

**DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
Regency Centers Redlands Marketplace Project
CITY OF REDLANDS, CALIFORNIA**

Prepared for:

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE AND BACKGROUND

The Project Applicant is proposing the construction of the Regency Centers Redlands Marketplace Project within the East Valley Corridor Specific Plan area of the City of Redlands (City). The development would consist of four pad buildings for shops designated for retail or food service uses, a major market tenant, and a drive-through facility. Other site improvements include a parking lot, points of ingress and egress, auxiliary structures, landscaping, and a plaza space (Project/Proposed Project). The Project site is 8.18 acres and includes 70,200 square feet (SF) of commercial building space.

Implementation of the Proposed Project would require several discretionary approvals from the City, including a Specific Plan Amendment, Zone Change, Commission Review and Approval, and Conditional Use Permits (see Section 1.4.1 *Permits and Approvals*). Under the City’s Measure U, the Project would be required to prepare a Socioeconomic Cost Benefit Study.

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Location

The Proposed Project site is located within undeveloped parcels in the City at the northeast corner of West Lugonia Avenue and Tennessee Street (see Figure 1). The Project site is within the East Valley Corridor Specific Plan at the following Assessor Parcel Numbers (APN): 0167-171-16-0000, 0167-171-11-0000, and 0167-171-12-0000.

1.2.2 General Plan Designation/Zoning

The Project site has a General Plan land use designation of Commercial (see Figure 2).

The Project site is zoned as East Valley Corridor Specific Plan Specific Development (EV/SD) (City 2018). Per the East Valley Corridor Specific Plan, the EV/SD zoning designation provides an alternative, more flexible site planning process which encourages creative and imaginative planning of administrative professional, commercial or industrial developments, or a mixture of such uses (City 2024).

The Project proponent proposes a Zone Change to establish the site’s zoning as General Commercial (C-3). This would also include a Specific Plan Amendment for the Project site’s removal from the East Valley Corridor Specific Plan. The C-3 designation under the City of Redlands Zoning Ordinance allows for a broad range of commercial uses. This Zone Change would align the Project site’s existing zoning with the intended commercial use while maintaining consistency with surrounding land uses and the City’s overall land use planning objectives.

The Proposed Project shall attain a Conditional Use Permit for a drive-through restaurant as required for the General Commercial District zone.

The Project site is surrounded by East Valley Corridor Specific Plan – General Commercial (EV/CG) zoning to the north, south and west, and Multiple-Family Residential (R-3) zoning to the east (see Figure 2).

1.2.3 Surrounding Land Uses

The land immediately north and east of the Project site consists of vacant, undisturbed parcels. The western Project boundary is bordered by Tennessee Street. West Lugonia Avenue forms the southern Project boundary and is adjacent to an existing shopping center.

Immediately north of the Project site, an approved project includes a 13.48-acre mixed-use project consisting of 460 residential units (including 5 percent designated as Very Low Income) and 18,000 square feet of commercial space.

To the immediate east of the Project site, an approved project includes the construction of 451 apartments and 72 condominium townhomes in multiple buildings, along with on-site open space and recreational amenities, and 18 single-family residences on approximately 25 acres. This project site is currently being graded in preparation for building construction.

1.3 **PROJECT DESCRIPTION**

The Proposed Project would include the construction and operation a shopping plaza on undeveloped parcels located at the northeast corner of the intersection of West Lugonia Avenue and Tennessee Street, on approximately 356,152 SF (8.18 acres) of land.

Proposed structures include four buildings for shops designated for retail or food service uses, a major market tenant, and a drive-through facility. The total proposed area is 70,200 SF (1.61 acres). Other site improvements include a parking lot, points of ingress and egress, auxiliary structures, landscaping, and a plaza space.

1.3.1 Site Plan

The proposed buildings are illustrated on the site plan in Figure 3 and the total site footprint is detailed in Table 1.

Table 1: Proposed Project Footprint

Building	Footprint (SF)
Major A Market	36,000
Pad 1 (Drive-through)	2,700
Shops 1	6,600
Shops 2	6,900
Shops 3	8,000
Shops 4	10,000
Customer/Employee Parking Spaces	350 Stalls
Total Building Footprint	72,200
Total Site Footprint¹	356,152

Notes:

1. Includes parking areas, points of ingress and egress, plaza space, auxiliary structures, and landscaping coverage.

1.3.2 Construction

Construction of the Proposed Project would require multiple workers using equipment such as loaders, pick-up trucks, backhoes, water trucks for dust suppression, cranes, asphalt pavers, and excavators. Project materials would be staged on-site. The Project site would be excavated and graded to construct the proposed buildings, internal driveways and parking lots. Engineered fill would be used beneath building structures, exterior slabs, and pavement. Grading of the Project site would require 8,536 cubic yards of imported soil and 8,840 cubic yards of exported soils, which would result in a net loss of 304 cubic yards of dirt. Proposed utilities include potable and non-potable water lines, fire water lines, storm drain lines, and sewer lines that would connect to existing infrastructure in the City. The Project would incorporate solar energy systems in compliance with applicable building code and energy regulations.

The Project is expected to break ground in Spring 2026 and be completed by Winter 2026. Construction activities will take place between 7:00 a.m. and 6:00 p.m. Monday through Saturday. No construction work will occur on Sundays or holidays per the City's Community Noise Control Section in Chapter 8.06 of the Municipal Code.

1.3.3 Operations

The Proposed Project would operate as a shopping center, providing retail, food, and grocery establishments to the existing population within the City. Other uses permitted and conditionally permitted under the C-3 zoning designation, such as dry cleaning, hospitals, and banks, may also operate on the Project site. Hours of operation are anticipated to be between 8:00 a.m. and 8:00 p.m. The number of employees on-site during operating hours would vary depending on the types of commercial uses, employment needs, and building occupancy levels.

Access and Circulation

The site is accessible State Route 210 (I-210), 0.07-mile to the east, and Interstate 10 (I-10), 0.40-mile to the south, with Tennessee Street and West Lugonia Avenue bordering the property's respective western and southern frontages.

Two points of ingress and egress would be provided on the southern Project boundary via West Lugonia Avenue and two points of ingress and egress would be provided on the western Project boundary via Tennessee Street (See Figure 3). The Project would provide four pedestrian access points from adjacent public sidewalks, located at the northeastern, central-southern, southwestern, and eastern boundaries of the Project site. In addition, a drive aisle would be constructed surrounding the perimeter of the Project site.

To reduce circulation impacts to a less-than-significant level, the Project would incorporate mitigation measure (MM) T-1 through MM T-2, which would modify the signalization of the following intersections to achieve an acceptable Level of Service (LOS) C, based on anticipated traffic levels with implementation of the Proposed Project (see Section 4.17.1):

- **MM T-1: Lugonia Avenue & Home Depot Parking Lot.** Increasing the cycle length to 100 seconds (sec) and optimizing the splits lead to an improvement in the level of service to LOS C at the PM peak hour with a reduction in delays to 33 sec.

- **MM T-2: West Lugonia Avenue & Texas Street** Changing lanes configuration of the northbound (NB) approach (one NB left turn lane with a storage length of 40 ft and one NB through and right turn lane) leads to an improvement in the level of service to LOS C at the PM peak hour with a reduction in delays to 21.2 sec.

Figure 1 – Project Location and Vicinity Map



Figure 2 – Land Use/Zoning



1.4 REQUIRED PERMITS AND APPROVALS

Reviewing Agencies include those agencies that do not have discretionary authority but may review the Initial Study and Mitigated Negative Declaration (IS/MND) for adequacy and accuracy. Responsible Agencies have discretionary approval authority for a project, and may rely on this IS/MND for their independent decision-making process. Potential Responsible Agencies and Reviewing Agencies include the following:

Reviewing Agencies

- South Coast Air Quality Management District (SCAQMD)
- California Department of Transportation (Caltrans)

1.4.1 Permits and Approvals

The following permits and approvals may be required prior to construction of the Project:

City of Redlands

- Specific Plan Amendment (Amendment No. 55 to Specific Plan 40) to remove the Project from the East Valley Corridor Specific Plan
- Zone Change No. 482 to establish C-3 (General Commercial) zoning for the site
- Commission Review and Approval No. 976 for site plan and architectural approval
- Conditional Use Permit No. 1207 for alcoholic beverage sales within the grocery store.
- Conditional Use Permit No. 1208 to establish a drive through restaurant use
- Socio-Economic Cost Benefit Study
- Grading Permit
- Building Permit

Santa Ana Regional Water Quality Control Board (SARWQCB; Region 8)

- Compliance with National Pollutant Discharge Elimination System (NPDES) Construction General Permit

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

2.2 DETERMINATION

On the basis of this initial evaluation:

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



Signature

Sean Reilly

Name

October 16, 2025

Date

Principal Planner

Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration Section 15063(c)(3)(D) of the CEQA Guidelines. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

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

4.1.1 Impact Analysis

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

Less Than Significant Impact. As described in the General Plan EIR, scenic vistas within the City include scenic corridors and views to open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains (City 2017a). Current and future scenic drives are identified within Chapter 2, Distinctive City, of the General Plan. The General Plan indicates that specific development standards have been adopted by Resolution to protect identified scenic highways, drives, and historic streets.

The land immediately north and east of the Project site currently consists of vacant, undisturbed parcels. However, the Tennessee Village Project, approved on December 4th, 2024, will develop a mixed-use project consisting of 460 residential units and 18,000 square feet of commercial space. This project would be located on a parcel immediately north of the Proposed Project. There are currently no proposed or approved projects on the west. An approved project is being graded to the east.

West Lugonia Avenue forms the southern Project boundary. Property to the south of West Lugonia Avenue is developed with an existing shopping center. State Route 210 lies 0.07-mile to the east and Interstate 10 lies 0.40-mile to the south of the Project site.

Although the Project lies on undisturbed land, the site does not contain trees or other vegetation that would potentially add scenic value. Vegetation on the site is largely composed of low-growing, non-native species and ruderal plants associated with disturbed habitats.

The Proposed Project would result in partial obstruction of views toward the San Bernardino Mountains for pedestrians and drivers along West Lugonia Avenue looking north. However, West Lugonia Avenue is not a designated scenic corridor in the City’s General Plan. Existing development, along West Lugonia Avenue already partially limits views in this area. The Project would be consistent

with the surrounding urban and suburban character and would not introduce elements that are out of scale or significantly visually intrusive.

The proposed major market, the tallest building under the Proposed Project, would not exceed 42 feet in height. The approved Tennessee Village Project, located within the same view corridor when looking north from West Lugonia Avenue toward the San Bernardino Mountains, will have a maximum building height of 52 feet, 6 inches. Because the Proposed Project would be shorter than the adjacent future development, it would not intensify cumulative visual impacts when considered in conjunction with the mixed-use project. The Proposed Project would be visually compatible with the surrounding commercial character.

Furthermore, mountain views remain available from other nearby public vantage points along West Lugonia Avenue that are not affected by the Project. As such, the obstruction does not substantially degrade the existing visual character or quality of the site and its surroundings.

Tennessee Street is not a designated scenic corridor in the City's General Plan. Due to the flat topography of the region, there are no scenic vistas or prominent visual resources when looking south or west along Tennessee Street. Although the Proposed Project would be located within these viewsheds, the lack of notable scenic features means that its presence would not result in substantial impacts on public views from Tennessee Street. Therefore, impacts would be less than significant.

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

No Impact. The nearest eligible Scenic Highway is a segment of California State Route 38 (SR 38), located 0.83 miles east of the Project site (Caltrans 2025). Due to intervening development and flat topography between the Project site and SR 38, the Project site is not visible from the scenic segment of SR 38. No impact would occur.

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

Less Than Significant Impact. As described in Threshold a) above, the Proposed Project would result in partial obstruction of views toward the San Bernardino Mountains for pedestrians and drivers along West Lugonia Avenue looking north. However, West Lugonia Avenue is not a designated scenic corridor in the City's General Plan. Existing developments along West Lugonia Avenue already partially limit views in this area. As previously discussed the Proposed Project also would not result in substantial impacts on public views from Tennessee Street.

The Project would be consistent with the surrounding urban and suburban character and would not introduce elements that are out of scale or significantly visually intrusive. The proposed major market, the tallest building under the Proposed Project, would not exceed 42 feet in height, which would be approximately ten feet less than the height of the approved Tennessee Village Project. Furthermore, mountain views remain available from other nearby public vantage points that are not affected by the Project. The Project is also consistent with the proposed C-3 zoning designation, as discussed in Section 1.2.2. As such, the obstruction does not substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be less than significant.

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

Less Than Significant Impact. The Project would include mounted light fixtures on the proposed buildings. Parking lot lighting would consist of pole-mounted LED fixtures, spaced throughout the lot to provide uniform illumination. All fixtures would be fully shielded and downward-facing to minimize light spillover onto adjacent properties and reduce skyglow. The Proposed Project would increase the amount of light in the area because it is a vacant lot with no lighting present. Construction may have security lighting during night hours.

The City's General Plan Action 2-A.35 states:

Establish standards for the evaluation of exterior lighting for new development and redevelopment to ensure that exterior lighting (except traffic lights, navigational lights, and other similar safety lighting) is minimized, restricted to low-intensity fixtures, shielded, and concealed to the maximum feasible extent, and that high-intensity perimeter lighting and lighting for sports and other private recreational facilities is limited to reduce light pollution visible from public viewing areas.

Although the Project area would increase lighting within the area, compliance with City standards for exterior lighting for new developments, as established by the City's General Plan Action 2-A.35, would reduce this impact to a less than significant level.

Under the Proposed Project, the Project site would be removed from the East Valley Corridor Specific Plan and would undergo a Zone Change to C-3. The Proposed Project would comply with all applicable lighting and glare requirements under the C-3 zoning designation. Under Section 18.92.220 of the City's Municipal Code, lighting facilities within the C-3 zone shall be arranged in a manner which will protect the highway and neighboring properties from direct glare or hazardous interference of any kind. Therefore, impacts would be less than significant.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.1 Impact Analysis

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

No Impact. Prime farmland is land that has a combination of characteristics to be used as cropland, pasture, rangeland, and forest land. According to the Department of Conservation (DOC) California Important Farmland Finder mapping system, the Project site is designated as Grazing Land (DOC 2022). Grazing Land is defined as follows: “Land on which the existing vegetation is suited to the grazing of livestock. This category is used only in California and was developed in cooperation with the California Cattlemen’s Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities” (DOC 2022).

The Proposed Project area is not designated for agricultural use in the City's General Plan, it is not zoned for agricultural or farmland use and no agricultural or farmland use is proposed. The Project site is proposed to be used for commercial purposes, which is consistent with the surrounding uses. The Project site is not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore, implementation of the Proposed Project would not convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to a non-agricultural use. No impact would occur.

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

No Impact. While the DOC indicates that the Project site is designated as grazing land, the Project site is currently zoned as EV/SD and would be rezoned as C-3. Both EV/SD and C-3 zoning designations permit commercial uses. The Project site is currently designated as Grazing Land and is surrounded by Urban and Built-Up land (DOC 2022). According to the DOC's Williamson Act Enrollment Finder, the Project site is not located within, nor adjacent to, any land enrolled in the Williamson Act contracts (DOC 2024). The Project site is not zoned for agricultural uses, nor is the Project being proposed to be rezoned for agricultural use. Therefore, the Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

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

No Impact. There are no existing trees on the Project site and the area is not designated for forest or timberland use. The Project site is zoned as EV/SD and would be rezoned to C-3. The Proposed Project would not conflict with existing zoning or cause rezoning of forest or timberland zones. Therefore, the Proposed Project would not conflict with existing zoning for forest or Timberland Production, resulting in no impact.

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

No Impact. As discussed in the previous section, the Project's proposed commercial uses are permitted under the existing EV/SD zoning designation and the proposed C-3 zoning designation (City 2024; City 2025a). There are no existing trees on the Project site and the area is not designated for forest or timberland use. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use due to its zoning and lack of forest land, resulting in no impact.

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

No impact. The Project site is not adjacent to any Farmland or forest land. The surrounding areas are either designated as Grazing Land or Urban and Built-up Land by the California Department of Conservation (DOC 2022). The proposed commercial development is a permitted use under the existing EV/SD zoning designation and the proposed C-3 zoning designation (City 2024; City 2025a). Due to the lack of Farmland and forest land in the vicinity of the Project, no impact would occur.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.3.1 Impact Analysis

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

Less Than Significant Impact. On August 10, 2025, an Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis (Air Report) was prepared by Vista Environmental for the Proposed Project. The Air Report is included in Appendix A.

The regional plan that applies to the Proposed Project is the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the Proposed Project with the AQMP and whether the Proposed Project would interfere with the region’s ability to comply with Federal and State air quality standards.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP" (Appendix A). Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- 1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- 2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in the Air Report, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance discussed in Section 9.1 of the Air Report or local thresholds of significance discussed in Section 9.2 of the Air Report. The ongoing operation of the Proposed Project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance discussed in Section 9.1 of the Air Report. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the Proposed Project would be consistent with the first criterion (Appendix A).

Criterion 2 - Exceed Assumptions in the AQMP?

