REVISED

CITY OF REDLANDS

CITY COUNCIL

A G E N D A

JUNE 3, 2025

MARIO SAUCEDO
Mayor

MARC SHAW
Mayor Pro Tempore

PAUL T. BARICH
Council Member

EDDIE TEJEDA
Council Member

DENISE DAVIS
Council Member

***

JEANNE DONALDSON
City Clerk

PHILLIP DOOLITTLE
City Treasurer

CHARLES M. DUGGAN JR.
City Manager

YVETTE M. ABICH GARCIA
City Attorney

5:00 p.m. Open Public Meeting, Public Comment (Closed Session)
6:00 p.m. Open Session (Public Meeting)

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City Council Chambers
Civic Center, 35 Cajon Street, Redlands, California

Recycled Paper

A G E N D A

The following information comprises the agenda for the regular meeting of the City Council of the City of Redlands at the times noted below in the City Council Chambers, Civic Center, 35 Cajon Street, Redlands, California, on:

TUESDAY, JUNE 3, 2025

To join via Zoom on a computer, laptop, or smart device
Please visit www.zoom.us, click on Join a Meeting
Enter the **Meeting ID 896 2789 8341**, then run the Zoom launcher
To join via Zoom with audio only (cell phone or landline):
Dial **1-877-853-5247**
Enter the **Meeting ID 896 2789 8341**

Should the City lose connectivity on Zoom, we will halt the meeting until it can be restored. To check on the status of remote connectivity in the event of an outage, go to the City's website at www.cityofredlands.org or to the City's Facebook page at @CityofRedlands or the Instagram page at @CityofRedlands_CityHall.

In the event the City cannot reestablish Zoom connectivity in a reasonable amount of time, the mayor will adjourn the meeting to a future date.

***PLEASE NOTE**:* Anyone desiring to speak on an agendized item at this meeting may do so during the consideration of that item. Due to time constraints and the number of persons who may wish to give oral testimony, public comments will be limited to three (3) minutes.

- **To provide comment while participating from Council Chambers:**
  - Although it is not required, speakers are encouraged to submit a "Speaker Sign Up Sheet" before the meeting is convened. Forms are available in the Office of the City Clerk or in Council Chambers.
  - After the meeting has convened, you may place the speaker form in the basket at the table along the north wall of the Chambers. Please do not disturb the City Clerk while the meeting is in progress.

- **To provide comment through Zoom (on a computer, laptop, or smart device)**:
  - Click the "Raise Hand" button and the moderator will unmute you when it is your turn to speak

- **To provide comment via audio only (cell phone or landline)**:
  - Dial *9 to "Raise Hand". The moderator will identify you by your area code and last 3 numbers of your telephone number when it is your turn to speak.



PLEASE SILENCE CELL PHONES, PAGERS AND OTHER ELECTRONIC COMMUNICATION DEVICES UPON ENTERING THE CHAMBERS

5:00 P.M.

A. **Call City Council Meeting to Order.**

B. **Public Comment**
(Any person wishing to provide public comment on a closed session matter may do so at this time.)

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C. **Recess City Council Meeting to a Closed Session**

1. Conference with Legal Counsel – Anticipated Litigation Pursuant to Government Code Sections 54956.9(d)(2) and (e)(3):
A point has been reached where, in the opinion of the legislative body of the local agency on the advice of its legal counsel, based on existing facts and circumstances, there is a significant exposure to litigation against the local agency, based on the receipt of a government claim from claimant Alexis DeLeon threatening litigation (copy available for public inspection in City Clerk's Office).

2. Conference with legal counsel: Existing Litigation - Government Code §54956.9(d)(1)
(City Attorney Garcia)

   a. Salcido v. City of Redlands, et al., San Bernardino County Superior Court, Case No. CIVSB2218452

3. Conference with legal counsel: Anticipated Litigation - Government Code §54956.9(d)(4)
(City Attorney Garcia)
One Case:
a. Possible initiation of litigation by the City.

4. Conference with real property negotiators - Government Code §54956.8
(Assistant City Manager Christopher Boatman)

Property:	APN: 0292-481-93-0000 and 0292-481-94-0000
Agency Negotiators:	Charles M. Duggan, City Manager; Christopher Boatman, Assistant City Manager
Negotiating Party:	Venkateswara R. Paladugu and Geetha K. Paladugu, Trustees of the Paladugu Family Trust
Under Negotiation:	Terms of payment and price for possible purchase of property by the City.

5. Conference with real property negotiators - Government Code §54956.8
(Assistant City Manager Christopher Boatman)

Property:	APN: 0168-343-01-0000
Agency Negotiators:	Charles M. Duggan, City Manager; Christopher Boatman, Assistant City Manager
Negotiating Party:	Kevin Sartin, Sartin Company, Inc.
Under Negotiation:	Terms of payment and price for possible sale of property by the City.

6:00 P.M.

D. **Reconvene City Council Meeting**

E. ***Invocation by Council Member Tejeda - Pledge of Allegiance***
(In keeping with long-standing traditions of legislative invocations, this City Council meeting may include a brief invocation. Such invocations are not intended to proselytize or advance any one, or to disparage any other, faith or belief. Neither the City nor the City Council endorses any particular religious belief or form of invocation.)

F. **Closed Session Report**
(No reportable action taken in closed session unless otherwise announced by the City Attorney at this time.)

G. **Presentations**

1. Presentation of Juneteenth proclamation to Pastor Donald R. Robinson, Community Missionary Baptist Church and Daphne Hawkins, Founder & President of The LOVE Program (Mayor Saucedo and Council Member Davis)

2. Presentation of the LGBTQ+ Pride Month proclamation to Salem Clawthorne (Council Member Davis)

H. **Public Comment - City Council**
(At this time, the City Council will provide an opportunity for the public to address them on any subject, within the jurisdiction of the City Council, which is not already scheduled on this agenda. However, any matter that requires action will be referred to staff for a report and possible action at a subsequent meeting. Comments will be limited to three {3} minutes.)

I. **Consent Calendar**
(The following routine items have been recommended for approval and will be acted upon simultaneously unless separate discussion and/or action is requested by a Councilmember or a member of the audience.)

1. Approve minutes of the regular meeting of May 20, 2025 (City Clerk Donaldson)

2. Authorize issuance of proclamation declaring June 19, 2025, as Juneteenth (Mayor Saucedo and Council Member Davis)

3. Authorize issuance of a proclamation recognizing June 2025 as LGBTQ+ Pride Month (Council Member Davis)

4. Approve a Memorandum of Understanding between the Counties of Los Angeles, Orange, Riverside, San Diego and the City of Redlands for Secure Access to Electronic Recording Services through SECURE Government to Government (G2G) Portal (City Clerk Donaldson)

5. Approve the sole/single source purchase order with Tierra West Advisors, Inc. in an amount not-to exceed $38,165 for real estate consulting services, and the approval of a sole/single source purchase order with Delta Private Security in an amount not-to-exceed $44,800 for on-site security services at the City's supportive housing complex (Assistant City Manager Boatman)

6. Adopt Resolution No. 8652 - Annual Engineer's Reports Preliminary Approval, and Resolution No. 8653 - Declaration of Intention to Levy Fiscal Year 25/26 Street Lighting District No. 1 and Landscape Maintenance District No. 1 Assessments (Facilities and Community Services Director Crocker)

7. Approve a request for in-kind support in the amount of $42,275.78, related to the 2025 Summer Music Festival event hosted from June 20, 2025, through August 15, 2025 by the Redlands Bowl Performing Arts, temporary street closures related to the event, and determine that the event is categorically exempt from environmental review pursuant to Section 15311(c) of the state's guidelines implementing the California Environmental Quality Act (Facilities and Community Services Director Crocker)

Recycled Paper

8. Approve the First Amendment to the Agreement for property tax management, information, and audit services with HdL Coren & Cone to increase the total agreement amount from $99,875 to $105,470 (Management Services/Finance Director Garcia)

9. Adopt Resolution No. 8686 establishing the special tax levy within the City of Redlands Community Facilities District No. 2003-1 (Redlands Business Center) (Management Services/Finance Director Garcia)

J. **Communications**

K. **Public Hearings**

1. A Public Hearing to consider the following matters concerning the 2021–2029 Housing Element Rezoning Project, implementing Housing Element Program 1.1-1:
    1. Adoption of Resolution No. 8687 to certify the Final Subsequent Environmental Impact Report prepared for the proposed project, and adopt the associated Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring & Reporting Program in accordance with the California Environmental Quality Act.

    2. Adoption of Resolution No. 8688 for General Plan Amendment No. 149 to amend the Land Use Map and change the designation of seven parcels to Medium Density Residential, change 14 parcels to High Density Residential, and change a portion of one parcel to Public/Institutional.

    3. Adoption of Resolution No. 8689 for Amendment No. 1 to Concept Plan 4 to remove three parcels from the Concept Plan No. 4 boundaries.

    4. Adoption of Resolution No. 8690 for Amendment No. 54 to the East Valley Corridor Specific Plan (Specific Plan No. 40) to remove 21 parcels from the Specific Plan's boundaries (and designate the zoning pursuant to RMC Title 18), change the land use designation of one parcel to Multiple Family Residential–2500 District (EV/2500RM), and change the land use designation of one parcel to Public/Institutional (EV/PI) District to accommodate the existing land use.

    5. Introduction of Ordinance No. 2983 for Zone Change No. 479, a proposal to amend the Zoning Map amendment to change the zone of nine parcels to Multiple Family Residential (R-2) and change 16 parcels to Multiple Family Residential (R-3) district pursuant to Title 18 (Zoning Regulations) of the Redlands Municipal Code; and change the zone of one parcel to Multifamily Residential (EV/2500RM) and a portion of one parcel to Public Institutional (EV/IP) within the East Valley Corridor Specific Plan (Specific Plan No. 40).

        The subject properties are the following APNs: 0292-163-02-0000; 0292-163-03-0000; 0292-165-05-0000; 0292-165-06-0000; 0292-165-07-0000; 0292-165-08-0000; 0292-165-09-0000; 0292-165-10-0000; 0292-165-16-0000; 0292-165-17-0000; 0292-165-04-0000; 0292-167-02-0000; 0292-167-07-0000; 0292-167-28-0000; 0292-167-29-0000; 0292-167-30-0000; 0292-167-17-0000; 0292-201-20-0000; 0292-201-14-0000; 0167-141-04-0000; 0167-141-05-0000; 0167-141-06-0000; 0169-021-02-0000; 0169-021-11-0000; 0167-151-23-0000; 0167-161-10-0000; 0292-165-15-0000.

    (Mayor to declare meeting open as a public hearing)

    (Development Services Director Desatnik)

Recycled Paper

2. Public Hearing to consider Resolution No. 8685 - Approving the Issuance of the California Municipal Finance Authority Revenue Bonds, Series 2025 (HumanGood)
(Mayor to declare meeting open as a public hearing)

(Management Services/Finance Director Garcia)

L. **New Business**

1. Consideration of Resolution No. 8692 authorizing the City Manager, or designee, to execute the Subrecipient Agreements, any amendments and all other related documents associated with the Encampment Resolution Funding (ERF-3-R) Program for an amount not-to-exceed $4,155,600 (Assistant City Manager Boatman)

2. A Public Hearing regarding a report on city vacancies and the status of recruitment and retention efforts as required by Assembly Bill 2561 (Government Code Section 3502.3) (Human Resources/Risk Management Director Meteau)

(Mayor to declare meeting open as a public hearing)

3. Consideration of a Professional Services Agreement with Carl Warren & Company, LLC., for Third-Party Liability Claims Administration for an amount not-to-exceed $663,735 (Human Resources/Risk Management Director Meteau)

4. Consideration of the Fire Department's continued participation in the CONFIRE Joint Powers Authority for Fiscal Year 2025–2026 and authorization to pay the associated annual service fee in an amount not to exceed $922,557 (Fire Chief Sessler)

5. Consideraton of a five-year Professional Services Agreement with ICS Intelesys, Inc. for Cloud VoIP Services Migration in an amount not-to-exceed $74,601 and a five-year Master Service Agreement with RingCentral, Inc. for corresponding phone hardware, software, and VoIP as a service in an amount not-to-exceed $485,548 (Management Services/Finance Director Garcia)

6. Consideration of the Citywide Annual Purchase Orders for miscellaneous tools, equipment and supplies for Fiscal Year 2025-2026 for a total not to exceed $1,080,000 (Management Services/Finance Director Garcia)

7. Consideration of the sole source purchase for 800 MHz APX 6500 and APX 6000 portable radios from Motorola Solutions in an amount not to exceed $820,031.37 (Police Chief Tolber)

M. **Individual Council Member Announcements and/or Reports on Activities**
(No collective discussion or action.)

N. **Adjournment**
The next regular meeting of the City Council will be held on June 17, 2025

Recycled Paper

If you challenge any proposed development entitlement listed on this agenda in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Council at or prior to this public hearing.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact Goutam Dobey, of the Municipal Utilities and Engineering Department at (909) 798-7584 ext 2. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

(28 CFR 35.102-35.104 ADA Title II)

Any writings or documents distributed to a majority of the City Council regarding an open session agenda item less than 72 hours before this meeting are available for public inspection at the City Clerk's Office or at the dais of the City Clerk once the open session begins.

Staff reports or other written documentation relating to items referred to on the agenda are available at the A. K. Smiley Public Library, 125 West Vine Street, Redlands, California, and on the City's website referenced below.

Regular meetings are televised live on Redlands TV Channel 3 (Spectrum) and Channel 35 (Frontier) and re-broadcast at 7:00 P.M. the following Wednesday, Friday and Sunday; and at 9:00 A.M. Thursday, Saturday and Monday. Meetings are also streamed live and archived for later viewing on demand on the City's website at www.cityofredlands.org. Agendas, staff reports and minutes of the City Council of the City of Redlands are available online at: www.cityofredlands.org.

Recycled Paper

City Council Meeting **I. 1.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Approve minutes of the regular meeting of May 20, 2025 (City Clerk Donaldson)

MOTION:

I move to approve the regular meeting minutes of May 20, 2025.

Attachments

Regular Meeting Minutes of May 20, 2025

MINUTES

Regular meetings of the City Council and the Redlands Financing Authority of the City of Redlands held in the Council Chambers, Civic Center, 35 Cajon Street, on May 20, 2025 at 5:00 P.M.

Present: Mario Saucedo, Mayor
Marc Shaw, Mayor Pro Tempore
Paul Barich, Council Member
Eddie Tejeda, Council Member
Denise Davis, Council Member

Staff: Charles M. Duggan, Jr., City Manager; Yvette M. Abich Garcia, City Attorney; Jeanne Donaldson, City Clerk; Phillip Doolittle, City Treasurer; Janice McConnell, Assistant City Manager; Chris Boatman, Assistant City Manager; Carl Baker, Public Information Officer; Danielle Garcia, Management Services/Finance Director; Brian Desatnik, Development Services Director; John Harris, Municipal Utilities and Engineering Director; Reggie Brown, Deputy Fire Chief; Stephen Crane, Deputy Police Chief; Tabitha Crocker, Facilities and Community Services Director; Robert Meteau, HR/Risk Management Director

Mayor Saucedo called the meeting to order and explained that comments could be presented in-person, via Zoom, via cell phone or landline. He offered the public an opportunity to provide comment on any item on the agenda for the closed session.

PUBLIC COMMENT

Existing Litigation - Steve Rogers addressed Item C.3, regarding the existing litigation related to Chiakowsky, et, al. v. City of Redlands, stating he had raised concerns about the engineering designs of the intersection in question at the time of its construction. He thought it unsafe and pointed to the fact that the director overseeing the project was not a licensed engineer. He said the City should settle this litigation sooner rather than later.

CLOSED SESSION

CONFERENCE WITH LEGAL COUNSEL- ANTICIPATED LITIGATION PURSUANT TO GOVERNMENT CODE SECTIONS 54956.9(d)(2) and (e)(3): A point has been reached where, in the opinion of the legislative body of the local agency on the advice of its legal counsel, based on existing facts and circumstances, there is a significant exposure to litigation against the local agency, based on the receipt of a government claim from claimant Crystal Adrianna Martinez threatening litigation (copy available for public inspection in City Clerk's Office).

Conference with legal counsel: Anticipated Litigation - Government Code §54956.9(d)(2)(e)(2) (Assistant City Manager McConnell)
One Case:
a. Facts and circumstances: Consideration of Workers Compensation claim filed by Roy Williamson.

Conference with legal counsel: Existing Litigation - Government Code §54956.9(d)(1)
(City Attorney Garcia)
One Case:

1. Chiakowsky, et, al. v. City of Redlands, et al., San Bernardino Superior Court, Case No. CIVSB2402748

RECONVENE CITY COUNCIL MEETING

The meeting reconvened at 6:00 P.M. The invocation was provided by Council Member Barich, and the Pledge of Allegiance to the American flag was conducted by Kimberly Elementary School students.

CLOSED SESSION REPORT

City Attorney Garcia announced that no reportable action was taken during the closed session.

PUBLIC COMMENT

Together for Redlands - Michael Paisner stated that the local group, Together for Redlands, should not be confused with a different organization called Stronger Together Now. He added that Together for Redlands has been the victim of hate speech and ongoing vilification. He urged the Council to condemn acts of hatred.

Unsafe Cyclists - Bruce Laycook described witnessing cyclists who are engaging in highly unsafe activities while riding in the streets, scaring drivers, weaving in and out of traffic and popping wheelies. He also said he has seen numerous cyclists riding without helmets, and he requested the Police Department investigate these matters.

Eco-Arts Proposal Community Garden - Nine people, including Brian Ball, Brenda Spoelstra, Danielle Wallis, Daniel Gohman, Young Min Kim, Abbie Bosworth, Erin Benson, Doris Dialon, Alejandro Gutierez Chavez of the Arts Council of San Bernardino highlighted a proposed project to create and establish an eco-arts community garden/home at Sylvan Park. The intent is to utilize the historic structure near the Skate Park and develop a vibrant space where people could enjoy the arts, culture, music, and a community garden. Grant money has already been secured, and they pushed for the Council to consider their plan.

Gender Identity - Gregory Brittain stated he believes there are two genders and only two genders. He thought there was an assault on truth and that young people were confused by the dialogue regarding gender identity.

Appreciation of Diversity - Jennifer, via zoom, thanked Council Member Davis for advocating for all people within the community.

CONSENT CALENDAR

Minutes

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, the regular meeting minutes of May 6, 2025.

Vote: 5 - 0 Passed

League of California Community Services Policy Report

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, to receive and file the conference report by Mayor Saucedo for the League of California Community Services Policy Committee meeting held on March 28, 2025.

Vote: 5 - 0 Passed

Software Integration Agreement

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, the Sole Source Agreement with NewEdge Services, LLC for Software Integration between Cityworks Server and Tyler Munis ERP and other professional services for a total contract not to exceed $59,300, with the option to extend the agreement for future related services.

Vote: 5 - 0 Passed

Sales, Use & Transactions Tax Audit Services Agreement

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, the Professional Services Agreement for Sales, Use and Transactions Tax Audit and Consulting Services with Hinderliter De Llamas & Associates for a period of three (3) years with two (2) one-year Extended Term options in a total amount not-to-exceed $113,300.

Vote: 5 - 0 Passed

Emergency Medical Services Field Internship Agreement

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, the Emergency Medical Services Field Internship Agreement between the City of Redlands and the San Bernardino Community College District (Crafton Hills College), designating the Redlands Fire Department as a Paramedic Clinical Field Internship Training Site for a five-year period, from July 1, 2025, through June 30, 2030.

Vote: 5 - 0 Passed

Resolution No. 8691 Staff Vacancies, Recruitment and Retention

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, Resolution No. 8691 establishing the policy for reporting on Staff Vacancies and the City's Recruitment and Retention Efforts to comply with Government Code Section 3502.3 and Assembly Bill 2561.

Vote: 5 - 0 Passed

U of R Event Services Agreement for RESA

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously determined, by roll call vote, that approval of the agreement is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the Event Services Agreement with the University of Redlands to conduct the Redlands Emergency Services Academy at the University's facility.

Vote: 5 - 0 Passed

Intergovernmental Purchase Getac Mobile Data Computers

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, an Intergovernmental Purchase of Getac Mobile Data Computers from Code 3 Technologies in the amount of $53,648.25.

Vote: 5 - 0 Passed

COMMUNICATIONS

2025 City County SBCTA Conference Report

Mayor Saucedo reported on his experiences at the 2025 City County Conference of the San Bernardino County Transit Authority (SBCTA) held May 8-9, 2025 in Lake Arrowhead. The City County Conference brings together elected officials and agency staff to discuss cooperative regional transportation planning and work towards furthering an efficient multi-modal system in the County. Sessions he attended included: Proposition 36 Implementation and Impacts; Disaster Response: Lessons Learned through Fire and Ice; and The Evolving Industrial Landscape: New Challenges and New Opportunities.

SCAQMD Proposed Amended Rules 1111 & 1121

Mayor Pro Tem Shaw explained that his request for Council to consider taking action regarding South Coast Air Quality Management District's (SCAQMD) Proposed Amended Rule 1111 (PAR 1111) and Proposed Amended Rule 1121 (PAR 1121) was introduced during the March 18, 2025 meeting and again discussed on April 1, 2025. The Council agreed to table the matter on both occasions, to allow additional time to review the revised SCAQMD proposals and to hear SCAQMD's presentation to the San Bernardino Council of Governments (SBCOG) at their April 2 meeting, related to the impacts of the PARs implementation. The

PARs seek to transition to zero-emission space and appliances, based on future effective dates when existing appliances need to be replaced.

At the April 2 SBCOG Board meeting, staff reminded the Board that at their January 8, 2025, Board meeting, they received a presentation from SCAQMD regarding PAR 1111 and 1121 and that on that same date, the Board adopted Resolution No. 25-059 opposing the PARs. Comments received from Board members at the April 2 meeting were overwhelmingly opposed to the PARs. As the SCAQMD presentation was a receive and file item, no action was taken to withdraw Resolution No. 25-59 and SBCOG's opposition to the PARs remains in place.

Furthermore, on April 2, the Redlands Chamber of Commerce's Government Review Committee meeting, the Committee voted to join the Cost of Living Council in opposition to PARs 1111 and 1121. In addition to SBCOG and the Redlands Chamber of Commerce, a number of neighboring agencies in Southern California have submitted letters of opposition to PARs 1111 and 1121, including the cities of Anaheim, Corona, Temecula, Upland, and Yorba Linda.

As public comment, Michael Paisner, Aura Vasquez, Jennifer representing the Sierra Club, Vanessa Villanueva, DeForest Barnette and Bruce Laycook supported the SCAQMD proposed rules and urged the Council to reject the letter of opposition put forward by Mayor Pro Tem Shaw. They spoke of the need for programs to reduce NOx emissions and the importance of seeking ways to transition away from fossil fuels. They suggested that by transitioning away from gas water heaters and furnaces, the rules work to save lives and eliminate "silent killers" found in homes. They pointed out that this region has the worst air pollution in the nation and to avoid serious medical outcomes, action must be taken to promote a safer and cleaner community.

Dale Broome and Gregory Brittain spoke in opposition to PARs 1111 and 1121, citing the rules placed economically harmful restrictions on homeowners and businesses, imposed compliance standards for NOx emissions that are technologically and economically unfeasible for natural gas appliance manufacturers to meet, and posed significant infrastructural challenges to an already overburdened electrical power grid. They questioned who would be funding the rebates and thought it ultimately would be the taxpayers.

Council Member Davis thanked everyone who spoke. She thought that voting against the SCAQMD programs would be in opposition to the City's Climate Action Plan, and she would not be voting to support the letter in opposition to PARs 1111 and 1121. Council Members raised concerns related to the overall costs of the program and the viability of relying on one energy source.

On motion of Mayor Pro Tempore Marc Shaw, seconded by Council Member Paul Barich, the City Council authorized, by roll call vote, the Mayor to sign a letter to SCAQMD on behalf of the City Council in opposition to Proposed Amended Rule 1111 and Proposed Amended Rule 1121.

Vote: 4 - 1 Passed

NAY: Council Member Denise Davis

PUBLIC HEARINGS

Resolution No. 8683 Traffic Survey Report & Ordinance No. 2982 Prima Facie Speed Limits

Mayor Saucedo declared the meeting open as a public hearing and called on Municipal Utilities and Engineering Director Harris to provide details of Resolution No. 8683 adopting the 2024 Engineering & Traffic Survey report and Ordinance No. 2982 amending Chapter 10.24 of the Redlands Municipal Code confirming prima facie speed limits for specified city streets.

On December 6, 2022, the City Council adopted Ordinance No. 2946, which amended RMC Chapter 10.24.030 to update speed limits throughout the City. At that time, the Council directed staff to re-evaluate speed limits following the full implementation of Assembly Bill 43 (AB 43), which grants cities greater flexibility in setting speed limits to improve roadway safety, particularly in areas with high pedestrian activity or with a history of reported traffic accidents. Prior to AB 43, speed limits were strictly determined by the 85th percentile speed. The 2024 Engineering and Traffic Survey (2024 E&TS) incorporates AB 43 provisions to ensure that appropriate speed limits are established for specific roadway conditions and safety priorities while remaining compliant with State law.

The findings of the speed surveys conducted across various street segments, were presented to the Traffic and Parking Commission (TPC) on January 23, 2025. Open house events were hosted on February 8 and February 13, 2025, to solicit public feedback on the 2024 E&TS. The TPC conducted a final review of the study on March 27, 2025, and voted 4:1 to recommend City Council approval of the 2024 E&TS. The 2024 E&TS report provides a comprehensive analysis of speed limits throughout the City and recommends speed limit reductions on fifty-five roadway segments in accordance with applicable State laws.

Council Member Tejeda was pleased with the recommended speed limit reductions on so many roads that were scattered throughout every district in the City. Council Member Barich asked whether the speed limits could be reduced by another 5 mph. Director Harris and City Manager Duggan explained that the City must remain in compliance with the law. Deviating too far below the 85th percentile could artificially create speed traps.

As public comment, Kevin Morningstar said he had thoroughly reviewed the 2025 E&TS report but expressed concerns about some of the report's conclusions. There was a lack of correlation between accident data and posted speed limits, possibly indicating that accidents were not speed-induced, but instead driver-related. He requested the Council send the matter back to the TPC for further review. Michael Paisner warned that establishing different speed limits on certain sections along one road could cause driver confusion and create a potential speed trap. Bruce Laycook suggested the Council focus on changing driver behavior and their speeding habits. Changing posted speed limits will not necessarily change driving behavior on its own, and he recommended educating the public and issuing warning tickets as a more effective way to change behavior. With no further comments, Mayor Saucedo closed the public hearing. Council Members offered their perspectives and held a brief discussion about delaying the vote, but ultimately, they agreed to support the proposed resolution and ordinance.

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously determined, by roll call vote, that the approval of Resolution No. 8683, and introduction of Ordinance No. 2982 are exempt from environmental review pursuant to Sections 15061(b)(3) of the California Environmental Quality Act; approved Resolution No. 8683 adopting the 2024 Engineering & Traffic Survey report and rescinding Resolution No. 8348; and introduced Ordinance No. 2982, amending Chapter 10.24 of the Redlands Municipal Code confirming prima facie speed limits for specified city streets.

Vote: 5 - 0 Passed

NEW BUSINESS

Traffic Signal Systems Maintenance Agreement Amended

Facilities and Community Services Director Crocker explained the need for the First Amendment to the Non-Professional Services Agreement with Yunex LLC, for Traffic Signal Systems Maintenance, to increase the Contractor's scope of services and compensation for additional services in the amount of $340,000. With the introduction of new technology and the development of the Redlands Passenger Rail Project (RPRP), maintenance has become more specialized and complex, requiring specialized services to establish and maintain.

On motion of Council Member Paul Barich, seconded by Council Member Eddie Tejeda, the City Council unanimously approved, by roll call vote, the First Amendment to the Non-Professional Services Agreement with Yunex LLC, for Traffic Signal Systems Maintenance, to increase the Contractor's scope of services and compensation for additional services in the amount of $340,000.

Vote: 5 - 0 Passed

Recycled Water Supply Agreement with SCE

Staff requested this item be pulled from the agenda, and it will be presented to the City Council at a future meeting.

FY 25/26 MUED Annual Purchase Orders

Municipal Utilities and Engineering Director Harris reviewed the FY 25/26 MUED Annual Purchase Orders for a total amount not-to-exceed $4,852,000. MUED operates and maintains critical water and wastewater utility infrastructure and facilities throughout the City's service area. The vendors will provide miscellaneous repair and maintenance supplies, chemical and laboratory products, specialized departmental materials, and on-call maintenance and contractual services on an as-needed basis.

