

5. Impacts Found Not to Be Significant

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

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

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

5.1 AESTHETICS

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

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

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

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

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

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

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

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

For example, Action 2-A.25 requires any application that would alter or demolish an undesignated and non-surveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission; Policy 2-P.18 calls for the reinforcement of Redlands' identity

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

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

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

5.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

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

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

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

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

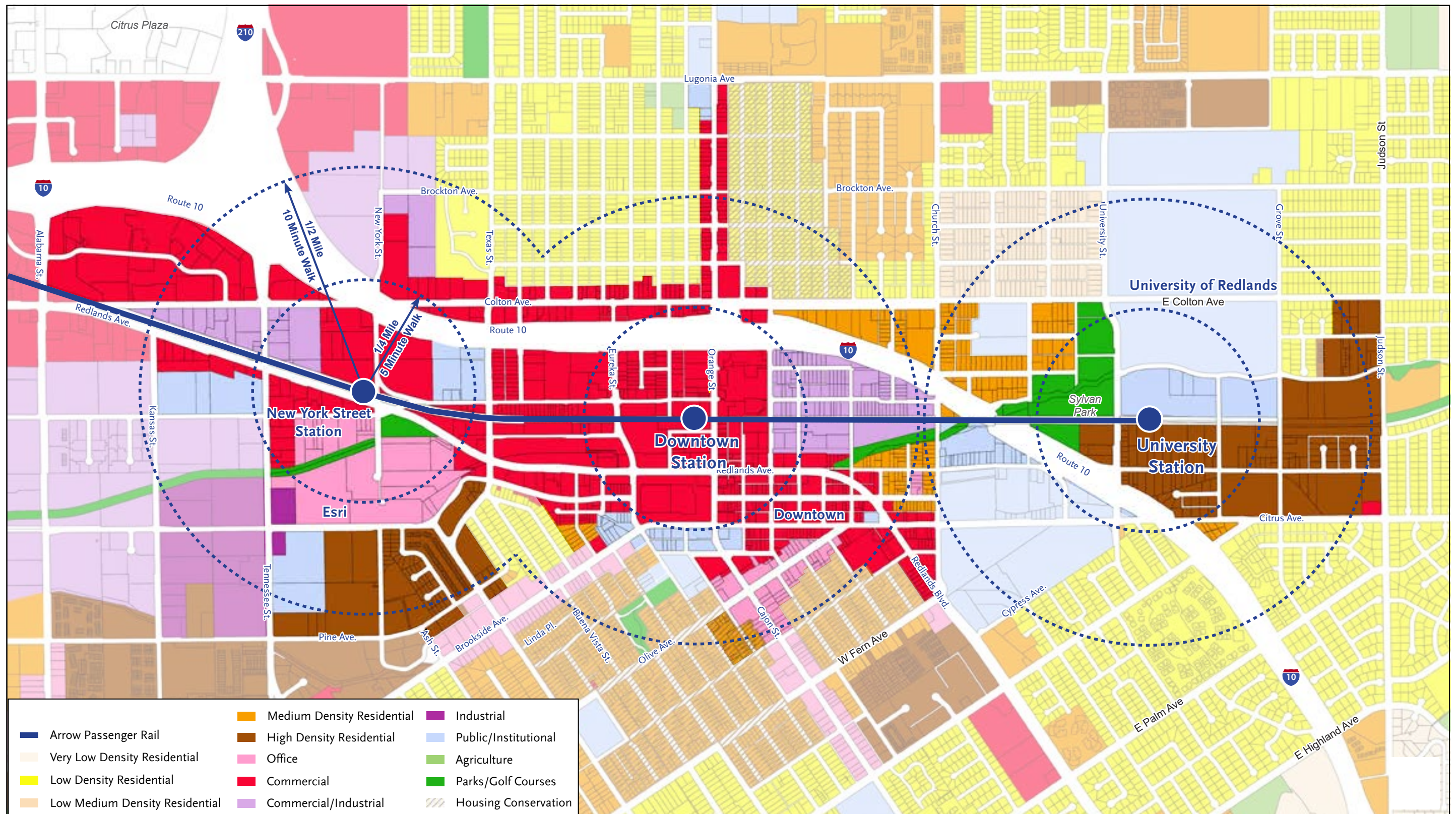
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