As discussed in Appendix A, consistency with the AQMP assumptions is determined by performing an analysis of the Proposed Project with the assumptions in the 2022 AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Proposed Project are based on the same forecasts as the AQMP. The 2022 AQMP was developed through use of the planning forecasts provided in the Connect SoCal and 2019 Federal Transportation Improvement Program (FTIP). The Connect SoCal is a major planning document for the regional transportation and land use network within Southern California. The Connect SoCal is a long-range plan that is required by federal and state requirements placed on Southern California Association of Governments (SCAG) and is updated every four years. The 2019 FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this Project, the City of Redland's General Plan defines the assumptions that are represented in AQMP.

The Project site is currently designated as Commercial (C) in the General Plan and is zoned East Valley Corridor Specific Plan. However, it should be noted that the Project area is currently being removed from the *East Valley Corridor Specific Plan* and zoned General Commercial District (C-3). The Proposed Project is compliant with the Commercial General Plan land use designation and is mostly compliant with the C-3 land use designation. However, the Proposed Project will require a conditional use permit to allow a drive-through restaurant as a conditionally permitted land use. The *Trip Generation Study of Coffee/Donut Shops in Western NY*, prepared by CED Engineering, found that the vehicle trips generated from coffee shops are more dependent on other factors such as the median age of the nearby residents as well as the distance from freeways and major roads than if the coffee shop has a drive-thru (Appendix A). As such, the addition of the drive-thru to the coffee shop would not likely alter the trip generation forecasts for the Project site provided in the Connect SoCal. Furthermore, the Proposed Project would support the strategies provided in the Connect SoCal by promoting walkable communities through the provision of commercial uses in close proximity to existing residential uses. It would also promote the use of public transportation, since the existing Omnitrans Lugonia at Tennessee Bus Stop is located adjacent to the Project site. For these reasons, the Proposed Project is not anticipated to exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the Proposed Project would not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact would occur in relation to implementation of the AQMP.

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

Less Than Significant Impact. The Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or State ambient air quality standard. The following section provides the Air Report’s calculated potential air emissions associated with the construction and operations of the Proposed Project and compares the emissions to the SCAQMD standards.

Construction Emissions

The construction activities for the Proposed Project are anticipated to include site preparation and grading of the 8.18-acre Project site, building construction of the shopping center, paving of the on-site ingress and egress points, parking lots, loading areas and hardscapes and application of architectural coatings. The CalEEMod model has been utilized to calculate the construction-related criteria pollutant emissions from the Proposed Project and the input parameters utilized in this analysis have been detailed in Section 8.1 of Appendix A. The construction emissions have been analyzed for both regional and local air quality impacts. The maximum daily construction emissions by season are shown below in Table 2 and the CalEEMod printouts are attached to the Air Report in Appendix A.

Table 2: Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO2	PM10	PM2.5
Winter 2025	3.39	31.8	31.2	0.05	6.98	3.96
Summer 2026	1.18	10.3	14.8	0.03	0.78	0.45
Winter 2026	36.3	10.3	14.4	0.03	0.78	0.45
Maximum Daily Construction Emissions	36.3	31.8	31.2	0.05	6.98	3.96
SCAQMD Regional Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.1.30

Table 2 shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during construction of the Proposed Project. Therefore, less than significant regional air quality impacts would occur from construction of the Proposed Project.

Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from construction were analyzed through utilizing the methodology described in Localized Significance Threshold Methodology (LST Methodology), prepared by SCAQMD, revised October 2009 (Appendix A). The LST Methodology found the primary criteria pollutant emissions of concern are NOx, CO, PM10, and PM2.5. In order to determine if any of these pollutants require a detailed analysis of the local air quality impacts, each phase of construction was screened using the SCAQMD’s Mass Rate LST Look-up Tables. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily onsite emissions of CO, NOx, PM10, and PM2.5 from the Proposed Project could result in a significant impact to the local air quality. Table 3 shows the onsite emissions from the CalEEMod model for the different construction phases and the calculated localized emissions thresholds that have been detailed in Section 9.2 of the Air Report.

Table 3: Construction-Related Criteria Pollutant Emissions

Construction Phase	On-site Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Site Preparation ¹	31.65	30.24	6.76	3.92
Grading ¹	29.95	29.24	3.92	2.13
Building Construction	9.85	13.00	0.38	0.35
Paving	7.12	9.94	0.32	0.29
Architectural Coatings	0.86	1.13	0.02	0.02
Maximum Daily Construction Emissions	31.65	30.24	6.76	3.92
SCAQMD Local Construction Thresholds²	203	1,230	9	5
Exceeds Threshold?	No	No	No	No

Notes:

¹ Site Preparation and Grading phases based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

² The nearest offsite sensitive receptors are the approved but not yet constructed residential developments adjacent to the north and east sides of the project site. According to SCAQMD Methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: Calculated from SCAQMD’s Mass Rate Look-up Tables for two and five acres interpolated to 3 acres in Air Monitoring Area 34, Central San Bernardino County.

The data provided in Table 3 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds during construction activities for the Proposed Project. Therefore, a less than significant local air quality impact would occur from construction of the Proposed Project.

Operational Emissions

The on-going operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the Project-generated vehicle trips, emissions from energy usage, and on-site area source emissions created from the on-going use of the proposed project. The following section provides the analysis from Appendix A of potential long-term air quality impacts due to regional air quality and local air quality impacts with the on-going operations of the Proposed Project.

Operations-Related Regional Criteria Pollutant Analysis

The operations-related regional criteria air quality impacts created by the Proposed Project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 8.1 of the Air Report. The worst-case summer or winter VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} daily emissions created from the Proposed Project’s long-term operations have been calculated and are summarized below in Table 4 and the CalEEMod daily emissions printouts are attached to the Air Report in Appendix A.

Table 4: Operational Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile Sources ¹	25.2	17.0	142	0.31	26.3	6.83
Area Sources ²	2.21	0.03	3.05	<0.01	0.01	<0.01
Energy Usage ³	0.01	0.19	0.16	<0.01	0.01	0.01
Total Emissions	27.4	17.2	145.2	0.31	26.3	6.84
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

¹ Mobile sources consist of emissions from vehicles and road dust.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of emissions from on-site natural gas usage.

Source: CalEEMod Version 2022.1.1.30

The data provided in Table 4 shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the Proposed Project.

In *Sierra Club v. County of Fresno (2018) 6 Cal.5th 502* (also referred to as “Friant Ranch”), the California Supreme Court held that when an EIR concluded that when a project would have significant impacts to air quality impacts, an EIR should “make a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences” (Appendix A). In order to determine compliance with this Case, the Court developed a multi-part test that includes the following:

- 1) The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

The Air Report details the specific health risks created from each criteria pollutant in Section 4.1 and specifically in Table C (Appendix A). In addition, the specific health risks created from diesel particulate matter are detailed in Section 2.2 of the Air Report. As such, the Air Report’s analysis meets the part 1 requirements of the Friant Ranch Case.

- 2) The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it

states “The Court of Appeal identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of the possible adverse health effects. The County could have, for example, identified the Project’s impact on the days of nonattainment per year.”

The Friant Ranch Case found that an EIR’s air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes (Appendix A). The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the Proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk, it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the California Air Resources Board (CARB) methodology, which reported that a PM2.5 methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the Proposed Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds per day of NOx and 89,180 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone. As shown above in Table 2, Project-related construction activities would generate a maximum of 36.3 pounds per day of VOC and 31.8 pounds per day of NOx and as shown above in Table 4, operation of the Proposed Project would generate 27.4 pounds per day of VOC and 17.2 pounds per day NOx. The Proposed Project would not generate anywhere near these levels of 6,620 pounds per day of NOx or 89,190 pounds per day of VOC emissions. Therefore, the Proposed Project’s emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, this analysis does evaluate the Proposed Project’s localized impact to air quality for emissions of CO, NOx, PM10, and PM2.5 by comparing the Proposed Project’s on-site emissions to the SCAQMD’s applicable Localized Significance Thresholds (LST). As evaluated in this analysis, the Proposed Project would not result in emissions that exceeded the SCAQMD’s LSTs. Therefore, the Proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NOx, PM10, and PM2.5.

Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a

regional impact to the South Coast Air Basin (Air Basin). The Proposed Project has been analyzed for the potential local CO emission impacts from the Project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following analyzes the vehicular CO emissions and local impacts from on-site operations.

Local CO Hotspot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and Federal CO standards of 20 parts per million (ppm) over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined (Appendix A). In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis¹ for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. Since the nearby intersections to the Proposed Project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the Proposed Project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the Proposed Project.

Local Criteria Pollutant Impacts from On-site Operations

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas appliances may have the potential to create emissions areas that exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from on-site operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the methodology described in LST Methodology (Appendix A). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO_x, PM₁₀, and PM_{2.5} from the Proposed Project could result in a significant impact to the local air quality. Table 5 shows the on-site emissions from the CalEEMod model that includes area sources, energy usage, and vehicles operating in the immediate vicinity of the Project site and the calculated emissions thresholds.

¹ The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning and LOS F in the evening peak hour

Table 5: Operations-Related Local Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Mobile Sources	0.44	3.68	0.68	0.18
Area Sources	0.03	3.05	0.01	<0.01
Energy Usage	0.19	0.16	0.01	0.01
Total Emissions	0.66	6.89	0.70	0.19
SCAQMD Regional Operational Thresholds	356	5,851	19	7
Exceeds Thresholds?	No	No	No	No

Notes:

¹ Mobile sources consist of emissions from vehicles and road dust and were calculated based on 1/8 of the mobile source emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the Project site.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consist of emissions from on-site natural gas usage.

⁴ The nearest off-site sensitive receptors are the approved but not yet constructed residential developments adjacent to the north and east sides of the Project site. According to SCAQMD Methodology, all receptors closer than 25 meters are based on the 25 meter threshold.

Source: Calculated from SCAQMD’s Mass Rate Look-up Tables for two and five acres (interpolated to 3.0 acres) in Air Monitoring Area 35, East San Bernardino Valley

The data provided in Table 5 shows that the on-going operations of the Proposed Project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed in Section 9.2 of the Air Report. Therefore, the on-going operations of the Proposed Project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

Therefore, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant.

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

Less Than Significant Impact. The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the Proposed Project, which may expose sensitive receptors to substantial concentrations have been calculated in Section 10.3 of the Air Report, and in Threshold b) above, for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptors to the Project site are the single-family homes located on the east side of Karon Street that are as near 860 feet east of the Project site. There are also approved but not yet constructed residential developments adjacent to the north and east sides of the Project site. The nearest school is Citrus Valley High School that is located as near as 3,400 feet north of the Project site.

Construction-Related Sensitive Receptor Impacts

The nearest sensitive receptors to the Project site are the single-family homes located on the east side of Karon Street that are as near 860 feet east of the Project site. There are also approved but not yet constructed residential developments adjacent to the north and east sides of the Project site.

Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from on-site construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the Proposed Project have been analyzed above in Threshold b) and found that the construction of the Proposed Project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance. Therefore, construction of the Proposed Project would create a less than significant construction-related impact on local air quality and no mitigation would be required.

Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the Proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology (Appendix A). It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors (Appendix A).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet’s usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, due to the limitations in off-road construction equipment DPM emissions from implementation of Section 2448, a less than significant short-term Toxic Air Contaminant (TAC) impacts would occur during construction of the Proposed Project from DPM emissions.

Operations-Related Sensitive Receptor Impacts

The on-going operations of the Proposed Project may expose sensitive receptors to substantial pollutant concentrations from the potential local air quality impacts from on-site operations and from possible toxic air contaminant impacts.

Local Criteria Pollutant Impacts from On-site Operations

The local air quality impacts from the operation of the Proposed Project would occur from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas appliances. The analysis provided in Threshold b) found that the operation of the Proposed Project

would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance. Therefore, the on-going operations of the Proposed Project would create a less than significant operations-related impact on local air quality due to on-site emissions and no mitigation would be required.

Operations-Related Toxic Air Contaminant Impacts

The Proposed Project consists of development of a shopping center that would generate DPM emissions from diesel truck deliveries to the Project site. Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program (Appendix A).

According to the 2022 CEQA California Environmental Quality Act Statute & Guidelines (State CEQA Guidelines), Appendix M provides the performance standards for infill projects eligible for streamlined review and states the following:

“Significant sources of air pollution” include airports, marine ports, rail yards and distribution centers that receive more than 100 heavy-duty truck visits per day, as well as stationary sources that are designated major by the Clean Air Act.”

In addition, the Health Risk Assessments for Proposed Land Use Project, prepared by the California Air Pollution Control Officers Association (CAPCOA), July 2009, details that a potentially significant impact may occur if sensitive receptors are placed within 1,000 feet of distribution centers that generate more than 100 trucks deliveries per day.

According to Truck Trip Generation by Grocery Stores, prepared by Transportation Northwest, August 2010, manual counts were performed at eight grocery stores that ranged from 23,000 to 53,500 square feet that found an average of 18 truck trips per day (9 truck deliveries per day) were generated on a typical weekday (Appendix A). Since the proposed 36,000 square foot Major A Market would be in the mid-size of the modeled grocery stores, this Study likely provides a good estimate of the number of truck deliveries that would be generated by the proposed Major A Market. Due to the small sizes of the rest of the proposed shops that would not have enough storage room for receiving large truck deliveries, it is anticipated that the deliveries to the rest of the proposed shops would be primarily from delivery vans that are primarily powered from gasoline. As such, the nine truck deliveries per day would be well below both the State CEQA Guidelines and CAPCOA guidelines provided above for when a potentially significant health risk impact would occur from diesel truck emissions. It should also be noted that the nearest sensitive receptors to the Project site are the single-family homes located on the east side of Karon Street that are as near 860 feet east of the Project site, which is located near the CAPCOA 1,000-foot screening distance, where a less than significant cancer risk impact would occur from DPM emissions, from over 100 diesel truck deliveries per day. Based on the above reasons it can be reasonably concluded that the DPM emissions created from the on-going operation of the Proposed Project would result in a less than significant TAC impact to the nearby sensitive receptors and no mitigation would be required.

Therefore, operation of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

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

Less than Significant Impact. As discussed in Appendix A, the Proposed Project would not create objectionable odors affecting a substantial number of people. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the Project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The Proposed Project would consist of the development of a shopping center. Operation of the Proposed Project may create odors from diesel truck emissions, and from trash storage bins. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Diesel truck emissions odors would be generated intermittently from truck loading and unloading activities at the Project site and would not likely be noticeable for extended periods of time beyond the Project site boundaries. Due to the locations of the trash storage areas, that as shown on the Site Plan (Figure 3), are a minimum of 36 feet away from the nearest property line and through compliance with SCAQMD's Rule 402 and City

trash storage regulations, no significant impact related to odors would occur during the on-going operations of the Proposed Project. Therefore, a less than significant odor impact would occur and no mitigation would be required.

Therefore, a less than significant odor impact would occur and no mitigation would be required.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.4.1 Impact Analysis

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

Less than Significant Impact with Mitigation Incorporated. In July 2025, a Biological Resources Technical Report (Biology Report) was prepared by Cadre Environmental for the Proposed Project. The Biology Report is included in Appendix B.

Existing biological resource conditions within and adjacent to the Project site were initially investigated through review of pertinent scientific literature and industry standard databases. Additionally, a reconnaissance survey of the Project site was conducted on March 3rd, 2025 to characterize and identify potential sensitive plant and wildlife habitats, and to establish the accuracy of the data identified in the literature search.

Sensitive Plant Species

According to Appendix B, a total of 8.06-acres of disturbed/ruderal vegetation and 0.08 acres of development were documented on-site. This region of the Project site appears to be annually disked and is dominated by ruderal species and native species common within disturbed habitats.

Based on a review of the California Natural Diversity Database (CNDDDB), Redlands General Plan and existing conditions within and adjacent to the Project site, a total of eighteen (18) sensitive plant species have potential to occur within the vicinity of the property (see Table 2 of Appendix B). However, all sensitive plant species with the potential to occur within the Project site either were not detected or did not have the potential to occur due to the lack of suitable or undisturbed vegetation and soils. Therefore, no impacts would occur towards any plant species identified as a candidate, sensitive, or special status species.

Sensitive Wildlife Species

General wildlife species documented within the Project site include red-tailed hawk (*Buteo jamaicensis*), rock dove (*Columba livia*), northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), and California ground squirrel (*Otospermophilus beecheyi*).

Based on a review of the CNDDDB, Redlands General Plan, and existing site conditions, a total of forty-six (46) sensitive invertebrate and wildlife species have the potential of occurring within the vicinity of the property, as presented in Table 3 of Appendix B.

Out of the 46 sensitive wildlife species surveyed, 35 species were determined to have no potential of occurring on the Project site primarily due to lack of suitable habitat or undisturbed vegetation and soils. Below is a list of 11 sensitive wildlife species that were determined to have a low to moderate potential of occurring within the Project site.

Low Potential

- Long-eared owl (*Asio otus*); May occasionally forage on-site. No breeding habitat is present within or adjacent to the Project site .
- Prairie falcon (*Falco mexicanus*); May occasionally forage within Project site.
- Merlin (*Falco columbarius*); May occasionally forage within Project site.
- Northern harrier (*Circus cyaneus*); May occasionally forage within Project site.
- Cooper's hawk (*Accipiter cooperii*); May occasionally forage within the Project site.
- Golden eagle (*Aquila chrysaetos*); May occasionally forage on-site. No breeding habitat is present within or adjacent to the Project site.
- Sharp-shinned hawk (*Accipiter striatus*); May occasionally forage within Project site. However, no breeding habitat is located within or adjacent to the Project site.

