less than significant.

Q. Utilities and Service Systems

Impact UT-1 Finding: The Project would not require or result in the relocation or construction of new water or wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects (Draft Subsequent EIR at p. 5.12-9). Impacts would be less than significant.

Facts in Support of Finding:

Water: The water facilities currently serving the Rezone sites would likely be sufficient to accommodate the additional residential development proposed by the Project. However, future developments proposed under the Project could necessitate further water infrastructure, including new water connections, water pumps, and other improvements to water utilities within the Rezone sites and within adjacent utility rights-of-way. Local improvements are anticipated; however, extensive off-site utility improvements are not anticipated to be required for buildout pursuant to the proposed Project. The construction of any needed water system improvements as part of future site-specific development projects under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures listed throughout this document.

Wastewater: As compared to the existing General Plan buildout, the proposed development of the proposed Project would result in minor increases in the wastewater to the City's existing sewer systems. Based on the sewer systems standards, sewer pipes larger than 12-inches in diameter are designed to flow up to 75 percent full. Therefore, since most of the existing sewer systems are flowing at or less than 50 percent full, there is additional capacity to handle an increase in wastewater (Draft Subsequent EIR Appendix H). The construction of any needed wastewater system improvements as part of future site-specific developments under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft

Subsequent EIR mitigation measures throughout this document. These requirements would ensure that construction related impacts remain less than significant.

Stormwater: Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the proposed Project. Implementation of development projects pursuant to the proposed Project would increase the intensity of residential land uses within the City, and future site-specific development projects would install on-site stormwater drainage infrastructure and new connections to the existing stormwater drainage system. Under the City's development review procedures for site-specific development projects, the City determines stormwater system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity. The stormwater system design specifications for each site-specific development project would be required to comply with City standards and implementing projects would be required to prepare a WQMP. Additionally, future large-scale stormwater drainage improvements pursuant to the 2017 Redlands Master Plan of Drainage and implementing project site-specific stormwater drainage improvements would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures, which would ensure that impacts would be less than significant.

Impact UT-2 Finding: Sufficient water supplies are available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years (Draft Subsequent EIR at p. 5.12-11). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would result in a total demand of 457 AFY, which would be a 231 AFY increase in comparison to water demands associated with the buildout of the approved General Plan within the Project area. The Integrated Regional Water Management Plan (IRUWMP) assessed the projected water demand and supply in the service area and concluded that the City of Redlands Municipal Utilities and Engineering Department (MUED) has an adequate water supply to meet all demands within its service area to 2045 under varying drought conditions. The Project's additional demands of 231 AFY, as listed in Draft Subsequent EIR Table 5.12-5, is less than the assumed increase in demands in the IRUWMP; therefore, the Project's relatively small increase in water demand would not cause demand to exceed the 2035 or 2045 projected demands for the MUED. Thus, impacts related to the need for new or expanded water supplies and entitlements would be less than significant.

Impact UT-3 Finding: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the projects projected demand in addition to the providers existing commitments (Draft Subsequent EIR at p. 5.12-12). Impacts would be less than significant.

Facts in Support of Finding: As shown in Draft Subsequent EIR Table 5.12-3, *Net Change in Wastewater Generation for Project Site*, the proposed Project would result in a net increase of 30,585 gallons per day (0.031 mgd) or 34 AFY compared to the buildout of the existing General Plan. In 2020, the City's Wastewater Treatment Plant (WWTP) collected 6,620 AF (5.8 mgd) for treatment. Therefore, the WWTP has a residual capacity of 3.7 mgd. The amount of additional wastewater that would be generated by the proposed Project is less than one percent of WWTP's total remaining daily treatment capacity. As a result, the WWTP serving the Project would have adequate capacity to serve the demand resulting from buildout pursuant to the proposed Project in addition to existing service commitments, and impacts would be less than significant.

Impact UT-4 Finding: The Project would not 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 (Initial Study at p. 98). Impacts would be less than significant.

Facts in Support of Finding:

Construction: The majority of waste generated during demolition and construction activities by implementing projects would be building materials (e.g., concrete, dirt, and waste generated by construction workers). As stated in Draft Subsequent EIR Section 13.66.040 of the City's Municipal Code, *Construction and Demolition Recycling Requirements*, no demolition permit or building permit shall be issued for any development activity subject to this chapter unless the construction and demolition recycling plan has been approved by the municipal utilities director. Thus, implementing projects pursuant to the proposed Project would be required to meet the City's waste diversion requirements as they pertain to project construction.

Operation: Buildout pursuant to the proposed Project would result in a decrease of 2,057,992.20 SF of nonresidential development. Thus, implementation of the proposed Project is expected to decrease waste generation. As the California Street Landfill has the capacity to process an additional 527.31 tons of solid waste per day and the San Timoteo Sanitary Landfill has the capacity to process an additional 337.1 tons per day, the solid waste generated by the Project would be within the capacity of the landfill. The solid waste generated by full buildout of the proposed Project would represent approximately 0.6 percent of the excess capacity of the California Street Landfill and 0.9 percent of the excess capacity at the San Timoteo Sanitary Landfill each day. Construction and operational impacts related to solid waste would be less than significant.

Impact UT-5 Finding: The Project would not 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 (Initial Study at p. 99). Impacts would be less than significant.

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

Utilities and Service Systems Cumulative Finding: The Project would not result in cumulative impacts related to utilities and service systems (Draft Subsequent EIR at p. 5.12-13).

Facts in Support of Finding:

Water: As discussed above, buildout pursuant to the proposed Project would result in an increase in water demand of 231 AFY. It is anticipated that existing and future water entitlements from groundwater, surface water, purchased or imported water sources, and recycled water, plus water conservation methods included in Title 24, would be sufficient to meet the proposed Project's demand at buildout, in addition to forecast demand for MUED's entire service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require new or expanded entitlements, and cumulative impacts would be less than significant.

Wastewater: The existing sewer system and WWTP would have sufficient capacity to handle the flows resulting from implementation of the proposed Project. The continued regular assessment, maintenance, and upgrades of the sewer system by the City would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less-than-significant cumulative impact.

Stormwater: Santa Ana RWQCB permit conditions require a hydrology/drainage study to demonstrate that proposed storm drain systems are able to detain a minimum "Design Capture Volume," which is dependent on the specific characteristics of each site. As a result, increases in runoff from cumulative projects that could combine to impact stormwater drainage capacity would be minimized, and cumulative impacts related to drainage infrastructure would be less than significant.

R. Wildfires

Impact WF-1 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not substantially impair an adopted emergency response plan or emergency evacuation plan (Initial Study at p. 100). Impacts would be less than significant.

Facts in Support of Finding: The Rezone sites are classified as being in a moderate fire threat area per the High Fire Hazard Area Redlands GIS map. The sites are also not located in a State responsibility area. Moreover, future development pursuant to the proposed Project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts from proposed Project implementation would be less than significant

Impact WF-2 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones, and would not involve slope, prevailing winds, and other factors, that could exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (Initial Study at p. 100). No impacts would occur.

Facts in Support of Finding: The sites are located within an urbanized environment with moderate fire threat level and do not include, nor are they around, wildlands or areas of high fire hazard terrain or vegetation. Implementation of the proposed Project would neither exacerbate wildfire risks nor expose occupants to risk of pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impact would occur.

Impact WF-3 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not 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 (Initial Study at p. 101). No impacts would occur.

Facts in Support of Finding: The sites are within an urbanized environment with a moderate fire threat level and do not include wildlands or areas of high fire hazard terrain or vegetation. Implementation of the proposed Project would include the introduction of new residential developments and may require individual projects to connect to existing infrastructure within roadways. However, these new developments within an existing urbanized environment, and future utility upgrades, if needed, would not exacerbate fire risk or result in temporary or ongoing impacts to the environment in regard to wildfires. Thus, no impacts would result.

Impact WF-4 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not 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 (Initial Study at p. 101). Impacts would be less than significant.

Facts in Support of Finding: The proposed sites are generally flat and are not located near hillside areas or in the downslope pathway of a potential landslide. While a few of the sites are within a special flood hazard area, implementation of the proposed Project would improve the existing drainage. Therefore, post-fire risks related to downstream flooding or landslides would be less than significant.