On motion of Council Member Eddie Tejeda, seconded by Mayor Mario Saucedo, the City Council unanimously determined, by roll call vote, that approval of the FY 25/26 MUED Annual Purchase Orders is exempt from environmental review pursuant to Section 15301 of the State’s Guidelines implementing the California Environmental Quality Act; and approved the FY 25/26 MUED Annual Purchase Orders for an amount not-to-exceed $4,852,000.

Vote: 5 - 0 Passed

Water Meter Replacement Project Agreement Amendment

Municipal Utilities and Engineering Director Harris introduced the First Amendment to the Non-Professional Services Agreement with Ferguson Enterprises, LLC for the Water Meter Replacement Project to increase the total compensation amount by 2.5% to $6,915,828.08. The Project is ninety-five percent complete and staff is able to read water meters remotely as soon as they are installed. Throughout this final Project phase, several bid item quantity discrepancies were discovered. The original bid schedule underestimated the actual number of water meter vault lids, 3/4", 1", and 2" water meters and registers to be replaced within water meter reading routes 22 and 23. A First Amendment is necessary to adjust the Agreement total compensation to reconcile actual Project costs before the Project is completed. The Amendment revises the total compensation to $6,915,828.08, an increase of $168,570.12 (2.5 %) to the original Agreement's total compensation.

On motion of Mayor Pro Tempore Marc Shaw, seconded by Council Member Paul Barich, the City Council unanimously determined, by roll call vote, that approval of the First Amendment to the Non-Professional Services Agreement with Ferguson Enterprises, LLC is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the First Amendment to the Non-Professional Services Agreement with Ferguson Enterprises, LLC for the Water Meter Replacement Project to increase the total compensation amount by 2.5% to $6,915,828.08.

Vote: 5 - 0 Passed

COUNCIL MEMBER ANNOUNCEMENTS AND ACTIVITIES

Mayor Saucedo attended a Town Hall meeting hosted by Congressman Pete Aguilar, the Public Market grand opening, enjoyed reading to young children at Mountain Grove Plaza, the Boards and Badges event at the skatepark, Taco Bell's grand re-opening, participated in the Blessing Center's Hike for Hope, and he and City Manager Duggan met with Assemblymember Robert Garcia.

Mayor Pro Tem Shaw enjoyed the Library Days event and invited everyone to come downtown on Sunday, May 25 for the annual Redlands Firefighters Car Show.

Council Member Barich enjoyed the Library Days event and attended the Library Board meeting, adding that the Museum of Redlands is moving closer to being completed.

Council Member Tejeda participated in a neighborhood meeting to discuss residents' concerns about new development along Stuart Street downtown, and he attended the local Teamster meeting.

Council Member Davis enjoyed the Library Days event, the Boards and Badges event at the skatepark, and the Blue Zone program kickoff in Riverside. She reminded everyone that the Blue Zone program in Redlands had been extended, and she encouraged the community to participate in a healthy walk on Saturday mornings at Brookside Park.

ADJOURNMENT

Mayor Saucedo adjourned the City Council meeting at 7:51 P.M. in memory of Dan McHugh, who passed away last week. Dan retired in 2022, after serving 28 years as the City Attorney and the principal legal advisor to the City Council, City Manager and all operations. He was appointed in 1994 and worked alongside eighteen separate city councils. He witnessed the tremendous change in the city over nearly three decades and was intricately involved in the most important developments within the community. He held a tremendous amount of institutional knowledge, and it is hard to overstate his role in the City. He will be remembered as a highly intelligent man, with a dry wit and an incredible work ethic, and he will be greatly missed. The next regular meeting of the City of Redlands City Council will be held on June 3, 2025.

REDLANDS FINANCING AUTHORITY

Chairperson Saucedo called the meeting to order and offered anyone present the opportunity to address the Board on any subject not already on the agenda, within the jurisdiction of the Redlands Financing Authority.

PUBLIC COMMENT

None forthcoming

Minutes

On motion of Board Member Barich, seconded by Board Member Davis, the minutes of the regular meeting of January 21, 2025 were unanimously approved, by roll call vote.

Vote: 5 - 0 Passed

ADJOURNMENT

There being no further business, the Redlands Financing Authority adjourned at 7:52 P.M. The next regular meeting of the Agency will be held on September 16, 2025.

City Council Meeting **I. 2.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Authorize issuance of proclamation declaring June 19, 2025, as Juneteenth (Mayor Saucedo and Council Member Davis)

MOTION:

I move to authorize issuance of proclamation declaring June 19, 2025, as Juneteenth.

Attachments

Juneteenth 2025

PROCLAMATION

Juneteenth

WHEREAS, the City of Redlands recognizes JUNETEENTH as a citywide celebration on Thursday, June 19, 2025, in recognition of the day news reached the Black community in Texas of their emancipation from slavery on June 19, 1865, also known as Juneteenth Independence Day or Emancipation Day; and

WHEREAS, at 2 p.m. on New Year's Day, January 1, 1863, using his war powers as President, Abraham Lincoln signed the Emancipation Proclamation, providing that all persons held as enslaved within any State in rebellion against the United States "*shall be then, thenceforward, and forever free*;" and

WHEREAS, the Emancipation Proclamation made the permanent abolition of slavery a Union war aim and provided the legal framework for the emancipation of nearly all four million enslaved people, ultimately serving as the catalyst for the announcement of General Order No. 3 by United States Army general Gordon Granger, proclaiming freedom from slavery in Texas; and

WHEREAS, Congress ultimately passed the Thirteenth Amendment to the United States Constitution, which abolished slavery throughout the United States and its territories; and

WHEREAS, the City Council recognizes Israel Beal, born into slavery April 10, 1848, was freed from slavery by the Emancipation Proclamation and served as a teamster. Israel Beal was a Redlands pioneer, affectionately known as "Doc," was a property owner, teamster, builder, and business owner in the young State of California, hauling and moving houses as an early contractor from San Bernardino to Lugonia in 1883, contributing to the construction of early churches in Redlands, the City's reservoir and the original Big Bear Dam, and planting the 160-acre vineyard which now makes up part of the University of Redlands campus; and

WHEREAS, the City Council and the Human Relations Commission gratefully acknowledge the contributions made by Black community members to the enrichment of the City of Redlands;

NOW, THEREFORE, BE IT PROCLAIMED, that the City Council of the City of Redlands does hereby recognize June 19, 2025, as Juneteenth and the many contributions made by valuable residents and community leaders past and present who are committed to preserving African-American history in the City of Redlands.

IN WITNESS WHEREOF, we hereunto affix our signatures and Official Seal of the City of Redlands on this 3rd day of June, 2025

_____

Mario Saucedo, Mayor

Attest:

_____

Jeanne Donaldson, City Clerk

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City Council Meeting **I. 3.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Authorize issuance of a proclamation recognizing June 2025 as LGBTQ+ Pride Month (Council Member Davis)

MOTION:

I move to authorize the issuance of a proclamation recognizing June 2025 as LGBTQ+ Pride Month.

Attachments

LGBTQ+ Pride Month Proclamation 2025

PROCLAMATION

LGBTQ+ Pride Month

WHEREAS, the City of Redlands has a diverse community, including its LGBTQ+ residents, and welcomes people of many backgrounds in the belief that a diverse population leads to a more vibrant community through inclusion, justice, and love; and

WHEREAS, many of the residents, students, city employees, and business owners within the City of Redlands who are a part of the LGBTQ+ community contribute to the vitality and enrichment of the City; and

WHEREAS, the Stonewall Uprising was one of the most prominent gatherings for persons of diverse backgrounds and interests to come together in a unified voice to call for change and progress in LGBTQ+ civil rights; and

WHEREAS, the Stonewall Uprising is considered by many to be the catalyst that launched the modern LGBTQ+ civil rights movement and since the Stonewall Uprising, LGBTQ+ citizens have made significant progress towards equality throughout the nation; and

WHEREAS, despite being marginalized, LGBTQ+ people continue to celebrate authenticity, acceptance, and love as it is imperative that all people in our community, regardless of sexual orientation, gender identity, and expression, feel valued, safe, empowered and supported by their peers and community leaders; and

WHEREAS, the City's first crosswalk mural on Vine Street which has an LGBTQ+ theme won the 2022 American Planning Association Inland Empire Chapter Grassroots Initiative Excellence Award: and

WHEREAS, the City of Redlands denounces prejudice and unfair discrimination based on age, gender identity, gender expression, race, color, religion, marital status, national origin, sexual orientation, or physical attributes as an affront to its fundamental principles;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Redlands does hereby proclaim the month of June 2025 as Pride Month in recognition of the Anniversary of the Stonewall Uprising and the contributions made by members of the LGBTQ+ community to actively promote the principles of equality and liberty.

IN WITNESS WHEREOF, we hereunto affix our signatures and Official Seal of the City of Redlands on this 3rd day of June 2025.

_____

Mario Saucedo, Mayor

Attest:

_____

Jeanne Donaldson, City Clerk

City Council Meeting **I. 4.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Approve a Memorandum of Understanding between the Counties of Los Angeles, Orange, Riverside, San Diego and the City of Redlands for Secure Access to Electronic Recording Services through SECURE Government to Government (G2G) Portal (City Clerk Donaldson)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the Memorandum of Understanding between Counties of Los Angeles, Orange, Riverside, San Diego and the City of Redlands for secure access to electronic recording services.

RECOMMENDATION:

Staff recommends the City Council approve the Memorandum of Understanding between Counties of Los Angeles, Orange, Riverside, San Diego and the City of Redlands for secure access to electronic recording services through SECURE Government to Government (G2G) Portal.

DISCUSSION:

On June 2, 2020, the Redlands City Council entered into a Memorandum of Understanding (MOU) with the Counties of Los Angeles, Orange, Riverside, San Diego and San Bernardino to participate in an electronic recording program, SECURE G2G Portal, for a term of five years. The program has proven to be successful, as electronic recording provides for a more sustainable work environment, while offering the office greater efficiency. Electronic recording allows the Clerk's office to process documents in a fraction of the time traditional paper requires, bringing turnaround times from weeks to days. The SECURE

G2G portal also provides real-time tracking and improved document security.

To avoid any lapse in the Clerk's ability to electronically record city documents, a new MOU is made available by the Counties of Los Angeles, Orange, Riverside and San Diego, referred to as the "Owners" of the SECURE G2G Portal. The MOU defines the requirements, rules and policies needed for local agencies to participate and be authorized access to the portal and is for a term of (5) five years.

ALTERNATIVES:

The City Council may choose not to approve the Memorandum of Understanding the between Counties of Los Angeles, Orange, Riverside, San Diego and the City of Redlands for secure access to electronic recording services, but this would force the Clerk's office to process recording City documents via USPS mail.

STRATEGIC PLAN:

Not Applicable

SUBMITTED BY:
Jeanne Donaldson, City Clerk

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Jeanne Donaldson, City Clerk

Fiscal Impact

Discussion:
There is no impact to the General Fund.

Attachments

Memorandum of Understanding for E-Recording Services

MEMORANDUM OF UNDERSTANDING
BETWEEN OWNER COUNTIES AND GOVERNMENT PARTICIPANTS
FOR THE USE OF THE SECURE GOVERNMENT TO GOVERNMENT (G2G)
PORTAL

THIS MEMORANDUM OF UNDERSTANDING ("**MOU**" or "**Agreement**"), made and entered into on 6/9/2025, is between the counties of Los Angeles, Orange, Riverside, and San Diego (hereinafter collectively referred to as "**Owners**") that own the Statewide Electronic Courier Universal Recording Environment ("SECURE") with the Orange County Clerk-Recorder acting on their behalf as the Lead County, and City of Redlands the submitting party ("**Government Agency**"), recording electronically through the SECURE Government to Government (**G2G**) Portal. The Owners and Government Agency are collectively referred to as the "Parties."

WHEREAS, California Government Code Section 27279(b) states "[t]he recorder of any county may, in lieu of a written paper, accept for recording digitized images, digital images, or both, of a recordable instrument, paper, or notice if [. . .] [t]he requester and addressee for delivery of the recorded images are the same and can be readily identified as a local or state government entity, or an agency, branch, or instrumentality of the federal government."

WHEREAS, the Counties of Orange, Los Angeles, Riverside and San Diego are the Owners of the SECURE G2G Portal; and

WHEREAS, the SECURE G2G Portal functions as a separate portal under the same security framework as the existing SECURE system; and

WHEREAS, the Counties of Orange, Los Angeles, Riverside and San Diego entered into an agreement dated August 19, 2008 to share the ownership and ongoing maintenance of a multi-county G2G electronic recording portal; and

WHEREAS, Orange County is the "Lead County" in supporting this SECURE G2G Portal and is responsible for executing any agreements with participants with the approval of the other Owners.

NOW THEREFORE, the Parties, for and in consideration of the mutual promises and agreements herein continued, do agree to the following:

1. DEFINITIONS

A. Owners: means the Counties of Los Angeles, Orange, Riverside and San Diego Counties.

B. Lead County: means the County of Orange as the designated lead in developing and supporting the multi-county system and responsible for handling the administrative

functions, negotiating and executing any contract relating to the support and maintenance of SECURE.

C. **Partner County or Partner Counties:** means non-owner counties that have contracted to use SECURE**.**

D. **SECURE G2G Portal:** means the SECURE Government to Government Portal.

E. **Government Agency:** means a government entity, other government agency, or a county department of the Owners that submits package(s) of documents electronically to an Owner or Partner County using the SECURE G2G Portal for the purpose of electronically recording under this MOU.

F. **SECURE:** means the Statewide Electronic Courier Universal Recording Environment used by multiple counties to electronically receive and return documents for recording.

G. **Government to Government:** means the acts of a county recorder recording a document for a Government Agency through the SECURE G2G Portal.

H. **Operational Issues:** means issues regarding the business rules that dictate what can be recorded by an individual Owner county or Partner County.

I. **Technical Issues:** means issues regarding how the SECURE G2G Portal electronically receives and returns recordable documents.

J. **Infrastructure:** means the non-software components used to electronically receive and return recordable documents through the SECURE G2G Portal.

2. PURPOSE

The purpose of this MOU is to define the requirements, rules and policies needed for Parties to share in the use of the SECURE G2G Portal to electronically record documents in a secure electronic recording environment.

3. TERM

This Agreement shall become effective upon the signature of the Parties for a term of 5 years unless terminated in writing by either party in accordance with this Agreement. The parties, by written agreement, may extend the agreement for no more than one additional year.

4. FEES and COST

Government Agency is exempt from fees for SECURE G2G Portal system use, maintenance and technical support. Government Agency may be held responsible to pay any other applicable fees, taxes, and other charges, however denominated, for the recordation of

documents. Government Agency is responsible for startup costs, which may include reimbursements for setup and tokens if applicable.

5. Eligibility

Established Government Agencies at the local, state or federal level, as defined below, will be allowed to submit legal documents for electronic recording through the SECURE G2G Portal pursuant to California Government Code section 27279(b), which states in part "[t]he recorder of any county may, in lieu of a written paper, accept for recording digitized images, digital images, or both, of a recordable instrument, paper, or notice if [. . .] [t]he requester and addressee for delivery of the recorded images are the same and can be readily identified as a local or state government entity, or an agency, branch, or instrumentality of the federal government."

6. SECURE G2G Portal Recording Requirements

SECURE G2G Portal recording requirements and specifications are generally set forth in Attachment A and Attachment B, incorporated herein by reference, to this Agreement.

6.1 Government Agency shall comply with any and all requirements and specifications of the Agreement and in Attachments A and B (collectively Attachments).

6.2 Government Agency understands that the requirements and specifications may change from time to time.

6.3 Government Agency understands that the requirements and specifications set forth in the attachments could be specific to individual Owner or Partner Counties.

6.4 Government Agency acknowledges that the recording requirements and specifications contained in the attachments may not be exhaustive of the recording requirements for the individual Owners and Partner Counties.

6.5 Owners will provide written notice to the Government Agency within 30 days if there are any changes to the requirements or specifications.

6.6 Attachment A – Provides the technical specifications including submission methods, communication protocol security framework and imaging standards.

6.7 Attachment B – Contains the processing schedules, hours of operation, policies, sample document types and authority, technical service contact and security incident contact information for electronic recording with each individual Owner or Partner County.

7. Government Agency Acknowledgments and Responsibilities

7.1 Government Agency must supply all electronic recording equipment, i.e., computer, monitor, scanner, printer, an internet connection and a token from the Lead County, if applicable.

7.2 The electronic documents or records shall be considered the "original" record of the transaction in substitution for, and with the same intended effect as, paper documents or records. In the case that such documents or records bear a digital or electronic signature, those signatures shall have the same effect as paper documents or records bearing handwritten signatures.

7.3 Government Agency is responsible for the accuracy, completeness and content of documents submitted for recording through the G2G portal.

7.4 Government Agency shall immediately notify Lead County of any security incident, including but not limited to attempts at or actual unauthorized access which could compromise or otherwise adversely affect SECURE's data systems.

7.5 Government Agency shall ensure that all security measures and credentials implemented are protected. Government Agency assumes all responsibility for documents submitted through unique credentials provided to Government Agency for the purposes of engaging in G2G recording.

7.6 Government Agency is responsible for receiving and verifying receipt of documents recorded to ensure that the source of the receipt is the county where the document was to be recorded.

7.7 Government Agency shall address all Operational Issues related to the electronic recording process with the individual Owner or Partner Counties.

7.8 Government Agency shall notify the Lead County of all problems involving Technical Issues. Government Agency shall work in good faith with the Lead County to resolve any Technical Issues. Resolution of Technical Issues may require Government Agency to provide onsite access to Lead County.

7.9 Government Agency shall comply with each county's individual recording requirements. Government Agency's submission of a document via the SECURE G2G Portal for transmission to a particular county for recording does not guarantee the document will be recorded by that individual county. Each Owner or Partner County may have its own specific requirements for the recordation of documents including, but not limited to, document types authorized for recording and payment methods. Documents not meeting a county's specific requirements for recording may be rejected by the respective county.

7.10 Following the electronic recordation of a document, Government Agency agrees to deliver the original document and/or notify the real party in interest.

8. Lead County Responsibilities

8.1 Lead County shall conduct ongoing monitoring of the SECURE G2G Portal to protect the integrity of the transmission process.

8.2 Lead County shall test and maintain the SECURE G2G Portal software and hardware.

8.3 If the SECURE G2G Portal experiences delays or power failures that interfere with the normal course of business, the Lead County will work with the individual Owner or Partner County and Government Agency until the problem has been remedied.

8.4 Lead County will coordinate the SECURE G2G Portal administration, training, policy creation, access control and establishment of contracts required for Government Agency to submit to Partner Counties.

8.5 Lead County shall facilitate communication between Government Agency and Owner or Partner Counties.

9. SECURE G2G Portal Review

Government Agency's right to submit documents under this Agreement is subject to Owners review and acceptance of Government Agency's standards and procedures. Such approval will not be unreasonably withheld by Owners. This review is to confirm that all requirements of this Agreement are met.

10. General Recording Requirements

Submission, acceptance, recording and rejection of any document must comply with all applicable federal, state and local laws. County specific recording requirements are generally set forth in Attachment B.

11. Suspension

Lead County, with the concurrence of all the other Owners, may suspend Government Agency's submission of documents to the SECURE G2G Portal, restrict access, or deny access to Government Agency and any of Government Agency's individual staff members at any time in its sole discretion as it deems necessary.

Notice of suspension will be immediately provided to Government Agency by Lead County on behalf of Owners. Government Agency may resume submission upon satisfactory resolution of the reason for suspension after notification from the Lead County. Whether a matter is resolved is determined solely by the SECURE Owners.

The following is a non-exhaustive list of reasons for suspension:

11.1 To protect the public interest.

11.2 To protect the integrity of public records.

11.3 To protect real property owners from financial harm.

11.4 To prevent fraud.

11.5 For Government Agency's violation of, or to prevent the violation of, any federal, state, or local law.

11.6 For Government Agency's failure to notify Lead County of modifications which could compromise or otherwise adversely affect SECURE's data systems.

11.7 For Government Agency's default of any provision of this Agreement.

12. <u>Limitation of Liability</u>

Owners and Partner Counties shall be held harmless from and not incur any liability for any damages whatsoever caused either directly or indirectly for:

12.1 Information electronically transmitted by the Government Agency.

12.2 Any breach of security, fraud or deceit resulting from electronic recording.

12.3 Damages resulting from software, hardware, or other equipment failure.

12.4 Delays or power failures that interfere with the normal course of electronic recording.

12.5 Restricting or terminating Government Agency's ability to electronically record documents.

12.6 Claims, disputes or legal actions concerning an electronic transaction, including, but not limited to, the accuracy, completeness or content of documents submitted for recording.

12.7 Government Agency, Owners and Partner Counties shall not be liable to each other for:

12.7.1 Any special, incidental, exemplary or consequential damages arising from or as a result of any delay, omission or error in the electronic recording transmission or receipt.

12.7.2 Any failure to perform processing of the transactions and documents where such failure is beyond the party's reasonable control (including, without limitation, any mechanical, electronic or communications failure, which prevents the parties from transmitting or receiving the electronic recording transactions).

12.7.3 Except for payment and indemnity obligations hereunder, any cessation, interruption or delay in the performance of an obligation hereunder due to earthquake, flood, fire, storm, natural disaster, act of God, war, armed conflict, terrorist action, labor strike, lockout boycott, provided that the party relying

upon this paragraph: (a) shall have given the other party written notice thereof promptly and, in any event within five (5) days of discovery thereof and, (b) shall take all reasonable steps reasonably necessary under the circumstances to mitigate the effects of the force majeure event upon which such notice is based in the event the force majeure event described in this paragraph extends for a period in excess of three (3) days.

13. Indemnification

13.1 Owners shall not be responsible for any damage or liability occurring by reason of any acts or omissions on the part of Government Agency under or in connection with any work, authority or jurisdiction delegated or determined to be the responsibility of Government Agency under this Agreement. It is also understood and agreed that pursuant to Government Code Section 895.4, Government Agency shall fully indemnify, defend, and hold Owners and their respective officers, employees, and agents harmless from, and against, any claims, demands, liability, damages, costs (including attorney's fees), and expenses, including, without limitation, those involving bodily injury, death, or personal injury of any person or property damage of any nature whatsoever (collectively "Claims"), arising from, or related to, any acts or omissions on the part of the Government Agency under or in connection with any work, authority or jurisdiction delegated to or determined to be the responsibility of Government Agency under this Agreement, except to the extent caused by the sole negligence or willful misconduct of the Owners. This provision shall survive termination or expiration of this Agreement.

13.2 Notwithstanding section 13.1 above, in the event the Government Agency under this Agreement is a county department of an Owner, such Government Agency's indemnification obligations to each other Owner hereunder shall not exceed each Owner's indemnification obligations under that certain Multi-County Agreement Between the Counties of Los Angeles, Orange, Riverside, and San Diego for Shared Ownership and Ongoing Maintenance of an Electronic Recording Delivery System (the "Multi-County Agreement").

13.3 In the event of fraud that arises directly or indirectly from Government Agency's submission of a document through the SECURE G2G Portal for electronic recording that impacts the value of or title to real estate, Government Agency shall defend and indemnify the Owners against any Claims (as defined in section 13.1, above) for any G2G electronic recording transaction in which the Government Agency engages.

14. Termination

14.1 Either party may terminate this Agreement for any reason by providing 30 calendar days' written notice of termination.

14.2 Owners may terminate this Agreement immediately if Government Agency is in default of any of the terms of this Agreement.

14.3 Notwithstanding any other provision of this Agreement, the Owners may terminate this Agreement immediately at any time in its sole discretion as it deems necessary. The following is a non-exhaustive list of reasons for termination:

14.3.1 To protect the public interest.

14.3.2 To protect the integrity of public records.

14.3.3 To protect real property owners from financial harm.

14.3.4 To prevent fraud.

14.3.5 For Government Agency's violation of, or to prevent the violation of, any federal, state or local law.

14.4 The indemnification and limitation of liability provisions of this Agreement shall survive any termination of this Agreement.

15. Dispute Resolution

Owners and Government Agency will attempt, in good faith, to resolve any controversy or claim arising out of or relating to G2G electronic recording through either negotiation or mediation prior to initiating litigation.

16. Governing Laws and Venue

This Agreement has been negotiated and executed in the State of California and shall be governed by and construed under the laws of the State of California. In the event of any legal action to enforce or interpret this Agreement, the sole and exclusive venue shall be a court of competent jurisdiction located in Orange County, California.

17. Amendment

Any amendments or modifications to this Agreement shall be in writing duly executed by each party's authorized official, which shall become effective at a time mutually agreed upon by the Parties. No alteration or variation of the terms of this Agreement shall be valid unless made in writing and signed by the parties hereto, and no oral understanding or Agreement not incorporated herein shall be binding on either party.

18. Assignment

This Agreement shall not be assigned by a party, either in whole or in part, without prior written consent of other party. Any assignment or purported assignment of this Agreement by a party without the prior written consent of the other party will be deemed void and of no force or effect.

19. Entire Agreement

This Agreement contains the entire and complete understanding of the Parties and supersedes any and all other agreements, oral or written, with respect to the terms under this Agreement.

20. Parties in Interest

None of the provisions of this Agreement or any other document relating hereto provides any rights or remedies to any person other than the Parties hereto and the Partner Counties and their respective successors, transferees, assumers and assigns, if any.

21. Privileged and Confidential Information

The Government Agency agrees that all personal information, which is considered privileged and confidential under state law contained within the documents submitted for recording will not be released by the Government Agency to any individual or other legal entity who would not otherwise have authorized access to such information. Any release of information by the Government Agency to any unauthorized individual or other legal entity may result in the Owners terminating this Agreement.

22. Waiver

No waiver of the breach of any of the covenants, agreements, restrictions, or conditions of this Agreement by Owners shall be construed to be a waiver of any succeeding breach of the same or other covenants, agreements, restrictions, or conditions of this Agreement. No delay or omission of Owners, in exercising any right, power or remedy herein provided in the event of default shall be construed as a waiver thereof or acquiescence therein, or be construed as a waiver of a variation of any of the terms of this Agreement.

23. Severability

If any term or portion of this Agreement is held to be invalid, illegal, void or otherwise unenforceable by a court of competent jurisdiction, the remaining provisions of this Agreement shall continue in full force and effect.

24. Sections and Attachments

All sections and attachments referred to herein are attached hereto and incorporated by reference.

25. Headings

The Agreement captions, clause, section and attachment headings used in this Agreement are inserted for convenience of reference only and are not intended to define, limit or affect the construction or interpretation of any term or provision hereof.

26. No Presumption Against Drafter

This Agreement is deemed to have been drafted jointly by the Parties. This Agreement shall be construed without regard to any presumption or rule requiring construction against or in favor of the party receiving a particular benefit under this Agreement. No rule of strict construction will be applied against any party or person.

27. Notices

Any notice requirement set forth herein shall be in writing and delivered to the appropriate party at the address listed in this subparagraph. Notice shall be given by electronic mail or deposited in the United States mail, postage prepaid, to the parties listed below. Addresses for notice may be changed from time to time by written notice to the other party. All communications shall be effective when actually received; provided, however, that nonreceipt of any communication as the result of a change in address of which the sending party was not notified or as the result of a refusal to accept delivery shall be deemed receipt of such communication. For reporting a security incident, the Government Agency shall also report the incident to the Lead County at the email address specified below.

Government Agency

City of Redlands
Attn: City Clerk
35 Cajon Street, Suite 4
Redlands, Ca 92373
Email: jdonaldson@cityofredlands.org

Lead County:

Orange County Clerk-Recorder
Attn: SECURE G2G Coordinator
601 N. Ross Street
Santa Ana, CA 92701
Email: SECURESupport@rec.ocgov.com

28. Signatures in Counterparts:

This MOU may be executed in counterparts by the parties. This MOU is in effect as to any signatory party upon execution and, for purposes of enforcement, true copies of signatures shall be deemed to be original signatures.

IN WITNESS WHEREOF, the parties hereto have caused this MOU to be executed and attested to by their proper officers thereunto duly authorized and their official seals to be hereto affixed, as of the day and year first above written.