Moderate Potential

- California horned lark (*Eremophila alpestris actia*); Expected to occasionally forage and nest on-site.
- White-tailed kite (*Elanus leucurus*); May occasionally forage on-site. No breeding habitat is present within or adjacent to the Project site. The species has been documented approximately 11 miles southwest of the Project site in 2006 (Appendix B).
- Burrowing owl (*Athene cunicularia*); Suitable burrows larger than 4 inches in diameter and foraging habitat documented within the Project site. The species has been documented approximately 3 miles northwest of the Project site in 2006 (Appendix B).
- Loggerhead shrike (*Lanius ludovicianus*); The Project site provides suitable foraging habitat. However, no suitable nesting habitat was documented within the property.

Suitable burrows greater than four inches in diameter potentially utilized for refugia and/or nesting were documented in the southeast region of the Project site and the balance of the property provides suitable foraging habitat for the burrowing owl. To ensure that potential adverse effects to burrowing owl are reduced to a less than significant level, a preconstruction survey will be required prior to initiation of Project activities, as summarized in MM BIO-1.

Suitable foraging habitat for nine sensitive species including loggerhead shrike, white-tailed kite, golden eagle, Cooper's hawk, sharp-shinned hawk, northern harrier, merlin, prairie falcon, and long-eared owl was documented within the Project site. Impacts to 8.06-acre of disturbed/ruderal habitat is not expected to result in a significant impact to regional foraging resources for these species. No mitigation is proposed.

Suitable foraging and nesting habitat for one additional sensitive species, California horned lark, was documented within the Project site. To ensure that potential adverse effects to California horned lark are reduced to a less than significant level, a focused nesting survey will be required prior to initiation of Project activities, as summarized in MM BIO-2. Therefore, with incorporation of MM BIO-1 and MM BIO-2, impacts towards sensitive species would be less than significant.

MM BIO-1 Preconstruction Burrowing Owl Surveys. To ensure the proposed action does not result in direct or indirect impacts to the burrowing owl, a preconstruction survey will be conducted no less than 14-days prior to the initiation of ground-disturbing activities to ensure protection for this species including a survey conducted with 24 hours of start of work. The preconstruction surveys will be conducted in compliance with California Department of Fish and Wildlife (CDFW) guidelines (Appendix B). A report of the findings prepared by a qualified biologist shall be submitted to the City prior to any permit or approval for ground disturbing activities.

If burrowing owls are not detected on-site, the proposed action may proceed. However, if Project initiation is delayed more than 14- days, updated preconstruction surveys may be required. If burrowing owls are detected on-site during the focused or preconstruction surveys a burrowing owl monitoring and/or relocation plan will be developed and approved by the City, CDFW, and United States Fish and Wildlife Service (USFWS) prior to

any permit or approval for ground disturbing activities. At a minimum, the plan will include the following:

1. Burrowing owl status, distribution, and habitat utilization within and adjacent to the Project site.
2. Conservation objectives and goals developed in cooperation with CDFW and USFWS.
3. Results of burrowing owl monitoring activities.
 - a. 500-ft. minimum protective (no work) zone will be designated around each of the occupied burrow sites and delineated by orange silt fencing. The installation of the fencing will be monitored by a qualified biologist to ensure owls are not directly or indirectly impacted as a result of fence installation. The monitoring biologist will also be responsible for directing where the fencing shall be installed.
 - b. A qualified monitoring biologist will monitor the owls weekly during the non-breeding season to determine if the 500-ft. protective zone is adequate for their protection. The weekly monitoring events will also provide critical information regarding the status of the species on-site for purposes of developing a relocation plan.
 - c. A qualified monitoring biologist will conduct an initial environmental briefing with any contractors which will be working on-site. The briefing will include a discussion of burrowing owl natural history, identification of burrowing owl non-breeding season protection zones, and summary of penalties for directly and/or indirectly impacting the species.
 - d. A qualified monitoring biologist will be authorized to stop all work activities in the event potential direct and/or indirect impacts to burrowing owl may occur as a result of proposed staging activities.
 - e. Monthly updates on the monitoring efforts including recommendations, as warranted, will be submitted to the City, CDFW, and USFWS.
4. Passive and/or active relocation activities and approach.
5. Burrowing owl management activities for active relocation sites.

Based on the candidacy or listing status of the species at the time of surveys, if detected, acquisition of an Incidental Take Permit (ITP) may also be required. The CDFW will be contacted to determine appropriate conservation measures to prevent direct/indirect impacts to the species, or acquisition of an ITP. To initiate the ITP process, the applicant or representative will contact the appropriate CDFW Regional Office and submit an ITP application. The CDFW will accept applications in any form, but they must be submitted to the Regional Manager and they must include the following:

1. The appropriate application fee.
2. Applicant's full name, mailing address, and telephone number(s). If the applicant is a corporation, firm, partnership, association, institution, or public or private agency, the name and address of the person responsible for the project or activity requiring the permit, the president or principal officer, and the registered agent for the service of process.
3. The common and scientific names of the species to be covered by the permit and the species' status under CESA.
4. A complete description of the project or activity for which the permit is sought.
5. The location where the project or activity is to occur or to be conducted.
6. An analysis of whether and to what extent the project or activity for which the permit is sought could result in the taking of species to be covered by the permit.
7. An analysis of the impacts of the proposed taking on the species.
8. An analysis of whether issuance of the ITP would jeopardize the continued existence of a species. A complete, responsive jeopardy analysis shall include consideration of the species' capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of:
 9. Known population trends,
 10. Known threats to the species.
 11. Reasonably foreseeable impacts on the species from other related projects and activities.
 12. Proposed measures to minimize and fully mitigate the impacts of the proposed taking.
 13. A proposed plan to monitor compliance with the minimization and mitigation measures and the effectiveness of the measures.
 14. A description of the funding sources and the level of funding available for implementation of the minimization and mitigation measures.
15. Certification in the following language: I certify that the information submitted in this application is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to suspension or revocation of this permit and to civil and criminal penalties under the laws of the State of California.
16. Documentation of CEQA compliance.

MM BIO-2 Regulatory Requirement Migratory Bird Treaty Act (MBTA) & California Department of Fish and Game (CDFG) Code. In order to avoid violation of the federal MBTA and CDFG Code Sections 3503, 3503.5, and 3513, site preparation activities (ground disturbance, construction activities, and staging equipment) for the project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (February 1st to August 31st). Construction outside the nesting season (between September 1st and January 31st) does not require preconstruction nesting bird surveys. If site-preparation activities are proposed during the nesting/breeding season (February 1st to August 31st), the project proponent shall retain a qualified avian biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the project to determine if active nests of species protected by the MBTA or the CDFG Codes are present in the construction zone. The nest surveys shall include the Project site where project activities have the potential to cause nest failure. The survey results shall be provided to the City for review and approval. The project applicant shall adhere to the following:

1. The project applicant shall retain a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the property; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. However, if active nests (including nesting raptors) are located, then avoidance or minimization measures shall be undertaken in consultation with the City, CDFW, and USFWS, as warranted. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active or the nest has failed. The biologist shall monitor the nest at the onset of project activities and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site biologist

shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for review and approval prior to initiation of construction activities.

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

No Impact. As discussed in Appendix B, a total of 8.14 acres of developed and disturbed/ruderal vegetation communities within the Project site would be directly and permanently impacted as a result of Project implementation. No riparian or sensitive habitat identified in local or regional plans, policies, regulations, or by CDFW or USFWS would be impacted as a result of project implementation. No impact would occur.

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

Less Than Significant Impact. The Project site was assessed for the potential presence/absence of United State Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB) jurisdictional resources (Appendix B). No jurisdictional resources regulated by USACE, CDFW, and RWQCB are present within or adjacent to the Project site. Impacts to water quality would be less than significant during both construction and operation following preparation of a Water Quality Management Plan (WQMP), Stormwater Pollution Prevention Plan (SWPPP), and compliance with the City of Redlands Storm Water Program/NPDES permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions (refer to *Section 4.10, Hydrology and Water Quality*).

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

Less than Significant with Mitigation Incorporated. The Project site possesses suitable habitat for ground nesting migratory birds protected under the MBTA and the CDFG Code Sections 3503, 3503.5, and 3513. In order to avoid violation of the MBTA and the CDFG Codes, site preparation activities (ground disturbance, construction activities, and staging equipment) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird/raptor species (generally February 1st to August 31st).

Construction outside the nesting season (between September 1st and January 31st) does not require preconstruction nesting bird surveys. However, if construction is proposed between February 1st to August 31st, a qualified biologist will conduct a preconstruction nesting bird and raptor survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds or raptors within or directly adjacent to the Project site. Loss of an active nest would be considered a potentially significant impact. Impacts to raptor foraging and potential nesting bird habitat would be reduced to less than significant with the implementation of MM BIO-2.

In regard to wildlife corridors, the Project site is completely surrounded by high traffic roads, commercial development, and ruderal/disturbed habitat, and does not contribute to the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. The proposed action would not conflict with Principle 6-P.9 of the City of Redlands General Plan. The Project site is not located within or adjacent to a wildlife movement corridor or linkage designated in the South Coast Missing Linkages project. No mitigation or urban wildlands interface avoidance measures required or proposed with respect to wildlife corridors.

Therefore, with incorporation of MM BIO-2, impacts would be less than significant.

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

No Impact. As discussed in Appendix B, no trees regulated by the City of Redland's Trees and Tree Protection Along Street and Public Places Ordinance (City Municipal Code Chapter 12.52) were documented on-site. In general, there are no trees within the Project site. No Impact would occur.

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

No Impact. As discussed in Appendix B, the Project site is not located within or adjacent to a Conservation Program Area. Therefore, implementation of the Project would not result in a conflict with the provisions of an adopted habitat conservation plan and no impact would occur.

4.5 CULTURAL RESOURCES

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

4.5.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Less Than Significant Impact. In 2023, an Archaeological and Historic Built Environment Resources Inventory and Evaluation Report (original Cultural Report) was prepared by ECORP Consulting for the Proposed Project. On August 8, 2025, an addendum to the original Cultural Report was prepared by ECORP because the original Project plans changed to include areas that were not part of the original study. The addendum confirmed the conclusions of the original Cultural Report. Both documents are located in Appendix C.

The addendum utilized an updated search of the California Historical Resources Information System (CHRIS) inventory, an updated search of the Sacred Lands File from the Native American Heritage Commission (NAHC), and a field reconnaissance survey on the updated Project Area.

Two cultural resources (LPA-2 and LPA-3) were identified within the Project site in the original Cultural Report, and one additional cultural resource (LPA-4) was identified in the addendum. LPA-2 is an electrical distribution line and was determined by both the original Cultural Report and addendum as ineligible for listing in the National Register of Historic Places (NRHP), the California Register of Historic Places (CRHR), or for designation as a City of Redlands Historic Resource (City Resource). LPA-3 is a water conveyance system and was determined by both the original Cultural Report and addendum as ineligible for listing in the NHRP, CRHR, or for designation as a City Resource. LPA-4 is a historic-period segment of an adjacent road and was determined by the addendum as ineligible for listing in the NHRP, CRHR, or for designation as a City Resource.

Therefore, as determined by the Cultural Report and its addendum, there are no historic resources pursuant to CEQA Section 15064.5 within the Project site, thus, a less than significant impact would occur.

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

Less Than Significant Impact with Mitigation Incorporated. According to the original Cultural Report, the Project Area contains Holocene alluvial deposits contemporaneous with human occupation of the

region. Although ECORP archaeologists did not identify pre-contact resources during the field survey, low potential exists for buried pre-contact archaeological sites within the Project Area due to the presence of Holocene alluvial deposits within the Project Area and the known ephemeral waterways in the vicinity of the Project Area. The potential of resource discovery is low, however, because of the property's previous agricultural use likely having eliminated soil horizons which may have contained any cultural deposits. The addendum to the Cultural Report did not address any archaeological resources that would have confirmed or altered the conclusions of the original report.

However, the original Cultural Report states that the potential always remains for ground-disturbing activities to expose previously unrecorded resources. Therefore, incorporation of mitigation measure (MM) CUL-1 and MM CUL-3 would reduce potential impacts on cultural resources to less than significant levels.

MM CUL-1 If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgement. In addition, the Yuhaaviatam of San Manuel Nation Cultural Resources Department and the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office (Consulting Tribes) shall be contacted as detailed within MM TCR-1, 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.

The following notifications shall apply, depending on the nature of the find:

1. If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
2. If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 108; or 2) that the treatment measures have been completed to their satisfaction.
3. If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the San Bernardino County Coroner (per Section 7050.5 of the Health and Safety

Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measured have been completed to their satisfaction.

MM CUL-2

The lead agency shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the lead agency of any occurrences; project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program.

The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground-disturbing equipment. All personnel shall be required to sign a training roster. The construction manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the lead agency as proof of compliance.

MM CUL-3:

If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the Consulting Tribes for review and comment, as detailed within MM TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

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

Less Than Significant Impact with Mitigation Incorporated. The Proposed Project includes ground disturbing activities, thus there is potential for discovery of human remains. In the event that human remains are discovered during ground-disturbing activities, then the Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, California PRC Section 5097.98, and AB 2641. These regulations pertaining the discovery of human remains are incorporated in MM CUL-1. Therefore, impacts would be less than significant with mitigation incorporated.

4.6 ENERGY

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

4.6.1 Impact Analysis

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

Less Than Significant Impact. As discussed in the Air Report, the Proposed Project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the Proposed Projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources is provided below.

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands. In 2022, San Bernardino County consumed 16,630 gigawatt-hours per year of electricity (Appendix A).

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and, therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State’s total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet. In 2022, San Bernardino County consumed 562 million Therms of natural gas (Appendix A).

Petroleum-based fuels currently account for a majority of the California’s transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the state has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, petroleum-based fuel

consumption in California has declined. In 2023, 897 million gallons of gasoline and 267 million gallons of diesel was sold in San Bernardino County (Appendix A).

The following section calculates the potential energy consumption associated with the construction and operations of the Proposed Project and provides a determination if any energy utilized by the Proposed Project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The Proposed Project would consume energy resources during construction in three general forms:

- 1) Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities);
- 2) Electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
- 3) Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction of the Proposed Project, the consumption of electricity would include off-site uses as well as from portable generators for on-site construction activities. Due to the large size of the Project site and limited construction period, it would not be practical to provide temporary power lines to provide electricity for on-site construction needs. Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power the manufacturing of parts and electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the Proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary. Construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Natural Gas

Construction of the Proposed Project typically would not involve the consumption of natural gas. Natural gas would not be supplied to support construction activities, thus there would be no demand generated by construction. Since Southern California Gas already provides natural gas to the vicinity of the Project site, construction-related activities would be limited to installation of new natural gas connections within the Project site. Development of the Proposed Project would not require extensive infrastructure improvements to serve the Project site. Construction-related energy usage impacts associated with the installation of natural gas connections are expected to be confined to trenching

in order to place the lines below surface. In addition, prior to ground disturbance, the Proposed Project would notify and coordinate with Southern California Gas to identify the locations and depth of all existing gas lines and avoid disruption of gas service. Therefore, construction-related impacts to natural gas supply and infrastructure would be less than significant.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the Project site and on-road automobiles transporting workers to and from the Project site and on-road trucks transporting equipment and supplies to the Project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown in Section 8.2 of the Air Report, which found that construction of the Proposed Project would consume 4,235 gallons of gasoline and 36,634 gallons of diesel fuel. This equates to 0.0005 percent of the gasoline and 0.014 percent of the diesel used annually in San Bernardino County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the Proposed Project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Proposed Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Proposed Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete. It is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The on-going operation of the Proposed Project would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips.

Operations-Related Electricity

Operation of the Proposed Project would result in consumption of electricity at the Project site. As detailed in Section 8.3 of the Air Report, the Proposed Project would consume 800,5568 kilowatt-hours per year of electricity. This equates to 0.0048 percent of the electricity consumed annually in the County of San Bernardino. As such, the operation-related electricity use would be nominal, when compared to current electricity usage rates in the County.

It should be noted that the Proposed Project would comply with all Federal, State, and City requirements related to the consumption of electricity, that includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation, use of energy efficient lighting and

appliances, water and space heating systems, as well as requiring a variety of other energy-efficiency measures to be incorporated into the Proposed Project. Therefore, it is anticipated the Proposed Project would be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the Proposed Project's electricity demand. Thus, the Project would not result in the wasteful or inefficient use of electricity and no mitigation measures would be required.

Operations-Related Natural Gas

Operation of the Proposed Project would result in consumption of natural gas at the Project site. As detailed in Section 8.3 of the Air Report, the Proposed Project would consume 7,066 therms per year of natural gas. This equates to 0.0013 percent of the natural gas consumed annually in San Bernardino County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

It should be noted that the Proposed Project would comply with all Federal, State, and City requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the Proposed Project, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the Proposed Project would be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the Proposed Project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the Proposed Project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the Project site. As detailed in Section 8.2 of the Air Report the Proposed Project would consume 504,871 gallons of gasoline per year from vehicle travel. This equates to 0.056 percent of the gasoline consumed annually in San Bernardino County. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates.