Wildfires Cumulative Finding: The Project would not result in cumulative impacts related to wildfires.

Facts in Support of Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones; and therefore, would not result in impacts related to wildfires and no potential of cumulative impacts would occur.

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SECTION III

IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City hereby finds that mitigation measures have been identified in the Initial Study and Draft Subsequent EIR that would avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts and the mitigation measures that would reduce them to a less than significant level are summarized below.

- Biological Resources
- Cultural Resources
- Geology and Soils
- Noise
- Tribal Cultural Resources

A. Biological Resources

Impact BIO-1 Finding: The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (Initial Study at p. 49). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: The Project area is urbanized and developed and is currently slated for urban development pursuant to the current General Plan land use designations analyzed under the General Plan EIR. Implementation of the Project would result in infill development within an already highly disturbed urban environment and would not result in any direct impacts to special status species, nor involve or result in any existing habitat modifications that could indirectly result in a substantial adverse effect on any special status species. While it is not expected that the Project site would support suitable habitat for rare plant and animal species, General Biological Surveys would be performed for future development projects within the proposed Project site to confirm whether suitable habitat exists, as outlined in Mitigation Measure BIO-1. If suitable habitat is identified, rare plant/wildlife surveys should be conducted to determine presence of species, in accordance with California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) and during the appropriate time of year. Therefore, the Project would not result in impacts on species identified as candidate, sensitive, or special status with implementation of Mitigation Measure BIO-1.

Impact BIO-2 Finding: The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Initial Study at p. 50). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Existing vegetation communities on-site consist of agricultural land, annual grassland, and developed/ruderal land. However, several sites are located near the Morey Arroyo riverine, which is a riparian habitat according to the USFWS National Wetland Inventory. Therefore, future developments related to the proposed Project within the Rezone sites shall require a biological survey for jurisdictional features prior to the approval of any development applications, as outlined in Mitigation Measure BIO-2. If jurisdictional waters are identified on a site, avoidance is preferred. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and State regulators via applicable consulting and permitting process. Thus, with implementation of Mitigation Measure BIO-2, impacts to riparian habitat would be less than significant.

Impact BIO-3 Finding: The Project would not 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 (Initial Study at p. 50). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Several sites are located near the Morey Arroyo riverine, which is a riparian habitat according to the USFWS National Wetland Inventory. These sites are already slated for urban development pursuant to their respective current General Plan land use designations, as analyzed under the General Plan EIR. Nevertheless, Mitigation Measure BIO-2 has been included to require jurisdictional assessments for individual development projects within the Project site prior to approval of any development applications. With implementation of Mitigation Measure BIO-2, impacts to federally protected wetlands would be less than significant.

Biological Resources Cumulative Finding: The Project would not result in cumulatively considerable impacts to biological resources. Impacts would be less than significant with mitigation.

Facts in Support of Finding: With implementation of the mitigation measures identified in the Initial Study and Draft Subsequent EIR, the Project would not result in significant impacts related to special-status species, jurisdictional waters, wildlife movement, local ordinances or regulations protecting biological resources, habitat conservation plans, plant communities, and habitat fragmentation. Since the Project would implement existing requirements and mitigation measures and would result in less than significant impacts to biological resources, the Project could not combine with other projects within the City in a manner that would result in cumulative impacts. Cumulative projects would be required to comply with applicable survey requirements and mitigation for biological resources. Further, there are no projects that would, in combination with the Project, produce a significant impact to biological resources.

Mitigation Measures

MM BIO-1 Biological Assessment: Future projects proposed within the proposed Project site shall be surveyed by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur or if any riparian habitats, jurisdictional drainages, or wetlands are present onsite. If suitable habitat is present, a qualified biologist shall survey for special-status species during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating any ground disturbing activities in a given area. The focused surveys shall be conducted in accordance with CDFW guidelines. If special-status species are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.

MM BIO-2 Jurisdictional Resources: If potential jurisdictional waters are determined to be present onsite through the biological assessment require by MM BIO-1 above, a jurisdictional assessment shall be conducted for future projects within Sites 1 through 24. Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and State regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW.

Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction are subject to approval by permitting agencies and shall include, but are not limited to, the following:

- Construction-related equipment shall be stored in developed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage.
- Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants.

- Substances harmful to aquatic life shall not be discharged into the drainage. All hazardous substances shall be properly handled and stored.
- A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction.
- To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.

B. Cultural Resources

Impact CUL-1 Finding: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (Initial Study at p. 54). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Implementation of site-specific development projects pursuant to the proposed Project could cause a substantial adverse change in the significance of a historical resource by altering a historical resource's physical characteristics, which convey its historical significance. While there are no designated historical resources on the Project site, some structures may be older than 45 years and may Adherence to Redlands Municipal Code Section 2.62.200 (included as PPP CUL-1) and Certificate of Appropriateness procedures would address unidentified, potential historical resources (buildings, structures, and features aged 45 years and older) and would ensure preservation of known historic resources as new development within the Project area occurs. Furthermore, Mitigation Measure CUL-1 is included to require evaluation of potential historic resources for implementing projects that could potentially impact a building or structure in excess of 45 years of age. Mitigation Measure CUL-2 requires any identified historical resources to meet the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. Therefore, with implementation of Mitigation Measure CUL-1 and CUL-2, and Redlands Municipal Code Section 2.62.200 (provided as PPP CUL-1), impacts related to a substantial adverse change in the significance of a historic resource would be less than significant.

Impact CUL-2 Finding: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 (Draft Subsequent EIR at p. 5.3-12). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Future development pursuant to the Redlands RHNA Rezone Project could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources. As such, future development projects within Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 would be required to implement Mitigation Measure CUL-3, which requires preparation of an archaeological resource assessment of the specific site and proposed development in accordance with the California Office of Historic Preservation. On properties where the potential for resources is identified through implementation of Mitigation Measure CUL-3, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified cultural preservation expert, included as Mitigation Measure CUL-4.

The Morey Arroyo is located adjacent to or partially within Sites 2, 7, 8, 11, 12, 16, and 24. While other segments of the Morey Arroyo were found to not constitute significant archaeological resources, water sources within the City are known to result in increased archaeological sensitivity in the surrounding areas. Therefore, future site-specific development projects pursuant to the Redlands RHNA Rezone Project within proximity to the Morey Arroyo could result in ground disturbing activities in areas highly sensitive for

archaeological resources and could result in disturbance of unknown archaeological resources. Therefore, any future development in Sites 2, 7, 8, 11, 12, 16, and 24 that results in ground disturbing activities within 50 feet of the Morey Arroyo would be required to implement Mitigation Measure CUL-4 due to the high archaeological sensitivity. With implementation of Mitigation Measures CUL-3 and CUL-4, impacts related to a substantial adverse change in the significance of an archaeological resource during buildout pursuant to the Redlands RHNA Rezone Project would be less than significant.

Cultural Resources Cumulative Finding: Impacts related to historic and archaeological resources and human remains would be less than significant with compliance with existing regulations and mitigation measures (Draft Subsequent EIR at p. 5.3-12).

Facts in Support of Finding: Cumulative impacts on cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic ethnic sites or an industry (e.g., Santa Fe Depot), that occur within a larger geographic context than a site-specific development project site. Thus, this analysis considers cumulative development within the Valley Region of San Bernardino County, which is identified as sensitive for archaeological resources. There is a possibility that ground-disturbing activities during future construction may uncover or disturb unknown archaeological resources. However, implementation of Mitigation Measures CUL-3 and CUL-4 would reduce the potential impact to unknown resources. Thus, the cumulative effects of development on archaeological resources from implementation of the proposed Project with mitigation in combination with other projects would be less than significant.

Plans, Policies and Programs (PPP)

PPP CUL-1: Municipal Code Chapter 2.62. The City of Redlands Historic Architectural Design Guidelines shall apply to all future projects within the proposed Project. The Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* may also be applicable to properties or projects that may affect historic buildings and resources.