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

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

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

Figure 3 - Transit Village Land Use



Source: City of Redlands, 2018

0 1,200
Scale (Feet)



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

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

5.3 AIR QUALITY

Would the project:

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

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

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

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

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

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

Construction

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

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

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Operation

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Construction

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

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

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

Operation

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

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

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

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

No Impact. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Additionally, during construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. The General Plan EIR determined odor impacts would be less than significant as construction-related odors would be temporary and occur at magnitudes that would not affect a substantial number of people and because developments under the 2035 General Plan would be in compliance with all local, state, and federal regulations related to control of operation-related odors.

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

5.4 BIOLOGICAL RESOURCES

Would the project:

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

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

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

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

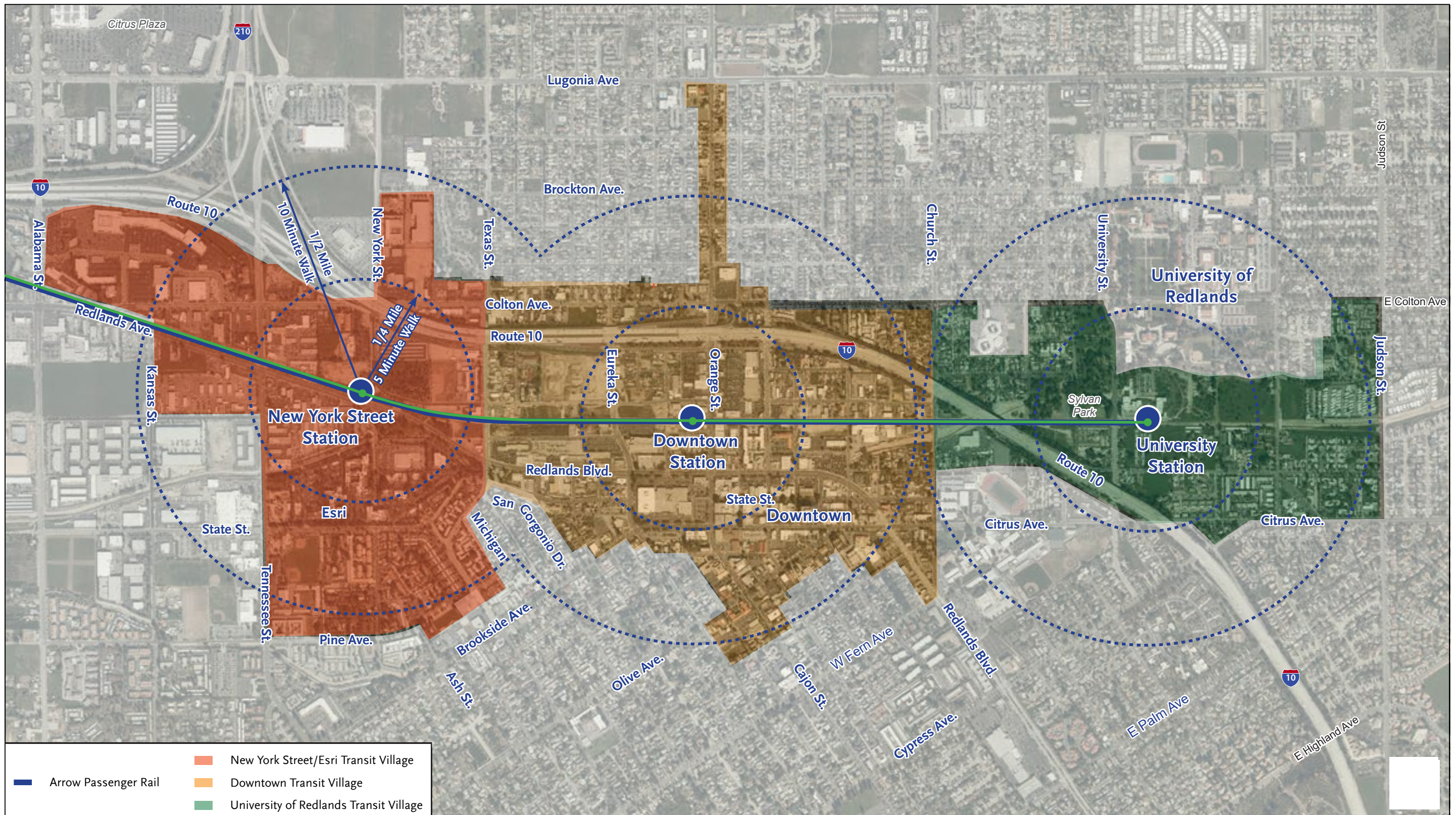
No Impact. As stated in the General Plan EIR, future development may result in significant impacts on riparian vegetation or other sensitive natural communities, especially on land with native vegetation adjacent to or immediately upstream of the Santa Ana River, Mill Creek, and San Timoteo Creek. However,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