It should be noted that, the Proposed Project would comply with all Federal, State, and City requirements related to the consumption of transportation energy that includes California Code of Regulations Title 24, Part 10 California Green Building Standards that require conduit to be installed to the proposed parking areas for future EV charging stations. Therefore, it is anticipated the Proposed Project would be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the Proposed Project's demand. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

In conclusion, the Proposed Project would comply with regulatory compliance measures outlined by the State and City related to air quality, energy, and GHGs (Appendix A). Additionally, the Proposed Project would be constructed in accordance with all applicable City Building and Fire Codes. Therefore,

the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

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

Less Than Significant Impact. As discussed in Appendix A, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The City of Redlands General Plan 2035, adopted December 5, 2017, provides an Energy Efficiency and Conservation Section that details the following energy conservation policy actions. The proposed project’s consistency with the applicable energy-related policies in the General Plan are shown in Table 6.

Table 6: Proposed Project Compliance with Redlands General Plan Energy Conservation Policies

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
8-A.1 Work with Southern California Edison Company (SCE) and Southern California Gas Company (SCG) to educate the public about the need to conserve energy resources and the higher energy efficiency of new appliances and building materials.	Not Applicable. This relates to the City working with the utility’s providers. However, the Proposed Project would be consistent with the 2022 Title 24 standards for energy-efficient appliances and equipment
8-A.2 Support San Bernardino County and San Bernardino Associated Governments (SANBAG) in implementation of their energy-related policies.	Not Applicable. This is a City policy, since it requires the City to support SANBAG.
8-A.3 Leverage and help drive community participation in utility company programs and financial incentives within the City (e.g., one stop information clearinghouse, incentives, on bill financing, etc.).	Not Applicable. This policy is only applicable to the City to implement.
8-A.4 Continue pursuit of sustainable energy sources—such as hydroelectricity; geothermal, solar, and wind power; and biomethane—to meet the community’s needs.	Not Applicable. This is a City policy. However, the Proposed Project would be consistent with the 2022 Title 24 standards for energy-efficient appliances and equipment and Cal Green Standards.

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
<p>8-A.5 Accelerate the adoption of solar power and/or other alternative energy usage in Redlands through actions such as:</p> <ul style="list-style-type: none"> • Establishing incremental growth goals for solar power/alternative energy systems in Redlands; • Developing guidelines, recommendations, and examples for cost-effective solar and/or other alternative energy-based installation; and <p>Installing solar/alternative energy technology on available City spaces.</p>	<p>Consistent. The Proposed Project would be designed to meet the 2022 or newer Title 24 Part 6 requirements that require all commercial structures to be designed to be solar-ready, which includes designing roofs to be capable of handling the increased load of solar panels and providing conduit for PV solar panel hookups.</p>
<p>8-A.6 Complete a cost-benefit analysis for new City energy conservation or renewable energy projects that reviews the costs and benefits of a project over its life cycle to ensure the highest and best use of available funds.</p>	<p>Not Applicable. This policy is only applicable to the City to implement.</p>
<p>8-A.7 Seek alternatives to reduce non-renew-able energy consumption attributable to transportation within the Planning Area. Seek funding and other assistance from the South Coast Air Quality Management District (AQMD) for installation of electric vehicle charging stations at appropriate locations throughout the city.</p>	<p>Consistent. The Proposed Project would be designed to meet the 2022 or newer Title 24 Part 11 requirements that require the require installation of electric vehicle charging stations in the proposed parking lots.</p>
<p>8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.</p>	<p>Consistent. The Proposed Project would be consistent with the 2022 or newer Title 24 standards Parts 6 and 11.</p>
<p>8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.</p>	<p>Consistent. The Proposed Project would be consistent with the 2022 or newer Title 24 Part 11 (Cal Green Standards).</p>
<p>8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.</p>	<p>Consistent. The Proposed Project SWPP and landscape plan has been designed to mitigate issues such as stormwater runoff and the urban heat island effect.</p>

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
<p>8-A.11 Further City efforts to be a model of energy conservation stewardship by:</p> <ul style="list-style-type: none"> • Continuing participation in SCE/SCG’s Community Partnership program; • Moving City electric load off-peak where practical; • Partnering directly with large consumers of energy and encouraging and promoting their energy efficiency activities; • Establishing energy efficiency and conservation baselines; and <p>Reporting routinely on the progress of goals.</p>	<p>Not Applicable. This policy is only applicable to the City.</p>
<p>8-A.12 Explore participating in new high-efficiency technology programs such as LED lighting for City facilities, safety lighting in parks and other public spaces, and LED street lighting conversion for all City-owned street lights.</p>	<p>Not Applicable. This policy is only applicable to the City related to City facilities.</p>
<p>8-A.13 Identify and obtain funding sources to implement energy conservation and efficiency programs and other emerging energy strategies suitable to conditions within the city.</p>	<p>Not Applicable. This policy is only applicable to the City.</p>
<p>8-A.14 Seek funding programs to assist low and moderate-income households in energy conservation.</p>	<p>Not Applicable. This policy is only applicable to the City.</p>
<p>8-A.15 Encourage City employees to submit energy efficiency and conservation recommendations for City operations and follow up on the recommendations.</p>	<p>Not Applicable. This policy is only applicable to the City for City employees.</p>
<p>8-A.16 Complete a comprehensive review of City codes and standards for applicability for energy and water efficiency/conservation measures and make changes to modify them accordingly.</p>	<p>Not Applicable. This policy is only applicable to the City related to City codes and standards.</p>
<p>8-A.17 Set goals consistent with the State’s Long-Term Energy Efficiency Strategic Plan. Design and implement programs and incentives to meet these goals in both private and public sector construction:</p> <ul style="list-style-type: none"> • All new residential construction in California will be zero net energy by 2020. • All new commercial construction in California will be zero net energy by 2030. <p>The heating, ventilation, and air conditioning (HVAC) industry will be improved to ensure optimal equipment performance; and all eligible low-income homes will be energy efficient by 2020.</p>	<p>Not Applicable. This policy is only applicable to the City’s long-term goals. Also, since the proposed commercial development would be built and operational prior to 2030, this policy is not applicable to the Proposed Project.</p>

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
8-A.18 Allocate savings realized from energy efficiency improvements at City facilities to implement additional energy efficiency improvements at City facilities.	Not Applicable. This policy is only applicable to the City related to City facilities.
8-A.19 Explore adoption of a model dark sky ordinance for appropriate areas of the city i.e. the rural areas of the canyons and Crafton.	Not Applicable. This policy is only applicable to the City goal for the adopted dark sky ordinance in rural areas of canyons and Crafton.
8-A.20 Support energy resiliency through a diversified system of energy sources including zero and near-zero emission technologies.	Not Applicable. This policy is only applicable to the City.
8-A.21 Support the development of distributed energy resources (DER), such as combined heat and power (CHP) from micro-turbines, fuel cells, etc., to assist in local energy security.	Not Applicable. This policy is only applicable to the City supporting development of DER.
Source: Appendix A	

As shown in Table 6, the Proposed Project would be consistent with all applicable energy-related policies provided in the City’s General Plan. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

4.7 GEOLOGY AND SOILS

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

4.7.1 Impact Analysis

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The Project site is not located within a state-designated Alquist-Priolo Fault Zone. The nearest Alquist-Priolo Fault is a segment of the Claremont Fault within the San Jacinto Fault Zone, located approximately 4.5 miles southeast of the Project site (DOC 2025). All construction activities for the Project will be conducted in accordance with the Uniform Building Code as well as City regulations and ordinances, pertaining to the mitigation of potential geologic

and seismic impacts. Implementation of the Project would have a less than significant impact associated with risk of loss, injury, or death involving a rupture of a known fault.

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

Less Than Significant Impact. Ground movement during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and type of geologic material. Likewise, the composition of underlying soils can intensify ground shaking. Ground shaking is more pronounced in areas of unconsolidated alluvium, which tend to transfer relatively greater intensities of motion to the surface during a seismic event. Given the Project site, along with the majority of the City, is situated on alluvial deposits, there is potential for ground shaking impacts.

Figure 3.6-2 of the General Plan EIR delineates fault lines and zones within the City (City 2017a). According to this figure, the nearest fault is the Crafton Hills fault zone, located approximately 2.33 miles southeast of the Project site.

However, the Proposed Project would be constructed in compliance with the California Building Code (CBC). Section 1613 of the CBC requires all structures be designed and constructed to resist the effects of earthquake motions in accordance with the Minimum Design Loads for Buildings and Other Structures established by the American Society of Civil Engineers (ASCE 2022). Therefore, compliance with the CBC would result in less-than-significant impacts to people and structures from strong seismic ground shaking.

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

Less Than Significant Impact. Liquefaction typically occurs in areas underlain with loose saturated cohesionless soils within the upper 50 feet of subsurface materials. These soils, when subjected to ground shaking, can lose their strength as a result of the buildup of excess pore water pressure, causing them to behave closer to a liquefied state. Based on Figure 3.6-1 of the General Plan EIR, the Project site is underlain by Tujunga Loamy Sand, which is considered an unconsolidated alluvium material prone to liquefaction (City 2017a). However, according to Figure 3.6-4 of the General Plan EIR, the Project site is not in an area with liquefaction susceptibility (City 2017a). The Project would comply with the most recent CBC requirements, reducing any potential for liquefaction to less than significant levels.

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

No Impact. Landslides occur when gravity causes rock, soil, or debris to move down a slope. They happen when the forces pulling materials downhill exceed the forces holding them in place. According to Figure 3.6-3 of the General Plan EIR, the Proposed Project is not within an area that has landslide susceptibility (City 2017a). Furthermore, the Project site is relatively flat, thus further demonstrating the lack of landslide potential. No impact would occur relating to landslides.

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

Less Than Significant Impact. Project construction would be subject to local and State codes and requirements for erosion control and grading. Because construction activities would disturb one or

more acres, the Project must adhere to the provisions of the NPDES Construction General Permit. Construction activities subject to this permit include clearing, grading, and other soil disturbances such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include temporary project construction features (i.e., best management practices [BMPs]) designed to prevent erosion and protect the quality of stormwater runoff. Sediment-control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent.

In addition, grading activities would be required to conform to the most current version of the CBC and the approved Precise Grading Permit required by the City for grading of more than 50 cubic yards. The Project will consist of 2,045 cubic yards of net fill. The Project must also comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), which would reduce construction erosion impacts. Rule 403 requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces, with a goal to omit visibility beyond the property line or avoid exceedance of 20-percent opacity. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site. Compliance with these federal, regional, and local requirements would reduce the potential for both on-site and off-site erosion effects to accepted levels during Project construction. Upon completion of construction activities, ground surfaces would be stabilized by Project structures, paving, and landscaping. Therefore, impacts associated with soil erosion and topsoil loss would be less than significant.

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

Less Than Significant Impact. As noted in Threshold a) iii), the Proposed Project site is not located within a liquefaction zone, is relatively flat, and is underlain by excessively drained Tujunga Loamy Sand, which reduces the potential for saturated soil conditions that could lead to lateral spreading or subsidence (City 2017a). Lateral spreading typically occurs in areas with loose, saturated soils adjacent to slopes or free faces, neither of which are present on or near the Project site. As noted in Threshold a) iv), the Project site is not in an area susceptible to landslides (City 2017a).

Construction activities would be conducted in accordance with the CBC and the City's regulations and ordinances pertaining to the mitigation of potential geologic and seismic impacts. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These types of soil have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. However, the Proposed Project is located on Tujunga Loamy Sand, which has low expansive properties because it is primarily sand without clay characteristics (City 2017a). Therefore, impacts associated with expansive soils would be less than significant.

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

No Impact. The Project proposes constructing sewer lines within the Project site that would connect to existing sewer infrastructure in the City. Therefore, implementation of the Proposed Project would not result in an impact associated with soils incapable of supporting septic systems.

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

Less than Significant Impact. Stratigraphically, the Project overlies middle Holocene Young axial-valley deposits, Unit 3 (Qya3) (USGS 2003).

As defined by the Society of Vertebrate Paleontology's (SVP) Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010), significant paleontological resources are:

"...fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i. e., older than about 5,000 radiocarbon years)."

Because the middle Holocene-age Qya3 deposits are not considered to be older than recorded human history, they are generally considered to have low paleontological sensitivity and are unlikely to contain significant paleontological resources. Any subsurface findings within this soil deposit would more likely be associated with human occupation or activity and would, therefore, be considered cultural in nature. The discussion of archaeological and cultural resources is contained in Section 4.5, Cultural Resources.

Furthermore, proposed excavation is not anticipated to extend deep enough to encounter older, more sensitive Pleistocene-age deposits that may underlie the Qya3 unit. The Project shall comply with the City's General Plan Policy Action 2-A.76, which requires that in the unlikely event that paleontological resources are discovered, work shall be halted until a qualified paleontologist evaluates the find. If the resource is determined to be significant, the paleontologist shall supervise its removal, ensure proper preparation, cataloging, and archival storage at the applicant's expense, with materials retained within San Bernardino County if feasible. The policy is provided below:

Section 2.2: Cultural Resources from the General Plan 2035

Archaeological and Paleontological Resources

2-A.76 Establish a procedure for the management of paleontological materials found on-site during a development, including the following provisions:

- If materials are found on-site during grading, require that work be halted until a qualified professional evaluates the find to determine if it represents a significant paleontological resource.

- If the resource is determined to be significant, the paleontologist shall supervise removal of the material and determine the most appropriate archival storage of the material.
- Appropriate materials shall be prepared, catalogued, and archived at the applicant's expense and shall be retained within San Bernardino County if feasible.

Therefore, the Project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature, and impacts would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

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

4.8.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project would not generate greenhouse gas emission (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. The Proposed Project would consist of development of a shopping center. The Proposed Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment.

The Redlands Climate Action Plan (CAP) is the applicable plan for the Project area for reducing GHG emissions. According to the Redlands CAP, if a project is consistent with the General Plan, it may rely on the programmatic analysis contained in the Redlands CAP. The Proposed Project’s consistency with the General Plan has been detailed above in the consistency with the SCAQMD AQMP (see Section 4.3.1) which found that the Project is consistent with the General Plan. Since the Proposed Project is consistent with the General Plan, this analysis has relied on determining the significance of GHG emissions based on determination if the Proposed Project is consistent with the policies in the Redlands CAP. As such, this analysis has quantified Project-related GHG emissions for informational purposes only.

The Project’s GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed in Section 8.1 of the Air Report. A summary of the results is shown below in Table 7 and the CalEEMod model run is attached to the Air Report in Appendix A.

Table 7: Project Related Greenhouse Gas Annual Emissions

Category	Pollutant Emissions (pounds/day)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Construction				
Year 2025	90.8	<0.01	<0.01	91.2
Year 2026	334	0.01	0.01	337
Amortized Construction Emissions (30 years) ¹	14.2	<0.01	<0.01	14.3
Operations	--	--	--	0.11

Category	Pollutant Emissions (pounds/day)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	4,942	0.34	0.28	5,043
Area Sources	1.42	<0.01	<0.01	1.43
Energy Usage	163	0.02	<0.01	164
Waste and Wastewater	8.80	0.19	<0.01	14.9
Solid Waste	9.10	0.91	0.00	31.8
Refrigeration	-	-	-	0.75
Total Operational Emissions	5,124	1.46	0.29	5,256
Total GHG Emissions (Construction & Operations)	5,138	1.46	0.29	5,270

Notes:

¹ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2022.1.1.30

As detailed below in Threshold b), the Proposed Project would implement the applicable measures in the Redlands CAP. Therefore, a less than significant generation of greenhouse gas emissions would occur from the development of the Proposed Project.

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

The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The applicable plan for the Proposed Project would be the Redlands CAP. The Proposed Project’s consistency with the applicable General Plan Policies and the optional measures identified in the Redlands CAP is shown in Table 8.

Table 8: Consistency with the Policies and Measures in the City of Redlands Climate Action Plan

General Plan Policy/Optional Measure	Project Consistency
Optional Measures	
Option B: Promote Installation of Commercial and Industrial Photovoltaic Systems	Consistent. The proposed shopping center will be designed to meet current Title 24 building standards that currently require that the roofs to be designed to support future solar PV installations that includes running conduit from the main panel to the roof for a future solar PV system.
Option E: Promote Commercial and Industrial Facility Commissioning	Consistent. The project applicant has committed to working with the City and SCE and their available Commissioning procedures, where the HVAC systems are tested and calibrated for optimal performance.