Mitigation Measures

MM CUL-1: Demolition or alteration of a building or structure that is at least 50 years old at the time of permit application and has not previously been evaluated for demolition or renovation within the last five years from the time demolition or alternation is proposed shall be subject to review at the request of the City by a qualified architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify if the building or structure proposed for demolition or alteration qualifies as a historical resource under CEQA guidelines. Buildings and structures shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the City for review and approval prior to the issuance of a building permit. If no historic resources are identified, no further analysis is warranted. If historic resources are identified, the applicant shall be required to implement Mitigation Measure CR-2.

MM CUL-2: For renovations involving historical resources identified through the process described in the architectural history evaluation mitigation measure (MM CUL-1, project activities shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualifications Standards to ensure project compliance with the Standards for Rehabilitation. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. The memorandum should recommend design modifications necessary to bring

projects into compliance with the Standards for Rehabilitation, which shall be incorporated into project designs to ensure compliance with the Standards. The memorandum shall be submitted to the City for review and approval prior to the issuance of a building permit.

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

MM CUL-4: Archeological Monitoring/Preservation.

- *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.

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

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

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

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

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

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

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

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

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

C. Geology and Soil

Impact GEO-6 Finding: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (Initial Study at p. 63). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Future development pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken and could inadvertently uncover unknown paleontological resources buried in site soils. Therefore, future projects would be required to adhere to Mitigation Measure PAL-1, which would require future project applicants to provide an assessment of whether grading would impact any underlying soil units or geologic formations that have potential to yield fossiliferous materials. Mitigation Measure PAL-2 would establish a procedure for the management of paleontological materials on sites with potential to yield paleontological resources. Therefore, with implementation of Mitigation Measures PAL-1 and PAL-2, impacts related to paleontological resources would be less than significant.

Geology and Soil Cumulative Finding: The Project would result in less than significant cumulative impacts related to geology and soils.

Facts in Support of Finding: A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. As detailed previously, the Redlands area, including the Project site, is underlain by deep sediments that are sensitive to paleontological resources. However, with incorporation of mitigation measure PAL-1, ground excavation that could impact paleontological resources would be monitored to reduce potential significant impacts that could become cumulatively considerable. Thus, with incorporation of mitigation measures the potential for cumulatively considerable impacts would be less than significant.

Mitigation Measures

MM PAL-1: Paleontological Resources. Future project applicants within the Project sites shall provide a paleontological assessment by a qualified paleontologist meeting the standards of the Society of Vertebrate Paleontology (SVP) to determine whether grading for the project could impact underlying soil units or geologic formations that have a low to high potential to yield fossiliferous materials, prior to project approval. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and shall recommend a project-specific paleontological resources monitoring and mitigation plan (PRMMP), if warranted, based on paleontological sensitivity. This plan will address specifics of monitoring and mitigation for the development project, and will take into account updated geologic

mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. This PRMMP must meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity:

- High- All projects involving ground disturbances in previously undisturbed areas sediments mapped as having high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist and shall be monitored by a qualified paleontological monitor on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be of scientific significance, professionally and efficiently recover the fossil specimens and collect associated data pursuant to the guidelines of the Society of Vertebrate Paleontology. Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.
- Low to High- All projects involving ground disturbance in previously undisturbed areas mapped with low-to-high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist. The PRMMP shall specify that monitoring shall only be required when construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units shall require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account: a) the most recent local geologic mapping, b) depths at which fossils have been found in the vicinity of the project area, as revealed by the museum records search, and c) geotechnical studies of the project area, if available.
- Low- All projects involving ground disturbance in previously undisturbed areas mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found. Paleontological monitoring is usually not required for sediments with low paleontological sensitivity.
- None- Projects determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological mitigation measures, but shall implement MM PAL-2, if incidental discoveries occur.

MM PAL-2: Fossil Discovery. In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50 foot radius of the find until its significance can be determined by a Qualified Paleontologist. Scientifically significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP. A repository shall be identified and a curatorial arrangement will be signed prior to collection of the fossils. Any accredited institution may serve as a repository.

D. Noise

Impact NOI-1 Finding: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies (Draft Subsequent EIR at p. 5.7-13). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding:

Construction: Noise generated by construction equipment could include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. Construction projects are generally expected to occur in the following stages: demolition, excavation, and grading, building construction, architectural coating, and paving. Combined noise levels generated by heavy construction equipment range from approximately 77 dBA (Lmax) to 83 dBA (Lmax) at 50 feet from the noise source. City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. Therefore, in order to determine if construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria threshold detailed above were utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at a sensitive receiver, such as a residence. Because buildout pursuant to the proposed Project could result in construction in proximity to existing or future sensitive receptors, temporary intermittent construction noise impacts could occur. Therefore, Mitigation Measures NOI-1 and NOI-2 have been included to provide construction measures to reduce potential construction noise impacts to a less-than-significant level.

Operation:

Increase in Roadway Noise. As detailed in Section 5.10, *Transportation,* of the Draft Subsequent EIR, the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily trips, including a reduction of 1,716 p.m. peak hour trips compared to buildout of the existing zoning. As the Project would result in a reduction in daily trips compared to buildout of the existing General Plan land uses, impacts related to increased traffic noise from implementation of the proposed Project would be less than significant.

Roadway Noise Compatibility. Based on the proximity of future noise sensitive land uses, traffic-related noise impacts at future residential uses within the Project area would be potentially significant. However, this would be dependent upon the specific location and design of future projects. Thus, existing General Plan policies would be implemented to protect future uses. As listed previously, General Plan Healthy Community Element Action 7-A.136 requires a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" and Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Likewise, Measure U 9.0e requires noise level compliance for new projects, Measures U 9.0f, U 9.0u, and U 9.0v require noise studies or other verification that impacts would not occur, and Measure U 9.0i requires noise barriers. Therefore, with implementation of existing General Plan policies, impacts related to future residences within traffic noise impacted areas would be less than significant.

Noise from New Land Use Operations: Operation of new uses developed pursuant to the proposed Project could result in a substantial increase the ambient noise levels at sensitive receptors if not designed appropriately, the City's review and development permitting process ensures future project compliance with Municipal Code Section 8.06.090(F). As described previously, the General Plan Healthy Community Element Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Through implementation of the City's existing General Plan and Municipal Code regulations that would be verified through the City's development review and permitting process, impacts would be less than significant.

Impact NOI-2 Finding: The Project would not generate excessive ground-borne vibration or groundborne noise levels (Draft Subsequent EIR at p. 5.7-16). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding:

Construction: As described previously, Section 8.06.090(F) of the City's Municipal Code limits construction to occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, which also limits the time that construction

vibration could occur. Also, Municipal Code Section 8.06.020 identifies the vibration threshold as 0.01 in/sec root mean squared (RMS). Construction vibration levels would range from 0.004 to 0.063 in/sec RMS, and would exceed the perceptible vibration threshold of 0.01 in/sec RMS at distances of 100 feet or less. Therefore, Mitigation Measures NOI-3 is included to ensure that vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses, and that other equipment be used to reduce potential vibration impacts to below the vibration threshold of 0.01 in/sec RMS, which would reduce impacts to a less-than-significant level. In addition, Mitigation Measure NOI-4 is included to require an assessment of fragile historic buildings within 25 feet of construction to ensure that construction vibration from implementation of the proposed Project would not damage any historic structures.

Operation: The operation of residential and public/institutional land uses would not include the operation of any vibration sources other than typical on-site vehicle and truck operations, which result in negligible vibration levels. Therefore, impacts related to operational vibration from buildout pursuant to the proposed Project would be less than significant.