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

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

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

Figure 4 - Aerial Photograph



Source: City of Redlands, 2018

0 1,200
Scale (Feet)



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

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

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

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

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

5. Impacts Found Not to Be Significant

5.5 CULTURAL RESOURCES

Would the project:

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

5.6 ENERGY

Would the project:

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

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

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

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

5. Impacts Found Not to Be Significant

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

5.7 GEOLOGY AND SOILS

Would the project:

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

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

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

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

5. Impacts Found Not to Be Significant

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

iii) Seismic-related ground failure, including liquefaction?

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

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

iv) Landslides?

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

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

Less Than Significant Impact. See response to 5.7(c). This impact is less than significant.

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

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

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

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

5. Impacts Found Not to Be Significant

project would impact underlying soil units or geologic formations that have a moderate to high potential to yield fossiliferous materials, prior to issuance of a grading permit; if the potential for fossil discovery is moderate to high, require applicants to provide a paleontological monitor during rough grading of the project. Therefore, impacts would be less than significant with the implementation of these policies and actions. Impacts of the proposed Project and the General Plan EIR are less than significant as identified on page 3.8-26 of the General Plan EIR.

5.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

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

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

5. Impacts Found Not to Be Significant

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

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

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

5.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

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

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

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

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

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

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

Less Than Significant Impact. According to Figure 3.7-3, *Fire Hazards and Fire Safety Services*, of the General Plan EIR, the majority of Redlands is designated by CalFire as having a Moderate fire threat level, with areas of High, Very High, and Extreme threat found on the periphery of the City and in the SOI outside of the City limits in the canyonlands, Crafton, Mentone, and in the Santa Ana Wash. As indicated in the General Plan EIR, new development that occurs pursuant to the 2035 General Plan would generally occur within areas shown with Moderate fire threat, which covers most of the already urbanized portions of the 2035 General Plan Area accessible to emergency services and managed vegetation. The Project site is located within areas classified as Moderate fire threat, according to Figure 3.7-3 of the General Plan EIR. The policies require all development to adhere to safety standards provided in the CBC and California Fire Code, and promote close coordination with the Redlands Fire Department and the fire services of neighboring jurisdictions to ensure the safety of new development. Therefore, new development would be required to comply with state building and fire codes, as well as General Plan EIR policies and actions 7-A.90, 7-A.91, 7-A.96, 7-A.117, 5-P.7, 5-A.15, 6-A.35, 7-P.12, 7-P.28, 7-A.87, 7-A.88, 7-A.89, 7-A.93, 7-A.95, 7-A.101, 7-A.102, 7-A.103, 7-A.04, 7-A.105, 7-A.106, and 7-A.82, to ensure that impacts are less than significant. For example, Action 7-A.89 requires adherence to applicable building codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code, and therefore compliance with these codes and standards would reduce impacts involving wildland fires to less than significant. Impacts of the proposed Project and the General Plan EIR are less than significant as indicated on page 3.7-47 of the General Plan EIR.

5.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

iv) Impede or redirect flood flows?