--Signatures Follow--

OWNERS

THE COUNTY OF ORANGE AS LEAD COUNTY:

Approved By: Hugh Nguyen

Signature: _____
Orange County Clerk-Recorder

Date: _____

THE OFFICE OF THE ORANGE COUNTY COUNSEL
APPROVED AS TO FORM

Signature: _____
Title: Deputy County Counsel
Dated: _____

GOVERNMENT AGENCY

DEPARTMENT OF (Government Agency): City of Redlands

COUNTY: San Bernardino

Approved By: Mario Saucedo

Signature: _____

Title: Mayor

Date: _____

Attest:

_____
Jeanne Donaldson, City Clerk

Attachment A - Technical Specifications

1. Submission Methods

SECURE G2G Portal User Interface (UI) – Government Agencies who will be scanning paper or uploading image files directly into the SECURE G2G Portal must use a token for authentication. Government Agencies will receive recording confirmation via the UI. The UI allows user to upload a pre-scanned 300 DPI TIFF Group IV image or use a browser scanner TWAIN plugin.

SECURE G2G Portal Web API (API) – Government Agencies that directly connect to the API must adhere to the XSD standard. The XML files that are uploaded must include Base64 encoded 300 DPI TIFF Group IV image files. This process does not require a user to be involved in the transfer; it is an automatic process that will be programmed by the submitter in conjunction with the County. Government Agencies will receive recorded information via XML return package.

2. Communications Protocol

HTTPS is required for the submission of instruments.

3. Security Framework

The required security framework is provided for in the SECURE G2G Portal software. The SECURE G2G Portal software shall use a minimum of 128-bit file and image encryption. Industry standard Secure Sockets Layer (SSL) and user login with password that is encrypted shall be employed. User passwords are controlled by the Government Agency and at a minimum changed at 90-day intervals to reduce security exposure.

a) Endpoint Security (Authentication Token) - Government Agencies will require one token for each agency staff member that will be utilizing the UI. For use of the token to submit documents through the SECURE G2G Portal for recording electronically, please refer to the SECURE G2G Portal User Manual.

b) Computers and User Accounts

Government Agency computer(s) connected to the SECURE G2G Portal must be dedicated workstations for G2G recording only. Government Agency computers utilized for such are required to comply with a workstation checklist provided by Lead County.

Computers that connect to SECURE G2G Portal will have system and application logging enabled with a retention period of 3 months. Lead County may request reports of user access and transaction activity.

Workstations used to submit, retrieve, or, when applicable, return SECURE G2G Portal payloads are protected from unauthorized use and access. As a minimum, workstations shall meet all of the following requirements:

- Anti-malware software configured to start on system boot-up.
- All critical operating system patches applied within one month from when the patch first becomes available.
- A hardware firewall installed and maintained.
- Up to date virus scan software that shall check for definition updates every twenty-four hours.
- A full virus scan configured to run weekly at a minimum.
- Installed applications shall be limited to the purpose of performing the necessary operational needs of the recording process as defined by the County Recorder.
- Screen Lock must be configured for activation after 10 minutes of inactivity.

Shared user accounts may not be issued. At no time shall more than one person be authorized access to SECURE G2G Portal using a single SECURE G2G Portal user account or set of identity credentials. Each person shall be uniquely identified. If a user's status changes, so that access to SECURE G2G Portal is no longer required, the user's SECURE G2G Portal account and identity credentials shall be disabled and revoked, but not deleted from the system. SECURE G2G Portal user accounts and identity credentials are non-transferable.

c) Imaging Standards

The following imaging standards shall be complied with:

- Documents must be scanned or uploaded at 300 DPI TIFF Group IV image or use a browser scanner TWAIN plugin.
- Documents will be scanned in portrait mode.
- All pages, including attachments, must be numbered sequentially.
- Documents must be scanned to original size.
- Document details, such as margins, font size and other similar requirements, must meet all applicable state statutes as set out in Government Code Section 27361 et seq.

City Council Meeting **I. 5.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Approve the sole/single source purchase order with Tierra West Advisors, Inc. in an amount not-to exceed $38,165 for real estate consulting services, and the approval of a sole/single source purchase order with Delta Private Security in an amount not-to-exceed $44,800 for on-site security services at the City's supportive housing complex (Assistant City Manager Boatman)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motions are provided:

1. I move to approve a sole/single source purchase order with Tierra West Advisors, Inc. in an amount not-to exceed $38,165 for the provision of real estate consulting services; and

2. I move to approve a sole/single source purchase order with Delta Private Security in an amount not-to-exceed $44,800 for on-site security services at the City's supportive housing complex.

RECOMMENDATION:

Staff recommends that the City Council approve a sole/single source purchase order with Tierra West Advisors, Inc. in an amount not-to exceed $38,165 for the provision of real estate consulting services, and approve a sole/single source purchase order with Delta Private Security in an amount not-to-exceed $44,800 for on-site security services at the City's supportive housing complex.

DISCUSSION:

The Homeless Solutions Division is responsible for connecting people experiencing homelessness in the City with appropriate resources. The Homeless Solutions Division partners with local nonprofit and government entities to connect homeless persons with resources such as shelter, transitional housing, food assistance, outreach services, mental health counseling, substance abuse treatment, and more.

The City operates a Supportive Housing Complex (Good Nite Inn) ("facility"). The facility was previously managed by Shangri-La Project Homekey ("Shangri-La"). The partnership with Shangri-La and the City ended, and there was an immediate need to procure the services of a real-estate consultant to assist staff with the contractual requirements of day-to-day operation of the facility, including, but not limited to, identifying alternative management ownership. Per the City's purchasing regulations, staff issued sole/single source purchase orders totaling $30,000. However, it has been determined that additional services are required, and issuing a request for proposals and possible selection of an alternative contractor would adversely affect the ability of the Division to continue efforts to resolve the operational needs of the facility. Therefore, staff is requesting that the City Council approve a sole/single source purchase order with Tierra West Advisors, Inc. in an amount not-to exceed $38,165 for the provision of real estate consulting services to cover services already rendered and those that will be rendered going forward.

While the partnership with Shrangi-La ended, the project remains fully operational, as intended, and continues to require on-site security at the facility. For continuity of services, staff issued sole/single source purchase orders totaling $30,000 for the on-site security services until a formal Request for Bid can be published and awarded. As the total for these interim services will and have exceeded the amount of $30,000, staff is requesting that the City Council approve a sole/single source purchase order with Delta Private Security in an amount not-to-exceed $44,800.

ALTERNATIVES:

City Council may elect not to approve the sole source purchase orders, however this will adversely affect the operation of the Division.

STRATEGIC PLAN:

Supports Strategic Plan Priority B - Public Health and Safety

SUBMITTED BY:
Chris Boatman, Assistant City Manager

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Ashley Rosario, Management Analyst

Fiscal Impact

Fiscal Year:	FY 2024-25
Revenue Generating:	N
Appropriation Required Y/N:	N
Amount:	$82,965
Budgeted Y/N:	Y
Account No.:	101300.300008

Discussion:

Sufficient funding for these services are included in the Homeless Solutions Division's (101300.300008) budget for Fiscal Year 2024-25 as approved by City Council. Costs associated with any future renewal terms of the agreement will be included in subsequent budget requests prepared by the Department.

Attachments

Delta Security SS PKT
Tierra West SS PKT

Sole Source/ Single Source/ Standardization Form

For procurement of supplies, equipment and services valued at $5,000 and over

NOTE: Every question must be answered with appropriate documentation attached; incomplete forms will be immediately rejected by Purchasing.

Date: 5/1/25

To: Purchasing Division

From: Homeless Solutions Division/FCS

Estimated Total Cost: $ 44,800

Proposed Vendor: Delta Private Security

Request Term: FY 2024-25

This form must accompany the purchase document whenever an exception to the competitive process is requested. Requests for goods and/or services from a specific vendor or limited to a specific brand, where substitutes to the recommended vendor or brand are unacceptable, must be accompanied by a written justification explaining the circumstances that make alternatives unacceptable.

The City Manager will determine whether the justification is appropriate. Requests for exception must be supported by factual statements that will pass an audit.

Doc ID: 23ee720e06f0270e0e17b6ee80b3f07bff8038ed

INSTRUCTIONS

1. Please check all applicable categories (a. through i.) below and provide additional information where indicated.

☐ a. The requested product is an integral repair part or accessory compatible with existing equipment.

Existing Equipment: _____

Manufacturer/Model Number: _____

Age: _____

Current Estimated Value: _____

☐ b. The requested product has unique design/performance specifications or quality requirements that are not available in comparable products.

☐ c. I have standardized the requested product and the use of another brand/model would require considerable time and funding to evaluate.

☐ d. The requested product is one in which I (and/or my staff) have specialized training and/or extensive expertise. Retraining would incur substantial cost in time and/or funding.

☐ e. The requested product is used or demonstration equipment available at a lower-than-new cost.

☐ f. Repair/Maintenance service is available only from manufacturer or designated service representative.

☐ g. Upgrade to or enhancement of existing software is available only from manufacturer.

☐ h. Service proposed by vendor is unique; therefore, competitive bids are not available or applicable.

■ i. Other factors (provide detailed explanation in #2 below).

2. Provide a detailed explanation and pertinent documentation *for each category* checked in item 1 above. Attach additional sheets if necessary:

See Attached

Doc ID: 23ee720e06f0270e0e17b6ee80b3f07bff8038cd

The City operates a Permanent Supportive Housing Complex (Good Nite Inn). The facility was previously managed by Shangri-La Project Homekey. While managing the facility, Shangri-La selected Delta Security for on-site security needs.

While the partnership with Shangri-La and the City ended, there continues to be a need for on-site security at the facility. For continuity of services, this sole source PO request is being made to cover this service until a formal Request for Bid can be published and awarded.

Doc ID: 23ee720e06f0270e0e17b6ee80b3f07bff8038cd

3. Was an evaluation of other equipment, products, or services performed?
☐ Yes ■ No
If yes, please explain the type of evaluation performed and provide all supporting documentation:

4. List below the name of each individual who was involved in the evaluation, if conducted, and in making the recommendation to procure this product or service. Attach additional information, if necessary.

5. **Explain what action(s) the department would take if the sole/single source services were no longer available**

Staff would issue a Request for Bid for the services, however, there is an immediate need for services until the RFB can be completed.

6. I certify that the above information is accurate to the best of my knowledge, and a signed copy of this document will be kept on file and available for audit in my department

Ashley Rosario 5/1/15
Prepared by Date

05 / 05 / 2025
Department Director Date

Purchasing Approvals

Purchasing Agent Approval Date

City Manager Approval Date

Title	Sole Source Forms for Tierra West & Delta Security
File name	FY_24-25_So...ra_West.pdf and 1 other
Document ID	23cc729a06f0270e0c17b6ee80b3f07bff8938cd
Audit trail date format	MM / DD / YYYY
Status	Signed

Document History

SENT	**05 / 02 / 2025** 16:00:26 UTC	Sent for signature to Christopher Boatman (cboatman@cityofredlands.org) from arosario@cityofredlands.org IP: 47.179.65.195
VIEWED	**05 / 05 / 2025** 16:26:17 UTC	Viewed by Christopher Boatman (cboatman@cityofredlands.org) IP: 47.181.153.216
SIGNED	**05 / 05 / 2025** 16:27:04 UTC	Signed by Christopher Boatman (cboatman@cityofredlands.org) IP: 47.181.153.216
COMPLETED	**05 / 05 / 2025** 16:27:04 UTC	The document has been completed.

Sole Source/ Single Source/ Standardization Form

For procurement of supplies, equipment and services valued at $5,000 and over

NOTE: Every question must be answered with appropriate documentation attached; incomplete forms will be immediately rejected by Purchasing.

Date: 5/1/25

To: Purchasing Division

From: Homeless Solutions Division

Estimated Total Cost: $ 38,165

Proposed Vendor: Tierra West Advisors

Request Term: FY 2024-2025

This form must accompany the purchase document whenever an exception to the competitive process is requested. Requests for goods and/or services from a specific vendor or limited to a specific brand, where substitutes to the recommended vendor or brand are unacceptable, must be accompanied by a written justification explaining the circumstances that make alternatives unacceptable.

The City Manager will determine whether the justification is appropriate. Requests for exception must be supported by factual statements that will pass an audit.

INSTRUCTIONS

1. Please check all applicable categories (a. through i.) below and provide additional information where indicated.

☐ a. The requested product is an integral repair part or accessory compatible with existing equipment.

Existing Equipment: _____

Manufacturer/Model Number: _____

Age: _____

Current Estimated Value: _____

☐ b. The requested product has unique design/performance specifications or quality requirements that are not available in comparable products.

☐ c. I have standardized the requested product and the use of another brand/model would require considerable time and funding to evaluate.

☐ d. The requested product is one in which I (and/or my staff) have specialized training and/or extensive expertise. Retraining would incur substantial cost in time and/or funding.

☐ e. The requested product is used or demonstration equipment available at a lower-than-new cost.

☐ f. Repair/Maintenance service is available only from manufacturer or designated service representative.

☐ g. Upgrade to or enhancement of existing software is available only from manufacturer.

■ h. Service proposed by vendor is unique; therefore, competitive bids are not available or applicable.

☐ i. Other factors (provide detailed explanation in #2 below).

2. Provide a detailed explanation and pertinent documentation *for each category* checked in item 1 above. Attach additional sheets if necessary:

The City's Homeless Solutions Division is in need of real estate consulting services specific to homeless services, including knowledge of grant requirements, third party housing facilities (good nite inn facility). These services are time sensitive requiring the use of a vendor that has confirmed they are immediately available to provide the necessary services to the City.

Doc ID: 23aa720a06f0270a0a17b6aa80b3f07bff8038ad

3. Was an evaluation of other equipment, products, or services performed?
☐ Yes ■ No
If yes, please explain the type of evaluation performed and provide all supporting documentation:

4. List below the name of each individual who was involved in the evaluation, if conducted, and in making the recommendation to procure this product or service. Attach additional information, if necessary.

5. **Explain what action(s) the department would take if the sole/single source services were no longer available**

The City would issue a Request for Proposal for the services, however, that option will adversely affect the division's operations.

6. I certify that the above information is accurate to the best of my knowledge, and a signed copy of this document will be kept on file and available for audit in my department

Ashley Rosario 5/1/15
Prepared by Date

05 / 05 / 2025
Department Director Date

Purchasing Approvals

Purchasing Agent Approval Date

City Manager Approval Date

Title	Sole Source Forms for Tierra West & Delta Security
File name	FY_24-25_So...ra_West.pdf and 1 other
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COMPLETED	**05 / 05 / 2025** 16:27:04 UTC	The document has been completed.

City Council Meeting **I. 6.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Adopt Resolution No. 8652 - Annual Engineer's Reports Preliminary Approval, and Resolution No. 8653 - Declaration of Intention to Levy Fiscal Year 25/26 Street Lighting District No. 1 and Landscape Maintenance District No. 1 Assessments (Facilities and Community Services Director Crocker)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motions are provided:

1. I move to adopt Resolution No. 8652; and
2. I move to adopt Resolution No. 8653.

RECOMMENDATION:

Staff recommends City Council adopt Resolution No. 8652 preliminarily approving the annual Engineer's Reports for Landscape Maintenance District No. 1 and Street Lighting District No. 1, and Resolution No. 8653 declaring the City Council's intention to levy and collect assessments for fiscal year 25/26 and scheduling a June 17, 2025, Public Hearing to receive comments related to levying assessments within these districts.

DISCUSSION:

On July 7, 1987, City Council ordered the formation of Landscape Maintenance District No. 1 (LM District), which was established to ensure satisfactory levels of maintenance are provided. LM District assessments provide funding for labor, materials, and equipment associated with landscape services provided by the City within the LM District. These services include turf and ground cover maintenance, irrigation, tree and vegetation maintenance, and LM District management.

On September 19, 1989, City Council ordered the formation of Street Lighting District No. 1 (SL District), which was established to generate funding for electricity to power streetlights, labor, material, and equipment costs to replace burned-out or damaged streetlight bulbs, damaged streetlight poles, and provide SL District management.

On May 6, 2025, City Council approved Donald Young, One-Stop Permit Center Manager, as the Assessment Engineer for both districts. In the role of Assessment Engineer, Mr. Young is responsible for the preparation of the Engineer's Reports required to levy the annual assessments in accordance with the California Streets and Highways Code.

Staff has prepared the comprehensive Engineer's Reports to establish fiscal year 25/26 LM District and SL District assessments that will recover costs for City services within both districts. Appendix "D" of the Engineer's Reports details the assessments and provides a description of specific areas to be assessed. The Assessment District diagrams are also included in each of the Engineer's Reports as Appendix "B". No new areas are proposed for annexation into the districts.

A public hearing is required to levy these assessments. The date of the Public Hearing will be set by adoption of Resolution No. 8653. At the Public Hearing, the Council will consider Ordinance Nos. 2976 and 2977 to approve the Engineer's Reports for Landscape Maintenance District No. 1 and Street Lighting District No. 1 and implement the assessments for Fiscal Year 2025-2026. A copy of the Notice of Public Hearing is included with this staff report.

ALTERNATIVES:

The City Council may deny the staff recommendation which will result in no imposition of assessments by the San Bernardino County Assessor on property tax bills without adoption of the annual Engineer's Reports.

STRATEGIC PLAN:

N/A

SUBMITTED BY:

Tabitha Crocker, Facilities and Community Services Department Director

RECOMMENDED BY:

Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Christopher Boatman, Assistant City Manager
Danielle Garcia, Management Services/Finance Director
Brian Desatnik, Development Services Department Director

PREPARED BY:
Donald Young, One-Stop Permit Center Manager

Fiscal Impact

Fiscal Year: 25/26
Revenue Generating: Yes
Appropriation Required Y/N: No
Discussion:

The proposed FY 25/26 the Street Lighting District No. 1 and Landscape Maintenance District No. 1 assessments will generate revenues to supplement necessary General Fund costs within the Facilities and Community Services Department budget to provide services within the districts.

Attachments

Attachment A - Resolution No. 8652
Attachment B - Resolution No. 8653
Attachment C - 10 Day Notice
Attachment D - SLD Engineer's Report
Attachment E - LMD Engineer's Report

RESOLUTION NO. 8652

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS GIVING PRELIMINARY APPROVAL OF THE ENGINEER'S REPORTS FOR FISCAL YEAR 2025-2026 FOR STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (the "City Council") has heretofore determined that the public interest, convenience and necessity require the maintenance and operation of street lighting and appurtenant facilities, as set forth in Section 22525 of the Streets and Highways Code, within the incorporated boundaries of the City of Redlands; and

WHEREAS, the City Council has heretofore determined that the public interest, convenience and necessity require the maintenance of landscape and irrigation facilities set forth in Section 22525 of the Streets and Highways Code, State of California, within the incorporated boundaries of the City of Redlands; and

WHEREAS, Donald Young, One Stop Permit Center Manager, 35 Cajon Street, Suite 15A, Redlands, California, has been appointed "Assessment Engineer" with all provisions of Part 2 of Division 15 of the Streets and Highways Code applicable to the Engineer being applied to the "Assessment Engineer;" and

WHEREAS, Sections 22622 and 22623 of the Streets and Highways Code require that an Engineer's Report be prepared and filed annually, specifying the assessments to be levied against the benefitting properties within the City's Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, the Assessment Engineer has prepared and filed with the City Clerk reports in writing as required by the Landscaping and Lighting Act of 1972 and in compliance with Article XIIID of the California Constitution; and

WHEREAS, the City Council has duly considered said reports and each and every part thereof; and finds that each and every part of said reports is sufficient, and that no part of said reports requires modification in any respect;

NOW, THEREFORE, be it resolved by the City Council of the City of Redlands as follows:

Section 1. That the Engineer's estimate of the itemized costs and expenses of said work and of the incidental expenses in connection therewith, contained in said reports be, and each of them are hereby, preliminarily approved and confirmed.

Section 2. That the diagram showing the Street Lighting District No. 1 and Landscape Maintenance District No. 1 referred to and described in said reports, and the boundaries of the lots and parcels of land within such assessment district as the same existed at the time of passage of this resolution, are hereby preliminarily approved and confirmed.

Section 3. That the proposed assessment upon the properties in Street Lighting District No. 1 and Landscape Maintenance District No. 1, in proportion to the estimated benefit to be received by such properties, respectively, from said work and of the incidental expenses thereof, as contained in said report is hereby preliminarily approved and confirmed.

Section 4. That said reports shall stand as the Engineer's Report for the purposes of all subsequent proceedings for Street Lighting District No. 1 and Landscape Maintenance District No. 1.

APPROVED AND ADOPTED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

RESOLUTION NO. 8653

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS WITHIN REDLANDS' STREET LIGHTING ASSESSMENT DISTRICT NO. 1 AND LANDSCAPE ASSESSMENT DISTRICT NO. 1 FOR FISCAL YEAR 2025-2026 PURSUANT TO THE LANDSCAPING AND LIGHTING ACT OF 1972, AND ESTABLISHING A TIME AND PLACE FOR PUBLIC HEARINGS FOR THE TWO DISTRICTS TO CONSIDER PROTESTS

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The City Council of the City of Redlands hereby (1) finds that the public interest and convenience requires, and (2) declares its intention to levy and collect, assessments against the lots and parcels of property within an existing assessment districts designated "Redlands' Street Lighting Assessment District No. 1 and Landscape Assessment District No. 1" (the "Districts") pursuant to the provisions of the Landscaping and Lighting Act of 1972, Part 2 of Division 15 of the Streets and Highways Code (commencing with Section 22500) (the "Act") for fiscal year 2025-2026, commencing July 1, 2025, and ending June 30, 2026, to pay for the costs and expenses of the improvements described in Section 3 hereof.

Section 2. Reference is hereby made to a map on file in the office of the City Clerk and open for public inspection for a description of the exterior boundaries of the Districts.

Section 3. The proposed improvements are briefly described as follows: The operation, maintenance and servicing of public within the District, including the operation, maintenance and servicing of public lighting facilities and landscaping, including safety lighting, traffic signals, trees, shrubs, grass and other ornamental vegetation, and appurtenant facilities, located along public roadways, streets and rights-of-way within the boundaries of the Districts. "Maintenance" means the furnishing of services and materials for the ordinary and usual maintenance, operation and servicing of the public lighting and landscaping facilities, and appurtenant facilities, including repair, removal or replacement of all or part of any of the public lighting and landscaping facilities, or appurtenant facilities. "Servicing" means the maintenance of any of the public lighting and landscaping facilities or appurtenant facilities, including the furnishing of electric current, energy or gas for the operation of any of the lighting facilities and the furnishing of water for the irrigation of any of the landscaping facilities.

Section 4. The assessments to be levied and collected against the assessable lots and parcels of property within the Districts for fiscal year 2025-2026 are not proposed to increase from the assessments levied and collected for fiscal year 1997-1998.

Section 5. Public property owned by any public agency and in use in the performance of a public function which is included within the boundaries of the Districts shall not be subject to assessment to be made under these proceedings to cover any of the costs and expenses of the improvements.

Section 6. All railroad, gas, water and electric utility rights-of-way are included within the Districts and shall be assessed in accordance with the benefits received from the improvements.

Section 7. Reference is hereby made to the Reports of the Engineer entitled "City of Redlands Street Lighting District No. 1 Engineer's Report for Fiscal Year 2025-2026" and "City of Redlands Landscape Maintenance District No. 1 Engineer's Report for Fiscal Year 2025-2026" on file in the office of the City Clerk for a full and detailed description of the improvements, the boundaries of the District and any zones therein and the proposed assessments upon assessable lots and parcels of land within the District.

Section 8. NOTICE IS HEREBY GIVEN THAT THE CITY COUNCIL APPOINTS TUESDAY, THE 17TH DAY OF JUNE, 2025, AT THE HOUR OF 6:00 P.M., OR AS SOON THEREAFTER AS THE MATTER MAY BE HEARD, IN THE COUNCIL CHAMBERS AT CITY HALL, CITY OF REDLANDS, 35 CAJON STREET, SUITE 2, REDLANDS, CALIFORNIA 92373, AS THE TIME AND PLACE FOR TWO PUBLIC HEARINGS TO CONSIDER PROTESTS OR OBJECTIONS TO THE LEVY OF THE PROPOSED ASSESSMENTS IN CONNECTION WITH THE DISTRICTS. All interested persons shall be afforded the opportunity to hear and be heard. Any interested person may file a written protest with the City Clerk prior to the conclusion of the hearing. A written protest shall state all grounds of objection. A protest by a property owner shall contain a description sufficient to identify the property owned by the signer thereof. The City Council shall consider all oral statements and all written protests made or filed by any interested person.

Section 9. The City Clerk is hereby authorized and directed to give notice of such hearing in accordance with law.

Section 10. The City Council hereby determines and declares that the proposed assessments constitute a continuation of assessments existing on the effective date of Article XIIID, that the assessments are imposed exclusively to finance the maintenance and operation expenses for streets and that the assessments are exempt from the requirements of Article XIIID, Section 4 of the California Constitution.

Section 11. The City Council hereby designates Donald Young, One Stop Permit Center Manager, telephone number (909) 798-7585 x6, to answer inquiries regarding the hearing, protest proceedings and procedural or technical matters.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was duly adopted by the City Council, at a regular meeting thereof, held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

CITY OF REDLANDS
CITY COUNCIL
NOTICE OF PUBLIC HEARING

NOTICE is hereby given that the City Council of the City of Redlands, County of San Bernardino, State of California, will hold a public hearing to consider the following:

1. **PUBLIC HEARING** to consider Ordinance No 2976 and Ordinance No. 2977 to approve the Engineer's Report for Landscape Maintenance District No. 1 and Street Lighting District No. 1 and implement the assessments for Fiscal Year 2025-2026

   City of Redlands, Applicant

In accordance with the Landscaping and Lighting Act of 1972 and in compliance with Article XIIID of the California Constitution a report has been prepared and filed with the City Clerk.

The full text of the proposed Resolutions, and all materials relevant to this hearing, are available for public inspection in the Development Services Department, located at 35 Cajon Street, Ste. 15A, Redlands, California. Phone number is (909) 798-7585x6. Website: www.cityofredlands.org

The public hearing will be held in the Council Chambers, Civic Center, 35 Cajon Street, Ste. 2, Redlands, California, at 6:00 P.M., or as soon thereafter as may be heard, on Tuesday, June 17, 2024.

Due to time constrains and the number of persons wishing to give oral testimony, time restrictions may be placed on oral testimony at the hearing regarding this project. You may wish to make your comments in writing to the following address to assure that you are able to express yourself adequately: City Council, P.O. Box 3005, Redlands, California 92373 or by e-mail to jdonaldson@cityofredlands.org.

If you challenge the Ordinances described in this notice in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Council prior to the public hearing.

Dated: June 6, 2025

_____

Jeanne Donaldson, City Clerk
City of Redlands, California

CITY OF REDLANDS
STREET LIGHTING DISTRICT NO. 1
ENGINEER'S REPORT
FOR FISCAL YEAR 2025-2026

CITY OF REDLANDS
FACILITIES AND COMMUNITY SERVICES DEPARTMENT

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ENGINEER'S REPORT AFFIDAVIT

Street Lighting District No. 1

City of Redlands
San Bernardino County, State of California

This Report describes the Street Lighting District No. 1 ("District") and services therein including the improvements, budgets, parcels and assessments to be levied for Fiscal Year 2025-2026 as they existed at the time of the passage of the Resolution of Intention. Reference is hereby made to the San Bernardino County Assessor's maps for a detailed description of the lines and dimensions of parcels within the District. The undersigned respectfully submits the enclosed Report as directed by the City Council.

Dated this 3rd day of June, 2025



By: Donald P. Young

Donald Young
One Stop Permit Center Manager
R.C.E # 49918

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TABLE OF CONTENTS

I. AUTHORITY FOR REPORT

II. GENERAL DESCRIPTION

III. PLANS AND SPECIFICATIONS

IV. IMPROVEMENTS

V. ASSESSMENT DIAGRAM

VI. ESTIMATED COSTS AND ASSESSMENTS

VII. ASSESSMENT ROLL

VIII. PROPOSED BASIS FOR ASSESSMENTS

IX. CALCULATION OF UOB AND INCIDENTAL COSTS FOR FY 2025-2026

X. ESTIMATED ASSESSMENTS FOR FY 2025-2026

APPENDIX A: CALCULATION OF UOB AND INCIDENTAL COST TABLE
APPENDIX B: DISTRICT ASSESSMENT DIAGRAM
APPENDIX C: RESOLUTIONS
APPENDIX D: ASSESSMENT ROLL

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AUTHORITY FOR REPORT

This report is prepared by order of the City Council of the City of Redlands, California (City). This report is in compliance with the requirements of Chapter 1, Article 4, and Chapter 3 of Division 15 of the Streets and Highway Code of the State of California (Landscape and Lighting Act of 1972) and Article XIIID of the California Constitution.