Noise Cumulative Finding: The Project would result in less than significant cumulative impacts related to noise and vibration (Draft Subsequent EIR 5.7-17). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Cumulative noise assessment considers development pursuant to the proposed Project in combination with ambient growth and other development projects within the vicinity of the RHNA Rezone sites. Municipal Code Section 8.06.090(F) requires construction activities to not occur within the hours of 6:00 p.m. and 7:00 a.m. on weekdays or anytime on Sundays and federal holidays. As the timing of development and various construction activities pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects, construction activities associated with buildout pursuant to the rezoning would occur sporadically through the year 2035. Thus, it is currently unknown if future construction projects would occur adjacent to one another. However, implementation of construction noise Mitigation Measures NOI-1 and NOI-2 and construction vibration Mitigation Measures NOI-3 and NOI-4, provided herein, would reduce the potential of noise and vibration levels from different construction projects combining to become cumulatively considerable to a less than significant level. Therefore, with implementation of mitigation, cumulative noise and vibration impacts associated with construction activities would be less than significant.

All development projects would be subject to the operational noise standards established by the General Plan and Municipal Code, which would ensure that noise from new uses would stay below City standards, and therefore, not combine with other development projects to be cumulatively significant. Thus, operational noise from new land in combination with buildout pursuant to the proposed Project would result in less-than-significant cumulative noise impacts.

Mitigation Measures

MM NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors:

- Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity.
- Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.

MM NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall:

- Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;
- Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and
- Be removed and the site appropriately restored upon the conclusion of the construction activity.

MM NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.

MM NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.

E. Tribal Cultural Resources

Impact TCR-1 Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in Public Resource Code Section 5020.1(K). (Draft Subsequent EIR p. 5.11-6). Impacts less than significant with mitigation incorporated.

Facts in Support of Finding: The Sacred Lands File search was positive for sacred lands within one-half mile of the Project area, and the City sent letters to Native American Tribes notifying them of the proposed Project in accordance with SB 18 and AB 52. In response, the Kizh Nation and San Manuel requested consultation and met with the City. The Morrey Arroyo was identified as a potential site for TCRs. Due to the presence of portions of the Morrey Arroyo within the Project site, the Kizh Nation described that there is a potential of encountering historic and prehistoric resources during ground disturbing activities. Thus, the City has agreed to implement Mitigation Measure TCR-1 in the event of any inadvertent discovery of Tribal Cultural Resources (TCRs). Development and redevelopment projects pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb unknown buried TCRs. Thus, Initial Study Mitigation Measures CUL-3, CUL-4, and Draft Subsequent EIR Mitigation Measure TCR-1 are required for implementing projects and would reduce the potential for TCRs to be impacted during earthmoving activities and provides for preservation of any identified resources. With

implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant.

Impact TCR-2 Finding: The Project would not 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 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Draft Subsequent EIR at p. 5.11-6). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for Tribal Cultural Resources to occur in the Project area (other than the known Morrey Arroyo), and therefore, impacts are expected to be less than significant. However, the City has agreed to implement mitigation measures in the event of any inadvertent discovery of TCRs. Thus, Mitigation Measures CUL-3 and CUL-4 are included to reduce the potential for archaeological resources, including TCRs, to be impacted during earthmoving activities and provides for preservation of any identified resources. Furthermore, as a result of SB 18 and AB 52 tribal consultation, Mitigation Measure TCR-1 is included in the case if an incidental discovery of a TCR during ground disturbing activity. With implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant.

Tribal Cultural Resources Cumulative Finding: The Project would result in less than significant cumulative impacts related to tribal cultural resources (Draft Subsequent EIR 5.11-7).

Facts in Support of Finding: The cumulative study area for TCRs includes the Southern California region, which contains the same general tribal historic setting of the Gabrieleño, Cahuilla, and Serrano. Similar to future projects implemented pursuant to the proposed Project, other projects in the vicinity of the Project site could involve ground-disturbing activities in native soils that may uncover or disturb unknown TCRs. However, the Project has included Mitigation Measure CUL-1, CUL-2, and TCR-1 that would reduce the potential impact to unknown resources. Cumulative development would also be required to undergo environmental review to establish requirements for avoidance or mitigation of impacts to potential resources.

Mitigation Measures

MM CUL-3: Listed previously in Section III, Subsection B, *Cultural Resources*.

MM CUL-4: Listed previously in Section III, Subsection B, *Cultural Resources*.

MM TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and

approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

A. Full avoidance.
B. If avoidance is not feasible, Preservation in place.
C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.

If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.

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SECTION IV

RESOLUTION REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Public Resources Code Section §21002 states that "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

Section §15364 of the State CEQA Guidelines defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

The City Council hereby finds that, despite the incorporation of feasible measures outlined in the Final EIR, the following impacts cannot be fully mitigated to a less-than-significant level. Despite these significant and unavoidable impacts, the City nevertheless approves the Project because of the benefits described in the Statement of Overriding Considerations included herein.

A. Agriculture and Forestry

Impact Finding AG-1: The Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use (Draft Subsequent EIR at p. 5.1-8). Impacts are significant and unavoidable.

Facts in Support of Findings: According to the FMMP, Project implementation would cause the conversion of 44.67 acres of farmland designated as Prime Farmland to non-agricultural uses and would result in a reduction in overall acreage of agricultural lands within the City. The site received a LESA score of 67.0 (Land Evaluation Score of 40.75 and a Site Assessment Score of 26.25) out of a 100-point scale. According to the LESA Model significance thresholds, sites receiving a score of between 60 and 70 points are considered significant unless either the Land Evaluation or Site Assessment weighted factor subscore is less than 20 points. Both the Land Evaluation and Site Assessment subscores exceed 20 points. Therefore, the Project's conversion of the site's Farmlands to non-agricultural uses is considered significant.

There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of Prime Farmland to non-agricultural uses. Retention of on-site agricultural uses would be infeasible as it would prevent the development of future residential buildings, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources off-site would be infeasible as creation of new farmland-status properties within the City is outside of the City and future applicants' control. Additional off-site mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the Project parcels have no relationship to the loss of agricultural lands within the City or County. There is no available replacement acreage of lower quality farmland within the City or County that could be mitigated to Prime Farmland. Farmland within the City or County is either planned for future development of non-agricultural uses or already designated by the Department of Conservation as Unique Farmland, Farmland of Statewide Importance, or Prime Farmland. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Therefore, impacts would be significant and unavoidable.

Impact Finding AG-5: The Project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of Forest land to non-forest use (Draft Subsequent EIR at p. 5.1-9). Impacts are significant and unavoidable.

Facts in Support of Findings: According to the LESA Model significance thresholds, sites receiving a score of between 60 and 70 points are considered significant unless either the Land Evaluation or Site Assessment weighted factor subscore is less than 20 points. Both the Land Evaluation and Site Assessment subscores exceed 20 points. Therefore, the Project's conversion of the site's Farmlands to non-agricultural uses is considered significant.

There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of Prime Farmland to non-agricultural uses. Retention of on-site agricultural uses would be infeasible as it would prevent the development of future residential buildings, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources off-site would be infeasible as creation of new farmland-status properties within the City is outside of the City and future applicants' control. Additional off-site mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the Project parcels have no relationship to the loss of agricultural lands within the City or County. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Therefore, impacts would be significant and unavoidable.

Agriculture and Forestry Cumulative Finding: The Project would have a cumulatively adverse impact related to agriculture. A significant impact would occur (Draft EIR at p. 5.1-10).

Facts in Support of Findings: Continued conversion of agricultural lands to urban uses would substantially reduce overall agricultural productivity in the City and the County region. According to the City of Redlands General Plan EIR, approximately 200 acres of Prime, Important, or Unique Farmland could potentially be converted under buildout of the General Plan. The overall decrease in farmland within the City was identified as a significant cumulative impact in the General Plan EIR. Although the site is designated for non-agricultural uses by the General Plan, implementation of the Project would contribute to the reduction of agricultural uses and Farmland within the region and would cumulatively contribute to the loss of agricultural resources within the County. Although the proposed conversion is consistent with the projected decline in agricultural uses by the General Plan EIR, the Project would result in cumulatively considerable impacts to agricultural resources. Impacts would therefore be cumulatively significant and unavoidable.

B. Air Quality

Impact AQ-1 Finding: The Project would conflict with obstruct implementation of an applicable air quality plan (Draft Subsequent EIR at p. 5.2-20). Impacts would be significant and unavoidable.