General Plan Policy/Optional Measure	Project Consistency
Option F: Promote Replacement of Incandescent and Halogen Bulbs with LED or Other Energy Efficient Lamps	Consistent. All lighting will be required to meet the current Title 24 standards, that require the use of LED lights.
Option G: Promote an Increase in the Amount of Zero-Emissions Vehicle Travel	Consistent. Public EV Charging stations and preferred EV parking spaces will be provided per the current Title 24 requirements, which will promote the use of zero-emission vehicles.
Applicable General Plan Policies	
2-A.5: Develop new roadway connections, pedestrian paths, and bicycle routes that facilitate transportation in the north-south direction traversing the I-10 freeway.	Consistent. The Proposed Project would improve the portion of Tennessee Street that is adjacent to the Project site, which is a north-south road that traverses I-10, with a designated bike lane and a sidewalk.
2-A.6: Improve and make more efficient traffic flow for all modes of transportation along corridors that link north/south thoroughfares through techniques such as signal timing, additional lanes, sidewalks, bike paths, and other improvements.	Consistent. The Proposed Project would improve the portion of Tennessee Street that is adjacent to the Project site, which is a north-south road that traverses I-10, with a designated bike lane, a sidewalk and additional turn lanes.
4-A.96: Encourage the development of bicycle, pedestrian, and transit access that reduce the need for on-site parking.	Consistent. The Proposed Project would improve the portions of Tennessee Street and Lugonia Avenue that are adjacent to the Project site with bike lanes and sidewalks. In addition, there is an existing Omnitrans Bus Stop on Lugonia Avenue that is adjacent to the Project site that would be improved as part of the Proposed Project.
5-P.13: Ensure streets are designed to accommodate bicyclists per the Bicycle Master Plan.	Consistent. The Proposed Project would improve the portions of Tennessee Street and Lugonia Avenue that are adjacent to the Project site with bike lanes as identified in the Bicycle Master Plan.
5-A.16: Provide a safe, direct, and healthful pedestrian environment through means such as providing separate pedestrian-ways in parking lots, avoiding excessive driveway widths, and providing planting strips between sidewalks and streets where feasible.	Consistent. The Proposed Project has been designed to provide separate pedestrian ways throughout the Project site, including sidewalks that connect the shops through the parking lots.
5-P.19: Establish and maintain a comprehensive network of on- and off-roadway bike routes to encourage the use of bikes for both commuter and recreational trips.	Consistent. The Proposed Project will install bike routes adjacent to Lugonia Avenue and Tennessee Street as well as an onsite road system that will be accessible for bikes.

General Plan Policy/Optional Measure	Project Consistency
<p>5-A.4: Consider innovative design solutions to improve mobility, efficiency, connectivity, and safety through the use of traffic calming devices, roundabouts, curb extensions at intersections, separated bicycle infrastructure, high visibility pedestrian treatments and infrastructure, and signal coordination.</p>	<p>Consistent. The Proposed Project’s onsite accessways have been designed to improve safety by providing separate pedestrian ways throughout the Project site as well as implement traffic calming measures in order to improve pedestrian and bicycle safety.</p>
<p>5-A.26: Seek assistance from major employers in providing support facilities to encourage use of bikes for commuter purposes.</p>	<p>Consistent. The Proposed Project will be designed to meet the Title 24 requirements that require installation of bike storage facilities as well as showers and employee changing areas for the major employers in the shopping center.</p>
<p>5-A.27: Incorporate end-of-trip facilities into Transportation Demand Management (TDM) plans at employment sites and public facilities, depending upon distance from bikeways. Provide well-located, secure bike storage facilities at employment sites, shopping and recreational areas, and schools in order to facilitate bike use. Encourage major employers to provide shower and changing facilities or assist in funding bicycle transit centers in nearby locations.</p>	<p>Consistent. The Proposed Project will be designed to meet the Title 24 requirements that require installation of bike storage facilities as well as showers and employee changing areas for the major employers in the shopping center.</p>
<p>5-A.32: Utilize transportation demand management strategies, non-automotive enhancements (bicycle, pedestrian, transit, train, trails, and connectivity), and traffic signal management techniques as part of a long-term transportation solution and traffic mitigation strategy.</p>	<p>Consistent. The Proposed Project has been designed with onsite accessways to encourage bicycle, pedestrian and transit connectivity.</p>
<p>2-A.5: Develop new roadway connections, pedestrian paths, and bicycle routes that facilitate transportation in the north-south direction traversing the I-10 freeway.</p>	<p>Consistent. The Proposed Project would improve the portion of Tennessee Street that is adjacent to the Project site, which is a north-south road that traverses I-10, with a designated bike lane and sidewalk</p>
<p>4-A.96: Encourage the development of bicycle, pedestrian, and transit access that reduce the need for on-site parking.</p>	<p>Consistent. The Proposed Project has been designed with onsite accessways to encourage bicycle, pedestrian and transit access.</p>

General Plan Policy/Optional Measure	Project Consistency
5-P.16: Provide a safe, direct, and healthful pedestrian environment through means such as providing separate pedestrian-ways in parking lots, avoiding excessive driveway widths, and providing planting strips between sidewalks and streets where feasible.	Consistent. The Proposed Project has been designed to provide separate pedestrian ways throughout the Project site, including sidewalks that connect the shops through the parking lots.
5-P.18: Enhance street lighting for pedestrians where current lighting is inadequate.	Consistent. The Proposed Project will provide additional street lighting for the portions of Tennessee Street and Lugonia Avenue that are adjacent to the Project site as well as provide lighting along all onsite accessways.
5-A.18: Create appropriate enhancements to pedestrian crossings at key locations across minor arterials, boulevards, and collectors with a target of providing pedestrian crossings no further than 600 feet apart in appropriate areas and in accordance with State standards.	Consistent. The Proposed Project will provide pedestrian crossings at the adjacent existing and future intersections from the Project site to Tennessee Street and Lugonia Avenue, that will be located less than 600 feet apart.
5-A.21: Include amenities such as shade trees, transit shelters and other transit amenities, benches, trash and recycling receptacles, bollards, public art, and directional signage that can enhance the pedestrian experience.	Consistent. The Proposed Project will provide shade trees and trash and recycling receptacles as well as public art throughout the Project site as well improve the existing transit stop that is adjacent to the Project site.
5-A.63: Encourage convenient and safe pedestrian linkages to and from transit service to provide better first-mile and last-mile connectivity.	Consistent. The Proposed Project has been designed to provide separate safe pedestrian ways throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop that is adjacent to the south side of the Project site.
5-A.64: Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.	Consistent. The Proposed Project has been designed to provide separate safe pedestrian ways throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop that is adjacent to the south side of the Project site.
7-A.39: Install appropriate facilities along streets and at roadway intersections to improve and insure pedestrian safety.	Consistent. All new roadway intersections will include painted crosswalks and other pedestrian features.
4-A.15: Encourage the development of bicycle, pedestrian, and transit access that reduce the need for on-site parking.	Consistent. The Proposed Project has been designed to provide pedestrian and bike paths throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop that will reduce the need for on-site parking.

General Plan Policy/Optional Measure	Project Consistency
5-A.68: Design parking to meet applicable urban design goals from area plans and minimize negative impacts on pedestrians, bicyclists, and transit users.	Consistent. The Proposed Project has been designed to meet urban design goals by providing separated pedestrian and bike paths throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop.
5-A.69: Encourage developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less.	Consistent. The proposed shopping center will share parking spaces between uses.
4-P.9: Locate medium- and high-density development near regional access routes, transit stations, employment centers, shopping areas, and public services.	Consistent. The proposed shopping center will be located adjacent to a transit station and near regional access routes.
4-P.45: Provide choices for travel options, including walking, biking, vehicular, and transit.	Consistent. The Proposed Project has been designed to provide pedestrian and bike paths throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop that will provide travel options for the employees and shoppers.
5-A.55: Work with Omnitrans to plan for bus shelters, boarding areas, transfer centers, bus pads in the right-of-way, and bus turnouts	Consistent. The project applicant has committed to working with Omnitrans to improve the existing bus stop that is adjacent to the south side of the Project site.
5-A.64: Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.	Consistent. The Proposed Project has been designed to provide pedestrian paths throughout the Project site, including sidewalks that will connect to the existing Omnitrans Bus Stop adjacent to the south side of the Project site.
Source: Appendix A	

As shown in Table 8, with implementation of statewide regulatory requirements including the Title 24 standards, the Proposed Project would be consistent with all applicable policies of the Redlands CAP. Therefore, implementation of the Proposed Project would not conflict with the applicable plan that reduces GHG emissions.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.9.1 Impact Analysis

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

Less Than Significant Impact. During construction of the Project, hazardous and potentially hazardous materials typically associated with construction activities would be routinely transported to/from and used on the Project site. These hazardous materials could include gasoline, diesel fuel, lubricants, and other products used to operate and maintain construction equipment. Construction materials include paints, adhesives, cleaning fluids, and solvents. Handling of these hazardous materials would be temporary in nature and limited to quantities and concentrations consistent with a commercial use of this size. BMPs such as proper labeling of chemicals, storage in approved containers, preparation of an accidental release plan, and compliance with hazardous materials handling protocols would be prepared and implemented to ensure safe storage, handling, transport, use, and disposal of all hazardous materials during the construction phase of the Project, in compliance with all applicable laws, ordinances, rules, regulations, and orders. The Contractor would ensure hazardous waste generated is properly disposed. The transport, use, and handling of these materials would be a temporary activity coinciding with short-term Project construction activities.

Operation of the proposed shopping center and associated parking would not involve the routine transport, use, or disposal of significant quantities of hazardous materials. Operations of the Project may involve the use of small amounts of solvents and cleaners that are not acutely hazardous. Such materials are ubiquitous and product labeling identifies appropriate handling and use of these materials. Therefore, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

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

Less Than Significant Impact. As described in section a), Project construction would be required to be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use of common hazardous materials. The operation of the Project would not involve the routine transport, use, or disposal of significant hazardous materials. In addition, as discussed in Threshold d) below, there are no listed hazardous waste sites present on the Project site. Therefore, 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, and impacts would be less than significant.

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

No Impact. There are no schools located within one-quarter mile of the Project site. The closest school is the Redlands Adult School, located approximately 0.40-mile southwest of the Project site. There are no proposed schools within a one-quarter mile radius of the Project site (City 2025b). Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. No impact would occur.

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

No Impact. Review of the California Department of Toxic Substances Control (DTSC) EnviroStor Database (DTSC 2025) and State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2025) determined that there are no listed hazardous materials sites present at the Project site. Therefore, the Project would not be located on a hazardous materials site and no impact would occur.

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

No Impact. The nearest public airport is the San Bernardino International Airport, located approximately 2.5 miles northwest of the Project site. The Project is not located within an airport land use plan. Figure 3.7-2 Airport Hazards in the General Plan EIR displays the Project area outside of the San Bernadino International Airport and Redlands Municipal Airport Influence Area Boundary (City 2017a). Thus, no impact would occur.

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

Less Than Significant Impact. The applicable emergency response or emergency evacuation plans for the Project area include the San Bernardino County Emergency Operations Plan (EOP) and the Redlands Local Hazard Mitigation Plan (LHMP). The EOP is administered and coordinated by the San Bernardino County Fire Department Office of Emergency Services. The concepts presented in EOP are comprised of mitigation programs to reduce the vulnerabilities to disasters and preparedness activities to ensure the capabilities and resources are available for an effective response. The purpose of the LHMP is to outline a mitigation strategy to help reduce and/or eliminate impacts from hazards within the City (City 2017a).

During construction of the Project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency. However, such trips would be infrequent and temporary. As required per Section 15.20.720 of the City Municipal Code, the fire apparatus points of ingress and egress, and water supply for fire protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Given the Project is located in a High Fire Hazard Severity Zone (HFHSZ), typical construction safety measures would be employed including, but not limited to, storing flammable materials away from ignition sources, suspending construction activities in Red Flag Warning conditions, and keeping idling vehicles away from brush.

During operations, ingress and egress points would surround the entire perimeter of the Project site. Both West Lugonia Avenue and Tennessee Street would have an ingress and egress point for vehicles travelling in and out of the proposed shopping center. As required per Section 15.20.720 of the City Municipal Code, approved fire apparatus access shall be provided for every facility, building, or portion of a building thereafter constructed or moved into or within the jurisdiction. The fire apparatus access shall comply with the requirements of City Municipal Code Section 15.20.720 and shall extend to within 150 feet of all portions of the facility and all portions of the exterior wall for the first story of the building as measured by an approved route around the exterior of the building or facility.

Compliance with all City of Redlands Fire Department requirements would reduce the risk that the Project would impair an adopted emergency response plan or emergency evacuation plan, and impacts are less than significant.

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

Less than Significant Impact with Mitigation Incorporated. The Project site will be primarily covered with asphalt, cement, buildings, and landscaped/grassy areas. These features would not exacerbate wildfire risk. The Project site is within a HFHSZ in a Local Responsibility Area (CAL FIRE 2025). The California Fire Code (CFC) details extensive requirements for new developments within HFHSZs and wildland-urban interface areas to prevent exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Section 15.20.670 of the City's Municipal Code amends the CFC to require a fire-protection plan (FPP) for all new developments (including the Proposed Project)

within the wildland-urban interface area. Therefore, implementation of MM HAZ-1 requires implementation of an FPP that would reduce impacts relating to wildfire to less than significant levels.

MM HAZ-1

Prior to the issuance of grading permits, the Project applicant shall prepare a Fire Protection Plan (FPP) that complies with the requirements set forth in Section 15.20.670 of the City of Redlands Municipal Code. The FPP shall be submitted to and approved by the City of Redlands Fire Department. The plan shall include, at a minimum, the following elements:

- Mitigation measures consistent with the unique problems resulting from the location, topography, geology, flammable vegetation, and climate of the proposed site.
- Address water supply, access, building ignition and fire resistance, fire protection systems and equipment, defensible space and vegetation management.
- Demonstrate consistency with the requirements of California building code chapter 7A, and the international wildland-urban interface code, and the Redlands municipal code.

Furthermore, the City has amended several sections of the California Fire Code to address fire risks specific to local conditions. Applicable amendments for the Proposed Project include requirements for a fuel modification zone, fire department review and approval of construction documents, and the installation of fire apparatus access and water supply infrastructure prior to and during construction - unless alternative methods of fire protection are approved (City Municipal Code Chapter 15.20).

Thus, the implementation of MM HAZ-1 and compliance with City and state regulations would result in less than significant impacts relating to wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.10.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project includes a retention with infiltration basin on-site. Additionally, there are storm drain located at the intersection of West Lugonia Avenue and Tennessee Street.

Construction of the Project would be subject to City, County, and State requirements for erosion control and grading. Because construction activities would disturb one or more acres and more than 50 cubic yards of earth, the Applicant would be required to adhere to the provisions of the NPDES Construction General Permit and obtain a Grading Permit from the City. Construction activities subject to these permits include clearing, grading, and soil disturbance through stockpiling and grading. The NPDES Construction General Permit requires implementation of a SWPPP, which would include BMPs designed to prevent erosion and sedimentation in stormwater runoff. These construction BMPs would help retain stormwater and any constituents, pollutants, and sediment on the Project site, which would assist in the prevention of water quality impacts to downstream receiving waters during construction.

Additionally, as the Project is located in San Bernardino County, it is also subject to the requirements of the Santa Ana Regional Water Quality Control Board (SARWQCB) and must comply with the WQMP requirements of the San Bernardino County Municipal Separate Storm Sewer System (MS4) Permit. The WQMP would identify site design, source control, and treatment control BMPs to reduce post-construction stormwater runoff and associated pollutant loading.

Implementation of these regulatory requirements would prevent the violation of water quality standards and waste discharge requirements. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Project would cover approximately eight acres with impervious pavement and buildings. However, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge resulting in impeding groundwater management of the basin. The Project site is located within the Upper Santa Ana Valley - San Bernardino Groundwater Basin, which is designated as a very low priority basin under the California Sustainable Groundwater Management Act (SGMA) Basin Prioritization Dashboard (DWR 2025a). Very low priority basins are not subject to SGMA requirements for groundwater sustainability plans due to their limited reliance on groundwater and lack of overdraft conditions.

The Proposed Project involves the development of a shopping plaza, which is not a water-intensive land use. Water demand associated with the Project would be met by the City's municipal water supply system and would not involve the construction or use of groundwater wells. Therefore, the Project would not result in direct withdrawals from the basin.

Although the Project would introduce new impervious surfaces that could reduce the potential for direct infiltration on-site, compliance with post-construction stormwater management requirements under the applicable MS4 Permit and WQMP would include Low Impact Development (LID) strategies such as infiltration basins, vegetated swales, or other BMPs designed to retain and treat runoff on-site to the maximum extent feasible. These features help maintain or improve groundwater recharge conditions.

As such, the Project would not substantially deplete groundwater supplies nor interfere with groundwater recharge in a manner that would impede sustainable groundwater management of the basin. Impacts would be less than significant.

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

- i) *Result in substantial erosion or siltation on- or off-site;*

Less Than Significant Impact. Under existing conditions, stormwater infiltrates the undeveloped soils within the Project site and drains northwest. Some surface runoff may also flow toward Lugonia Avenue and Tennessee Street, where it is conveyed to a storm drain located at the intersection of the two roadways.

Project construction activities, such as grading and site preparation, would temporarily expose soils and increase the potential for erosion and sediment transport. However, the Proposed Project would be required to implement a SWPPP pursuant to the NPDES Construction General Permit, which would effectively reduce erosion and siltation during construction to less than significant levels.

In addition, the Project will prepare a Project-specific WQMP, as required under the MS4 Permit, which includes BMPs designed to control runoff and minimize potential for erosion and sedimentation during operations. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Project implementation would increase impervious surfaces, such as rooftops and paved parking areas, which could increase the rate and volume of surface runoff. However, the Project would be required to implement stormwater management measures in accordance with the NPDES Construction General Permit and MS4 Permit. The Project will prepare and implement a WQMP that includes site design, source control, and stormwater treatment BMPs to control post-construction runoff. These measures would ensure that the volume and rate of runoff would not exceed pre-development conditions.