I. GENERAL DESCRIPTION

The City Council of the City of Redlands, California has heretofore elected to form Street Lighting District No. 1 (District) and annexed territories to said District. The boundaries of said District and annexations thereto are entitled "Assessment Diagram of Street Lighting District No. 1," and are on file in the office of the City Clerk of the City of Redlands.

II. PLANS AND SPECIFICATIONS

All street lights are or will be owned by the City and are provided electrical services by Southern California Edison Company (SCE).

Reference is hereby made to the subject tract or parcel maps and assessment diagrams for the exact location of the parcels covered by the District. The plans and specifications by reference are hereby made a part of this report to the same extent as if said plans and specifications were attached hereto.

III. IMPROVEMENTS

The Landscaping and Lighting Act of 1972 allows the confirmation of benefit assessments for the construction of improvements in addition to maintenance and operation of existing facilities. Assessments will not be levied under the District to fund the installation of street lights during FY 2025-2026. Therefore, this report does not include any proposed benefit assessments for the installation of improvements for FY 2025-2026.

IV. ASSESSMENT DIAGRAM

The assessment District locations for the Original District and subsequent Annexations shown as Appendix B. The assessment diagrams by reference are hereby made a part of this report. The original diagram document used in prior Engineer's Reports was updated in 2021 for purposes of clarity.

Since there were numerous locations as part of Annexation Nos. 1, 2, 3, 4, 5, etc. they were identified on the diagram as S1-A, S1-B, S1-C or S2-A, S2-B, S2-C, etc. Prefix S is added to the identification on the later Annexations to identify that they are within the District. The same Annexation description will be used for identification with Sections IX and X of this report

V. ESTIMATED COSTS AND MAINTENANCE

Since the City owns the street lighting system, all maintenance efforts by the City should be allocated to the District as a direct cost. The Municipal Utilities and Engineering Department has taken the information used in the previous annual report and updated the values based upon the formulas for Unit of Benefit. Southern California Edison (SCE) monthly rates were calculated based upon LS-2 schedule of rates for 100W and 150W high pressure sodium vapor street lights. Because the District costs have historically exceeded the revenue generated by District assessment, it is anticipated that minimal administration and no maintenance will be provided during the 2025-2026 year. As such, the labor amount has been significantly reduced to an estimated value of $6,855 to be spread equally over the number of street lights.

Given these parameters the following is the estimated monthly costs per lamp:

POLES	SCE CHARGE	DEPARTMENT ADMINISTRATION	MONTHLY LAMP COST
419	$ 2.82	$ 1.36	$ 1,751

The following information is from the City's FY2017-2018 Budget:

Power Expenses	
City Street Lighting	S 15,000
Subtotal	**S 15,000**
Administration	
Salaries and Benefits	$ 10,893
Maintenance	$ 1,101
Subtotal	**S 11,994**
Incidental	
Other Professional Services	$ 0
Subtotal	**$ 0**
Total Costs	S 26,994
2017-2018 Levy	$ 25,465
Deficit	**$ 1,529**
Total Parcels Levied	990

The District and Annexations, which are maintained by the City, have been in existence for a number of years. Over the years, the existing assessments have not kept pace with the true annual cost of maintenance and administration.

No new areas are being proposed to be annexed to the District for FY 2025-2026.

VI. ASSESSMENT ROLL

Following the public hearing for FY 2025-2026 assessments and the City Council's approval of the assessments, an assessment roll will be prepared. The assessment roll will include the assessment parcel number, the San Bernardino County Assessor's parcel number and the confirmed assessment for each parcel. The assessment roll will be filed with the City Clerk and will subsequently be transmitted to the San Bernardino County Auditor/Tax Collector.

VII. PROPOSED BASIS FOR ASSESSMENTS

The City Council has heretofore determined that it will be necessary to utilize the provisions of the Landscaping and Lighting Act of 1972, a benefit assessment act, for the Original District and the subsequent Annexations to the District and to assess benefitting properties in proportion to the benefits that the various properties will receive.

The benefits the properties will receive will be assessed as increments of units of benefit (UOB). The District and the subsequent Annexations consist of various types of development having varying parcel sizes. Since the street lights either have been or will be installed in accordance with customary spacing established by the City, there will be four Assessment Zones based upon a street's curb-to-curb width.

Assessments proposed for individual parcels within the District and Annexations will be for the benefit received and will be determined based upon the four following Assessment Zones.

Zone 1: This will include all parcels having frontage on streets with curb separation of less than 40' or greater with 100watt HPSVL at 250' spacing.

Zone 2: This will include all parcels having frontage on streets with curb separations of less than 40' with 100 watt HPSVL at 600' spacing.

Zone 3: This will include all parcels having frontage on streets with curb separations of 40' or greater and less than 64' with 150 watt HPSVL at 250' spacing.

Zone 4: This will include all parcels having frontage on streets with curb separations of 64' or more with 150 watt HPSVL at 230' spacing.

Each of these four Assessment Zones will have assessments levied in UOB which is defined as increments of 100' frontage on public streets, right-of-way or easements. The frontage length and the corresponding UOB are as follows:

FRONTAGE LENGTH	UOB
Less than 199'	1
200' – 299'	2
300' – 399'	3
And so forth	

The UOB assessments for the four Zones are calculated as follows:

Zone 1: Includes 100 watt high pressure, sodium vapor luminaries with a monthly billing rate from SCE, a minimal amount of labor (excluding City General Government Overhead and Facilities and Community Services Department maintenance) for a lamp cost of $8.49. Since the spacing will be 240' ± 15', a spacing of 250' will be used in the calculation.

$$\frac{\$8.49 \times 12}{500} \times \frac{100'}{\text{UOB}} = \$20.38 \text{ per UOB}$$

Zone 2: Includes 100 watt high pressure, sodium vapor luminaries with a monthly billing rate from SCE, a minimal amount of labor (excluding City General Government Overhead and Facilities and Community Services Department maintenance) for a lamp cost of $8.49. Since the spacing will be 600', a spacing of 600' will be used in the calculation.

$$\frac{\$8.49 \times 12}{1200} \times \frac{100'}{\text{UOB}} = \$8.49 \text{ per UOB}$$

Zone 3: Includes 150 watt high pressure, sodium vapor luminaries with a monthly billing rate from SCE, a minimal amount of labor (excluding City General Government Overhead and Facilities and Community Services Department maintenance) for a lamp cost of $11.51. Since the spacing will be 265' ± 15', a spacing of 250' will be used in the calculation.

$$\frac{\$11.51 \times 12}{500} \times \frac{100'}{\text{UOB}} = \$27.63 \text{ per UOB}$$

Zone 4: Includes 150 watt high pressure, sodium vapor luminaries with a monthly billing rate from SCE, a minimal amount of labor (excluding City General Government Overhead and Facilities and Community Services Department maintenance) for a lamp cost of $11.51. Since the spacing will be 215' ± 15', a spacing of 230' will be used in the calculation.

$$\frac{\$11.51 \times 12}{460} \times \frac{100'}{\text{UOB}} = \$30.03 \text{ per UOB}$$

The incidental expenses are most equitably spread on a UOB basis, which is the same method for spreading the benefit from the direct lighting costs.

VIII. CALCULATION OF UOB AND INCIDENTAL COSTS FOR FY 2025-2026

For a breakdown of the UOB Incidental Costs see Appendix A – Calculation of UOB and Incidental Cost Table

IX. ESTIMATED ASSESSMENTS FOR FY 2025-2026

The following calculations presume the on-site development has been completed and include the estimated energy, administration and engineering costs:

Original District (Zone 3) – Parcel Map 11917 APN 0292-032-39, 40, 41, 42

The four parcels will receive one UOB per 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of operation and maintenance to be assessed
N = Number of UOB in Parcel Map 11917

NA = C
A = $621.55/31
A = $20.05 per UOB

Assessment for each parcel:

Parcel 2	-	10 UOB	=	$200.50
Parcel 3	-	2 UOB	=	$40.10
Parcel 4	-	3 UOB	=	$60.15
Parcel 5	-	16 UOB	=	$320.80

Annexation S1-A – Parcel Map 12450, APN 0167-201-62 thru -65

These parcels are not assessed.

Annexation S1-B (Zone 4) – Parcel Map 11755 APN 0293-172-16, 17, 18

The seven parcels in Annexation S1-B having street frontage will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S1-B with street frontage

NA = C
A = $273.39/13
A = $21.03 per UOB

Assessment for each parcel:

Parcel 1	-	1 UOB	=	$21.03
Parcel 3	-	1 UOB	=	$21.03
Parcel 5	-	1 UOB	=	$21.03
Parcel 6	-	2 UOB	=	$42.06
Parcel 7	-	2 UOB	=	$42.06
Parcel 8	-	4 UOB	=	$84.12
Parcel 9	-	2 UOB	=	$42.06

The original parcels have been reconfigured into three Assessor's Parcels.

Annexation S1-C (Zone 4) – CUP 617 APN 0292-033-11

The one parcel in Annexation S1-C will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S1-C

NA = C
A = $231.33/1
A = $231.33 per Parcel

The APN for this parcel has been changed to 0292-321-10.
This parcel is exempt from assessment. It is owned by Southern California Gas Company.

Annexation S1-D (Zone 3) – MS 184, Parcel Map 12300, APN 0167-231-19, 20, 21

The three parcels in Annexation S1-D will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S1-D

NA = C
A = $60.15/3
A = $20.05 per Parcel

Annexation S1-E (Zone 3) – CUP 382 APN 0171-383-19, 20

The two parcels in Annexation S1-E will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-E

NA = C
A = $40.10/2
A = $20.05 per Parcel

Annexation S1-F (Zone 1) – CRA 606 APN 0169-131-33

The one parcel in Annexation S1-F will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-F

NA = C

A = $19.45/1
A = $19.45 per Parcel

Annexation S1-G (Zone 4) – CRA 486 APN 0292-321-10

The one parcel in Annexation S1-G will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-G
NA = C
A = $105.15/1
A = $105.15 per Parcel

This parcel is exempt from assessment and has been removed from the assessment roll.

Annexation S1-H (Zone 4) – CUP 253 APN 0169-411-07

The one parcel in Annexation S1-H will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-H

NA = C
A = $105.15/1
A = $105.15 per Parcel

Annexation S1-I (Zone 3) – CRA 608 APN 0169-142-11

The one parcel in Annexation S1-I will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-I

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-J (Zone 3) – CUP 519 APN 0171-331-04

The one parcel in Annexation S1-J will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-J

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-K (Zone 4) – CUP 516 APN 0292-166-11

The one parcel in Annexation S1-K will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-K

NA = C
A = $273.39/1
A = $273.39 per Parcel

Annexation S1-L (Zone 3) – CUP 518 APN 0169-053-12

The one parcel in Annexation S1-L will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-L

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-M (Zone 3) – CUP 522 APN 0172-031-49

The one parcel in Annexation S1-M will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-M

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-N (Zone 1) – Tract 13947 APN 0174-621-01 thru -35

The thirty-five parcels in Annexation S1-N will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-N

NA = C
A = $680.75/35
A = $19.45 per Parcel

Annexation S1-O (Zone 3) – CUP 521 APN 0292-034-16

The one parcel in Annexation S1-O will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-L

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-P (Zone 1) – CUP 605 APN 0169-182-02, 03, 04

The three parcels in Annexation S1-P will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-L

NA = C
A = $38.90/3
A = $12.97 per Parcel

Annexation S1-Q – City Hall, APN 0171-301-03

The one parcel in Annexation S1-Q is not assessed.

Annexation S1-R – Parcel Map 11904, APN 0176-044-14, 15

The two parcels in Annexation S1-R are not assessed.

Annexation S1-S (Zone 3) – CUP 278 APN 0171-171-18, 22, 23

The three parcels in Annexation S1-S will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-L

NA = C
A = $80.20/3
A = $26.73 per Parcel

Annexation S7-A was originally APN 0171-161-13 and was then changed to APN 0171-161-14 and -15. Annexation S1-S was originally APN 0171-171-18, -22, and -23. Assessments for Annexation S7-A and S1-S were combined and then adjusted proportionately. New APNs for both annexations are 0171-161-17 and 0171-171-34. Assessment spread proportionately.

Annexation S1-T (Zone 3) – CUP 405 APN 0169-343-07

The one parcel in Annexation S1-T will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-T

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S1-U (Zone 4) – CRA 354, Parcel Map 3131 APN 0292-182-30, 31

The two parcels in Annexation S1-U will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-L

NA = C
A = $42.06/2
A = $21.03 per Parcel

Annexation S1-V (Zone 1) – CRA 346 APN 0292-061-25

The one parcel in Annexation S1-V will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-V

NA = C
A = $19.45/1
A = $19.45 per Parcel

This property is owned by the County of San Bernardino and is not assessed.

Annexation S1-W (Zone 3) – CRA 607 APN 0292-156-21

The one parcel in Annexation S1-L will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-W

NA = C
A = $120.30/1
A = $120.30 per Parcel

Annexation S1-X (Zone 1) – Tract 12461 APN 1212-191-60 thru -79

The twenty parcels in Annexation S1-X will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of parcels in Annexation S1-X

NA = C
A = $389.00/20
A = $19.45 per Parcel

Annexation S1-Y (Zone 3) – Parcel Map 12022 APN 0169-212-17 thru -27

The eleven parcels in Annexation S1-Y having street frontage will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S1-Y

NA = C
A = $380.95/19
A = $20.05 per UOB

Assessment for each parcel:

Parcel 1	-	3 UOB	=	$60.15
Parcel 2	-	1 UOB	=	$20.05
Parcel 3	-	1 UOB	=	$20.05
Parcel 4	-	2 UOB	=	$40.10
Parcel 5	-	4 UOB	=	$80.20
Parcel 6	-	3 UOB	=	$60.15
Parcel 7	-	1 UOB	=	$20.05
Parcel 8	-	1 UOB	=	$20.05
Parcel 9	-	1 UOB	=	$20.05
Parcel 10	-	1 UOB	=	$20.05
Parcel 11	-	1 UOB	=	$20.05

Annexation S2-A (Zone 3) – Parcel Map 12330 APN 0292-153-24, 25, 26, 27

The four parcels in Annexation S2-A will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S2-A

NA = C
A = $240.60/12
A = $20.05 per UOB

Assessment for each parcel:

Parcel 1	-	4 UOB	=	$80.20
Parcel 3	-	4 UOB	=	$80.20
Parcel 5	-	2 UOB	=	$40.10
Parcel 4	-	2 UOB	=	$40.10

Annexation S2-B (Zone 3) – Parcel Map 12940 APN 0292-441-11 thru 15

The five parcels in Annexation S2-B will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S2-B

NA = C
A = $60.15/5
A = $12.03 per Parcel

Annexation S2-C (Zone 3) – MS 184, Parcel Map 12300, APN 0167-231-19, 20, 21

This annexation is a duplication of Annexation S1-D and has been removed.

Annexation S2-D (Zone 1) – Tract 14556 APN 0176-441-18 thru 27

The ten parcels in Annexation S2-D will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S2-D

NA = C
A = $330.65/10
A = $33.07 per Parcel

Annexation S2-E – CRA 611 APN 0174-241-31

This annexation is not assessed.

Annexation S2-F (Zone 3) – MS 196 APN 0292-331-15, 16

The two parcels in Annexation S2-F will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S2-F

NA = C
A = $160.40/2
A = $80.20 per Parcel

Annexation S2-G Parcel Map 11189 APN 0294-091-48, 48

The two parcels in Annexation S2-G are not assessed.

Annexation S2-H (Zone 4) – CRA 615 APN 0292-157-31

The one parcel in Annexation S2-H will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S2-H

NA = C
A = $21.03/1
A = $21.03 per Parcel

Annexation S3-A (Zone 3) – CRA 517 APN 0169-321-01, 02

The two parcels in Annexation S3-A will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-A

NA = C
A = $80.20/2
A = $40.10 per Parcel

Annexation S3-B (Zone 1) – CRA 628 APN 0292-310-07

The one parcel in Annexation S3-B will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-B

NA = C
A = $19.45/1
A = $19.45 per Parcel

Annexation S3-C (Zone 3) – CRA 624 APN 0169-281-39

The one parcel in Annexation S3-C will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-C

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S3-D (Zone 3) – CRA 305 APN 0167-271-61

The one parcels in Annexation S3-D will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-D

NA = C
A = $100.25/1
A = $100.25 per Parcel

Annexation S3-E (Zone 1) – Tract 13575 APN 1212-201-01 thru -27

The twenty-seven parcels in Annexation S3-E will receive an equal benefit assessment:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-E

NA = C
A = $700.20/27
A = $25.93 per Parcel

Annexation S3-F (Zone 3 & 4) – CUP 550 APN 0292-165-15

The one parcel in Annexation S3-F will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-F

NA = C
A = $222.51/1
A = $222.51 per Parcel

Annexation S3-G (Zone 1) – CRA 623 APN 0292-381-08

The one parcel in Annexation S3-G will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-G

NA = C
A = $19.45/1
A = $19.45 per UOB

Annexation S3-H (Zone 4) – CUP 542 APN 0292-064-13, 17, 21 thru 27

The nine parcels in Annexation S3-H will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-A

NA = C
A = $567.81/27
A = $21.03 per UOB

Assessment for each parcel:

Parcel 1	-	4 UOB	=	$84.12
Parcel 2	-	2 UOB	=	$42.06
Parcel 3	-	2 UOB	=	$42.06
Parcel 4	-	7 UOB	=	$147.21
Parcel 5	-	4 UOB	=	$84.12
Parcel 6	-	2 UOB	=	$42.06
Parcel 7	-	1 UOB	=	$21.03
Parcel 8	-	1 UOB	=	$21.03
Parcel 9	-	4 UOB	=	$84.12

Annexation S3-I – there is no Annexation S3-I

Annexation S3-J (Zone 3) – MS 201 APN 0171-341-33

The one parcel in Annexation S3-J will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S3-J

NA = C
A = $80.20/1
A = $80.20 per Parcel

Annexation S4-A (Zone 4) – MS 213, Parcel Map 13978 APN 0172-301-14, 15, 16, 17

The four parcels in Annexation S4-A will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-A

NA = C
A = $63.09/3
A = $21.03 per UOB

Assessment for each parcel:

Parcel 1	-	2 UOB	=	$25.24
Parcel 2	-	1 UOB	=	$12.62
Parcel 3	-	1 UOB	=	$12.62
Parcel 4	-	1 UOB	=	$12.62

Annexation S4-B (Zone 3) – MS 211 APN 0292-201-36, 39

The two parcels in Annexation S4-B will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-B

NA = C
A = $100.25/5
A = $20.05 per UOB

Assessment for each parcel:

Parcel 1	-	2 UOB	=	$40.10
Parcel 2	-	3 UOB	=	$60.15

Parcel 2 lot line was adjusted with the property to the north. The assessment was spread proportionately - $47.57 to APN 0292-201-39 and $12.58 to APN 0292-201-40.

Annexation S4-C (Zone 4) – CUP 559 APN 0171-202-30

The one parcel in Annexation S4-C will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-C

NA = C
A = $40.10/1
A = $40.10 per Parcel

Annexation S4-D (Zone 1) – CRA 636 APN 0169-043-14

The one parcel in Annexation S4-D will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-D

NA = C
A = $58.35/1
A = $58.35 per Parcel

Annexation S4-E (Zone 4) – CUP 546 APN 0292-192-11

The one parcel in Annexation S4-E will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-E

NA = C
A = $231.33
A = $231.33 per UOB

Annexation S4-F (Zone 1) – CUP 641 APN 0292-310-36

The two parcels in Annexation S4-F will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-G

NA = C
A = $38.90/2
A = $19.45 per UOB

The two parcels were subsequently combined into a single parcel and the full assessment is on the one parcel.

Annexation S4-G (Zone 4) – CRA 640 APN 0169-301-08, 10, 11

The three parcels in Annexation S4-G will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessment are as follows:

A = Assessment per UOB
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB in Annexation S4-C

NA = C
A = $21.03/3
A = $7.01 per Parcel

Annexation S4-H (Zone 4) - CUP 562 APN 0292-064-17

The one parcel in Annexation S4-H will receive four UOB assessments for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S4-H

NA = C
A = $84.12/1
A = $84.12 per Parcel

Note that Annexation S4-H is already assessed in Annexation S3-H. Therefore, the assessment in Annexation S4-H is $0

Annexation S4-I (Zone 1) - CUP 548 APN 0169-313-16

The one parcel in Annexation S4-I will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S4-1

NA = C
A = $77.80 /1
A = $77.80 per Parcel

Annexation S5-A – CRA 637 APN 0169-281-23

This property became a City owned parcel and was removed from the assessment roll.

Annexation S5-B (Zone 1) - Tract 10179 APN 0167-851-39 thru 56, 0167-861-37 thru 54

The thirty-six parcels in Annexation S5-B will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S5-B

NA = C
A = $505.70/36
A = $14.05 per Parcel

Annexation S5-C (Zone 1) - CUP 574 APN 0171-202-33

The one parcel in Annexation S5-C will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S5-C

NA = C
A = $19.45/1
A = $19.45 per Parcel

Annexation S5-D (Zone 3) - CRA 642 APN 0292-154-12

The one parcel in Annexation S5-D will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation 85·0

NA = C
A = $100.25/1
A = $100.25 per Parcel

Annexation S5-E (Zone 1) - MS 216-B Parcel Map 14090 APN 0174-021-41, 42

The two parcels in Annexation S5-E will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S5-E

NA = C
A = $38.90/2
A = $19.45 per Parcel

Annexation S6-A (Zone 4) - CRA 648 APN 0292-157-16

The one parcel in Annexation S6-A will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S6-A

NA = C
A = $189.27/1
A = $189.27 per Parcel

This parcel has been purchased by the City of Redlands and will therefore no longer be assessed.

Annexation S6-B (Zone 1) - CUP 581 APN 0171-203-13

The one parcel in Annexation S6-B will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S6-B

NA = C
A = $38.90/1
A = $38.90 per Parcel

Annexation S7-A (Zone 3): MS 228 APN 0171-161-17

The two parcels in Annexation S7-A will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-A

NA = C
A = $200.50/2
A = $100.25 per Parcel

Annexation S7-A was originally APN 0171-161-13 and was then changed to APN 0171-161-14 and -15. Annexation S1-S was originally APN 0171-171-18, -22, and -23. Assessments for Annexation S7-A and S1-S were combined and then adjusted proportionately. New APNs for both annexations are 0171-161-17 and 0171-171-34. Assessment spread proportionately.

Annexation S7-B (Zone 3): CRA 639 APN 0292-152-39

The one parcel in Annexation S7-B will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-B

NA = C
A = $100.25/1
A = $100.25 per Parcel

Annexation S7-C (Zone 4) - CUP 602 APN 0292-063-48

The one parcel in Annexation S7-C will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-C

NA = C
A = $42.06/1
A = $42.06 per Parcel

Annexation S7-D (Zone 1) - CUP 590 APN 0171-332-30

The one parcel in Annexation S7-D will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-D

NA = C
A = $38.90/1
A = $38.90 per Parcel

Annexation S7-E (Zones 1 & 3) - CUP 607 APN 0167-101-13

The one parcel in Annexation S7-E will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-E

NA = C
A = $198.10/1
A = $198.10 per Parcel

Annexation S7-F (Zone 1) - CUP 577 APN 1212-041-01

The one parcel in Annexation S7-F will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-F

NA = C
A = $77.80/1
A = $77.80 per Parcel

Annexation S7-G (Zone 1) - CUP 541 APN 0174-261-15

The one parcel in Annexation S7-G will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-G

NA = C
A = $155.60/1
A = $155.60 per Parcel

Annexation S7-H (Zone 2) - Tract 14790-1 APN 0176-521-01 thru -13, -18 thru -23, -27 thru -32, APN 0176-531-01, 02, 03, 07, 08, 09, 12, 13, 18, 20, 21, 22, 24, 25, 26

The forty parcels in Annexation S7-H will receive an equal benefit assessment.

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S7-H

NA = C
A = $1,660.00/40
A = $41.50 per Parcel

Annexation S8-A (Zone 3) - CUP 584 APN 0172-121-03

The one parcel in Annexation S8-A will receive the entire benefit assessment. The calculations for the assessment are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S8-A

NA = C
A = $20.05/1
A = $20.05 per Parcel

Annexation S8-B (Zone 3) - CRA 666 APN 0292-158-17

The one parcel in Annexation S8-B will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S8-B

NA = C
A = $40.10/1
A = $40.10 per Parcel

Annexation S8-C (Zone 3) - CRA 616

The portion of this property that was Annexation S8-C is no longer assessed.

Annexation S9-A (Zones 1 & 4) - Tract 15589 APN 0293-421-01 thru -45

The forty-five parcels in Annexation S9-A will receive an equal benefit assessment.