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

5. Impacts Found Not to Be Significant

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

Less Than Significant Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. Although there are no large water tanks in the area that could impact the Project site, there are dams in the region that could create flooding impacts. Thirteen dams in the greater Los Angeles area moved or cracked during the 1994 Northridge earthquake. However, none were severely damaged. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act.

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

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

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

5. Impacts Found Not to Be Significant

5.11 MINERAL RESOURCES

Would the project:

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

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

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

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

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

5. Impacts Found Not to Be Significant

5.12 NOISE

Would the project:

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

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

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

5. Impacts Found Not to Be Significant

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

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

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

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

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

5.13 PUBLIC SERVICES

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

a) Fire protection?

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

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

b) Police protection?

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

c) Schools?

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

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

d) Parks?

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

e) Other public facilities?

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

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5.14 RECREATION

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

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

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

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

5.15 TRANSPORTATION

Would the project:

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

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

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b) Result in inadequate emergency access?

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

5.16 TRIBAL CULTURAL RESOURCES

Would the project:

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

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

As stated in the General Plan EIR, the City of Redlands contacted the California Native American Heritage Commission (NAHC) in July 2016 to request a search of its Sacred Lands File, pursuant to SB 18 and AB 52. The NAHC provided a list with 13 California Native American tribes to contact in accordance with SB 18. Of these tribes, the Agua Caliente Band of Cahuilla Indians and the San Manuel Band of Mission Indians indicated that they did not identify any cultural resources but requested drafts of the 2035 General Plan policies and the cultural section of the General Plan EIR. The following General Plan EIR policies and actions would be applicable to tribal cultural resources and the protection of such resources 2-P.17, 2-A.71, 2-A.72, 2-A.73, and 2-A.74. Compliance with the actions includes Action 2-A.72 that requires applicants for projects identified by the South Central Coastal Information Center as potentially affecting sensitive resource sites hire a consulting archaeologist to develop an archaeological resource mitigation plan and to monitor the project to ensure that mitigation measures are implemented; and, Action 2-A.73 that requires that areas found during construction to contain significant historic or prehistoric archaeological artifacts be examined by a qualified consulting archaeologist (RPA certified) or historian for appropriate protection and preservation. The 2035

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

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

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

5.17 WILDFIRE

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

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

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

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would be required to comply with the General Plan EIR policies and actions aimed at ensuring that adequate emergency access is provided for existing and future development. Additionally, with the implementation of current state and federal regulations, combined with General Plan EIR policies and actions 5-A.3, 5-P.7, 5-A.15, 7-A.90, 7-A.96, and 7-A.101, the proposed Project would reduce potential impacts along emergency access routes. For example, Action 5-A.17 calls for the maintenance of access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code, and therefore, future development would continue to provide emergency access during and post-construction. As with the General Plan EIR, as identified on page 3.15-55 of the General Plan EIR, impacts of the proposed Project would also be less than significant.

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

Less Than Significant Impact. There are three primary factors used in accessing wildfire hazards – topography, weather, and fuel. The Project area is generally flat and is in a highly urbanized environment. According to Figure 3.7-3, *Fire Hazards and Fire Safety Services*, of the General Plan EIR, the Project area is in a moderate threat level area. There are no slopes in or adjacent to the Project area, and because it is urban there are fire hydrants and access to the entire TVPA. As noted above, emergency access during and post-construction will be in compliance with the 2035 General Plan. Additionally, the following General Plan EIR action aims to reduce impacts to slopes: 7-A.93. Action 7-A.93 requires that new development minimize risks to life and property through fire hazards through multiple techniques, such as assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns, etc. The combination of urban development that reduces fire fuel, existing fire hydrants and water supply for suppression, coupled with multiple access points, ensure that uncontrolled wildfire impacts are less than significant. As identified on page 3.7-46 of the General Plan EIR, the General Plan EIR, as well as the proposed Project would have less than significant impacts pertaining to exposing people or structures to fire risks, and the proposed Project and General Plan EIR have less than significant impacts on landslides, as identified on page 3.6-17 of the General Plan EIR.

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

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

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

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

5.18 REFERENCES

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5. Impacts Found Not to Be Significant

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