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

As detailed below under Impact AQ-2 within the Draft Subsequent EIR, although the proposed Project would result in decreased emissions in comparison to those occurring under buildout of the existing General Plan land uses, the Project would continue to result in regional operational-source emissions that would exceed the thresholds of significance for CO, VOCs, and NO_X emissions after implementation of regulatory requirements and Mitigation Measures AQ-1 and AQ-2. Therefore, the Project would result in an increase in the frequency or severity of existing air quality violations and contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. As a result, the proposed Project would result in an impact related to Consistency Criterion No. 2.

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

Impact AQ-2 Finding: The Project would result in a cumulatively considerable net increase of criteria pollutants for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (Draft Subsequent EIR at p. 5.2-22). Impacts would be significant and unavoidable.

Facts in Support of Finding:

Construction: The timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically over a 10-year period or longer. Due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours, etc.), it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant air quality impact. Conversely, implementation of the Project has a potential to result in a significant and unavoidable impact with respect to construction activity associated with future development projects particularly if multiple construction projects overlap for emissions of CO, VOCs, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Thus, Mitigation Measure AQ-1 has been included to require that future projects prepare a technical assessment of potential air quality impacts from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. However, it is possible that emissions from future construction projects could exceed thresholds with implementation of feasible mitigation. Therefore, impacts related to construction air quality would be significant and unavoidable after implementation of mitigation.

Operation: As shown in Draft Subsequent EIR Table 5.2-7, operation of the proposed land uses at buildout and full occupancy under the proposed Project would generate emissions that would also exceed the applicable SCAQMD thresholds for VOC, CO, and NO_X. Because buildout of the proposed land uses would continue to result in exceedance of the operational SCAQMD thresholds for VOC, CO, and NOx, Mitigation Measure AQ-2 would be implemented to require developments in the Project area to prepare a technical air quality analysis and include all applicable mitigation measures to reduce operational emissions. However, the details of future proposed projects are unknown, and the volume of emissions that could be reduced through mitigation measures are specific to each proposed development, which are currently unknown. Thus, similar to the analysis presented in the General Plan EIR, even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions have the potential to continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

Impact AQ-3 Finding: The Project would expose sensitive receptors to substantial pollutant concentrations (Draft Subsequent EIR at p. 5.2-26). Impacts would be significant and unavoidable.

Facts in Support of Finding:

Construction: A Localized Significance Threshold (LST) analysis can only be conducted at a development project level, and quantification of LSTs is not applicable for this program-level environmental analysis. However, implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to LST's. As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_X, CO, PM_{10}, and $PM_{2.5}$) associated with the maximum daily grading activities for the proposed development, and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Hence, impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1.

Operational: Buildout of the proposed Project would result in additional residential and public developments, which do not typically involve vehicles idling or queueing for long periods. Therefore, due to the lack of significant stationary source emissions, impacts related to operational LSTs would be less than significant.

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

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

Air Quality Cumulative Finding: The Project would have a cumulatively adverse impact related to air quality. A significant impact would occur (Draft Subsequent EIR at p. 5.2-27).

Facts in Support of Finding: If an individual project would result in air emissions of criteria pollutants that exceed the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. As described under Impact AQ-2 in the Draft Subsequent EIR, emissions from construction of the proposed Project could exceed the SCAQMD's thresholds after implementation of SCAQMD rules and mitigation measures. Also, emissions from operation of the proposed Project at buildout would exceed SCAQMD's threshold for CO, VOC, and NOx after implementation of mitigation measures. Because the large majority of operational-source CO and NOx emissions (by weight) would be generated by project vehicles, and the VOC emissions would be generated by consumer products that neither future project applicants nor the City have the ability to reduce emissions of. Therefore, similar to the analysis presented in the General Plan EIR, operational-source CO, VOC, and NOx emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Mitigation Measures

MM AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts

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

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

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

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

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

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

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

C. Greenhouse Gas Emissions

Impact GHG-1 Finding: The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (Draft Subsequent EIR at p. 5.5-14). Impacts would be significant and unavoidable.

Facts in Support of Findings:

Construction: Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. As described previously, the timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, Mitigation Measure AQ-1 has been included to require that future projects prepare a technical assessment of GHG emissions from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. Due to the variables that must be considered when examining GHG construction emissions, and because SCAQMD methodology includes amortizing construction emissions over 30 years and adding them to the operation of the Project to determine significance, it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant GHG impact.

Operation: As shown on Draft Subsequent EIR Table 5.5-2, operation of the Project at buildout and full occupancy would generate 23,660.41 $MTCO_2e$ per year, which equates to a $MTCO_2e$/SP of 3.56, which would be substantially less than the emissions generated from buildout of the existing General Plan land uses; but would exceed the threshold of 3.0 $MTCO_2e$/SP. Thus, operational impacts related to GHG emissions would be significant. Because buildout of the proposed land uses would result in exceedance of the SP

screening threshold, Mitigation Measures AQ-1 and AQ-2 would be implemented to require development projects to prepare a project-specific technical GHG analysis and include all applicable mitigation measures to reduce project specific operational emissions. Because the details of future proposed projects are currently unknown, the volume of emissions that could be reduced through mitigation measures are specific to each proposed development and are also currently unknown. Therefore, even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions could continue to exceed SP screening threshold, and impacts related to GHG emissions would be significant and unavoidable.

Impact GHG-2 Finding: The Project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases (Draft Subsequent EIR at p. 5.5-17). Impacts would be significant and unavoidable.

Facts in Support of Finding: The future development implemented by the proposed rezoning would be in compliance with State energy standards provided in Title 24 and other statewide standards for fuel and solar use. The Project would also be consistent with the relevant City General Plan policies and the City's Climate Action Plan. However, as detailed in Draft Subsequent EIR Table 5.5-5, the proposed Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, Local Actions. Due to this potential inconsistency, the proposed Project could result in a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be significant and unavoidable.

Greenhouse Gas Cumulative Finding: The Project would have a cumulatively adverse impact related to greenhouse gas emissions. A significant impact would occur (Draft Subsequent EIR at p. 5.5-25).

Facts in Support of Finding: The estimated GHG emissions from development pursuant to the proposed Project at buildout would be substantially less than those from buildout of the existing General Plan land uses but could exceed the service population threshold of 3.0 $MTCO_2e$ per year after implementation of mitigation. Therefore, buildout of the Project would result in a cumulatively considerable significant impact. In addition, the Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, *Local Actions*, which could combine with inconsistencies of potential other/future projects. Therefore, impacts related to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, could be cumulatively considerable, and therefore, significant.

Mitigation Measures

MM AQ-1: Construction Emissions. Listed previously in Section IV, Subsection B, *Air Quality*.

MM AQ-2: Operational Emissions. Listed previously in Section IV, Subsection B, *Air Quality*.

D. <u>Transportation</u>

Impact TR-2 Finding: The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (B) regarding vehicle miles traveled (Draft Subsequent EIR at p. 5.10-11).

Facts in Support of Finding: Site 22 is located in a low VMT area and future buildout in Site 22 would satisfy Screening Criterion 2. Therefore, buildout of future projects within Site 22 would result in a less-than-significant impact to VMT. As shown in Draft Subsequent EIR Table 5.10-3, the Project VMT/SP for TAZ 53827208 (Sites 1 and 2) would be 39.6 percent below the threshold under Project Baseline 2024 conditions and 22 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 1 and 2 pursuant to the proposed zoning designations would result in a less-than-significant VMT impact. As shown in Draft Subsequent EIR Table 5.10-4, the Project VMT/SP for TAZ 53827403 (Sites 3-7, 9-15, and 24) would be 23.4 percent below the threshold under Project Baseline 2024 conditions and 25.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 3 through 7, 9 through 15, and 24 under the proposed zoning designations would result in a less-than-significant VMT

impact. As shown in Draft Subsequent EIR Table 5.10-5, the Project VMT/SP for TAZ 53827493 (Site 8) would be 23.4 percent below the threshold under Project Baseline 2024 conditions. Additionally, since the Project is consistent with the General Plan land use designation, the Project would not require a cumulative year analysis. Therefore, buildout of Site 8 under the proposed Project would result in a less-than-significant VMT impact. As shown in Draft Subsequent EIR Table 5.10-6, the Project VMT/SP for TAZ 53827501 (Site 16) would be 34.7 percent below the threshold under Project Baseline 2024 conditions and 44.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Site 16 pursuant to the proposed zoning designation would result in a less-than-significant VMT impact. As shown in Draft Subsequent EIR Table 5.10-7, the Project VMT/SP for TAZ 53836401 (Sites 17-19) would be 17.6 percent below the threshold under Project Baseline 2024 conditions and 9.6 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 17-19 under the proposed zoning designations would result in a less-than-significant VMT impact.