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S9-A

NA = C
A = $202.40/45
A = $4.50 per Parcel

Annexation S9-B (Zone 1) - MS 221, Parcel Map 14285 APN 0174-281-33, 34, 35, 37

The four parcels in Annexation S9-B will receive an equal benefit assessment. The calculation for the assessment follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S9-B

NA = C
A = $58.35/4
A = $14.59 per Parcel

Annexation S9-C – there is no Annexation S9-C

Annexation S9-D (Zone 3) - CUP 617 APN 0292-033-13

The one parcel in Annexation S9-D will receive the entire benefit assessment. The calculation for the assessment follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S9-D

NA= C
A = $80.20/1
A = $80.20 per Parcel

Annexation S9-E (Zone 1) - CRA 670 APN 0292-157-20

The one parcel in Annexation S9-E will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S9-E

NA = C
A= $19.45/1
A = $19.45 per Parcel

Annexation S9-F (Zone 3) - CUP 629

The one parcel in Annexation S9-F will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S9-F

NA = C
A = $100.25/1
A = $100.25 per Parcel

Annexation S10-A (Zones 1 & 3) - Tract 15040 APN 0174-631-01 thru -09, -11 thru -35, -37 thru -58, -63, -64

The fifty-eight parcels in Annexation S10-A will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N =Number of Parcels in Annexation S10-A

NA = C
A = $1,461.15/58
A = $25.19 per Parcel

Annexation S10-B (Zones 1 & 4) - Tract 15832 APN 0172-301-18 thru 22, 26

The six parcels in Annexation S10-B will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-B

NA = C
A = $140.89/6
A = $23.48 per Parcel

Annexation S10-C (Zones 1, 3 & 4) - TR 15937 APN 0168-731-01 thru -25, APN 0168-741-01 thru -78, APN 0168-751-01 thru -56

The one hundred fifty-nine parcels in Annexation S10-C will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-C

NA = C
A = $2,722.64 /159
A = $17.12 per Parcel

Annexation S10-D (Zone 1) - Tract 16015 APN 1212-021-01 thru -62
The sixty-two parcels in Annexation S10-D will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-D

NA = C
A = $1,050.30/62
A = $16.94 per Parcel

Annexation S10-E (Zones 1 & 3) - Tract 16029 APN 0167-081-13 thru -45

The thirty-three parcels in Annexation S10-E will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $453.95/33
A = $13.76 per Parcel

Annexation S10-F (Zones 1 & 4) - Tract 16032 APN 0170-481-20 thru -34

The fifteen parcels in Annexation S10-F will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-F

NA = C
A = $259.17 /15
A = $17.28 per Parcel

Annexation S10-G (Zone 1) - Tract 16082 APN 0172-091-24 thru 36

The thirteen parcels in Annexation S1O-G will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-G

NA = C
A= $350.10/13
A = $26.93 per Parcel

Annexation S10-H (Zones 1 & 4) - Tract 16101 APN 0168-771-01 thru -50, APN 0168-781-01 thru -34, APN 0168-791-01 thru -28, APN 0168-801-01 thru -38

The one hundred fifty parcels in Annexation S10-H will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-H

NA = C
A = $2,289.87/150
A = $15.27 per Parcel

Annexation S10-I (Zones 1 & 4) - MS 253 (PM 15530) and MS 255 (PM 15617)
APN 0292-153-28, -30 thru -43

The fifteen parcels in Annexation S10-I will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment/Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-I

NA=C
A = $435.80/22
A = $19.81 per UOB

Assessment for each Parcel in PM 15530 (except Parcel 2):
APN 0292-153-28, 30 thru 41

Parcel 1	-	3 UOB	=	$59.43
Parcel 3	-	1 UOB	=	$19.81
Parcel 4	-	3 UOB	=	$59.43
Parcel 5	-	1 UOB	=	$19.81
Parcel 6	-	1 UOB	=	$19.81
Parcel 7	-	1 UOB	=	$19.81
Parcel 8	-	1 UOB	=	$19.81
Parcel 9	-	1 UOB	=	$19.81
Parcel 10	-	1 UOB	=	$19.81
Parcel 11	-	1 UOB	=	$19.81
Parcel 12	-	4 UOB	=	$79.24
Parcel 13	-	1 UOB	=	$19.81
Parcel 14	-	1 UOB	=	$19.81

Assessment for each Parcel in PM 15530:
APN 0292-153-42, 43

Parcel 1	-	1 UOB	=	$19.81
Parcel 3	-	1 UOB	=	$19.81

Annexation S10-J (Zone 4) - MS 252 (PM 15492) APN 0169-011-32 thru -35, -38, -39

The original five parcels in Annexation S10-J will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels in Annexation S10-J

NA = C
A = $147.21/5
A = $29.44 per Parcel for APN -32 thru -35

APN 0169-011-36 was split into APN 0169-011-38 and -39.
Therefore, A = $14.72 per Parcel for APN -38 and -39

Annexation S10-K (Zones 1 & 4) - CRA 720, PM 17658, APN 0292-154-22 thru -25

The four parcels in Annexation S7-K will receive one UOB assessment for 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment
C = Cost of SCE UOB and Incidental Expenses
N = Number of UOB

NA = C
A = $139.31/7
A = $19.45 per UOB (Zone 1)
A = $21.03 per UOB (Zone 4)

Assessment for each parcel:

Parcel 1	-	Zone 1 - 2 UOB / Zone 4 - 2 UOB	= $80.96
Parcel 2	-	Zone 1 - 1 UOB	= $19.45
Parcel 3	-	Zone 1 - 1 UOB	= $19.45
Parcel 4	-	Zone 1 - 1 UOB	= $19.45

Annexation S10-L – there is no Annexation S10-L

Annexation S10-M (Zone 1) - CRA 679 - APN 0292-310-42

The one parcel will receive entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and incidental Expenses
N = Number of Parcels

NA = C
A = $19.45/1
A = $19.45 per Parcel

Annexation S10-N (Zone 3) - CUP 35R2 - APN 0173-251-21

The one parcel will receive entire benefit assessment. The calculations for the assessments are as follows:

A =Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $60.15/1
A = $60.15 per Parcel

Annexation S10-O (Zone 3) - CUP 355 Rev. 8 - APN 0172-121-10, 11, 14

The three parcels will receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $80.20/3
A = $26.73 per Parcel

Annexation S10-P (Zone 3) - CUP 543 - APN 0171-431-05

The one parcel will receive entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $120.30/1
A = $120.30 per Parcel

Annexation S10-Q (Zones 1 & 2) - MS 234 (PM 14891) - APN 0169·272-29, APN 0169-281-45, 46

The three parcels will receive one UOB per 100 feet of parcel frontage in accordance with this report. The calculations for the assessments are as follows:

A = Assessment per UOB
C = Cost of operation and maintenance to be assessed
N = Number of UOB

NA = C
A = $196.38/12
A = $16.37 per UOB

Assessment for Each Parcel

Parcel 29	-	4 UOB	=	$65.48
Parcel 45	-	6 UOB	=	$98.22
Parcel 46	-	2 UOB	=	$32.74

Annexation S10-R (Zone 3) - MS 251 (PM 15414) APN 0176-014-16, 17

The two parcels will receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $60.15/2
A = $30.08 per Parcel

Annexation S10-S (Zones 1 & 3) - Tract 14790-2 APN 0294-181-02 thru -15, APN 0294-191-01 thru -04, -06 thru -12, -16 thru -20, APN 0294-201-09, -11, -13, -15, -19, -21, -27, -28, APN 0294-211-02 thru -04, -06 thru -10, -12, -13

The forty-eight parcels in Annexation S10-S will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $2,378.05/48
A = $49.54 per Parcel

Annexation S10-T (Zones 1 & 3) - Tract 14790-3 APN 0294-222-01 thru -12, APN 0294-232-01 thru -07, APN 0294-242-01 thru -06, APN 0294-252-01 thru -13, APN 0294-262-01 thru -13

The fifty-one parcels in Annexation S10-T will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $1,842.70/51
A = $36.13 per Parcel

Annexation S10-U (Zones 1, 3 & 4) - Tract 15532 APN 0168-271-13 thru -48

The thirty-six parcels in Annexation S10-U will each receive an equal benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $515.40/36
A = $14.32 per Parcel

Annexation S10-V (Zone 1) - CUP 652 - APN 0171-011-67

The one parcel will receive entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of SCE UOB and Incidental Expenses
N = Number of Parcels

NA = C
A = $19.45/1
A = $19.45 per Parcel

APN 0171-011-54 was the original Annexation 10-V. That parcel was merged with the parcel immediately to the east (APN 0171-011-45). The new parcel was assigned APN 0171-011-67.

Annexation S10-W (Zone 1) - MS 240 (PM 14912) - APN 0292-201-22

The one parcel will receive the entire benefit assessment. The calculations for the assessments are as follows:

A = Assessment per Parcel
C = Cost of Incidental Expenses
N = Number of Parcels

NA = C
A = $19.45/1
A = $19.45 per Parcel

This parcel has been subdivided and is not assessed.

* * * * * * * * * * * *

The City Council will hold a public meeting on June 17, 2025 to determine the assessments based upon the costs for FY 2025-2026 which are anticipated to be incurred by the City and which are to be recovered through assessments as required by the Landscaping and Lighting District Act of 1972.

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APPENDIX A

CALCULATION OF MAINTENANCE AND INCIDENTAL COST TABLE

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APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Original District	Annexation S1-B	Annexation S1-C	Annexation S1-D	Annexation S1-E	Annexation S1-F	Annexation S1-G	Annexation S1-H	Annexation S1-I	Annexation S1-J	Annexation S1-K	Annexation S1-L	Annexation S1-M	Annexation S1-N	Annexation S1-O	Annexation S1-P
Description	PM 11917	PM 11755	CUP 617	MS 184	CUP 382	CRA 606	CRA 486	CUP 253	CRA 608	CUP 519	CUP 516	CUP 518	CUP 522	Tract 13947	CUP 521	CUP 605
Original Parcels	APN 292-032-39 THRU 42	APN 293-172-16 THRU 18	This parcel has a new APN 0292-321-10. This parcel is exempt from assessment at this time because it is owned by Southern California Gas Company APN 292-033-11	APN 167-231-19 THRU 21	APN 171-383-19 & 20	APN 169-131-33	APN 292-321-10	APN 169-411-07	APN 169-142-11	APN 171-331-04	APN 292-166-11	APN 169-053-12	APN 172-031-49	APN 174-621-01 THRU 35	APN 292-034-16	APN 169-182-02 THRU 04
Zone	3	4	4	3	3	1	4	4	3	3	4	3	3	1	3	1
Unit of Benefit/Zone																
Zone 1 UOB	0	0	0	0	0	1	0	0	0	0	0	0	0	35	0	2
Zone 2 UOB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zone 3 UOB	31	0	0	3	2	0	0	0	1	1	0	1	1	0	1	0
Zone 4 UOB	0	13	11	0	0	0	5	5	0	0	13	0	0	0	0	0
TOTAL UOB per Zone	31	13	11	3	2	1	5	5	1	1	13	1	1	35	1	2
Actual Expenses																
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:																
Unit of Benefit Assessment/ Zone																
Zone 1	$ -	$ -	$ -	$ -	$ -	$ 20	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 713	$ -	$ 41
Zone 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 3	$ 857	$ -	$ -	$ 83	$ 55	$ -	$ -	$ -	$ 28	$ 28	$ -	$ 28	$ 28	$ -	$ 28	$ -
Zone 4	$ -	$ 390	$ 330	$ -	$ -	$ -	$ 150	$ 150	$ -	$ -	$ 390	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ 857**	**$ 390**	**$ 330**	**$ 83**	**$ 55**	**$ 20**	**$ 150**	**$ 150**	**$ 28**	**$ 28**	**$ 390**	**$ 28**	**$ 28**	**$ 713**	**$ 28**	**$ 41**
Incidental Expenses																
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 857**	**$ 390**	**$ 330**	**$ 83**	**$ 55**	**$ 20**	**$ 150**	**$ 150**	**$ 28**	**$ 28**	**$ 390**	**$ 28**	**$ 28**	**$ 713**	**$ 28**	**$ 41**
Levy Adjustments																
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ (235)	$ (117)	$ (330)	$ (23)	$ (15)	$ (1)	$ (45)	$ (45)	$ (8)	$ (8)	$ (117)	$ (8)	$ (8)	$ (33)	$ (8)	$ (2)
BALANCE TO LEVY	**$ 856.53**	**$ 390.39**	**$ 330.33**	**$ 82.89**	**$ 55.26**	**$ 20.38**	**$ 150.15**	**$ 150.15**	**$ 27.63**	**$ 27.63**	**$ 390.39**	**$ 27.63**	**$ 27.63**	**$ 713.30**	**$ 27.63**	**$ 40.76**
Total # of Parcels	4	3	1	3	2	1	1	1	1	1	1	1	1	35	1	3
Total Parcels Levied	4	3	0	3	2	1	1	1	1	1	1	1	1	35	1	3

Total Assessment Allowable	**$ 621.55**	**$ 273.39**	**$ -**	**$ 60.15**	**$ 40.10**	**$ 19.45**	**$ 105.15**	**$ 105.15**	**$ 20.05**	**$ 20.05**	**$ 273.39**	**$ 20.05**	**$ 20.05**	**$ 680.75**	**$ 20.05**	**$ 38.91**

APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Annexation S1-S	Annexation S1-T	Annexation S1-U	Annexation S1-V	Annexation S1-W	Annexation S1-X	Annexation S1-Y	Annexation S2-A	Annexation S2-B	Annexation S2-D	Annexation S2-F	Annexation S2-H	Annexation S3-A	Annexation S3-B	Annexation S3-C	Annexation S3-D
Description	CUP 278	CUP 405	CRA 354	CRA 346	CRA 607	Tract 12461	PM 12022	PM 12330	PM 12940	Tract 14556	MS 196	CRA 615	CRA 517	CRA 628	CRA 624	CRA 305
Original Parcels	APN 171-171-18, 22 & 23 Subsequently,S1-S and S7-A resubdivided. Proportionate assessments levied to 0171-171-34 for for S1-S	APN 169-343-07	APN 292-182-30 & 31	APN 292-061-25	APN 292-156-21	APN 1212-191-60 THRU 79	APN 169-212-17 THRU 27	APN 292-153-24 THRU 27	APN 292-441-11 THRU 15	APN 176-441-18 THRU 27	APN 292-331-15 & 16	APN 292-157-31	APN 169-321-01 & 02	APN 292-310-07	APN 169-281-39	APN 167-271-61
Zone	3	3	4	Owned by County	3	1	3	3	3	1	3	4	3	1	3	3
Unit of Benefit/Zone																
Zone 1 UOB	0	0	0	0	0	20	0	0	0	17	0	0	0	1	0	0
Zone 2 UOB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zone 3 UOB	4	1	0	0	6	0	19	12	3	0	8	0	4	0	1	5
Zone 4 UOB	0	0	2	0	0	0	0	0	0	0	0	1	0	0	0	0
TOTAL UOB per Zone	4	1	2	0	6	20	19	12	3	17	8	1	4	1	1	5
Actual Expenses																
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:																
Unit of Benefit Assessment/ Zone																
Zone 1	$ -	$ -	$ -	$ -	$ -	$ 408	$ -	$ -	$ -	$ 346	$ -	$ -	$ -	$ 20	$ -	$ -
Zone 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 3	$ 111	$ 28	$ -	$ -	$ 166	$ -	$ 525	$ 332	$ 83	$ -	$ 221	$ -	$ 111	$ -	$ 28	$ 138
Zone 4	$ -	$ -	$ 60	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 30	$ -	$ -	$ -	$ -
SUBTOTAL	**$ 111**	**$ 28**	**$ 60**	**$ -**	**$ 166**	**$ 408**	**$ 525**	**$ 332**	**$ 83**	**$ 346**	**$ 221**	**$ 30**	**$ 111**	**$ 20**	**$ 28**	**$ 138**
Incidental Expenses																
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 111**	**$ 28**	**$ 60**	**$ -**	**$ 166**	**$ 408**	**$ 525**	**$ 332**	**$ 83**	**$ 346**	**$ 221**	**$ 30**	**$ 111**	**$ 20**	**$ 28**	**$ 138**
Levy Adjustments																
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ (30)	$ (8)	$ (18)	$ -	$ (45)	$ (19)	$ (144)	$ (91)	$ (23)	$ (16)	$ (61)	$ (9)	$ (30)	$ (1)	$ (8)	$ (38)
BALANCE TO LEVY	**$ 110.52**	**$ 27.63**	**$ 60.06**	**$ -**	**$ 165.78**	**$ 407.60**	**$ 524.97**	**$ 331.56**	**$ 82.89**	**$ 346.46**	**$ 221.04**	**$ 30.03**	**$ 110.52**	**$ 20.38**	**$ 27.63**	**$ 138.15**
Total # of Parcels	3	1	2	1	1	20	11	4	5	10	2	1	2	1	1	1
Total Parcels Levied	3	1	2	0	1	20	11	4	5	10	2	1	2	1	1	1

Total Assessment Allowable	**$ 80.19**	**$ 20.05**	**$ 42.06**	**$ -**	**$ 120.30**	**$ 389.00**	**$ 380.95**	**$ 240.60**	**$ 60.15**	**$ 330.70**	**$ 160.40**	**$ 21.03**	**$ 80.20**	**$ 19.45**	**$ 20.05**	**$ 100.25**

APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Annexation S3-E	Annexation S3-F	Annexation S3-G	Annexation S3-H	Annexation S3-J	Annexation S4-A	Annexation S4-B	Annexation S4-C	Annexation S4-D	Annexation S4-E	Annexation S4-F	Annexation S4-G	Annexation S4-H	Annexation S4-I	Annexation S5-B	Annexation S5-C
Description	Tract 13575	CUP 550	CRA 623	CUP 542	MS 201	MS 213	MS 211	CUP 559	CUP 636	CRA 546	CRA 641	CRA 640	CUP 562	CUP 548	Tract 10179	CUP 574
Original Parcels	APN 1212-701-01 THRU 27	APN 292-165-15	APN 292-381-08	APN 292-064-13, 17, 21 THRU 27	APN 171-341-33	APN 172-301-14 THRU 17	APN 292-201-36 & 37 Subsequently 36 became 38	APN 171-202-30	APN 169-043-14	APN 292-192-11	APN 292-310-36	APN 169-301-08, 10, 11	APN 292-064-17	APN 169-313-16	APN 167-861-37 THRU 54; APN 167-851-39 THRU 56	APN 171-202-33
Zone	1	3 & 4	1	4	3	4	3	3	1	4	1	4	See ANX S3-H	1	1	1
Unit of Benefit/Zone																
Zone 1 UOB	36	0	1	0	0	0	0	0	3	0	2	0	0	4	26	1
Zone 2 UOB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zone 3 UOB	0	9	0	0	4	0	5	2	0	0	0	0	0	0	0	0
Zone 4 UOB	0	2	0	27	0	3	0	0	0	11	0	1	0	0	0	0
TOTAL UOB per Zone	36	11	1	27	4	3	5	2	3	11	2	1	0	4	26	1
Actual Expenses																
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:																
Unit of Benefit Assessment/ Zone																
Zone 1	$ 734	$ -	$ 20	$ -	$ -	$ -	$ -	$ -	$ 61	$ -	$ 41	$ -	$ -	$ 82	$ 530	$ 20
Zone 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 3	$ -	$ 249	$ -	$ -	$ 111	$ -	$ 138	$ 55	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 4	$ -	$ 60	$ -	$ 811	$ -	$ 90	$ -	$ -	$ -	$ 330	$ -	$ 30	$ -	$ -	$ -	$ -
SUBTOTAL	**$ 734**	**$ 309**	**$ 20**	**$ 811**	**$ 111**	**$ 90**	**$ 138**	**$ 55**	**$ 61**	**$ 330**	**$ 41**	**$ 30**	**$ -**	**$ 82**	**$ 530**	**$ 20**
Incidental Expenses																
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 734**	**$ 309**	**$ 20**	**$ 811**	**$ 111**	**$ 90**	**$ 138**	**$ 55**	**$ 61**	**$ 330**	**$ 41**	**$ 30**	**$ -**	**$ 82**	**$ 530**	**$ 20**
Levy Adjustments																
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ (34)	$ (86)	$ (1)	$ (243)	$ (30)	$ (27)	$ (38)	$ (15)	$ (3)	$ (99)	$ (2)	$ (9)	$ -	$ (4)	$ (24)	$ (1)
BALANCE TO LEVY	**$ 733.68**	**$ 308.73**	**$ 20.38**	**$ 810.81**	**$ 110.52**	**$ 90.09**	**$ 138.15**	**$ 55.26**	**$ 61.14**	**$ 330.33**	**$ 40.76**	**$ 30.03**	**$ -**	**$ 81.52**	**$ 529.88**	**$ 20.38**
Total # of Parcels	27	1	1	9	1	4	2	1	1	1	1	3	1	1	36	1
Total Parcels Levied	27	1	1	9	1	4	2	1	1	1	1	3	0	1	36	1

Total Assessment Allowable	**$ 700.11**	**$ 222.51**	**$ 19.45**	**$ 567.81**	**$ 80.20**	**$ 63.10**	**$ 100.25**	**$ 40.10**	**$ 58.35**	**$ 231.33**	**$ 38.90**	**$ 21.03**	**$ -**	**$ 77.80**	**$ 505.80**	**$ 19.45**

APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Annexation S5-D	Annexation S5-E	Annexation S6-A	Annexation S6-B	Annexation S7-A	Annexation S7-B	Annexation S7-C	Annexation S7-D	Annexation S7-E	Annexation S7-F	Annexation S7-G	Annexation S7-H	Annexation S8-A	Annexation S8-B	Annexation S9-A	Annexation S9-B
Description	CRA 642	MS 216-B	CRA 648	CUP 581	MS 228	CRA 639	CUP 602	CUP 590	CUP 607	CUP 577	CUP 541	Tract 14790-1	CUP 584	CRA 666	Tract 15589	MS 221
Original Parcels	APN 292-154-12	APN 174-021-41 & 42	Parcel is no longer assessed as it is owned by the City APN 292-157-16	APN 171-203-13	APN 171-161-14 & 15 Subsequently, S1-S and S7-H were resubdivided. Proportionate assessments levied to 0171-161-17 for for S7-A	APN 292-152-39	APN 292-063-48	APN 171-332-30	APN 167-101-13	APN 1212-041-01	APN 174-261-15	APN 176-521-01 THRU 13, 18 THRU 23, 27 THRU 32, APN 176-531-01 THRU 03, 07 THRU 09, 12 THRU 14, 18, 20 THRU 25 Subsequently, 0176-531-14 was changed to -26	APN 172-121-03	APN 292-158-03 Subsequently, 03 was changed to 17	APN 293-421-01 THRU 45	APN 174-281-33, 34, 35, 37
Zone	3	1	4	1	3	3	4	1	1 & 3	1	1	2	3	3	1 & 4	1
Unit of Benefit/Zone																
Zone 1 UOB	0	2	0	2	0	0	0	2	4	4	8	0	0	0	5	3
Zone 2 UOB	0	0	0	0	0	0	0	0	0	0	0	125	0	0	0	0
Zone 3 UOB	5	0	0	0	10	5	0	0	6	0	0	0	1	2	0	0
Zone 4 UOB	0	0	9	0	0	0	2	0	0	0	0	0	0	0	5	0
TOTAL UOB per Zone	5	2	9	2	10	5	2	2	10	4	8	125	1	2	10	3
Actual Expenses																
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:																
Unit of Benefit Assessment/ Zone																
Zone 1	$ -	$ 41	$ -	$ 41	$ -	$ -	$ -	$ 41	$ 82	$ 82	$ 163	$ -	$ -	$ -	$ 102	$ 61
Zone 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,061	$ -	$ -	$ -	$ -
Zone 3	$ 138	$ -	$ -	$ -	$ 276	$ 138	$ -	$ -	$ 166	$ -	$ -	$ -	$ 28	$ 55	$ -	$ -
Zone 4	$ -	$ -	$ 270	$ -	$ -	$ -	$ 60	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 150	$ -
SUBTOTAL	**$ 138**	**$ 41**	**$ 270**	**$ 41**	**$ 276**	**$ 138**	**$ 60**	**$ 41**	**$ 247**	**$ 82**	**$ 163**	**$ 1,061**	**$ 28**	**$ 55**	**$ 252**	**$ 61**
Incidental Expenses																
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 138**	**$ 41**	**$ 270**	**$ 41**	**$ 276**	**$ 138**	**$ 60**	**$ 41**	**$ 247**	**$ 82**	**$ 163**	**$ 1,061**	**$ 28**	**$ 55**	**$ 252**	**$ 61**
Levy Adjustments																
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ (38)	$ (2)	$ (270)	$ (2)	$ (76)	$ (38)	$ (18)	$ (2)	$ (49)	$ (4)	$ (7)	$ 599	$ (8)	$ (15)	$ (50)	$ (3)
BALANCE TO LEVY	**$ 138.15**	**$ 40.76**	**$ 270.27**	**$ 40.76**	**$ 276.30**	**$ 138.15**	**$ 60.06**	**$ 40.76**	**$ 247.30**	**$ 81.52**	**$ 163.04**	**$ 1,061.25**	**$ 27.63**	**$ 55.26**	**$ 252.05**	**$ 61.14**
Total # of Parcels	1	2	1	1	2	1	1	1	1	1	1	40	1	1	45	4
Total Parcels Levied	1	2	0	1	2	1	1	1	1	1	1	40	1	1	45	4

Total Assessment Allowable	**$ 100.25**	**$ 38.90**	**$ -**	**$ 38.90**	**$ 200.50**	**$ 100.25**	**$ 42.06**	**$ 38.90**	**$ 198.10**	**$ 77.80**	**$ 155.60**	**$ 1,660.00**	**$ 20.05**	**$ 40.10**	**$ 202.50**	**$ 58.36**

APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Annexation S9-D	Annexation S9-E	Annexation S9-F	Annexation S10-A	Annexation S10-B	Annexation S10-C	Annexation S10-D	Annexation S10-E	Annexation S10-F	Annexation S10-G	Annexation S10-H	Annexation S10-I	Annexation S10-J	Annexation S10-K	Annexation S10-M
Description	CUP 617	CRA 670	CUP 629	Tract 15040	Tract 15832	Tract 15937	Tract 16015	Tract 16029	Tract 16032	Tract 16082	Tract 16101	MS 253, 255 (PM 15530, 15617	MS 252 (PM 15492	CRA 720	CRA 679
Original Parcels	APN 292-033-13	APN 292-157-20	APN 1212-431-02	APN 174-631-01 THRU 09, 11 THRU 35, 37 THRU 58, 63 & 64	APN 172-301-18 THRU 22, 26	APN 168-731-01 THRU 25, APN 168-741-01 THRU 78, APN 168-751-01 THRU 56	APN 1212-021-01 THRU 62	APN 167-081-13 THRU 45	APN 170-481-20 THRU 34	APN 172-091 24 THRU 36	APN 168-771-01 THRU 50, APN 168-781-01 THRU 34, APN 168-791-01 THRU 28, APN168-801-01 THRU 38	APN 292-153-28, 30 THRU 43	APN 169-011-32 THRU 35, 38 & 39	APN 292-154-22 THRU 25	APN 292-310-42
Zone	3	1	3	1 & 3	1 & 4	1, 3, & 4	1	1 & 3	1 & 4	1	1 & 4	1 & 4	4	1 & 4	1
Unit of Benefit/Zone															
Zone 1 UOB	0	1	0	71	4	95	54	12	9	18	108	17	0	5	1
Zone 2 UOB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zone 3 UOB	4	0	5	4	0	30	0	11	0	0	0	0	0	0	0
Zone 4 UOB	0	0	0	0	3	13	0	0	4	0	9	5	7	2	0
TOTAL UOB per Zone	4	1	5	75	7	138	54	23	13	18	117	22	7	7	1
Actual Expenses															
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:															
Unit of Benefit Assessment/ Zone															
Zone 1	$ -	$ 20	$ -	$ 1,447	$ 82	$ 1,936	$ 1,101	$ 245	$ 183	$ 367	$ 2,201	$ 346	$ -	$ 102	$ 20
Zone 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 3	$ 111	$ -	$ 138	$ 111	$ -	$ 829	$ -	$ 304	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Zone 4	$ -	$ -	$ -	$ -	$ 90	$ 390	$ -	$ -	$ 120	$ -	$ 270	$ 150	$ 210	$ 60	$ -
SUBTOTAL	**$ 111**	**$ 20**	**$ 138**	**$ 1,558**	**$ 172**	**$ 3,155**	**$ 1,101**	**$ 548**	**$ 304**	**$ 367**	**$ 2,471**	**$ 497**	**$ 210**	**$ 162**	**$ 20**
Incidental Expenses															
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 111**	**$ 20**	**$ 138**	**$ 1,558**	**$ 172**	**$ 3,155**	**$ 1,101**	**$ 548**	**$ 304**	**$ 367**	**$ 2,471**	**$ 497**	**$ 210**	**$ 162**	**$ 20**
Levy Adjustments															
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ (30)	$ (1)	$ (38)	$ (96)	$ (31)	$ (433)	$ (50)	$ (94)	$ (44)	$ (17)	$ (181)	$ (61)	$ (63)	$ (23)	$ (1)
BALANCE TO LEVY	**$ 110.52**	**$ 20.38**	**$ 138.15**	**$ 1,557.50**	**$ 171.61**	**$ 3,155.39**	**$ 1,100.52**	**$ 548.49**	**$ 303.54**	**$ 366.84**	**$ 2,471.31**	**$ 496.61**	**$ 210.21**	**$ 161.96**	**$ 20.38**
Total # of Parcels	1	1	1	58	6	159	62	33	15	13	150	15	6	4	1
Total Parcels Levied	1	1	1	58	6	159	62	33	15	13	150	15	6	4	1

Total Assessment Allowable	**$ 80.20**	**$ 19.45**	**$ 100.25**	**$ 1,461.02**	**$ 140.88**	**$ 2,722.08**	**$ 1,050.28**	**$ 454.08**	**$ 259.20**	**$ 350.09**	**$ 2,290.50**	**$ 435.82**	**$ 147.20**	**$ 139.31**	**$ 19.45**

APPENDIX A
COST TABLE
ENGINEER'S REPORT
STREET LIGHTING DISTRICT NO. 1, FY 2025-2026

District Name	Annexation S10-N	Annexation S10-O	Annexation S10-P	Annexation S10-Q	Annexation S10-R	Annexation S10-S	Annexation S10-T	Annexation S10-U	Annexation S10-V	Annexation S10-W	TOTALS
Description	CUP 35R	CUP 355 REV. 8	CUP 543	MS 234 (PM 15414)	MS 251 (PM 15414)	Tract 14790-2	Tract 14790-3	Tract 15532	CUP 652	MS 240	
Original Parcels	APN 173-251-21	APN 172-121-10, 11, 14	APN 171-431-02 Subsequently, 02 was changed to 05	APN 169-272-29, APN 169-281-45, 46	APN 176-014-16 & 17	APN 294-181-02 THRU 15, APN 294-191-01 THRU 4, 6 THRU 12, 16 THRU 20, APN 294-201-09, 11, 13, 15, 19, 21, 27, 28, APN 294-211-02 THRU 04, 06 THRU 10, 12, 13	APN 294-222-01 THRU 12, APN 294-232-01 THRU 07, APN 294-242-01 THRU 06, APN 294-252-01 THRU 13, APN 294-262-01 THRU 13	APN 168-271-13 THRU 48	APN 171-011-54	APN 292-201-22	
Zone	3	3	3	1 & 2	3	1 & 3	1 & 3	1, 3 & 4	1	1	
Unit of Benefit/Zone											
Zone 1 UOB	0	0	0	6	0	80	70	18	1	0	**749**
Zone 2 UOB	0	0	0	6	0	0	0	0	0	0	**131**
Zone 3 UOB	3	4	6	0	3	41	24	3	0	0	**291**
Zone 4 UOB	0	0	0	0	0	0	0	5	0	0	**158**
TOTAL UOB per Zone	3	4	6	12	3	121	94	26	1	0	**1329**
Actual Expenses											
Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
Incidental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
TOTAL EXPENSES	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Calculation of Current Assessments:											
Unit of Benefit Assessment/ Zone											
Zone 1	$ -	$ -	$ -	$ 122	$ -	$ 1,630	$ 1,427	$ 367	$ 20	$ -	**$ 15,265**
Zone 2	$ -	$ -	$ -	$ 51	$ -	$ -	$ -	$ -	$ -	$ -	**$ 1,112**
Zone 3	$ 83	$ 111	$ 166	$ -	$ 83	$ 1,133	$ 663	$ 83	$ -	$ -	**$ 8,040.33**
Zone 4	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 150	$ -	$ -	**$ 4,745**
SUBTOTAL	**$ 83**	**$ 111**	**$ 166**	**$ 173**	**$ 83**	**$ 2,763**	**$ 2,090**	**$ 600**	**$ 20**	**$ -**	**$ 29,162**
Incidental Expenses											
Engineering and Admin.	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
TOTAL APPLIED UOB & EXPENSES	**$ 83**	**$ 111**	**$ 166**	**$ 173**	**$ 83**	**$ 2,763**	**$ 2,090**	**$ 600**	**$ 20**	**$ -**	**$ 29,162**
Levy Adjustments											
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
General Fund Contribution	$ (23)	$ (30)	$ (45)	$ 23	$ (23)	$ (385)	$ (247)	$ (84)	$ (1)	$ -	**$ (4,117)**
BALANCE TO LEVY	**$ 82.89**	**$ 110.52**	**$ 165.78**	**$ 173.22**	**$ 82.89**	**$ 2,763.23**	**$ 2,089.72**	**$ 599.88**	**$ 20.38**	**$ -**	**$ 29,161.88**
Total # of Parcels	1	3	1	3	2	48	51	36	1	1	**993**
Total Parcels Levied	1	3	1	3	2	48	51	36	1	0	**988**

Total Assessment Allowable	**$ 60.15**	**$ 80.19**	**$ 120.30**	**$ 196.44**	**$ 60.16**	**$ 2,377.92**	**$ 1,842.63**	**$ 515.52**	**$ 19.45**	**$ -**	**$ 25,044.65**

APPENDIX B

DISTRICT DIAGRAM

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CITY OF REDLANDS
STREET LIGHT DISTRICT NO. 1

APPENDIX B - ASSESSMENT DIAGRAMS

Abbreviations

APN – Assessor's Parcel Number

CRA – Commission Review and Approval

CUP – Conditional Use Permit

MS – Minor Subdivision

PM – Parcel Map

TM – Tract Map

General comments

Each annexation has its own diagram.