Current conditions at the Project site drains to the northwest. The site design would include on-site retention with infiltration so that post development peak would not exceed the predevelopment peak runoff rate. Therefore, the Project would not result in on- or off-site flooding due to increased runoff, and impacts would be less than significant.

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

Less Than Significant Impact. Under existing conditions, stormwater infiltrates the undeveloped soils within the Project site. Some surface runoff may also flow toward Lugonia Avenue and Tennessee Street, where it is conveyed to a storm drain located at the intersection of the two roadways.

Project implementation would increase impervious surfaces, such as rooftops and paved parking areas. However, the Proposed Project would include on-site retention with infiltration which would result in development peak runoff would not exceed predevelopment levels.

Moreover, the required implementation of a WQMP would ensure that site design and post-construction BMPs are implemented to control runoff volume and reduce pollutant load. Thus, compliance with regulatory requirements, including compliance with Section 15.54.200 Stormwater Management and Rainwater Retention of the Municipal Code, and the proposed storm drain improvements would result in less than significant impacts.

- iv) *Impede or redirect flood flows?*

Less Than Significant Impact. According to the Federal Emergency Management Agency (FEMA), the Project site is in an area designated as a Zone X Minimal Flood Hazard (FEMA 2023). FEMA defines Zone X as being outside a Special Flood Hazard Area and higher elevation than a 0.2 percent annual chance flood (500-year flood) (FEMA 2023). Project grading and the installation of on-site

drainage infrastructure would be designed to properly manage stormwater on-site and would connect to existing stormwater infrastructure. Additionally, the proposed storm drain infrastructure would be required to comply with the City's Standard Specifications and Detail Drawings for Design and Construction of Public Improvements (City 2023a). Therefore, impacts would be less than significant.

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

No Impact. The Project site is designated as a Zone X Area of Minimal Flood Hazard (FEMA 2023). FEMA defines Zone X as being outside a Special Flood Hazard Area and higher elevation than a 0.2 percent annual chance flood (500-year flood) (FEMA 2023).

The Project site is over 70 miles east of the Pacific Ocean and there are no large bodies of water near the site. As a result, there is no impact from the Project having a high risk of inundation due to being in flood, tsunami, or seiche zones.

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

Less than Significant Impact. The City is part of SARWQCB. The Santa Ana River Basin Water Quality Control Plan (Basin Plan) contains the SARWQCB's policies for managing the region's water quality. The Basin Plan includes an implementation plan describing the actions by the SARWQCB and others that are necessary to achieve and maintain the water quality standards. The City is responsible for monitoring Total Dissolved Substances (TDS) and nitrogen in groundwater every three years starting in 2005 (RWQCB 2020). The City, as part of the Basin Monitoring Program Task Force, must complete a Recomputation of Ambient Water Quality every three years and prepare a Water Quality Report for the Santa Ana River annually (RWQCB 2020). As a result, the City has an active role in collecting data for the management of water quality in the region.

The Project site is in the Upper Santa Ana Valley-San Bernardino Groundwater Basin as a very low priority basin under the California Sustainable Groundwater Management Act (SGMA) Basin Prioritization Dashboard (DWR 2025a). Very low priority basins are not subject to SGMA requirements for groundwater sustainability plans due to their limited reliance on groundwater and lack of overdraft conditions. Therefore, the California Department of Water Resources does not require the formation of a Groundwater Sustainability Agency (GSA) or a Groundwater Sustainability Plan for the Basin (DWR 2025b), resulting in no conflict of a sustainable groundwater management plan by the Project.

As discussed in a), the Project would be required to comply with City, County, and State requirements regarding protection of water quality, and thus would not conflict with a water quality control plan. In addition, the Project would not deplete groundwater supplies or interfere with groundwater recharge as discussed in b). Implementing the WQMP and the SWPPP during construction and operations will result in compliance with all applicable regulations, thus the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the impact is less than significant.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.11.1 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The Proposed Project would require a Specific Plan Amendment to remove the site from the East Valley Corridor Specific Plan and a Zone Change to establish C-3 zoning on the site. The Project’s proposed uses as a shopping plaza are permitted under the existing EV/SD and proposed C-3 zoning regulations. The Proposed Project shall also attain a Conditional Use Permit for a drive-through restaurant as required under the C-3 zoning designation (City 2025a).

Land areas to the immediate north, south, and west of the Project site are zoned as General Commercial District (C-3) and land area to the immediate east is zoned as Multi-Family Residential (R-3). Although the parcel located on the eastern border of the Project site is zoned as R-3, there are no established residences on it. The recently approved and/or completed developments surrounding the Project site reflect a consistent pattern of commercial and mixed-use development (See Section 1.2.3, *Surrounding Land Uses*).

Immediately north of the Project site, at 1234–1528 Tennessee Street, Redlands, California, 92374, an approved project includes the removal of approximately 13.48 acres from the East Valley Corridor Specific Plan, a zone change to C-3, and development of a mixed-use project consisting of 460 residential units (including 5 percent designated as Very Low Income) and 18,000 square feet of commercial space. This project has not yet been constructed, and the surrounding parcels currently lack a cohesive or established residential community that could be divided by the Proposed Project.

The proposed shopping plaza would complement rather than fragment the adjacent mixed-use development by providing retail and service opportunities that would benefit prospective nearby residents. No existing roadways, neighborhoods, or community facilities would be physically separated or made less accessible as a result of the Project. Therefore, no impact would occur.

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

Less Than Significant Impact. The Proposed Project would require a Specific Plan Amendment to remove the site from the East Valley Corridor Specific Plan and a Zone Change to establish C-3 zoning on the site. The Project’s proposed uses as a shopping plaza are permitted under the existing EV/SD and proposed C-3 zoning regulations. The Proposed Project shall also attain a Conditional Use Permit for a drive-through restaurant as required under the C-3 zoning designation (City 2025a). The

surrounding parcels are also zoned for commercial uses; thus the proposed retail, grocery, and restaurant uses would be compatible with existing land use patterns.

Although a Conditional Use Permit (CUP) is required for the proposed drive-through use and alcoholic beverage sales, such permits are part of the standard regulatory process and do not indicate inconsistency with land use plans. The Project will also be subject to Commission Review and Approval for the site plans and architectural approval.

Accordingly, the Project would not result in significant environmental impacts due to a conflict with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.12.1 Impact Analysis

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b) *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

a)&b) Less Than Significant Impact. Figure 6-4 of the General Plan shows mineral land classifications and designated aggregate resource sectors as identified by the California Geological Survey (CGS) (City 2017b). According to this figure, the Project site is in an area designated as a Mineral Resource Zone (MRZ) 2, where geologic data indicates that significant Portland Cement Concrete (PCC)-grade aggregate resources are present.

However, the Project site is not identified as an active or permitted mineral extraction site, and it is located within an urbanized area surrounded by existing roadway infrastructure and commercial development. Areas surrounding the Project site are zoned for commercial and residential use. Additionally, the General Plan and the East Valley Corridor Specific Plan do not designate the site for mineral resource extraction or preservation.

Development of the site for commercial uses would not interfere with any existing mineral extraction activities and would not preclude future resource recovery in the region. Therefore, although the site is within an MRZ-2 zone, the Project would not result in the loss of availability of a known mineral resource of regional, statewide, or local value, and impacts would be less than significant.

4.13 NOISE

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

4.13.1 Impact Analysis

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

Less Than Significant Impact with Mitigation Incorporated. In September 2025, a Noise and Vibration Assessment (Noise Study) was prepared by Kimley-Horn and Associates, Inc. for the Proposed Project. The Noise Study is included in Appendix D. Impacts associated with construction-related and operation-related noise are discussed separately below.

Construction Noise

As discussed in the Noise Study, the City does not establish quantitative construction noise standards and only limits the construction activities timeframe; therefore, the analysis contained in the Noise Study conservatively uses the Federal Transit Authority’s (FTA) threshold of 80 dBA (8-hour Leq) for residential uses and 90 dBA (8-hour Leq) for non-residential uses to evaluate construction noise impacts. Construction noise levels that exceed these thresholds would result in a significant impact.

Noise-producing construction activities associated with the Project would include site preparation, grading, excavation, paving, building construction, and architectural coating. Construction noise was modeled to conservatively determine worst-case exterior construction noise levels for each phase of the Project. Construction noise modeling was conducted using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) and includes all equipment running concurrently.

Based on the construction noise levels calculated and shown in Table 13 of the Noise Study, the estimated maximum exterior construction noise levels at the nearest sensitive receptors reach a maximum of 89.8 dBA Leq, thereby exceeding the 80 dBA Leq exterior noise threshold. The exceedance would occur only at the future residential and non-residential receptors located approximately 20 feet to the north, which are the sole sensitive receptors affected by exterior noise

above the threshold. Other sensitive receptors near the Project site would experience noise levels below the exterior noise threshold. Construction noise levels at the commercial uses to the south would reach a maximum of 76.2 dBA Leq and therefore do not exceed the 90 dBA Leq threshold for non-residential uses.

Given construction noise would exceed the 80 dBA Leq exterior noise threshold for residential uses at the future development, Tennessee Village, located north of the Project site, MM NOI-1 would require temporary construction noise barriers capable of reducing construction noise levels by a minimum of 10 dBA. Impacts would be less than significant with incorporation of MM NOI-1.

MM NOI -1 If Project construction occurs after the Tennessee Village mixed-use development, located north of the Project, is occupied, 12-foot-high temporary construction noise barriers capable of reducing construction noise levels by a minimum of 10 dBA shall be placed along the northern perimeter of the Project site. MM NOI-1 would only be required in the event that the Tennessee Village apartment buildings located within 80 feet of the Project property line are occupied during Project construction. Construction noise levels at any Tennessee Village apartments located more than 80 from the Project property line would not exceed the 80 dBA Leq residential noise threshold and would not require mitigation.

Operational Noise

With respect to on-site operational noise, the significance criteria used in the Noise Analysis is based on the City of Redlands Municipal Code Section 8.06.070(A): Exterior Noise Limits, which states that noise levels at the receiving land use may not exceed the permissible noise level based on the time of day. For residential and public spaces (Texonia Park) the permissible noise threshold would be 60 dBA during the day (7:00 a.m. to 10:00 p.m.) and 50 dBA at night (10:00 p.m. to 7:00 a.m.). For commercial uses to the south, the threshold would be 65 dBA during the day and 60 dBA at night. Noise levels that exceed these limits would result in a significant impact.

The City has not established significance thresholds for traffic noise, however Measure U Policy 9-0V considers an increase of 4 dBA or more to be over the clearly compatible noise level for the affected land use (refer to Table 5 of the Noise Study) as significant. Therefore, if traffic noise increases by 4 dBA or more over existing noise levels and the resulting traffic noise exceeds the clearly compatible noise level for surrounding land uses, traffic noise would be considered significant impact.

Major noise sources associated with Project operations include mechanical equipment (i.e. trash compactors, air conditioners, etc.), parking areas (i.e. car door slamming, car radios, engine start-up, and car pass-by), and off-site traffic noise.

On-Site Noise

On-site Project buildings would be at least 890 feet from existing residential uses, 165 feet from existing commercial uses, 110 feet from future residential receptors to the east, and 50 feet from future residential and non-residential receptors to the north. As discussed in the Noise Study, mechanical equipment noise from the Project would attenuate to 52 dBA at distance of 50 feet.

The Project also includes two trash compactors located in the northeast corner of the market, adjacent to the loading dock doors. Trash compactors generate noise levels of approximately 51 dBA

at 50 feet (Appendix D). These trash compactors are located approximately 1,025 feet from the existing residential properties to the east, 610 feet from existing commercial buildings to the south, 165 feet from future residential properties to the east, and 80 feet from future residential buildings to the north.

The proposed market includes dock-high doors for truck loading/unloading. During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities; backing up toward the docks; dropping down the dock ramps; maneuvering away from the docks; and cargo handling equipment. These loading docks are located approximately 976 feet from the existing residential properties to the east, 630 feet from existing commercial buildings to the south, 196 feet from future residential properties to the east, and 50 feet from future residential buildings to the north. Loading dock doors would also be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior activities including interior loading and associated activities.

Based on peak p.m. traffic in the Traffic Impact Study, a net increase of 387 vehicles would access the parking lot in a single hour. Conservatively, modeling assumed that vehicles would park nearest to receptors being analyzed. Therefore, vehicles were analyzed when in the parking area nearest to each receptor, 905 feet from the existing residential properties to the east, 150 feet from existing commercial buildings to the south, 125 feet from future residential properties to the east, and 100 feet from future residential buildings to the north.

As shown in Table 14 of the Noise Study, no operational noise levels resulting from the Proposed Project would exceed the noise thresholds at the nearest sensitive receptors. Therefore, on-site operational impacts would be less than significant.

Combined On-Site Operational Noise

On-site operational noise at each receptor, would be 31.32 dBA at the existing residential property to the east, 45.81 dBA at the existing commercial property, 45.78 at the Lugonia Village to the east, and 48.61 at the Tennessee Village to the north. As a result, on-site noise would not exceed the 50 dBA threshold for residential uses. Therefore, on-site operational noise would result in a less than significant impact.

Off-Site Noise

According to the Traffic Impact Study, the Project would generate 4,547 daily trips. Traffic noise levels on roadways primarily affected by Project-generated trips were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for existing conditions with and without the Project, based on traffic volumes provided by GTS. Table 15 in the Noise Study compares noise levels without the Project (existing land uses) to noise levels with Project related traffic volumes.

Traffic noise significance is determined based on the allowable noise increase thresholds identified in Measure U Policy 9-0v which limits the allowable noise increase to 4 dBA if resulting noise level exceeds the clearly compatible noise level for the surrounding land uses. As shown in Table 15 of the Noise Study, a maximum increase of 0.2 dBA would occur due to traffic associated with the Project.

An increase of 3 dBA is barely perceptible to the human ear, as a result traffic noise associated with the Project would not be noticeable. Therefore, “With Project” noise levels would be less than significant.

In addition, based on the analysis presented in the Noise Study regarding cumulative noise impacts, the Proposed Project would not result in cumulatively considerable noise impacts during construction or operation.

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

Less Than Significant Impact. Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used, the location of that equipment relative to the receptor, and the operations involved.

The City has not established significance thresholds for excessive ground-borne vibrations, therefore this analysis will use vibration thresholds identified by the FTA and Caltrans to determine impacts from construction related vibrations. For a traditionally built structure, without assistance from qualified engineers, the FTA guidelines show that a vibration level of up to 0.20 in/sec PPV is considered safe and would not result in any vibration damage. FTA guidelines show that modern engineered buildings built with reinforced-concrete, steel, or timber can withstand vibration levels up to 0.50 in/sec PPV and not experience vibration damage.

However, the City Municipal Code includes a vibration threshold for human annoyance. The City has defined “vibration perception threshold” as the minimum vibration necessary to cause a normal person to be aware of the vibration. Although it is not defined in the Municipal Code, the vibration perception threshold is presumed to be a motion velocity of 0.01 in/sec PPV. Impacts associated with construction and operational ground vibration are discussed separately below.

Construction Vibration

Vibration associated with construction of the Proposed Project would be generated from use of equipment including large bulldozers, caisson drilling, loaded trucks, jackhammers, and small bulldozers/tractors. Table 16 in the Noise Study shows that at 20 feet the vibration velocities from construction equipment would not exceed 0.1244 in/sec PPV, which is below the FTA’s 0.20 in/sec PPV threshold for building damage and the annoyance threshold. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest structure. Therefore, vibration impacts associated with Project construction would be less than significant.

Operational Vibration

The Project would include truck delivery activity at the Project site, delivering stock to the businesses on-site. These movements would generally be low-speed (i.e., less than 15 miles per hour) and would occur over new, smooth surfaces. For perspective, Caltrans has studied the effects of propagation of vehicle vibration on sensitive land uses and notes that “heavy trucks, and quite frequently buses, generate the highest earthborn vibrations of normal traffic” (Caltrans 2002). Caltrans further notes

that the highest traffic-generated vibrations are along freeways and state routes. Their study finds that “vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 inches per second, with the worst combinations of heavy trucks and poor roadway conditions (while such trucks were moving at freeway speeds). This level coincides with the maximum recommended safe level for ruins and ancient monuments (and historic buildings).” Since the Project’s truck movements would be at low speed (not at freeway speeds) and would be over smooth surfaces (not under poor roadway conditions), Project-related vibration associated with truck activity would not result in excessive ground-borne vibrations; no vehicle-generated vibration impacts would occur. The Project would not create or cause any vibration impacts due to operations.

Therefore, construction and operational vibration impacts associated with the Proposed Project would be less than significant.

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

Less Than Significant Impact. Airport-related noise levels are primarily associated with aircraft engine noise made while aircrafts are taking off, landing, or running their engines while still on the ground. According to the Noise Study, the nearest airports to the Project are the San Bernardino International Airport (SBD) and Redlands Municipal Airport (REI), approximately 3 miles to the northwest and northeast of the Project site, respectively. The Project site is located outside the SBD 60 dBA CNEL airport noise contour as well as outside the REI 60 dBA CNEL noise contour. Therefore, the Project would not be adversely affected by airport/airfield noise, nor would the Project contribute to or result in adverse airport/airfield noise impacts.