As shown in Draft Subsequent EIR Table 5.10-8, the Project VMT/SP for TAZ 53835402 (Sites 20 and 21) would be 85.1 percent above the threshold under Project Baseline 2024 conditions. and the Project VMT/SP for TAZ 53835101 (Site 23) would be 8.1 percent above the threshold under Project Baseline 2024 conditions. Therefore, buildout of Sites 20, 21, and 23 pursuant to the proposed zoning designations would result in a potentially significant VMT impact. As such, future development projects within Sites 20, 21, and 23 would be required to conduct a project-specific VMT screening analysis to determine whether the future proposed development would screen out of a full VMT analysis pursuant to Mitigation Measure T-1. Should the future proposed development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project-level VMT impact.

Mitigation Measures

MM TR-1: VMT Screening & Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines.

If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to:

- *Increase Residential Density*: Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT.
- *Integrate Affordable and Below Market Rate Housing*: Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project.

- *Implement Commute Trip Reduction Marketing*: Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA).
- *Provide Ridesharing Program*: Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA.
- *Implement Subsidized or Discounted Transit Program*: Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA.
- *Limit Residential Parking Supply*: The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project.
- *Unbundle Residential Parking Costs from Property Cost*: Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT.
- *Provide Pedestrian Network Improvement*: Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.
- C*onstruct or Improve Bike Facility*: Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT.
- C*onstruct or Improve Bike Boulevard*: Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT.
- *Expand Bikeway Network*: Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT.
- *Implement Conventional Carshare Program*: Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT.
- *Implement Electric Carshare Program*: Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions.
- *Implement Pedal (Non-Electric) Bikeshare Program*: Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT.
- *Implement Electric Bikeshare Program*: Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT.
- *Implement Scooter Share Program*: Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT.
- *Provide Community-Based Travel Planning (CBTP*): CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA.
- *Implement Market Price Public Parking (On-Street)*: Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas.

- *Implement Transit-Supportive Roadway Treatments*: Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.

SECTION V

GROWTH-INDUCING IMPACTS AND COMMITMENT OF RESOURCES

Section 15126.2(d) of the State CEQA Guidelines requires the EIR address the growth-inducing impact of the Project. Draft Subsequent EIR Section 5.13, *Mandatory Findings*, evaluates the potential for the proposed Project to affect the environment from employment or population growth, or the construction of additional housing, either directly or indirectly.

Impact Growth-1 Finding: The Project would not establish substantial permanent employment opportunities or otherwise stimulate activity such that it would result in the need for additional housing, businesses, and services to support increased economic opportunities (Draft Subsequent EIR at p. 5.13-3). Impacts would be less than significant.

Facts in Support of Finding: SCAG estimates that employment in the City will increase from 49,900 jobs in 2019 to 60,100 in 2050, which is an increase of over 21 percent. The employment anticipated by the proposed Project would generate approximately 550 new employees (see Section 5.8, *Population and Housing*), which represents about 5 percent of the estimated job growth by 2050. The 550 jobs expected in the Project area are included in SCAG projections because the employment-generating land uses within the Project area is existing pursuant to current General Plan land use designations and is decreasing with implementation of the Project. Thus, the employment that would occur within the Project area would be less than significant.

Buildout of the proposed Project would contribute to approximately 49.4 percent of the projected population growth, approximately 79.96 percent of the projected housing stock growth, and approximately 5 percent of the projected employment growth in the City. Thus, while the Project would result in an increase in population and housing units in an area not previously planned for housing, the increase in population and number of housing units that would result from the proposed Project would not exceed projections for the City. Additionally, the projected employment growth that would occur from buildout of the Project would not exceed employment growth projections for the City. Additionally, the proposed Project implements goals and policies of the Redlands Housing Element that support a variety of housing types and densities. Therefore, the economic effects of the proposed Project would not result in the need for additional development to support the proposed Project and would not result in a substantial impact on the environment.

Impact Growth-2 Finding: The Project would not remove obstacles to growth through the construction or extension of major infrastructure facilities that do not presently exist in the Project area or would add substantial capacity that could accommodate additional unplanned growth (Draft Subsequent EIR at p. 5.13-4). Impacts would be less than significant.

Facts in Support of Finding: The RHNA Rezone area is a developed urban area that is connected to the City's existing infrastructure system. Water, sewer, drainage, and roadway infrastructure currently provides service to all of the areas within the Project. As described in Section 5.12, *Utilities and Service Systems*, of the Draft Subsequent EIR, development projects pursuant to the RHNA Rezone would include potential installation of on-site infrastructure and new connections to the existing infrastructure systems, which include improvements to existing aged infrastructure such as increasing the size of water and sewer lines. However, these improvements would be sized to accommodate individual developments and would not provide excess capacity. Furthermore, buildout pursuant to the Project would not result in the extension of any roadways into undeveloped areas as the rezone sites are surrounded by existing roadways. Therefore, the infrastructure improvements implemented by the Project would not result in unplanned growth.

Impact Growth-3 Finding: The Project would not remove obstacles to growth through changes in existing regulations pertaining to land development (Draft Subsequent EIR at p. 5.13-5). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project includes amending the City of Redlands General Plan to change the land use designations of 23 sites to allow for additional residential development and a Specific Plan Amendment to remove 15 of the Rezone sites out of the East Valley Corridor Specific Plan (EVCSP). However, pursuant to the RHNA prepared by the California Department of Housing and Community Development (HCD), the City of Redlands must increase their residential zoning capacity to accommodate their 0.26 percent share that is 3,516 units of the RHNA. Assuming that the maximum number of residential units allowed by the proposed Project are developed and occupied (no vacancy), the 2,325 additional housing units in the Project area would consist of a 9.1 percent increase of housing units citywide, which is within the SCAG anticipated growth of both the City and the County. Therefore, impacts related to growth from changes in existing regulations pertaining to land development would not occur.

Impact Growth-4 Finding: The Project would not result in the need to expand one or more public service facilities to maintain desired levels of service (Draft Subsequent EIR at p. 5.13-5). Impacts would be less than significant.

Facts in Support of Finding: as detailed in Section 5.9, *Public Services*, of the Draft Subsequent EIR, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service. Based on service ratios and buildout projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities or plans. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur.

Impact Growth-4 Finding: The Project would not involve some other action that could encourage and facilitate other activities that could significantly affect eh environment (Draft Subsequent EIR at p. 5.13-5). Impacts would be less than significant.

Facts in Support of Finding: The development implemented pursuant to the proposed Project would be required to comply with all applicable City plans, policies, and ordinances. In addition, mitigation measures have been identified within the Draft Subsequent EIR to ensure that the Project minimizes environmental impacts. The Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment. All physical environmental effects from construction of buildout pursuant to the proposed Project have been analyzed in the technical sections of the Draft Subsequent EIR and the Initial Study prepared for the Project (included as Appendix A to the Draft Subsequent EIR). For example, activities such as excavation, grading, and construction as required for the buildout of the Project have been evaluated herein. Also, all operational aspects of future development pursuant to the Project have been analyzed in the Draft Subsequent EIR and through implementation of existing regulations, including the General Plan and zoning ordinance, would not create an environmental impact of induced growth.