North is up unless notated otherwise.

The assessor's parcel numbers are shown as a 9 digit number.

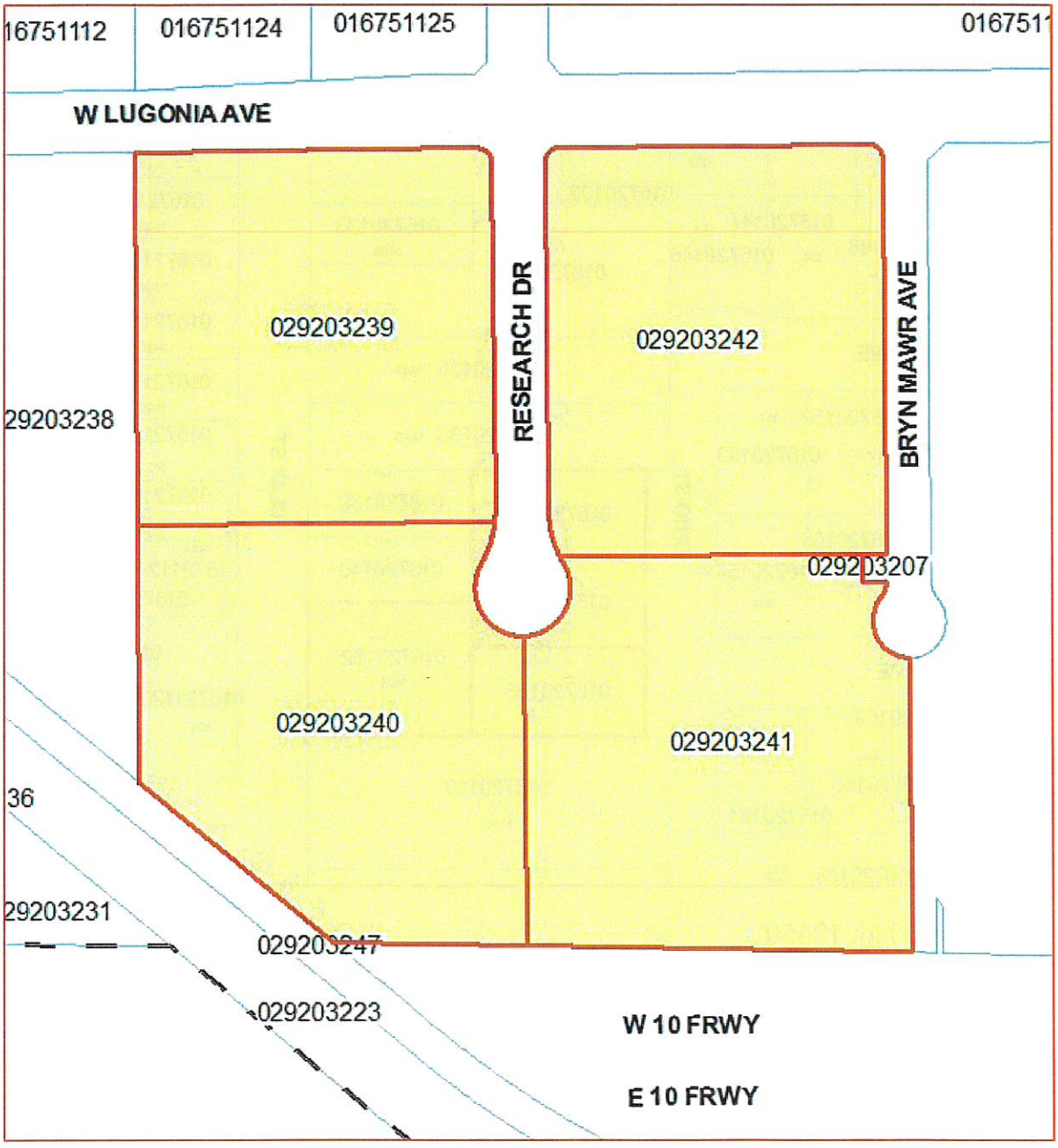
A dark red line delineates the boundary of each annexation.

A shaded background is typically used to indicate parcels within the Street Lighting District.

Annexation #s

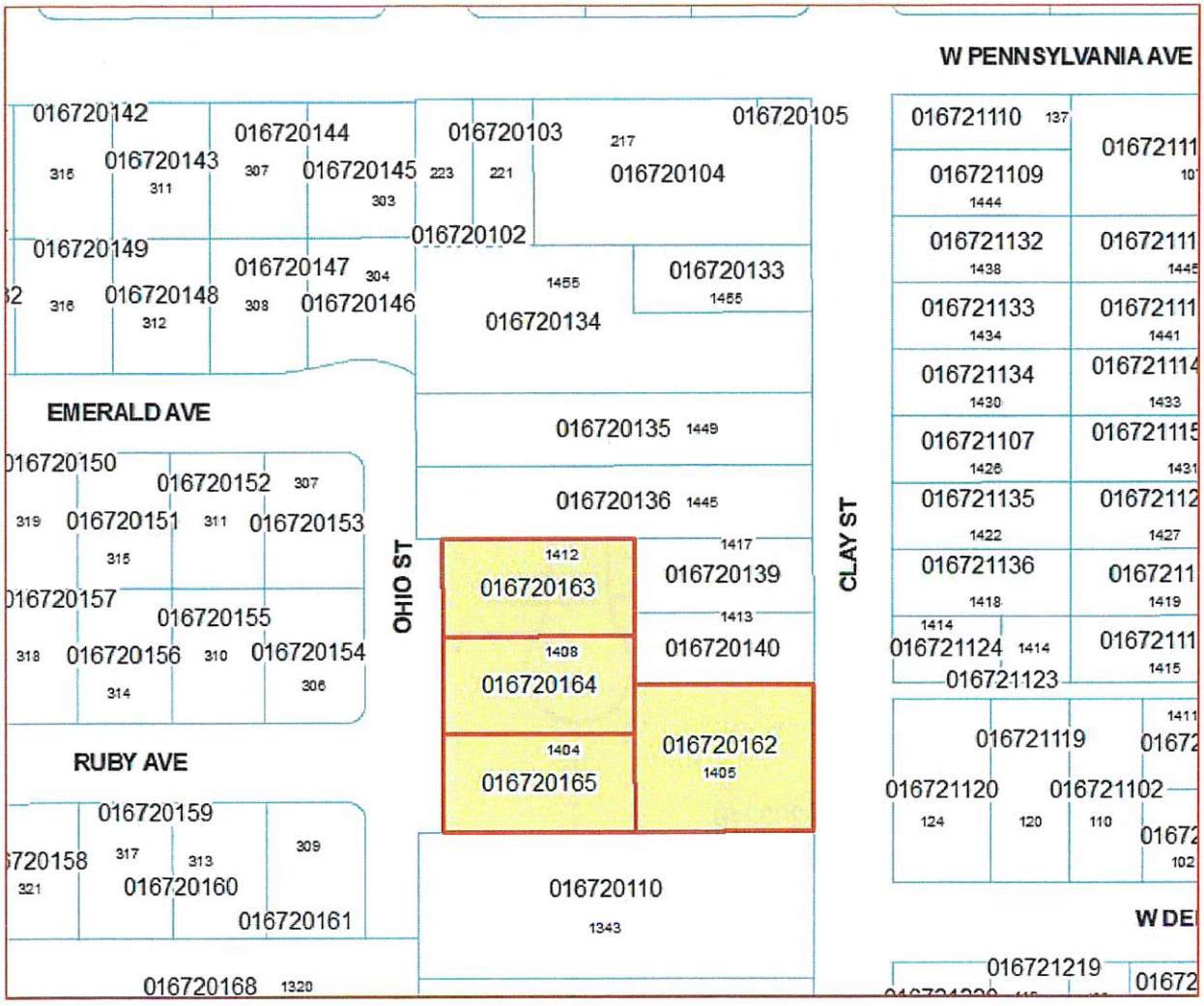
Initial District
S1-A thru S1-Y
S2-A thru S2-H
S3-A thru S3-I
S4-A thru S4-I
S5-A thru S5-E
S6-A thru S6-B
S7-A thru S7-H
S8-A thru S8-C
S9-A thru S9-F
S10-A thru S10-W

Initial District



Parcel Map No. 11917

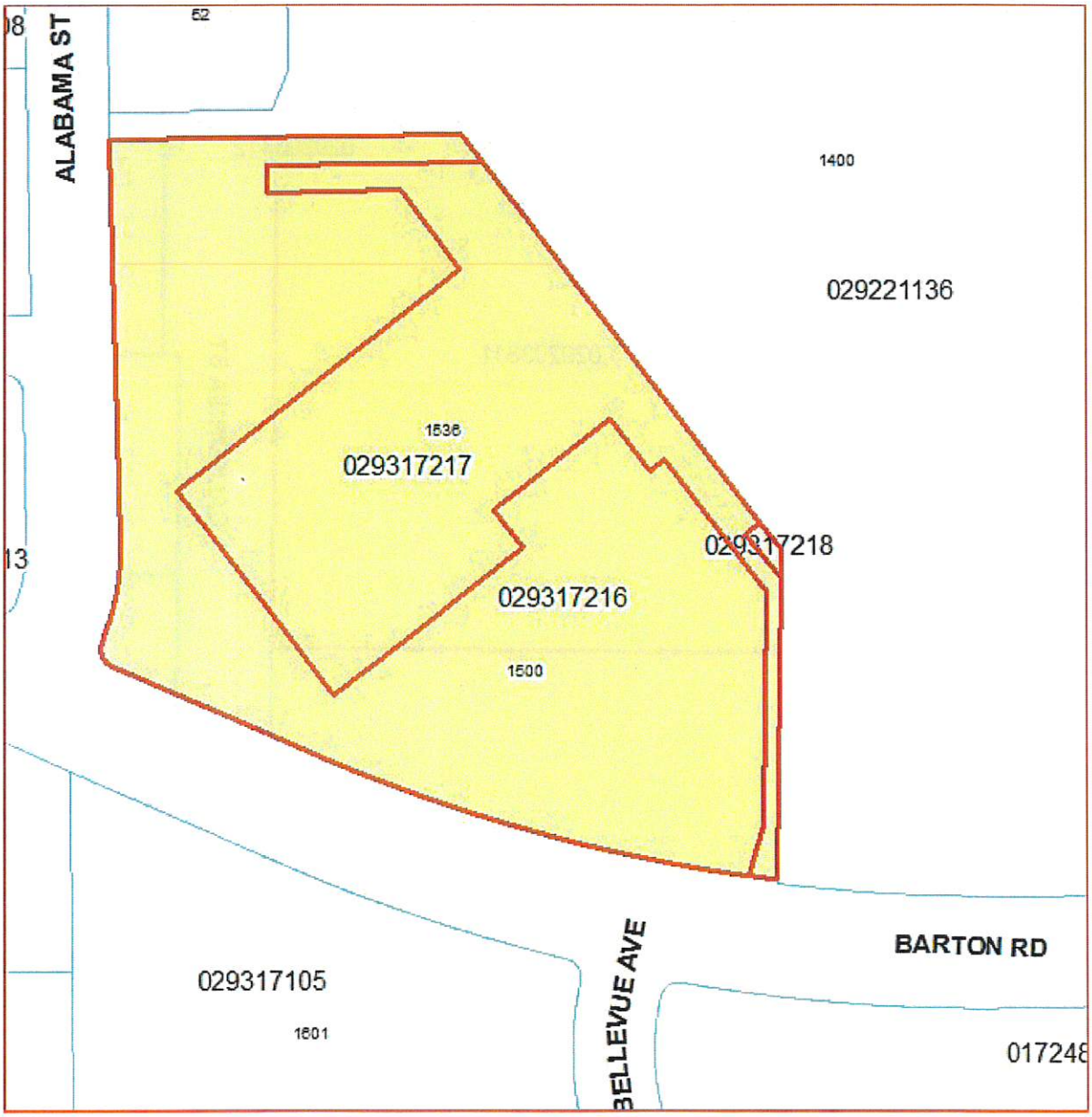
Annexation S1-A



Parcel Map No. 12450

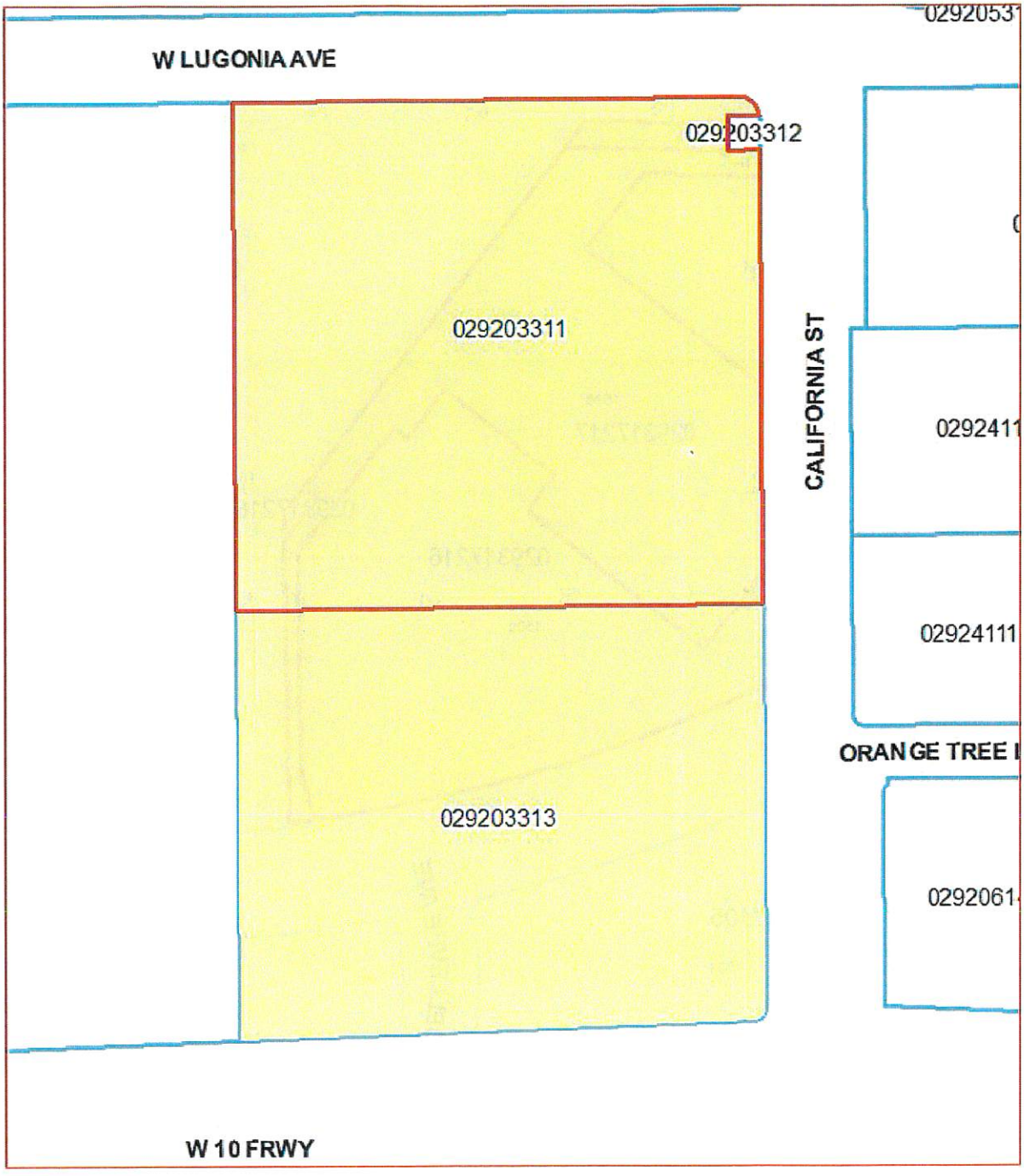
These parcels are not assessed.