4.14 POPULATION AND HOUSING

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

4.14.1 Impact Analysis

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

No Impact. The Proposed Project would construct a commercial facility consisting of buildings for retail or food service uses, a major market, a drive-through facility, a parking lot, ingress and egress points, auxiliary structures, landscaping, and a plaza space on undeveloped land. The Proposed Project is a permitted use under its proposed C-3 zoning designation. Surrounding uses consist of commercially operated businesses and vacant land. The Proposed Project does not propose construction/extension of roads or other infrastructure that could create substantial unplanned growth. Two points of ingress and egress would be constructed surrounding the perimeter of the Project site for emergency access purposes. The Proposed Project does not include construction of new residential facilities that would increase population growth within the Specific Plan area.

The construction and operation of the Proposed Project would create temporary and permanent jobs within the City. The City has an Annual Unemployment Rate of 5.3 percent, which is greater than the national unemployment rate of 4.3 percent (City 2025c; USBLS 2025). Given the availability of qualified workers within the City, it is anticipated that the majority of jobs created by the Proposed Project would be filled by the local workforce rather than requiring recruitment from outside the area. Because the Project would hire from the local population, it would not create significant population growth. No impact would occur.

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

No Impact. The Project site is undeveloped and zoned for a variety of uses, including commercial uses, under its EV/SD zoning designation. The Proposed Project would construct a commercial facility consisting of buildings for retail or food service uses, a major market, a drive-through facility, a parking lot, points of ingress and egress, auxiliary structures, landscaping, and a plaza on a vacant parcel. The Proposed Project is a permitted use under the Proposed C-3 zoning.

The properties surrounding the Proposed Project have been designated for commercial and residential purposes. Although there is a residential complex under construction to the east of the

Project site, there are no existing residential communities or housing on the Project site. Therefore, the Proposed Project would not displace people from existing housing and would not require construction of replacement housing. No impact would occur.

4.15 PUBLIC SERVICES

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

4.15.1 Impact Analysis

- a) i) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*
- ii) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

i) & ii) Less Than Significant Impact. The Proposed Project would be served by the City of Redlands Fire Department and the Redlands Police Department. The Proposed Project would not affect the service standards related to police protection and fire protection. The Proposed Project site is located approximately 0.80 north of the Redlands Police Station and 0.85 mile west of Redlands Fire Station 263 (Google 2025).

The Proposed Project would not result in population growth requiring the expansion of existing services or the creation of new services. While the increase in human activity in the Project area may lead to a minor, incremental demand for police and fire protection services, the Project proponent shall pay all applicable Development Impact Fees pursuant to City Ordinance No. 2968. These fees include contributions to the Police Facilities Fee and Fire Protection Facilities Fee, which are allocated toward the acquisition, installation, and construction of public facilities, as needed.

The Project area is currently being serviced by the Redlands Police Station and Fire Station 263 and would continue to receive the same services as nearby land uses. While there may be temporary travel delays during construction with the presence of construction vehicles entering and exiting

the Project area transporting heavy equipment, they would not create a long-term and significant delay for police and fire protection in the area. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project is located within the boundaries of the Redlands Unified School District. There are no schools within ¼ mile of the proposed Project. The closest school is the Redlands Adult School, located approximately 0.40 miles southwest of the Project site. Additionally, Lugonia Elementary School lies 0.95-mile east, Citrus Valley High School lies 0.77-mile north, and Packinghouse Christian Academy lies 0.77-mile northwest of the Project site.

Despite its proximity, the development of the Proposed Project would not induce population growth requiring the creation of new services or increased demand for services in the City. Employees working during construction and operation would come from the existing population in the City. The proposed shops, eating establishments, drive-through, and major market would serve the existing population in the City. In addition, the Project proponent shall pay School Facilities Fees as mandated by the Redlands Unified School District (District 2024).

While there may be temporary travel delays during construction with the presence of construction vehicles and equipment traveling along the roadway, these would occur during construction and are not expected to create long term and significant delay to those accessing the school campus. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project would not induce population growth requiring the extension of existing or creation of new park services. The nearest parks to the Project site are Texonia Park, approximately 0.33-mile to the east, Coyazo Park, approximately 1 mile north, and Martinez Park, approximately 1.3 miles northwest of the Project site (Google 2025). The Project proponent shall pay all applicable Development Impact Fees, including the Open Space and Parks Fee, pursuant to City Ordinance No. 2968. The construction and operation of the Proposed Project would not result in the deterioration, alteration, or increased demand of nearby parks. Impacts, therefore, would be less than significant because of the Project's distance from the parks and payment of applicable fees.

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

Less Than Significant Impact. The Proposed Project includes the installation of new on-site infrastructure such as sewer lines, water lines, and storm drain systems that would connect to existing utility networks serving the area. These improvements would be constructed within the Project site and would not require off-site infrastructure expansion. The City and associated service providers have the capacity to accommodate the Project's demand for public services, including water supply, wastewater treatment, storm drainage, fire protection, police services, and other municipal functions. In addition, the Project proponent shall pay all applicable Development Impact Fees pursuant to City Ordinance No. 2968. Such fees include the Public Facilities Fee, Sewer Capital Improvement Fee, Water Capital Improvement Fee, Solid Waste Capital Improvement Fee, Transportation System Improvements Fee, and Acquisition of Water Stocks and Water Rights Fee.

All approved and completed projects within the Project vicinity would be required to pay all applicable Development Impact Fees to maintain acceptable service ratios, response times, or other performance objectives for public facilities.

The Project would not generate a population increase or demand for public services that would result in the need to construct new or physically altered governmental facilities, such as libraries. Therefore, the Project would not result in substantial adverse environmental impacts related to the provision or construction of new governmental facilities, and impacts would be less than significant.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.16.1 Impact Analysis

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

No Impact. The nearest parks to the Project site are Texonia Park, approximately 0.33-mile to the east, Coyazo Park, approximately 1 mile north, and Martinez Park, approximately 1.3 miles northwest of the Project site (Google 2025).

The increased use of existing parks and recreational facilities typically results from a substantial increase in population growth or a lack of recreational facilities in an area. The Proposed Project would construct a commercial facility consisting of buildings for retail or food service uses, a major market, a drive-through facility, a parking lot, points of ingress and egress, auxiliary structures, landscaping, and a plaza on a vacant parcel. The Proposed Project would not result in a substantial increase in population growth that would increase the use of existing recreational facilities as it does not propose new residential facilities, nor does it involve the construction or removal of recreational facilities.

The Proposed Project would create temporary and permanent employment with construction and operation of the Proposed Project. The anticipated number of temporary and permanent employees would not result in increased use of existing neighborhood parks due to the temporary presence of the construction workers. Additionally, employees of the Proposed Project are expected to be filled by the local workforce. Thus, the Proposed Project would not result in the substantial physical deterioration of recreational facilities. Therefore, no impacts associated with parks or recreational facilities would occur.

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

No Impact. The Proposed Project does not include construction or expansion of recreational facilities. The Project site is undeveloped and zoned for a variety of uses, including the Project’s proposed commercial uses. Properties surrounding the Project site consist of various commercial businesses and vacant parcels designated for commercial or residential use. Therefore, the Proposed Project would not create an adverse physical effect on the environment through construction or expansion of recreational facilities, resulting in no impact.

4.17 TRANSPORTATION

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

4.17.1 Impact Analysis

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

Less Than Significant Impact with Mitigation Incorporated. On November 4, 1997, City passed Measure U, a voter-approved initiative ordinance which amended the City’s General Plan to establish controlled-growth policies and restrict land use and development citywide. The City General Plan and Measure U Section 1A.60 Principle Six has established the minimum acceptable Level of Service (LOS; C or better) for roadway segment and peak hour intersection operations. Where the current LOS is lower than C, roadway improvements shall be provided such that the LOS is not reduced below the LOS at the time of the application, or as provided in Section 5.20 of the Redlands General Plan where a more intense Level of Service is specifically permitted, for Existing Plus Project conditions.

For study intersections within the City, a project’s traffic impact requires mitigation if the addition of project-generated trips is forecast to cause a degradation to LOS D, E, or F at a study intersection. For project impacts at facilities with existing acceptable LOS (C or better), the project shall provide improvements that would, at a minimum, provide LOS C or better. For project impacts at facilities with existing unacceptable LOS (D, E, or F), the project shall provide improvements that would, at a minimum, provide LOS that is equal to or better than existing conditions.

On July 28, 2025, a Redlands Marketplace Traffic Impact Analysis (Traffic Analysis) was prepared by General Technologies and Solutions (GTS) for the Proposed Project. The Traffic Analysis, included in Appendix E, contains a Level of Service Analysis for compliance with the City’s Measure U Requirements. The LOS analysis portion is discussed below as it relates to Measure U. The traffic study analyses for Level of Service (LOS) and Vehicle Miles Traveled (VMT) were prepared with input provided by the Caltrans District 8 Division of Transportation Planning.

LOS Analysis

The LOS Analysis evaluated traffic conditions at 11 points along portions of Lugonia Avenue, San Bernardino Avenue, Orange Street, Texas Street, New York Street, and Tennessee Street that would potentially be impacted by the Proposed Project.

The study intersections (all signalized) are analyzed using the Highway Capacity Manual (HCM) 7th Edition methodology. This method measures the delay in seconds per vehicle at an intersection and assigns a numerical value called delay-per-vehicle (measured in seconds/vehicle) and a corresponding letter value to the intersection. The degree of congestion at an intersection is described by the level of service, which ranges from LOS A to LOS F, with LOS A representing free-flow conditions with little delay and LOS F representing over-saturated traffic flow throughout the peak hour. The level of service criteria for signalized intersections are shown in the table below.

Table 9: Level of Service Criteria for Signalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)	General Description
A	≤10	Free Flow
B	> 10-20	Stable Flow (slight delays)
C	> 20-35	Stable flow (acceptable delays)
D	> 35-55	Approaching unstable flow (tolerable delay, occasionally wait through more than one signal before proceeding)
E	> 55-80	Unstable flow (intolerable delay)
F ¹	>80	Forced flow (congested and queues fail to clear)

Source: Highway Capacity Manual 7th Edition, Transportation Research Board, 2022.

Notes: ¹ If the volume-to-capacity (v/c) ratio for a lane group exceeds 1.0 LOS F is assigned to the individual lane group. LOS for overall approach or intersection is determined solely by the control delay.

Existing Conditions

Existing transportation conditions within the Project area are included in Section 3 of the Traffic Analysis, which describes the existing roadway system, public transit and active transportation, and existing traffic volumes. Six of the study intersections currently operate within acceptable levels of service (C or better). The five intersections currently operating within unacceptable levels of service (D or lower) include:

- West Lugonia Avenue & Tennessee Street operating at LOS E during PM peak hour
- East Lugonia Avenue & Orange Street: LOS D during AM peak hour
- San Bernardino Avenue & Texas Street: LOS D during PM peak hour
- San Bernardino Avenue & Tennessee Street: LOS E during AM peak hour and LOS F during PM peak hour
- San Bernardino Avenue & Citrus Plaza Dr.: LOS F during both AM and PM peak hours
- I-10 EB Ramps & Tennessee Street: LOS E during PM peak hour

Existing Plus Project Conditions

The Existing Plus Project volume forecast was developed by adding project-generated trips to the Existing volumes. The methods for calculating the Project trip generation, trip distribution, and trip assignment

volume are described in Section 4 of the Traffic Analysis. Based on the analysis, the Project is forecasted to degrade the existing LOS conditions at the following intersections:

- West Lugonia Avenue & Home Depot Parking Lot (LOS degraded from C to F at the PM peak hour)
- West Lugonia Avenue & Texas Street (LOS degraded from B to E at the PM peak hour)

Mitigation measures (MM) T-1 through T-2 would optimize signal timing, adjust lane configurations, and improve traffic conditions to LOC C. Therefore, impacts regarding the circulation system would be less than significant with mitigations incorporated.

MM T-1 Lugonia Avenue & Home Depot Parking Lot. Increasing the cycle length to 100 sec and optimizing the splits lead to an improvement in the level of service to LOS C at the PM peak hour with a reduction in delays to 33 sec.

MM T-2 West Lugonia Avenue & Texas Street Changing lanes configuration of the NB approach (one NB left turn lane with a storage length of 40 ft and one NB through and right turn lane) leads to an improvement in the level of service to LOS C at the PM peak hour with a reduction in delays to 21.2 sec.

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

Less Than Significant Impact. On October, 2025, a Vehicle Miles Traveled (VMT) Screening (Traffic Memo) was prepared by General Technologies and Solutions (GTS) for the Proposed Project. The Traffic Memo is included in Appendix F. The preparation of the VMT Analysis was prepared in coordination with Caltrans.

As discussed in the Traffic Memo, the Proposed Project satisfies two of the screening thresholds outlined in the “City of Redlands CEQA Assessment VMT Analysis Guidelines,” which indicate when a proposed land use project is expected to result in a less than significant impact without the need for a more detailed analysis (Appendix F). Thus, the Project is screened from further VMT analysis based on the following criteria:

1. Low VMT Area Screening. Projects located within a low VMT generating area (where VMT per worker is at least 15 percent below County baseline) may be presumed to have a less than significant impact. Based on the San Bernardino County Transit Authority (SBCTA) VMT Screening Tool, the Project is located in a Low VMT Area, therefore the Project meets this screening criteria. The results of the SBCTA VMT Screening Tool are provided in Exhibit 4 of Appendix F.

2. Project Type Screening. Projects which serve the local community and have the potential to reduce VMT are typically not required to complete a VMT assessment. Projects which generate less than 3,000 MT CO₂e per year can be presumed to have a less than-significant impact on VMT. Projects which generate less than 3,000 MT CO₂e per year include the following:

- Single family residential - 167 dwelling units or fewer
- Multi-family (low-rise) – 232 dwelling units or fewer
- Multi-family (mid-rise) – 299 dwelling units or fewer

- Office – 59,100 SF or less
- Local Serving Retail – 112,400 square feet or less (no stores larger than 50,000 square feet)
- Warehousing – 463,600 SF or less
- Light Industrial – 74,600 SF or less

The Proposed Project is less than 112,400 square feet and is intended to serve the local community. In addition, per Attachment 1 of the City of Redlands CEQA Assessment VMT Analysis Guidelines, based on the proposed use and estimated daily trips for the project, the Proposed Project would generate less than 3,000 MT CO₂e per year (Appendix F). As a result, the Proposed Project can be presumed to have a less-than significant VMT impact and would meet the Project Type Screening criteria.

Based on review of the VMT screening criteria, the Project meets the City's Project Type screening thresholds. Therefore, the Project would result in a less-than-significant transportation impact, and no additional VMT analysis is required.

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

Less Than Significant with Mitigation Incorporated. The Proposed Project would include a drive-through, which would require a CUP permit prior to construction. A drive-through could pose a traffic safety hazard if vehicle queues extend into adjacent driveways or public roadways, obstructing sight lines, impeding the flow of through traffic, and increasing the potential for vehicle conflicts or accidents. According to the analysis contained in Section 8 of the Traffic Analysis, the proposed drive-through lane would provide 14 on-site vehicle queuing spaces, which is sufficient to accommodate the maximum anticipated queue length during peak periods. This determination is based on projected arrival rates and service times analyzed in accordance with the Los Angeles Department of Transportation (LADOT) queuing analysis methodology, ensuring that queuing would not extend into adjacent driveways or public rights-of-way. Therefore, there would be a less than significant impact associated with traffic queuing.

As discussed under Threshold a), the Project would have a significant LOS impact at three intersections, potentially creating hazardous traffic conditions. However, with the incorporation of MM T-1 through MM T-2, these intersections would operate at a LOS C, thereby reducing the potential for hazardous traffic conditions.

The Project site is located adjacent to two major roadways, Tennessee Street and West Lugonia Avenue, and would provide four entry and exit points to ensure safe and efficient vehicle circulation. The Project would not alter the alignment of any existing roadways, and all driveway access points would be designed in compliance with the City of Redlands' engineering standards and the Redlands Municipal Code design guidelines. These standards require appropriate sight distances, turning radii, and intersection spacing to minimize potential traffic conflicts and ensure safe ingress and egress. In addition, all access improvements would be reviewed and approved by the City Engineer to verify conformance with roadway safety requirements. Therefore, the Project would not result in geometric design features that would create hazardous conditions for motorists, pedestrians, or bicyclists.

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

Less Than Significant Impact. During construction of the Project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such trips would be infrequent and temporary. As required per Section 15.20.720 of the City Municipal Code, the fire apparatus points of ingress and egress and water supply for fire protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles.

During operations, there would be ingress and egress points that would surround the entire perimeter of the Project site. Both West Lugonia Avenue and Tennessee Street would have an ingress and egress point for vehicles travelling in and out of the proposed shopping center. As required per Section 15.20.720 of the City Municipal Code, approved fire apparatus access points shall be provided for every facility, building, or portion of a building thereafter constructed or moved into or within the jurisdiction. The fire apparatus access area shall comply with the requirements of City Municipal Code Section 15.20.720 and shall extend to within 150 feet of all portions of the facility and all portions of the exterior wall for the first story of the building as measured by an approved route around the exterior of the building or facility.

Compliance of all City of Redlands Fire Department requirements would result in less than significant impacts regarding emergency access.

4.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.18.1 Impact Analysis

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

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

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

As discussed in the Cultural Report and its addendum, no identified historic resources within the Project site are eligible for listing in the NHRP, CRHR, or as a designated City of Redlands Historic Resource (Appendix C).