SECTION VI

SIGNIFICANT IRREVERSIBLE EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires that an EIR discuss "any significant irreversible environmental changes which would be involved in the proposed action should it be implemented." Generally, a project would result in significant irreversible environmental changes if:

- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to residential uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
    - Changes in views associated with construction of the new building and associated development (Section 5.1, *Aesthetics*, of the Initial Study (included as Appendix A to the Draft Subsequent EIR))
    - Increased vehicle trips on surrounding roadways during operation of future projects under the proposed Project (see Section 5.10 of the Draft Subsequent EIR, *Transportation*).
    - Emissions of air pollutants associated with Project construction and operation of future projects under the proposed Project (see Section 5.2 of the Draft Subsequent EIR, *Air Quality*).
    - Consumption of non-renewable energy associated with construction and operation of future projects under the proposed Project due to the use of automobiles, lighting, heating and cooling systems, appliances, and the like (see Section 5.4 of the Draft Subsequent EIR, *Energy*).
    - Increased ambient noise associated with an increase in activities and traffic from future projects under the proposed Project (see Section 5.7 of the Draft Subsequent EIR, *Noise*).
    - Construction of the proposed Project as described in Section 3.0 of the Draft Subsequent EIR, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

The Project site contains approximately 44.67 acres of Prime Farmland. The Project could result in conversion of the Prime Farmland to non-agricultural uses with buildout pursuant to the proposed rezoning. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of this farmland to nonagricultural uses. Therefore, impacts would be significant and unavoidable. Project implementation would result in the conversion of existing 44.67 acres of Farmland at the Project site to nonagricultural use and could facilitate the conversion of Farmland within the vicinity to nonagricultural use. Development of the Project site could result in increased development pressure on the surrounding agricultural sites. Therefore, the Project could indirectly cause changes in the environment that could convert other farmland to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

In regard to energy usage from the proposed Project, as demonstrated in the analyses contained in Draft Subsequent EIR Section 5.4, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-generating and conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. Project specific information related to energy consumption is provided in Section 5.4, *Energy*, of the Draft Subsequent EIR.

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SECTION VII

ALTERNATIVES

The City of Redlands hereby declares that it has considered and rejected as infeasible the alternatives identified in the Draft Subsequent EIR and described below. Section 15126.6 of the State CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly achieve most of its basic objectives, but would avoid or substantially lessen any of the significant effects identified in the EIR analysis. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, an EIR must consider a reasonable range of alternatives that are potentially feasible; an EIR is not required to consider alternatives that are infeasible. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the objectives of the Project, as required by CEQA.

Objectives

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts. (Draft Subsequent EIR at p. 6-4)

- Implement Program 1.1-1 of the 6th Cycle 2021-2029 Housing Element to provide adequate capacity for at least 4,219 units on suitable sites.
- Maintain adequate housing sites for all income groups throughout the eight-year planning period.
- Increase the City's overall housing capacity and capability to accommodate housing as required per the certified Housing Element for the 2021-2029 housing cycle.
- Minimize potential land use conflicts associated with the proposed change to existing land use designations and zoning.

Alternatives

Key provisions of the State CEQA Guidelines relating to the alternatives analysis (Section 15126.6 et seq.) are summarized below:

- The discussion of alternatives shall focus on alternatives to the Project or its location that 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.
- The "No Project" alternative shall be evaluated along with its impact. The "No Project" analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved.
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate 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.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

Rationale for Selecting Potentially Feasible Alternatives

The alternatives must include a no-project alternative and a range of reasonable alternatives to the Project if those reasonable alternatives would attain most of the Project objectives while substantially lessening the

potentially significant Project impacts. The range of alternatives discussed in an EIR is governed by a "rule of reason," which the State CEQA Guidelines Section 15126.6(f)(3) defines as:

. . . set[ting] 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. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in the State CEQA Guidelines Section 15126.6(f)([1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative whose effects could not be reasonably identified, and whose implementation is remote or speculative.

For purposes of this analysis, the Project alternatives are evaluated to determine the extent to which they attain the basic Project objectives, while significantly lessening the significant effects of the Project.

Alternatives Not Selected for Analysis

Alternate Site Alternative

An alternative site alternative was considered and eliminated from further consideration. CEQA specifies that the key question regarding alternative site consideration is "whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project at another location." In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a Project applicant.

An alternate site for the Project was eliminated from further consideration. Any alternate site would need to occur within the City of Redlands. The City is required by State law to rezone housing shortfall sites according to what has been approved under the certified Housing Element (Government Code § 65583.2, Senate Bill 197). The sites identified within the City's 2021-2029 Housing Element include the Rezone sites, and an alternate site would fail to meet most of the Project objectives, would be infeasible, and would not be compliant with State law regarding rezoning pursuant to the City's Housing Element. Additionally, if the Project were to occur on an alternate site and rezoning were conducted within different parcels in the City, similar impacts would result and comparable mitigation would be required; therefore, impacts would not be reduced under this alternative. Therefore, this alternative has been determined infeasible. (Draft Subsequent EIR at p. 6-4)

Finding: The City of Redlands rejects the Alternative Site Alternative, on the following ground, which provides sufficient justification for rejection of this alternative: the Project is location specific as the sites were identified in the City's 2021-209 Housing Element. If the Project were to be relocated it would require similar, potentially additional, mitigations and would not reduce impacts compared to the proposed Project. Therefore, this alternative is eliminated from further consideration.

Alternatives Selected for Further Analysis

Alternative 1: No Project/No Development Alternative

This alternative consists of the Project not being approved, and the Project site would remain in the conditions that existed at the time the Notice of Preparation was published (July 1, 2024) with no additional development occurring within the Rezone sites. (Draft Subsequent EIR at p. 6-4)

Alternative 2: No Project/Buildout of Existing Land Use Alternative

Under this alternative, buildout of the residential and nonresidential uses would occur as permitted under the existing General Plan land use designations, and the Project site would not be rezoned to allow for additional residential uses. Buildout of this Alternative would result in up to 2,209,040.26 square feet of non-residential uses and 111 units of residential development. (Draft Subsequent EIR at p. 6-4)

Alternative 3: Reduced Project Site Alternative

The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the allowed area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located on the Morrey Arroyo Creek (Sites 2, 7, 8, 11,12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres. This alternative would still require an SPA to the EVCSP, a GPA, and zone change. (Draft Subsequent EIR at p. 6-5)

Alternative 4: Reduced Project Development Intensity Alternative

The Reduced Project Development Intensity Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, potential buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,948 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling-unit deficit in meeting their State mandated RHNA fair share. (Draft Subsequent EIR at p. 6-5)

Findings for Alternatives

Alternative 1: No Project/No Development Alternative

The No Project/No Development Alternative would result in continuation of the existing uses within the Rezone sites, and the potential buildout of additional residential units based on the proposed rezoning would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5.0 of this Draft Subsequent EIR, which include measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, and VMT.

Implementation of the No Project/No Development Alternative would not meet any of the Project objectives. The No Project/No Development Alternative would not introduce any additional housing within the City and the City would not be able to meet their RHNA per the 2021-2029 Housing Element. Additionally, under this alternative the City would not be able to address land use conflicts within the City. (Draft Subsequent EIR at p. 6-9)

Finding: The City of Redlands finds that the No Project/No Development Alternative would not necessitate mitigation measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources. However, the potential benefits of the proposed Project would also not be realized including providing housing that would result in a better jobs-housing balance in Redlands, which is currently considered jobs rich. In addition, the City of Redlands

would not be compliant with State Housing Element Law under this alternative. Each of these reasons, separately and independently, is a sufficient basis upon which to reject this alternative.

Alternative 2: No Project/Buildout of Existing Land Use Alternative

The No Project/Buildout of Existing Land Use Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, noise, and tribal cultural resources. This alternative would not result in lessened impacts to any of the 19 environmental topics analyzed in the Draft Subsequent EIR and Initial Study (Draft Subsequent EIR Table 6-3).

As shown in Draft Subsequent EIR Table 6-4, the No Project/Buildout of Existing Land Use Alternative would not meet any of the Project objectives. The No Project/Buildout of Existing Land Use Alternative would not introduce enough additional housing within the City to able to meet their RHNA per the 2021-2029 Housing Element. Additionally, under this alternative the City would not be able to address land use conflicts within the City.