Annexation S1-B



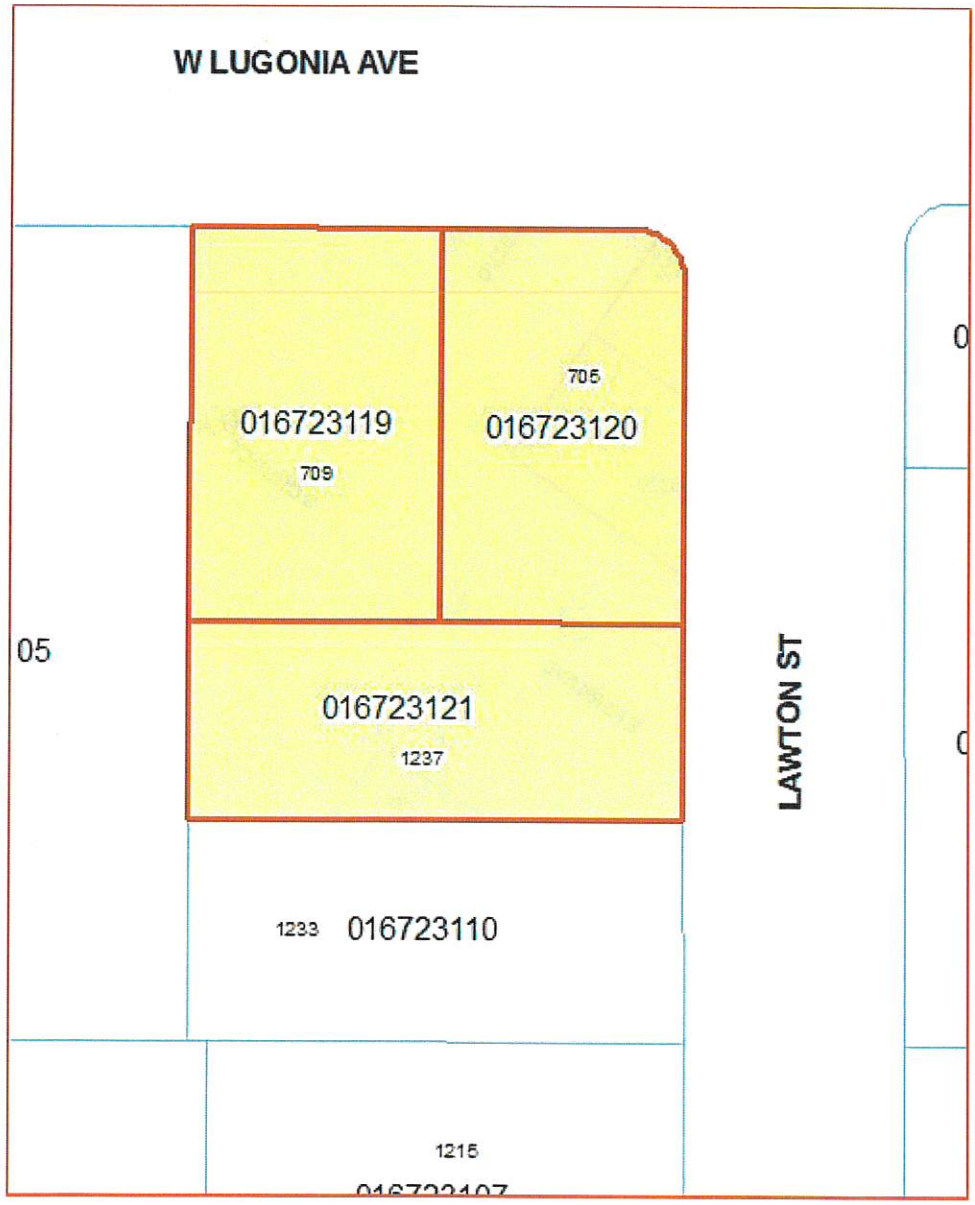
Parcel Map No. 11755

Annexation S1-C



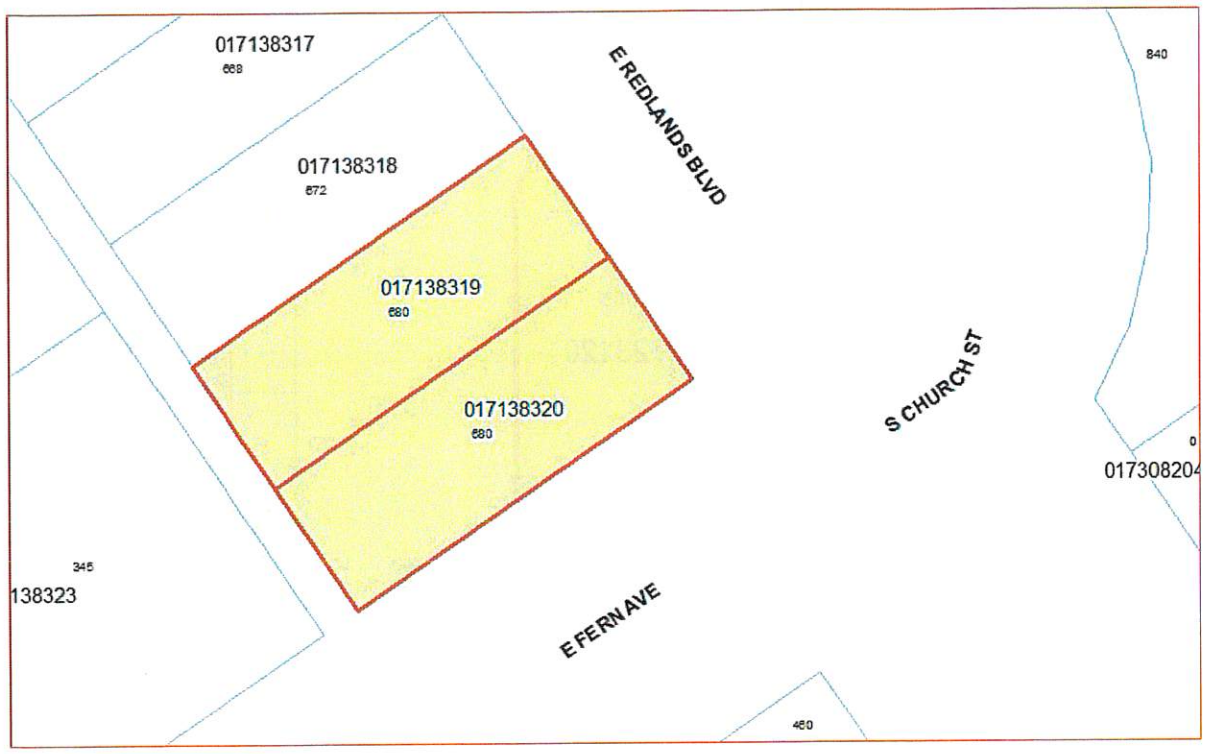
CUP 617

Annexation S1-D



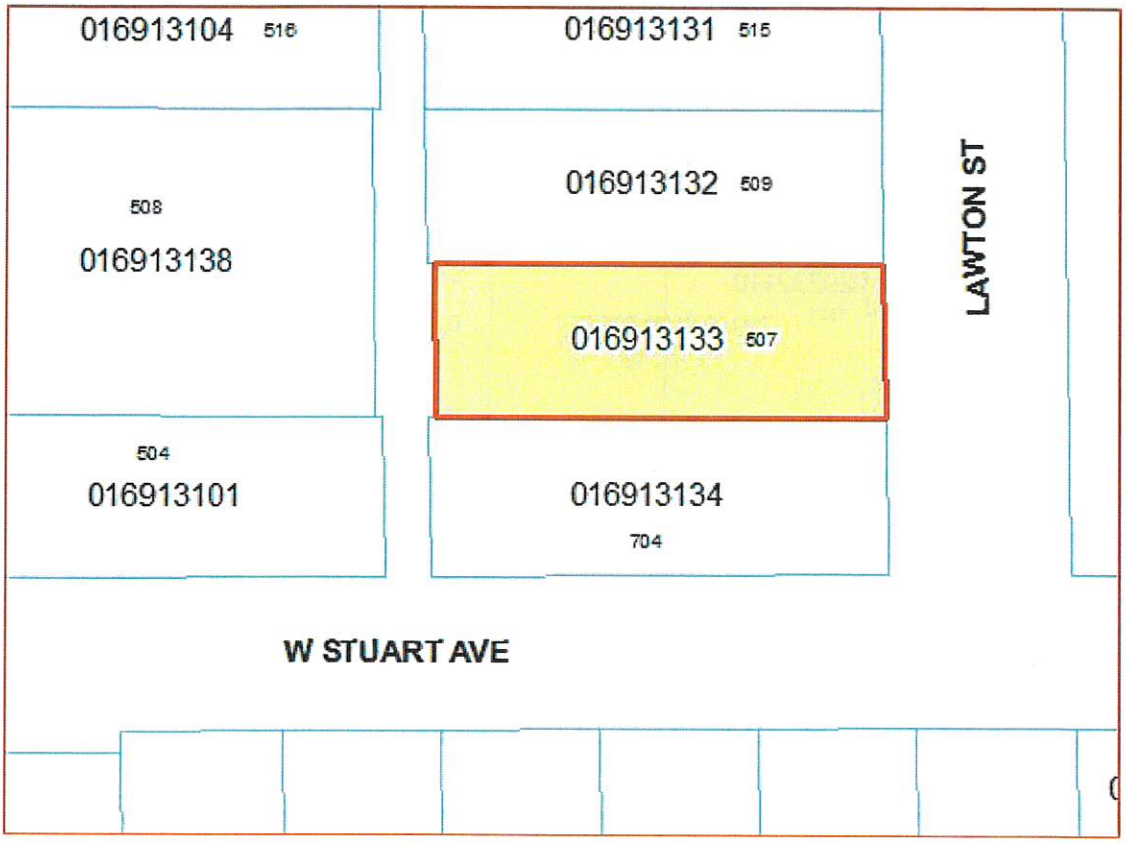
MS 184, Parcel Map No. 12300

Annexation S1-E



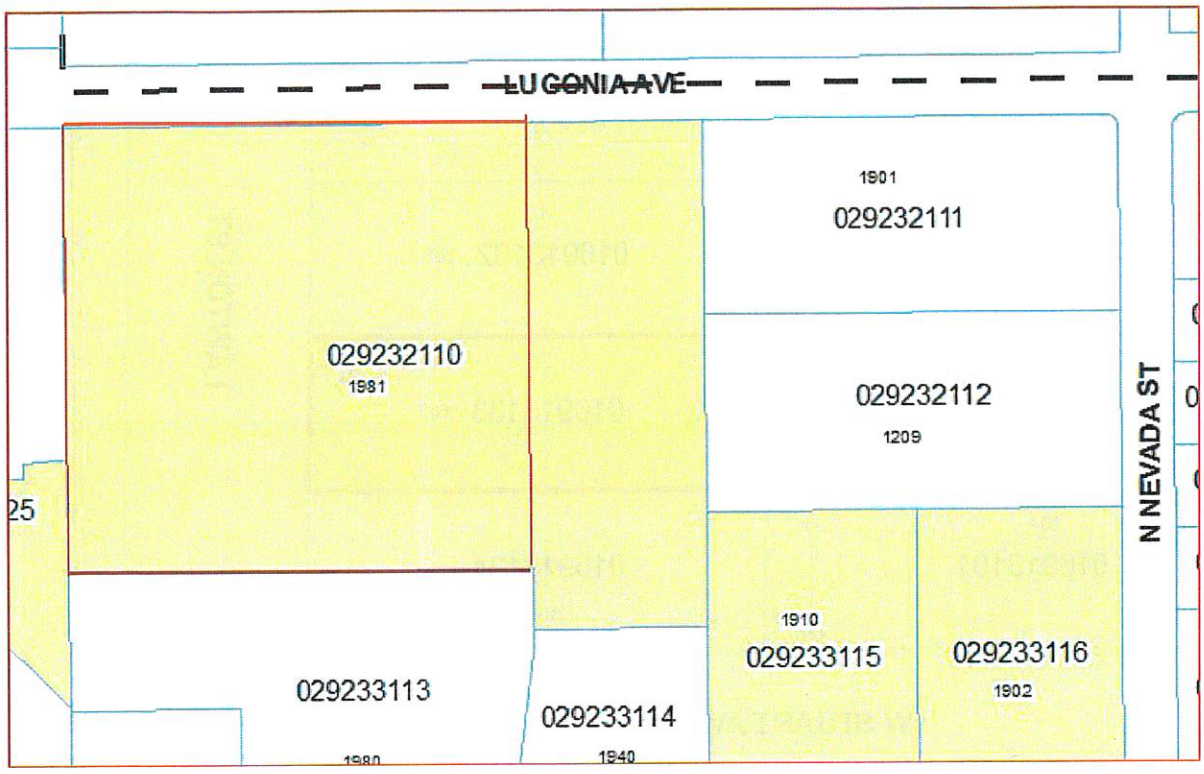
CUP 382

Annexation S1-F



CRA 606

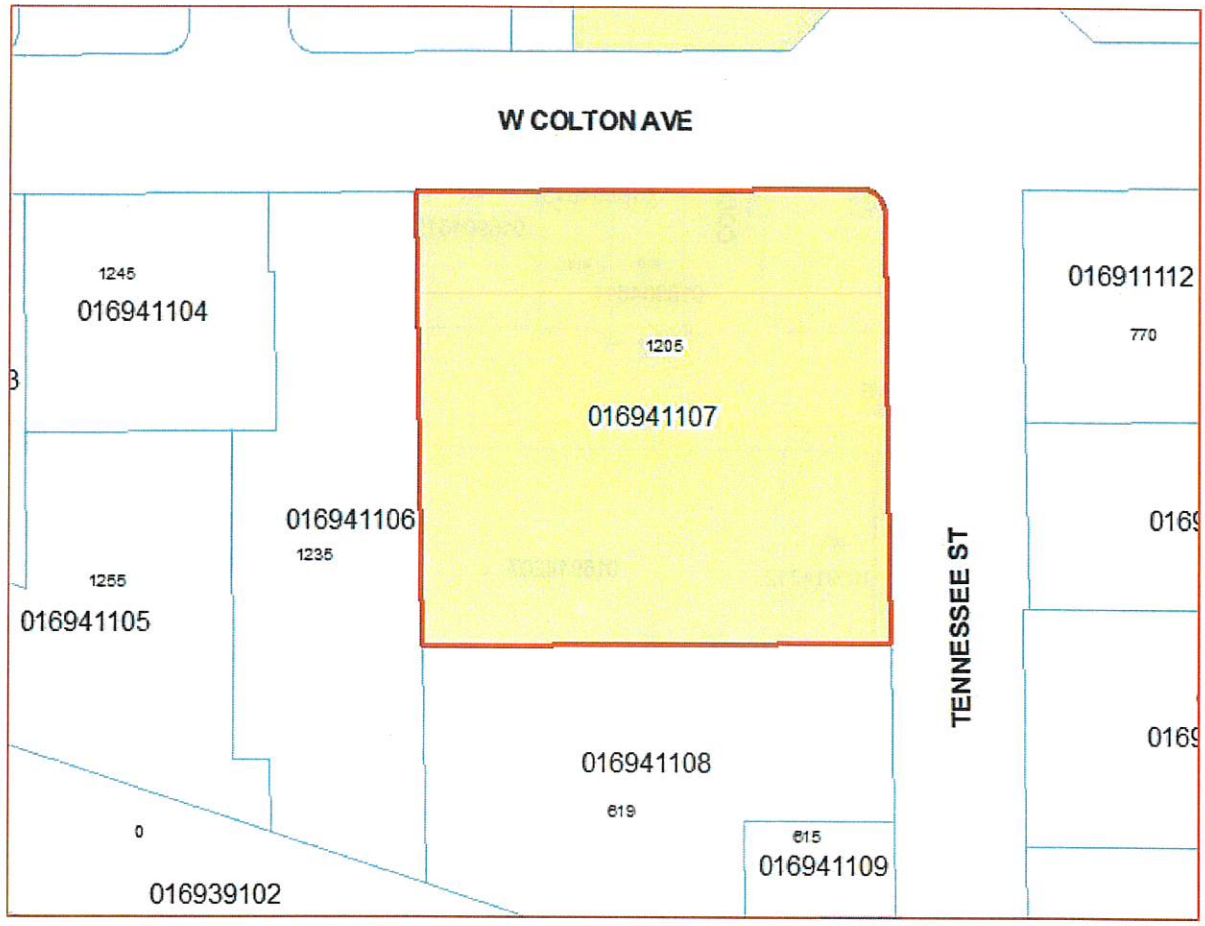
Annexation S1-G



CRA 486

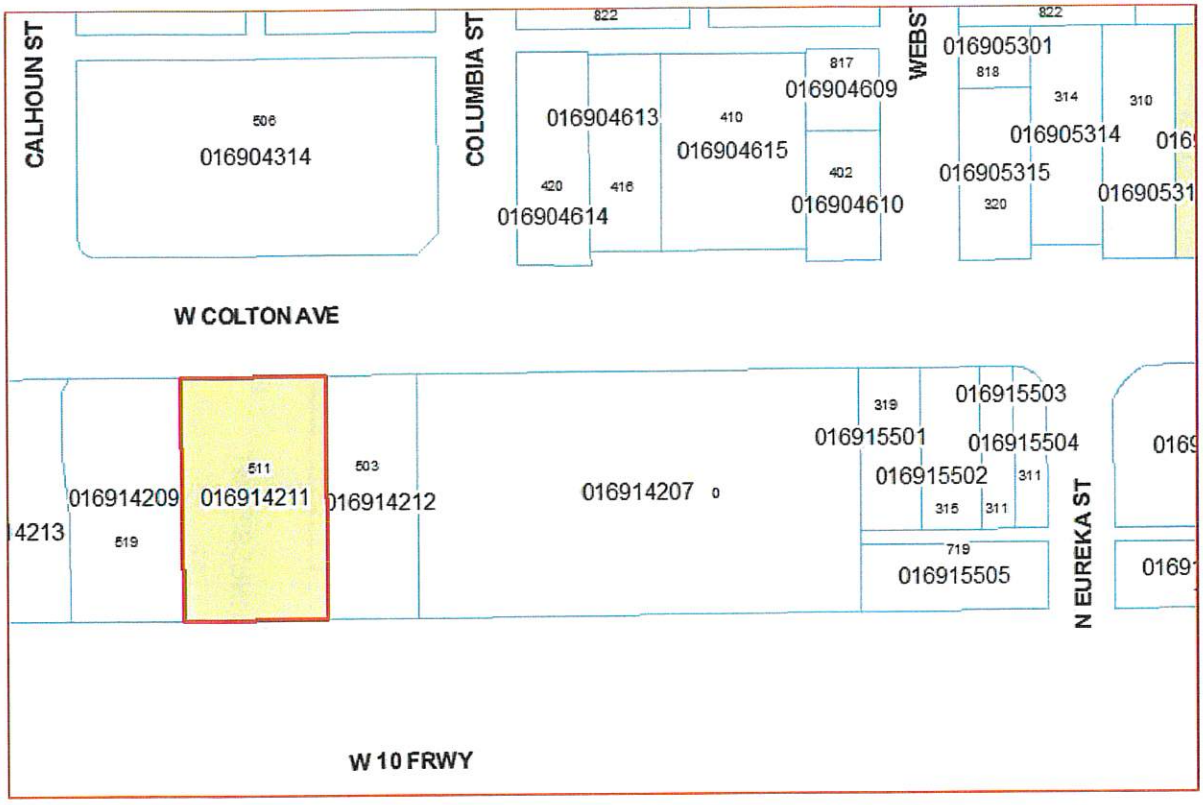
Note: The boundary shown in red was the original parcel for Annexation S1-G. The lot boundary was modified so the entire parcel is shown as part of the Street Light District.