ECORP submitted a request to the Native American Heritage Commission (NAHC) for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity in 2025. The response from the NAHC stated that the SLF records search was positive for recorded sacred properties within the Project site and the surrounding study area. The NAHC also provided a list of Native American Groups who may have information about the Project Area.

In accordance with AB 52, notices for the Proposed Project were sent to tribes that had previously requested notification. Additionally, the City requested a list of tribes to be contacted for SB 18 consultation from the NAHC.

Notices were distributed to all identified tribes on March 26, 2025. The following responses were received:

- March 26, 2025: Fort Yuma Quechan Indian Tribe
 - The Tribe responded, indicating that they did not wish to provide comments on the Project.
- March 26, 2025: Yuhaaviatam of San Manuel Nation (YSMN, formerly the San Manuel Band of Mission Indians)
 - The Tribe requested additional information, including a copy of the Cultural Resources Report. The report was provided, and the Tribe subsequently requested the inclusion of mitigation measures for inadvertent discoveries. On August 6, 2025, the City and the Tribe agreed upon the final mitigation text, and consultation was closed.
- April 15, 2025: Agua Caliente Band of Cahuilla Indians requested additional information, including a copy of the Cultural Resources Report. The report was provided, along with a copy of the City's proposed mitigation measures for inadvertent discoveries. On August 18, 2025, the City and the Tribe agreed upon the proposed mitigation text, and consultation was closed.

The following mitigation measure was provided during consultation and shall be implemented during the Proposed Project to ensure that impacts would be less than significant to Tribal Cultural Resources.

- MM TCR-1:**
1. The Consulting Tribes shall be contacted, as detailed in CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with the Consulting Tribes, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents the Consulting Tribes for the remainder of the project, should the Consulting Tribes elect to place a monitor on-site.

2. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to the Consulting Tribes.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.19.1 Impact Analysis

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

Less Than Significant Impact. The Project site would be serviced by Southern California Gas Company for natural gas, Southern California Edison for electricity, local providers (e.g. Spectrum, AT&T, or Frontier) for telecommunication services, and the City for water and wastewater.

The Proposed Project includes installation of on-site utilities, including sewer lines, water lines, and storm drain lines. These utility improvements would be constructed within the Project site and would connect to existing off-site utility systems already serving the surrounding developed area.

The Project would not require the relocation or substantial expansion of existing utility infrastructure, nor would it necessitate the construction of new off-site water or wastewater treatment, storm drainage, electrical, natural gas, or telecommunications facilities which would cause significant environmental effects. A discussion of potential utility impacts is provided below.

Water

As part of the Proposed Project, water lines would be installed throughout the Project site and would connect with the existing main on Lugonia Avenue. The Proposed Project would increase demand for water as compared to existing conditions, and on-site infrastructure is required for Project implementation. However, as discussed in Threshold b) below, impacts regarding water supply would be less than significant.

Wastewater

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

According to the Citywide Wastewater Master Plan, sewage generation is estimated based on land use-specific flow factors (Dudek 2021). For commercial developments, wastewater generation is assumed to average 3,000 gallons per day (gpd) per acre based on neighboring agency data and industry standards. Given that the Proposed Project's building footprint would occupy approximately 1.61 acres, it is estimated to generate about 4,830 gpd, representing only 0.05 percent of the WWTP's total daily treatment capacity. Therefore, the relatively incremental increase in wastewater from the Proposed Project would not have a significant impact on the WWTP, nor would it require the expansion of wastewater treatment facilities.

Stormwater Drainage

The Proposed Project would install on-site stormwater infrastructure (e.g., drainage pipes and inlets) to collect and convey runoff to existing municipal storm drain facilities located adjacent to the Project site along Lugonia Avenue. The approximately 8-acre Project site is currently undeveloped and would be developed with commercial uses and associated paving. However, stormwater infrastructure would be designed in accordance with the City's drainage standards, MS4 permit requirements, and General Plan policies intended to ensure post-development peak runoff rates do not exceed pre-development levels.

The City's General Plan acknowledges that some vacant parcels, including those in the East Valley Corridor, could generate increased runoff, but General Plan policies require new development to implement low-impact development (LID) strategies, maximize pervious surfaces, and manage runoff on-site through BMPs and design standards.

In alignment with these policies, the Proposed Project will connect to existing nearby storm drain infrastructure, be subject to NPDES and MS4 permitting requirements, be designed to handle the two-year, one-hour storm event, and implement applicable LID measures to minimize runoff and pollutant loads.

Therefore, while the Project would introduce impervious surfaces, it is consistent with the City's General Plan policies and stormwater management goals, and would not exceed the capacity of existing or planned facilities or result in significant stormwater-related impacts.

Electric Power, Natural Gas, and Telecommunications

The Proposed Project would connect to existing electric power, natural gas, and telecommunications infrastructure located adjacent to or within proximity of the Project site. Utility service providers in the City of Redlands, including Southern California Edison (electricity) and Southern California Gas Company (natural gas), have the capacity to accommodate the Project's expected demand for services. Telecommunications services would be provided by local providers such as Spectrum, AT&T, or Frontier.

Installation of utility lines would occur within the Project boundaries as part of standard site development and would not require the relocation or construction of major off-site infrastructure. The Project's energy and telecommunications needs are typical of a small-scale commercial development and would not necessitate expanded regional infrastructure.

Therefore, the Project would not require or result in the construction or expansion of utility facilities in a manner that would cause significant environmental impacts, and impacts would be less than significant.

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

Less Than Significant Impact. The City obtains water from surface water from Mill Creek Watershed and Santa Ana River Watershed, groundwater from the Bunker Hill Subbasin and Yucaipa Subbasin, recycled water, and water imported from the State Water Project (SWP), as needed. During wet years, the City contributes to regional efforts to recharge the Bunker Hill Basin so there is availability in dry years when other sources may be limited (EVWD 2021). The 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (UWMP) includes an analysis of the water supply reliability assessment up to five consecutive dry water years. The assessment is based on a 10 percent increase throughout the five-year drought, to be conservative. The results of the analysis indicated that Redlands does not anticipate any water shortage due to consecutive dry years.

The UWMP concludes that the Santa Ana River Watershed region would have a reliable water supply, based on projected 2045 water demand of 29,735 acre-feet per year (AFY) and a projected 2045 water supply of 35,544 AFY. According to the City's 2022 Water Systems Master Plan, commercial development is estimated to require 1.470 AFY per acre (City 2022). Based on this factor, the Proposed Project, with a total footprint of 8.18 acres, is estimated to require approximately 12 AFY, representing only 0.04 percent of the projected 2045 demand and 0.03 percent of the projected 2045 supply. Therefore, the incremental water demand from the Proposed Project would be minimal and would have a less than significant impact on water supply in the foreseeable future during multiple dry years.

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

Less Than Significant Impact. As previously discussed under threshold a), the City's Wastewater Treatment Plant (WWTP) has the capability to treat 9.5 million gallons a day and is projected to treat 6.75 million gallons per day with buildout of the General Plan (City 2017a). Thus, even with buildout of the certified General Plan, there would be 29 percent of WWTP capacity available. Furthermore, the Project is estimated to generate about 4,830 gpd, representing only 0.05 percent of the WWTP's

total daily treatment capacity. Therefore, it is reasonable to assume that the relatively incremental increase in wastewater from the Proposed Project would not have a significant impact on the WWTP.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

d) & e) Less Than Significant Impact. The California Street Landfill is owned and operated by the City and has a remaining capacity of 4,184,751 cubic yards and a permitted throughput of 829 tons per day (CalRecycle 2023). As of March 2025, the facility received a peak tonnage of 277.72 tons of solid waste in a day and consistently operates well below the maximum permitted daily tonnage (CalRecycle 2025).

As stated in the Redlands Strategic Plan, in 2017, the City Council adopted a new solid waste rate structure, which included funding designated for capital improvement projects and the purchase of more efficient landfill equipment (City 2023b). This has resulted in increased usable capacity of the landfill by 42 percent. Senate Bill (SB) 1383, effective January 1, 2022, brought regulations aimed to divert 50 percent of organic waste from landfills below 2014 levels by 2020 and 75 percent by 2025. The Strategic Plan also states the City has met and exceeded all required state mandates outlined in SB 1383.

The Project proposes to construct a shopping plaza on currently undeveloped land; therefore, no demolition is required. Construction of the Project will be subject to Construction and Demolition (C&D) waste diversion requirements under CALGreen Code Section 5.408, which mandates 65 percent diversion of C&D debris.

For Project operations, CalRecycle provides an estimate of 13 lb per 1000 SF per day for commercial projects and 3.12 lb/1000 SF/ day for supermarket projects (CalRecycle 2006). The proposed commercial structures have 31,500 sq ft of building footprint and the proposed major market has 36,000 sq ft of building footprint. Using the CalRecycle estimate, the facility would generate 521.82 lbs per day (0.26 tons per day), resulting in approximately 0.03 percent of the permitted daily throughput at the California Street Landfill.

Given the Project's compliance with applicable solid waste regulations, the minimal amount of solid waste estimated to be generated during operations, and the fact that the local landfill is operating well below its permitted daily throughput, impacts related to solid waste generation and landfill capacity would be less than significant.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.20.1 Impact Analysis

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

Less Than Significant Impact. The applicable emergency response or emergency evacuation plans for the Project area include the San Bernardino County Emergency Operations Plan (EOP) and the Redlands Local Hazard Mitigation Plan (LHMP). The EOP is administered and coordinated by the San Bernardino County Fire Department Office of Emergency Services. The concepts presented in EOP are comprised of mitigation programs to reduce the vulnerabilities to disasters and preparedness activities to ensure that capabilities and resources are available for an effective response. The purpose of the LHMP is to outline a mitigation strategy to help reduce and/or eliminate impacts from hazards within the City (City 2017a).

During construction of the Project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such trips would be infrequent and temporary. As required per Section 15.20.720 of the City Municipal Code, the fire apparatus access points and water supply for fire protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Given the Project is located in a HFHSZ, typical construction safety measures would be employed, including but not limited to, storing flammable materials away from ignition sources, suspending construction activities in Red Flag Warning conditions, and keeping idling vehicles away from brush.

During operations, points of ingress and egress would surround the entire perimeter of the Project site. Both West Lugonia Avenue and Tennessee Street would have an ingress and egress point for vehicles travelling in and out of the proposed shopping center. As required per Section 15.20.720 of

the City Municipal Code, approved fire apparatus at points of ingress and egress shall be provided for every facility, building, or portion of a building thereafter constructed or moved into or within the jurisdiction. The fire apparatus access shall comply with the requirements of City Municipal Code Section 15.20.720 and shall extend to within 150 feet of all portions of the facility and all portions of the exterior wall for the first story of the building as measured by an approved route around the exterior of the building or facility.

Compliance of all San Bernardino County Fire Protection District requirements would reduce the risk that the Project would impair an adopted emergency response plan or emergency evacuation plan, and impacts are less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. The Project site will be primarily covered with asphalt, cement, buildings, and landscaped/grassy areas. These features would not exacerbate wildfire risk. The Project site is within a HFHSZ in a Local Responsibility Area (CAL FIRE 2025). The CFC details extensive requirements for new developments within HFHSZs and wildland-urban interface areas to prevent exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Section 15.20.670 of the City's Municipal Code amends the CFC to require a FPP for all new developments (including the Proposed Project) within the wildland-urban interface area. As discussed in Section 4.9, Hazards and Hazardous Materials, the Project shall implement MM HAZ-1, which requires that an FPP be prepared to ensure less than significant impacts relating to wildfires.

Furthermore, the City has amended several sections of the CFC to address fire risks specific to local conditions. Applicable amendments for the Proposed Project include requirements for a fuel modification zone, fire department review and approval of construction documents, and the installation of fire apparatus at points of ingress and egress, and water supply infrastructure prior to and during construction, unless alternative methods of fire protection are approved (City Municipal Code Chapter 15.20).

Thus, the implementation of MM HAZ-1 and compliance with City and state regulations would result in less than significant impacts relating to wildfires.

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

Less Than Significant Impact. The Proposed Project is located within a designated HFHSZ; however, development of the currently undeveloped site with commercial buildings, paved surfaces, and irrigated landscaping would reduce the existing wildfire risk by significantly decreasing the on-site vegetative fuel load. Infrastructure improvements such as internal drive aisles, water and sewer lines, and stormwater drainage systems would be installed entirely within the Project site and would connect to existing utility systems. These improvements are typical of urban development and would not introduce features known to increase fire risk, such as elevated power lines or fuel storage. Impacts would be less than significant.

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

No Impact. As previously discussed in section 4.7.1, the Proposed Project is not within an area that has landslide susceptibility (City 2017a). The Project site is relatively flat, further demonstrating the lack of landslide potential. Additionally, as discussed in section 4.10.1, the Project site is designated as a Zone X Area of Minimal Flood Hazard (FEMA 2023). Therefore, there would be no impact from the Project associated with downslope or downstream flooding or landslides.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.21.1 Impact Analysis

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

Less than Significant Impact with Mitigation Incorporated. As discussed in the Biological Resources section, suitable burrows for burrowing owl were identified within the Project site. Mitigation measure BIO-1 would include a preconstruction survey, thus reducing impacts to less than significant.

Suitable foraging habitat for nine sensitive species including loggerhead shrike, white-tailed kite, golden eagle, Cooper's hawk, sharp-shinned hawk, northern harrier, merlin, prairie falcon, and long-eared owl, was documented within the Project site. Impacts to 8.06-acre of disturbed/ruderal habitat is not expected to result in a significant impact to regional foraging resources for these species. No mitigation is proposed.

Suitable foraging and nesting habitat for one additional sensitive species, California horned lark, was documented within the Project site. To ensure that potential adverse effects to California horned lark are reduced to a less than significant level, a focused nesting survey will be required prior to initiation of Project activities, as summarized in MM BIO-2. Therefore, the incorporation of MM BIO-1 and MM BIO-2, impacts towards sensitive species would be less than significant.

As discussed in the Cultural Resources section and Appendix B, none of the potential cultural resources identified within the Project site were determined to be eligible for listing in the NRHP, CRHR, or for designation as a City Resource (Appendix C). The Cultural Report states that the potential always remains for ground-disturbing activities to expose previously unrecorded archaeological resources. Therefore, the incorporation of MM CUL-1 through MM CUL-3 would reduce potential impacts on cultural resources to less than significant levels. As discussed in the Geology and Soils section, the potential for discovery of paleontological resources is considered low based on the middle Holocene age of soil deposits on the site. Additionally, the Proposed Project would incorporate the necessary General Plan policies such as 2-A.76 for potential archaeological and paleontological resources. Incorporation of MM CUL-1 through MM CUL-3 and compliance with General Plan policies would reduce impacts on examples of California history or prehistory to less than significant.

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

Less Than Significant Impact. As discussed throughout this document, all Project-related impacts would be less than significant, or less than significant with mitigation incorporated. Furthermore, because the Project would not result in significant or unmitigated environmental impacts in any issue area, the incremental contribution of the Project to cumulative impacts would not be considerable. The Project would not induce population growth or create new demand for public services or infrastructure beyond what has already been anticipated in existing land use and planning documents. Additionally, the Project is consistent with applicable regional plans and development patterns and would not conflict with the goals or policies designed to avoid or mitigate cumulative environmental effects. Given its limited scope and scale, the Project would not combine with other past, present, or reasonably foreseeable future projects to result in cumulatively significant impacts. Therefore, the Project’s contribution to cumulative impacts would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. Substantial adverse effects on human beings directly or indirectly are primarily resulting from impacts to air quality, geology and soil, greenhouse gas emissions, hazardous materials, land use, noise, and wildfire. From these categories, the Proposed Project would potentially result in significant noise impacts towards a future residential development. Given construction noise would exceed the 80 dBA Leq exterior noise threshold for residential uses at the future development, Tennessee Village, located north of the Project site, MM NOI-1 would require temporary construction noise barriers capable of reducing construction noise levels by a minimum of 10 dBA. Impacts would be less than significant with incorporation of MM NOI-1.

The Project does not pose any significant impacts, nor require mitigations regarding any of the other categories. As analyzed in this initial study, all impacts that would have an effect on human beings have been determined to be less than significant as the Proposed Project’s construction and operations will comply with the City’s General Plan policies and Municipal Code. Impacts, therefore, would be less than significant.

SECTION 5.0 – REFERENCES

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- 2018 East Valley Corridor Specific Plan. Division 3 – Land Use Map. Available at: https://www.cityofredlands.org/sites/main/files/file-attachments/5-ev_division_3-map_update_may_2018.pdf?1582744484
- 2022 Water Systems Master Plan. Available at: https://www.cityofredlands.org/sites/main/files/file-attachments/2022_water_systems_master_plan_reduced.pdf?1670018016
- 2023a Standard Specifications and Detail Drawings for Design and Construction of Public Improvements. Available at: https://www.cityofredlands.org/sites/main/files/file-attachments/pw_standards_spec_2023.pdf?1670265310
- 2023b City of Redlands Strategic Plan FY 22-23 Through FY 27-28. Available at: https://www.cityofredlands.org/sites/main/files/file-attachments/redlandsstrategicplan_final.pdf?1651172526
- 2024 East Valley Corridor Specific Plan. Division 3 – EV/SD – Special Development. Available at: https://www.cityofredlands.org/sites/main/files/file-attachments/ev-sd_-_special_development.pdf?1582745158
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