Finding: The City of Redlands finds that the No Project/Buildout of Existing Land Use Alternative would not result in any lessened impact compared to the proposed Project and would require the same mitigation measures as the proposed Project. This alternative would not meet the Project objectives to bring housing to the City of Redlands. In addition, the City of Redlands would not be compliant with State Housing Element Law under this alternative. These reasons, separately and independently, is a sufficient basis upon which to reject this alternative.

Alternative 3: Reduced Project Site Alternative

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

As shown in Table 6-4 of the Draft Subsequent EIR, implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4 as it would introduce additional residential units in the City to help reach the City's RHNA goals. The Reduced Project Site Alternative would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses to be consistent with the existing school uses and proposed residences surrounding the site.

Finding: The City of Redlands finds that the Reduced Project Site Alternative would not eliminate the significant and unavoidable impacts from the Project and would not eliminate the need for mitigation. The Reduced Project Site Alternative would meet the majority of Project objectives. However, it would not minimize potential land use conflicts associated with the proposed zone change. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

Alternative 4: Reduced Project Development Alternative

The Reduced Project Development Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, construction air quality emissions, GHG emissions, and VMT that would occur

from implementation of the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. However, this alternative would avoid the significant and unavoidable impact related to operational air quality emissions.

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

Finding: The City of Redlands finds that the Reduced Project Development Alternative would not provide enough housing to reach their RHNA goals as discussed in the certified Housing Element for the 2021-2029 housing cycle, which is a main objective of the proposed Project. Because this alternative would not meet the City's legal obligation to rezone the site to meet the necessary residential capacity consistent with the City's certified Housing Element Update, this alternative is eliminated from further consideration.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Environmentally Superior Alternative for the Project would be the No Project/No Development Alternative. Pursuant to CEQA Guidelines Section 15126.6(3)(1) an additional alternative need to be selected alongside the No Project/Development Alternative. The second Environmentally Superior Alternative for the Project is the Reduced Project Site Alternative.

The No Project/No Development Alternative would avoid the implementation of the mitigation measures that are identified in Section 5.0 of the Draft Subsequent EIR that are related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources. The Reduced Project Site Alternative would result in lessened impact to 5 of the 16 environmental topics analyzed in the Draft Subsequent EIR. Implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4, but would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning. This alternative would be required to implement applicable mitigation measures regarding air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources, similar to the Project. Thus, although environmentally superior, mitigation measures would continue to be required. (Draft Subsequent EIR at p. 7-18)

CEQA does not require the lead agency (the City of Redlands) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Based on the considerations described herein, the City of Redland finds that the No Project/No Development Alternative and Reduced Project Site Alternative are infeasible based on these environmental, economic, and social factors.

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SECTION VII

STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

The City of Redlands is the Lead Agency under CEQA for preparation, review, and certification of the Subsequent EIR for the Redlands RHNA Project (Project). As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed Project. In making this determination the City is guided by CEQA Guidelines Section § 15093, *Statement of Overriding Considerations*, which states:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal (sic) project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to CEQA Guidelines Section 15091.

In addition, Public Resources Code Section § 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section § 21081(b) and the State CEQA Guidelines Section § 15093, the City has balanced the benefits of the proposed Project against the unavoidable adverse impacts associated with the Project and has adopted all feasible mitigation measures with respect to these impacts. The City also has examined alternatives to the proposed Project, none of which both meet the Project objectives and is environmentally preferable to the proposed Project for the reasons discussed in the Findings and Facts in Support of Findings.

The City of Redlands, as the Lead Agency for this Project, and having reviewed the Subsequent EIR for the Redlands RHNA Rezone Project, and reviewed all written materials within the City's public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the Project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the Project.

Overriding Considerations

The City, after balancing the specific economic, legal, social, technological, and other benefits of the Project, has determined that the unavoidable adverse environmental impacts identified above may be considered

acceptable due to the following specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project, each of which standing alone is sufficient to support approval of the Project, in accordance with CEQA Guideline Section § 21081(b) and CEQA Guideline Section § 15093. The specific economic, legal, social, technological, or other benefits of the Project are as follows:

- The Project would allow the City to meet their State mandated RHNA fair share and would ensure that the City remains consists with State Housing Element Law.
- The Project would implement and be consistent with the City's Housing Element.
- The Project provides additional housing and the necessary residential capacity consistent with the City's certified Housing Element Update.
- The Project would provide housing that would result in a better jobs-housing balance in Redlands, which is currently considered jobs rich.
- The Project would promote a diverse housing stock with a wide range of sizes and affordability within the City of Redlands.
- The Project would increase the development potential of underutilized parcels of the City of Redlands, allowing for increased residential development and development impact fees within the City.
- The Project would locate new higher-density housing developments within close proximity to nearby retail stores, personal service uses, medical and dental offices, schools, parks, transportation corridors, and employment centers in Redlands.

SECTION VIII

CERTIFICATION OF THE EIR

The City of Redlands finds that it has reviewed and considered the Final EIR in evaluating the proposed Project, that the Final EIR is an accurate and objective statement that fully complies with CEQA, State CEQA Guidelines and that the Final EIR reflects the independent judgment of the City.

The City of Redlands declares that no new significant information as defined by State CEQA Guidelines, Section 15088.5 has been received by the City after circulation of the Draft Subsequent EIR that would require recirculation.

The City of Redlands certifies the Subsequent EIR based on the entirety of the record of proceedings, including but not limited to the following findings and conclusions.

Findings

The following significant environmental impacts have been identified in the Subsequent EIR and would require mitigation as set forth in Section IV of this Resolution but cannot be mitigated to a level of insignificance:

- Agriculture and Forestry (Project-related and cumulative),
- Air Quality(Project-related and cumulative),
- Greenhouse Gas Emissions (Project-related and cumulative), and
- Transportation (Project-level).

Conclusions

1. All significant environmental impacts from the implementation of the proposed Project have been identified in the Subsequent EIR and, with implementation of existing regulations and the mitigation measures from the Subsequent EIR, will be mitigated to a level of insignificance.
2. Other alternatives to the proposed Project, which could potentially achieve the basic objectives of the proposed Project, have been considered and rejected in favor of the proposed Project.
3. Environmental, economic, social, and other considerations and benefits derived from the proposed Project override and make infeasible any alternatives to the proposed Project or further mitigation measures beyond those incorporated into the proposed Project.

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SECTION IX

MITIGATION MONITORING AND REPORTING PLAN

Pursuant to Public Resources Code Section 21081.6, the City of Redlands adopts the Mitigation Monitoring and Reporting Plan (MMRP) attached to this Resolution as Exhibit A. In the event of any inconsistencies between the mitigation measures as set forth herein and the Mitigation Monitoring and Reporting Plan, the Mitigation Monitoring and Reporting Plan shall control.

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SECTION X

CONTENTS AND CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Redlands Planning Division. The custodian for these records is the City of Redlands. This information is provided in compliance with Public Resources Code Section 21081.6.

The record of proceedings for the City's decision on the Project consists of the following documents, at a minimum:

1. The Initial Study for the Redlands RHNA Rezone Project;
2. The NOP, NOA, NOC, and all other public notices issued by the City in conjunction with the Project;
3. All comments submitted by agencies or members of the public during the 45-day comment period on the Draft Subsequent EIR;
4. The Final EIR for the Redlands RHNA Rezone Project, including comments timely received on the Draft Subsequent EIR, responses to those comments, and technical appendices;
5. The Mitigation Monitoring and Reporting Plan for the Project;
6. All findings, resolutions and ordinances adopted by the City in connection with the Redlands RHNA Rezone Project, and all documents cited or referred to therein;
7. All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Redlands RHNA Rezone Project;
8. All documents submitted to the City by other public agencies or members of the public in connection with the Redlands RHNA Rezone Project up through Project approval.
9. Matters of common knowledge to the City, including, but not limited to federal, State, and local laws and regulations;
10. Any documents expressly cited or referenced in these findings, in addition to those cited above; and
11. Any other materials required for the record of proceedings by Public Resources Code Section 21167.6, subdivision (e).

The following location is where review of the record may be performed:

City of Redlands
Planning Division
35 Cajon Street
Redlands, CA 92373

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