Annexation S1-H



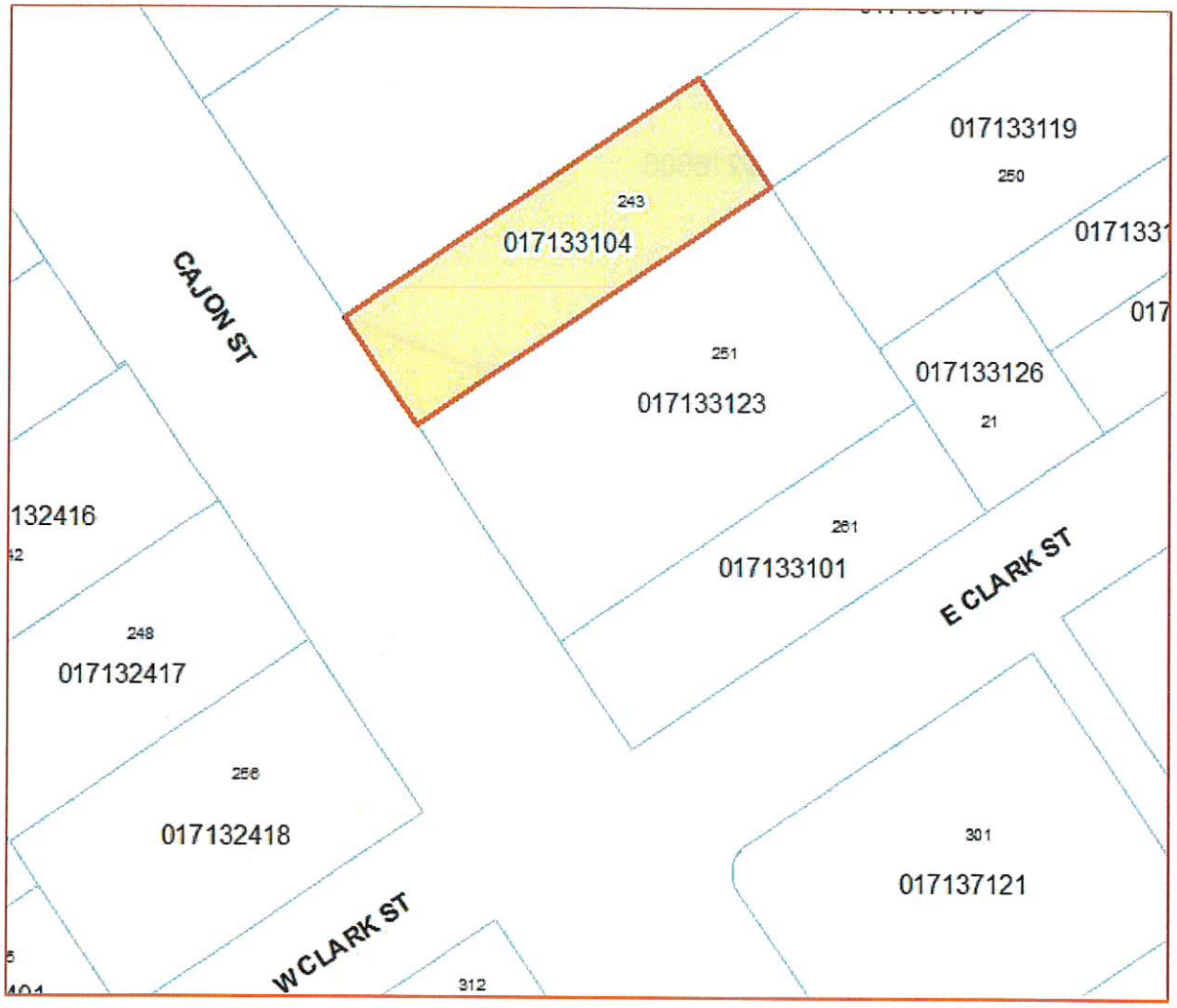
CUP 253

Annexation S1-I



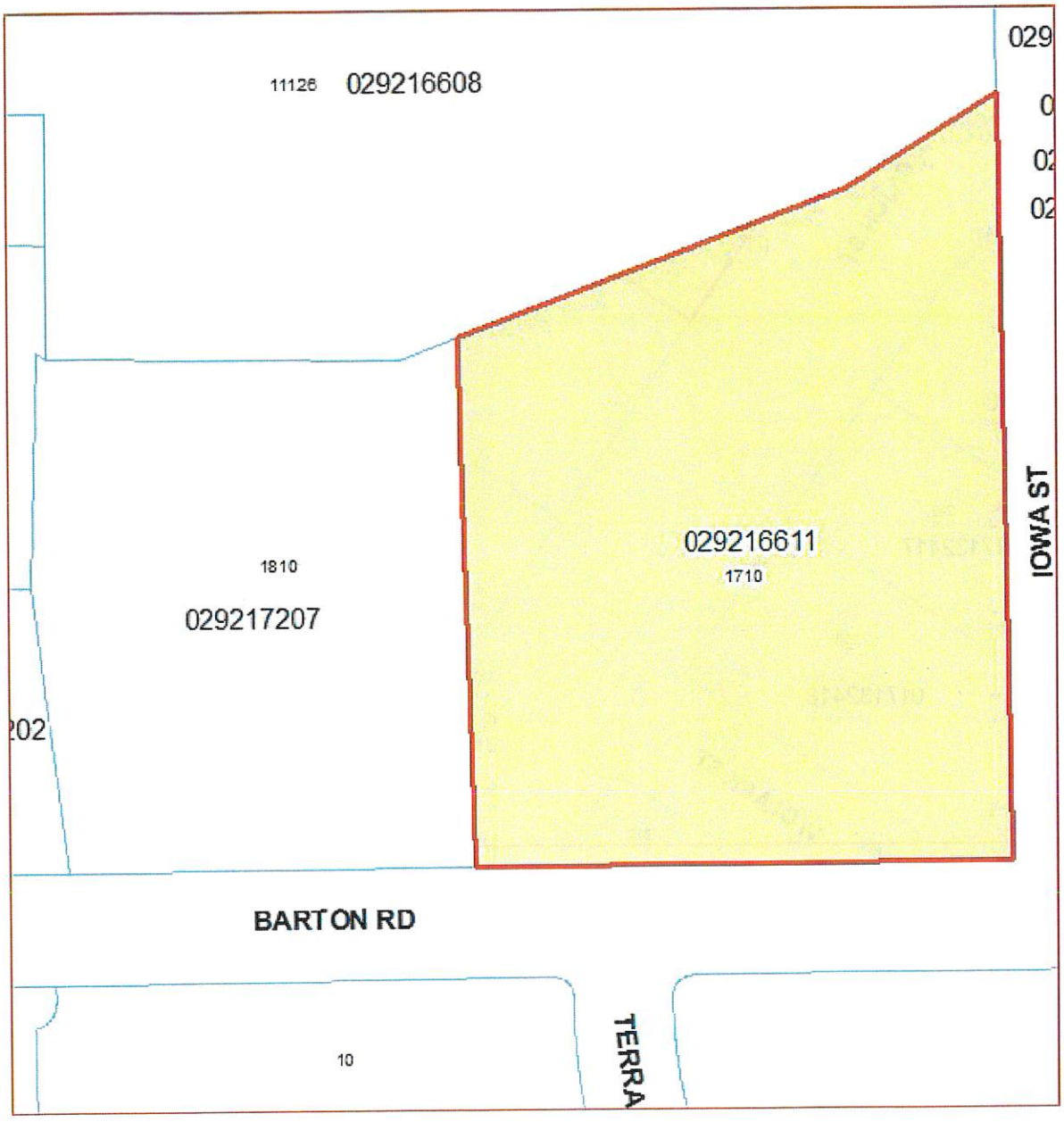
CRA 608

Annexation S1-J



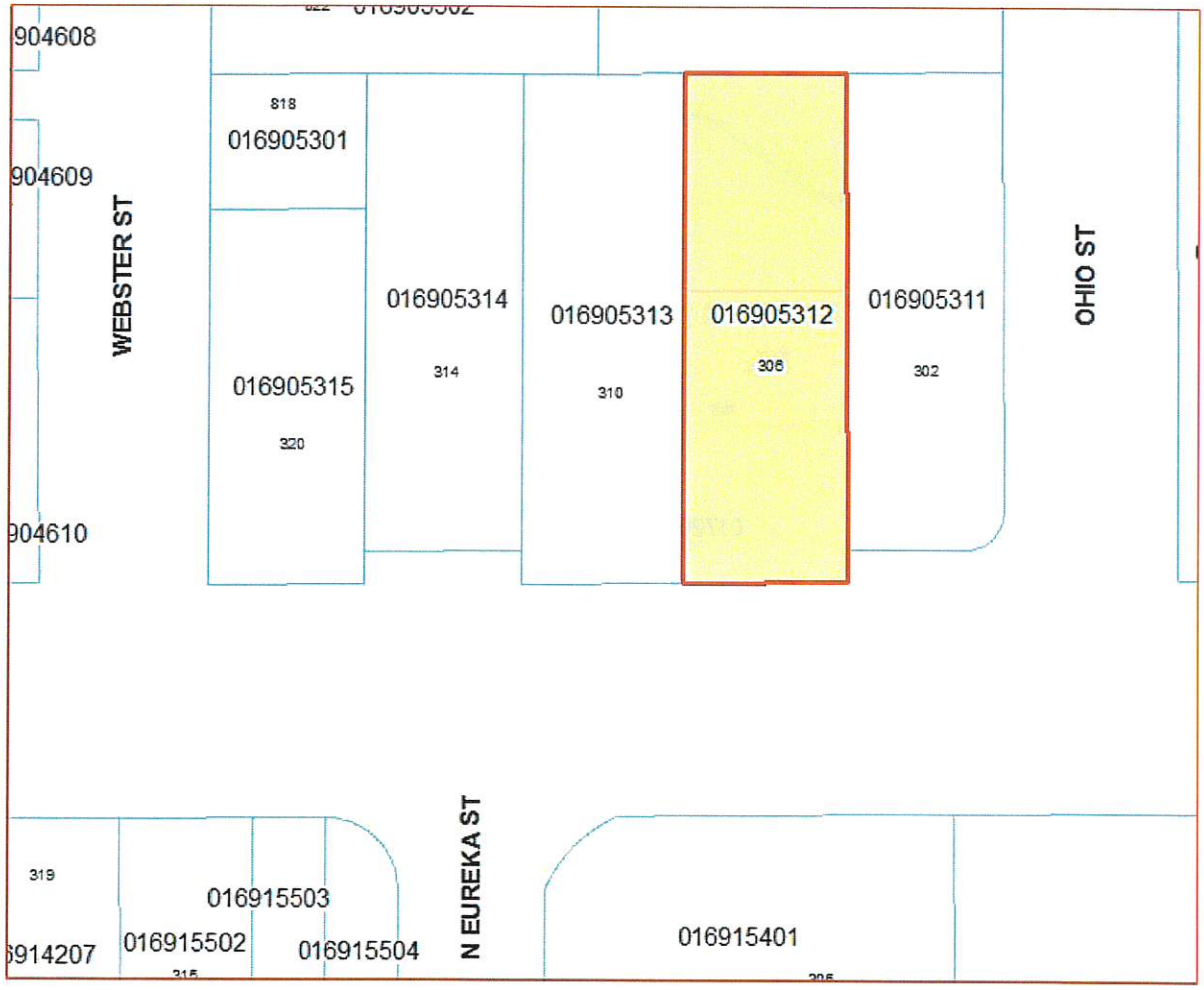
CUP 519

Annexation S1-K



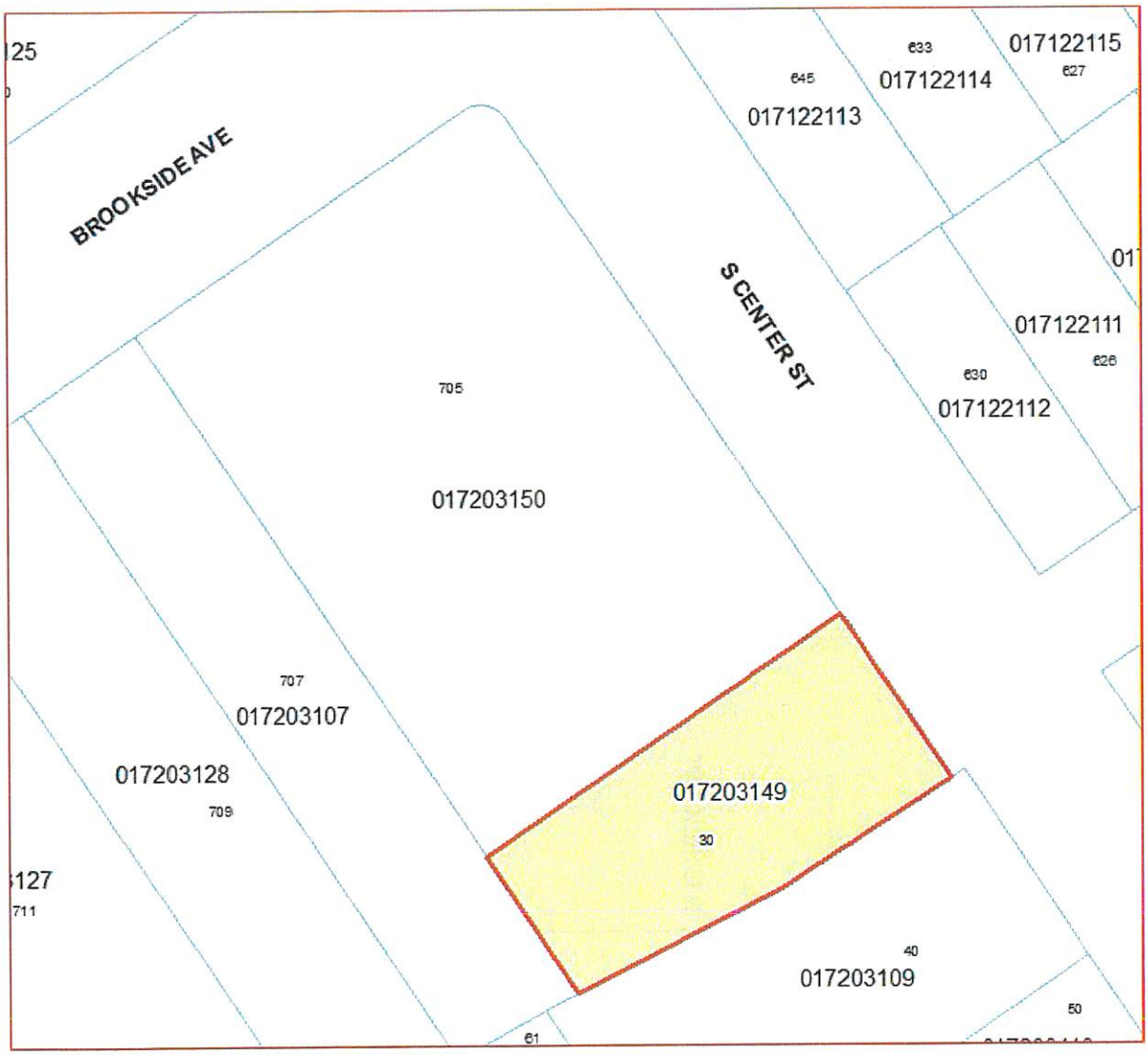
CUP 516

Annexation S1-L



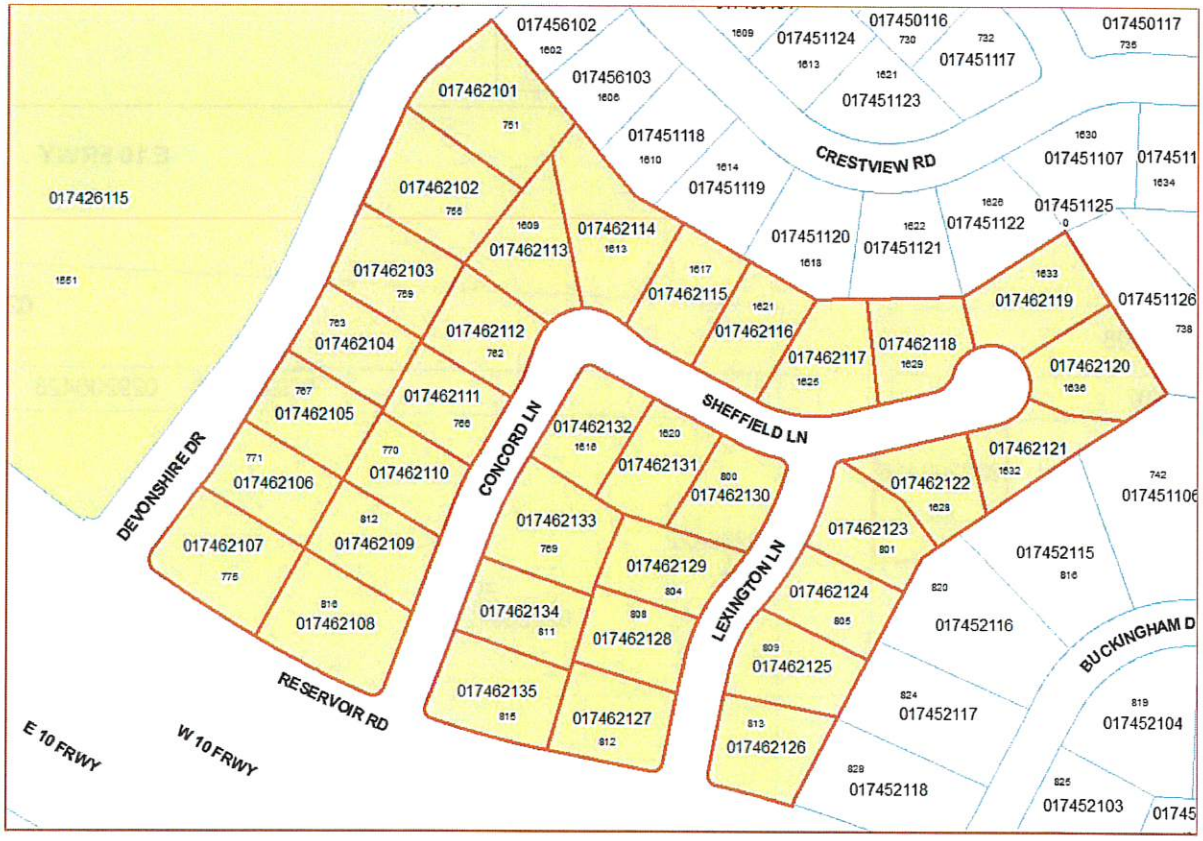
CUP 518

Annexation S1-M



CUP 522

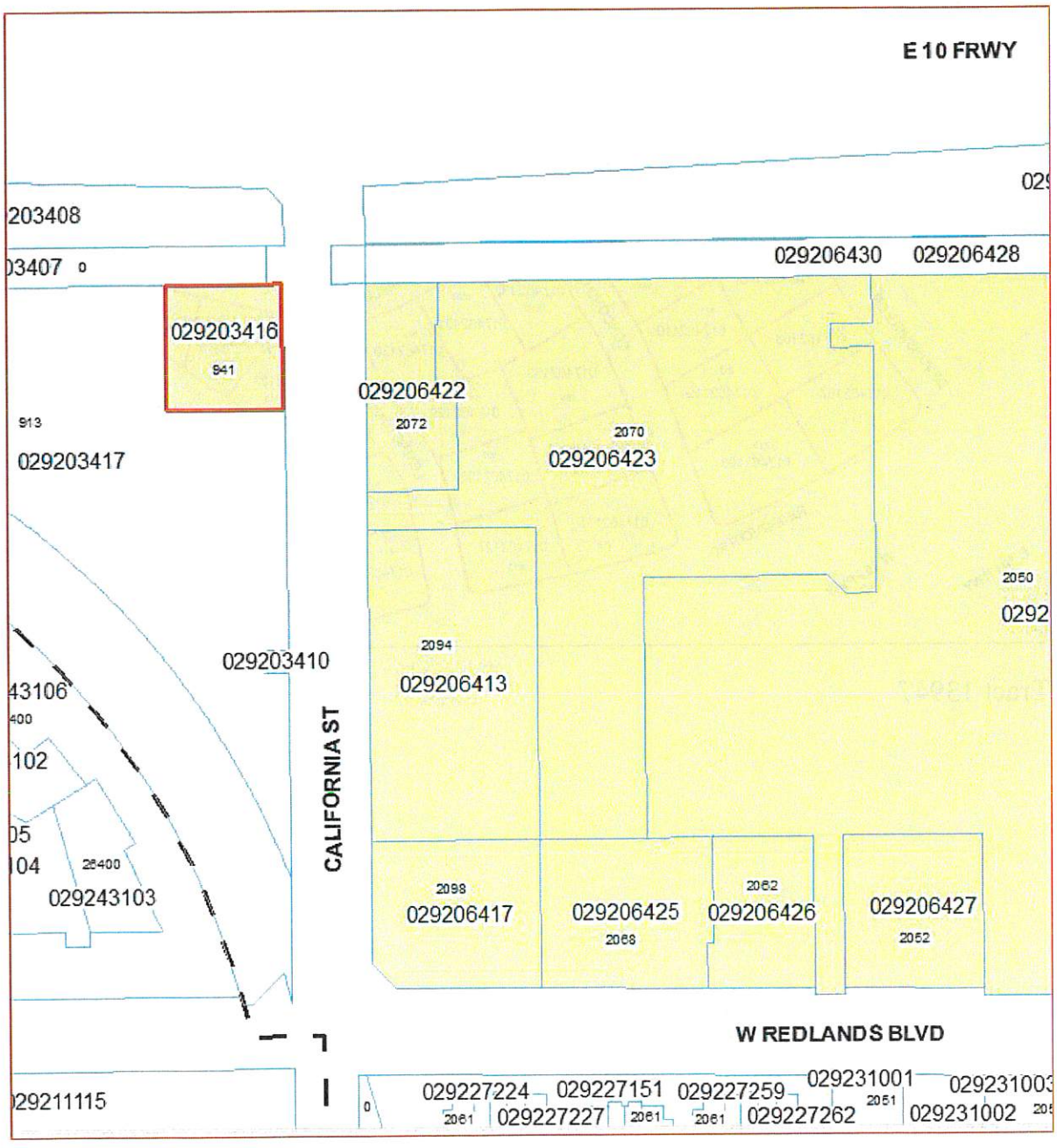
Annexation S1-N



Tract 13947

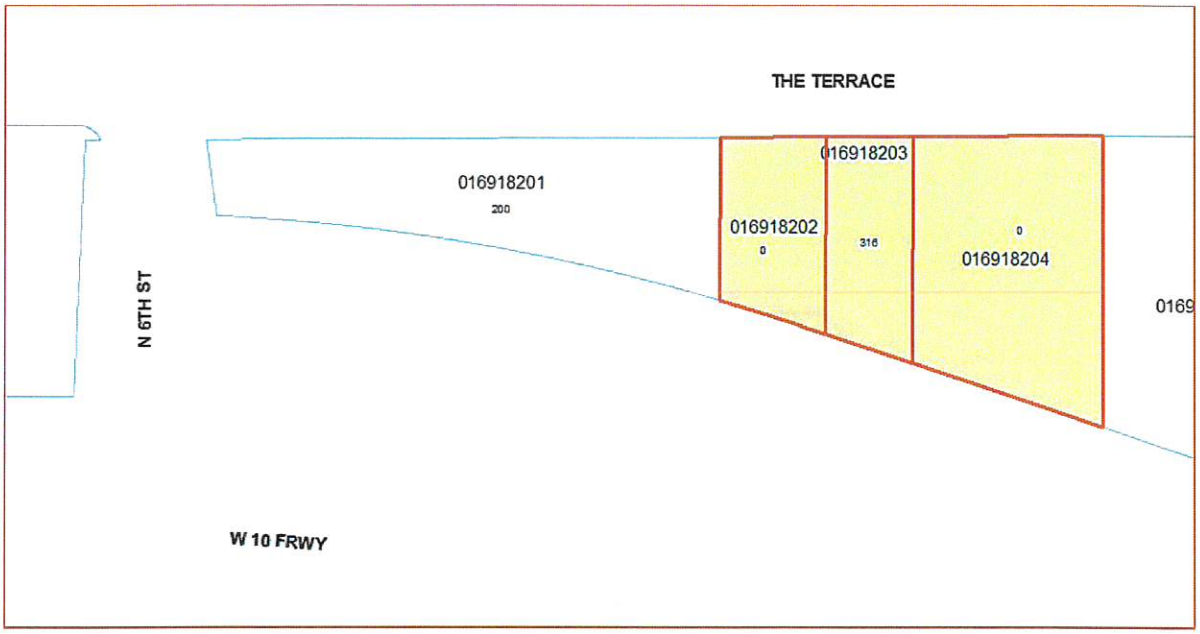
Annexation S1-O

APN changed from
029203416 to 029203439



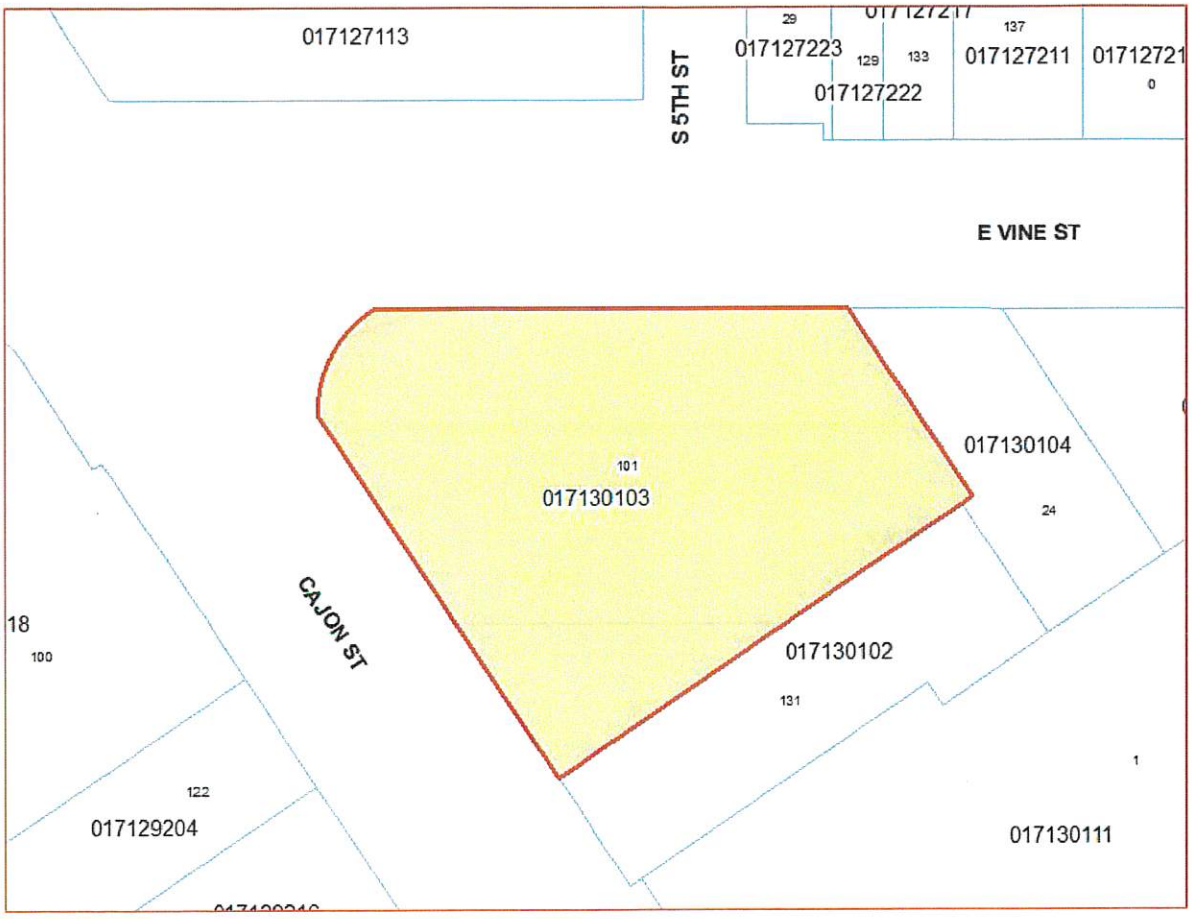
CUP 521

Annexation S1-P



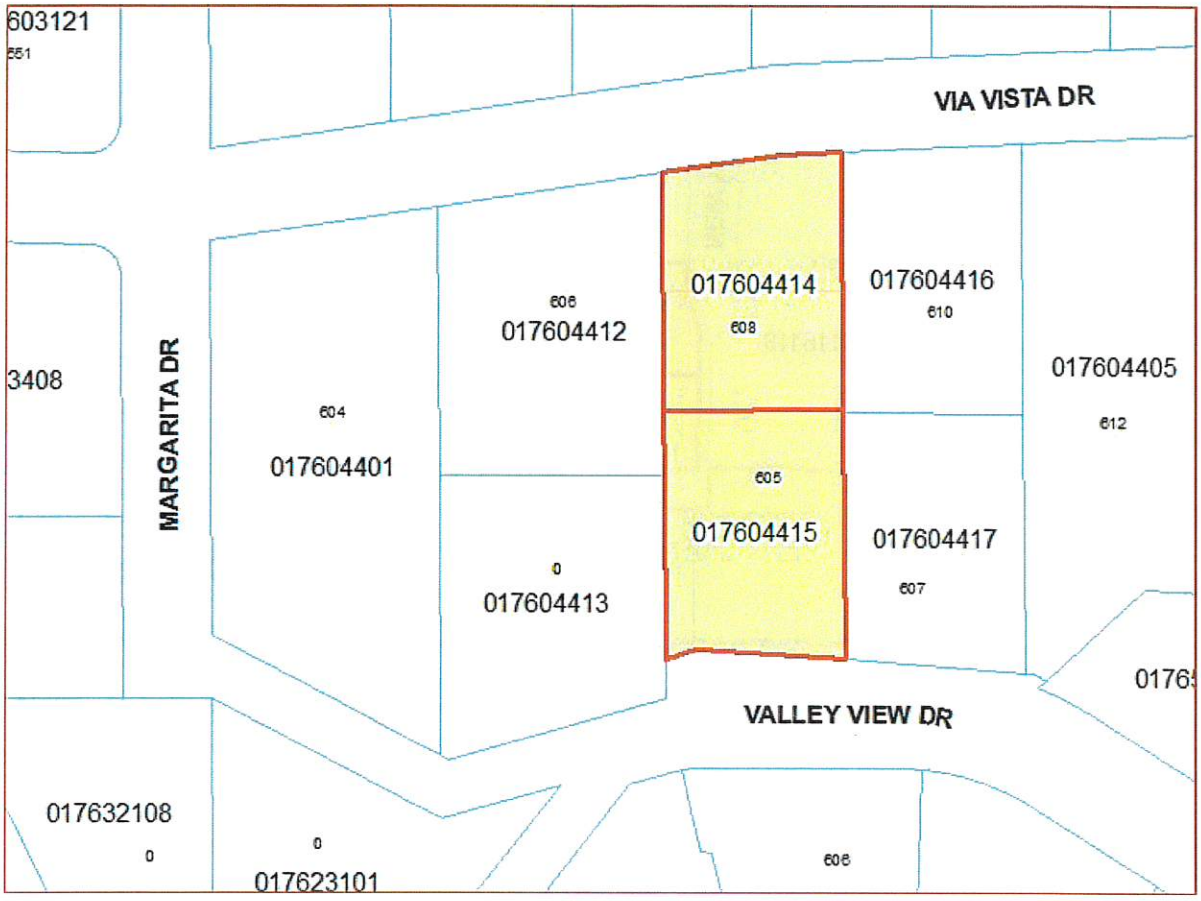
CUP 605

Annexation S1-Q



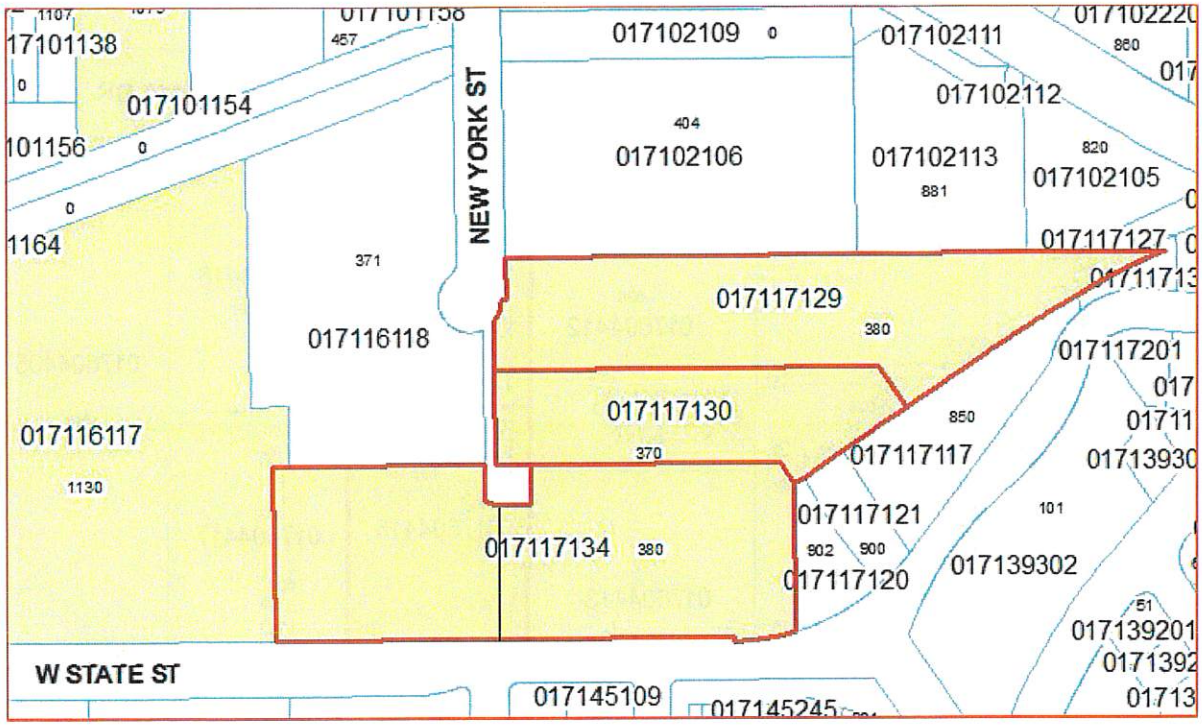
MS 183 - Parcel Map 12087, City Hall

Annexation S1-R



Parcel Map 11904

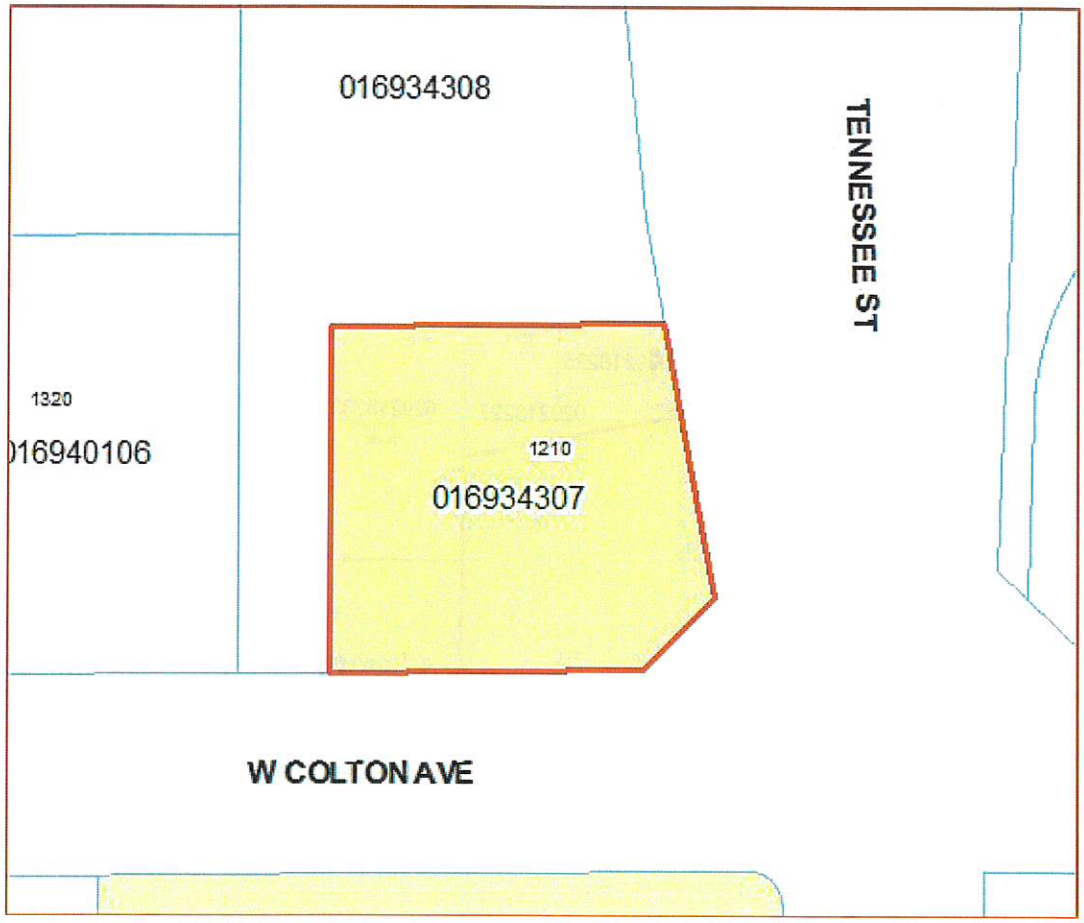
Annexation S1-S



CUP 278

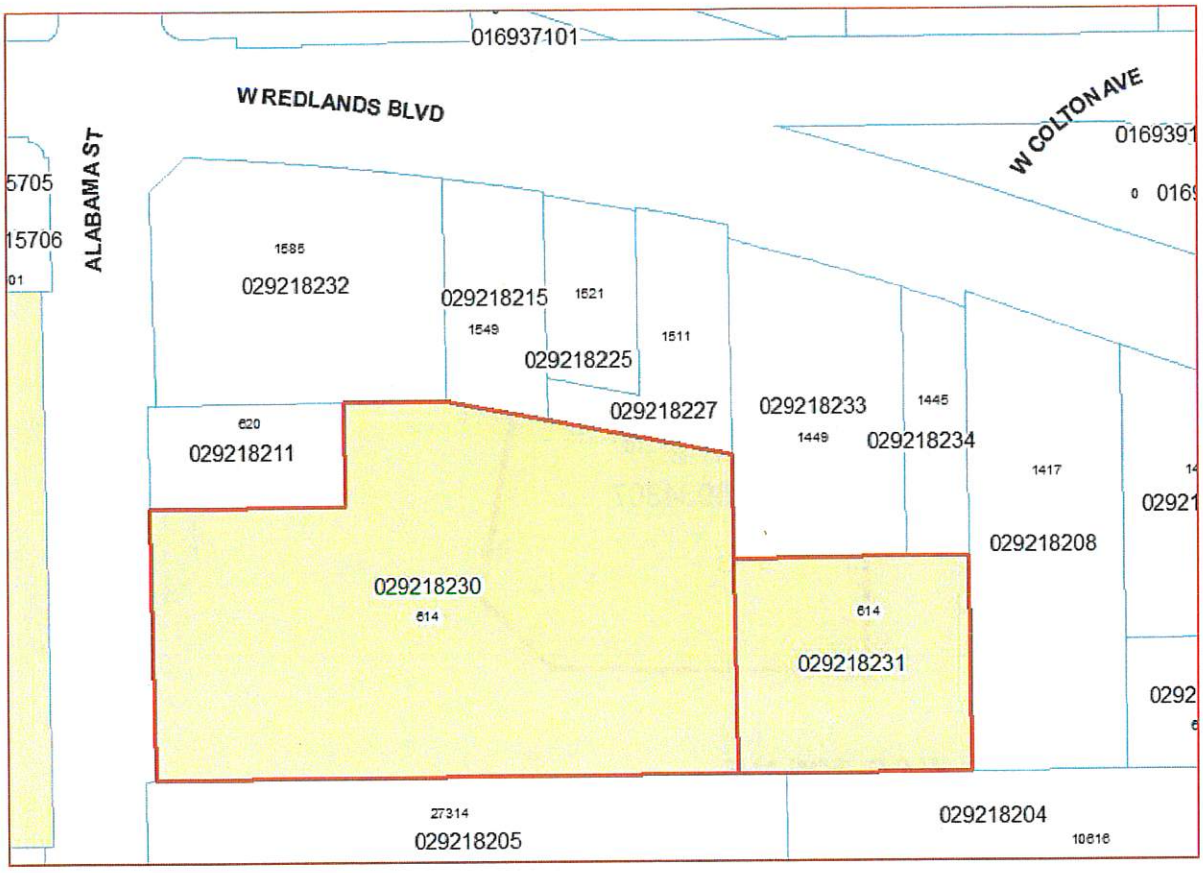
See comments for Annexation S7-A

Annexation S1-T



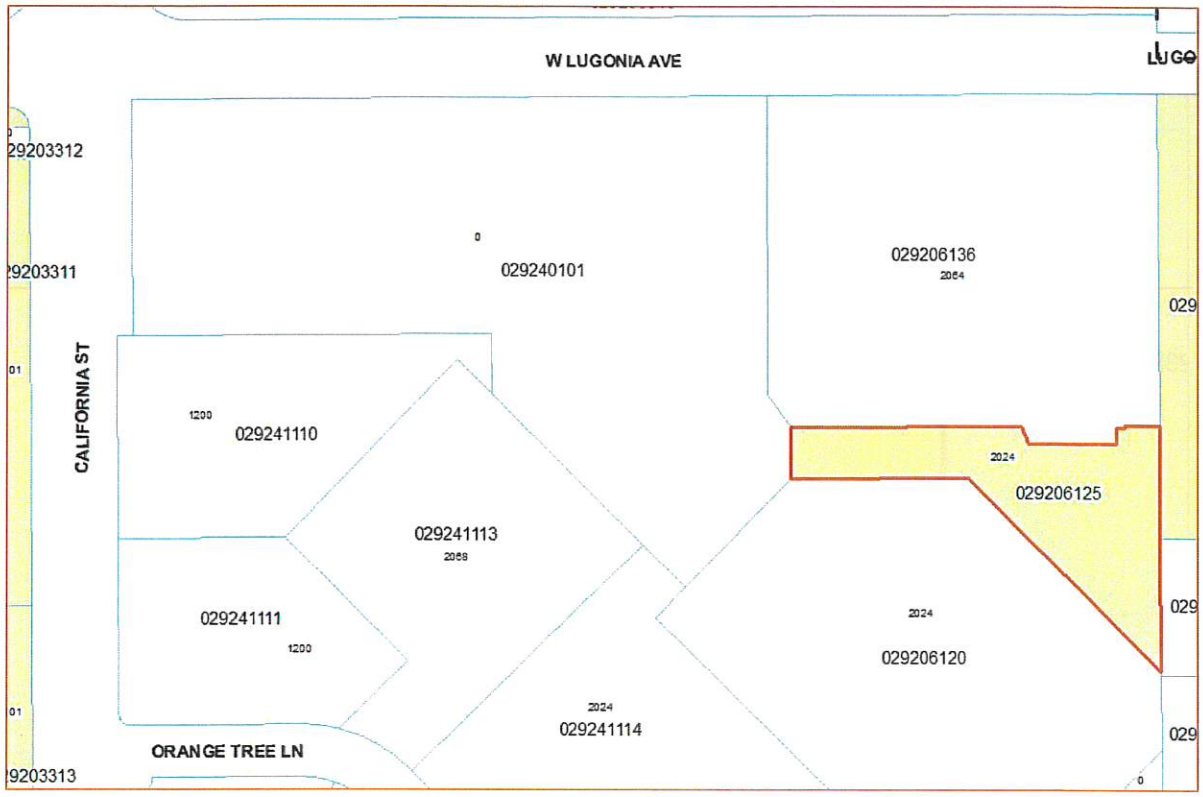
CUP 405

Annexation S1-U



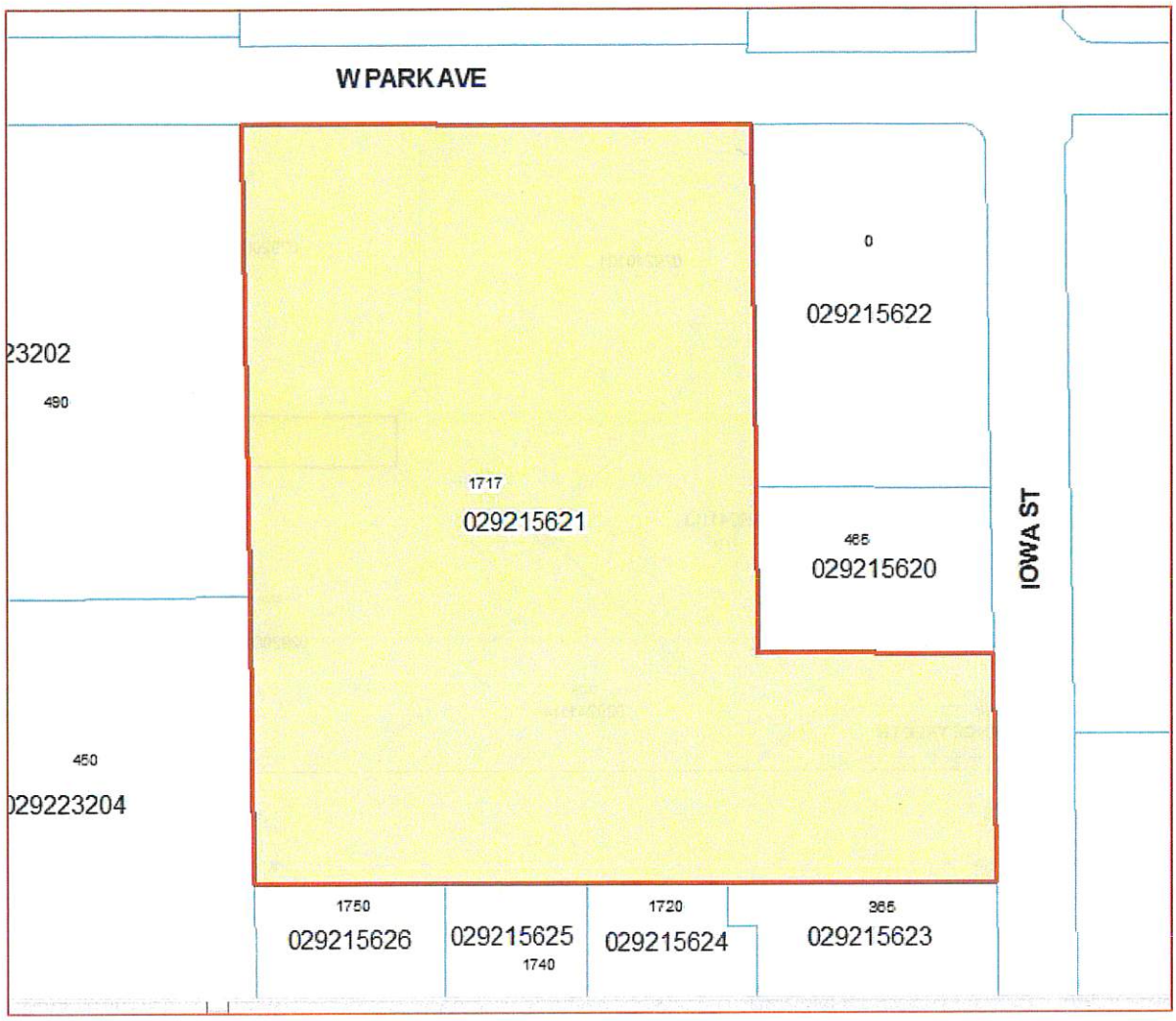
CRA 354, Parcel Map 3131

Annexation S1-V



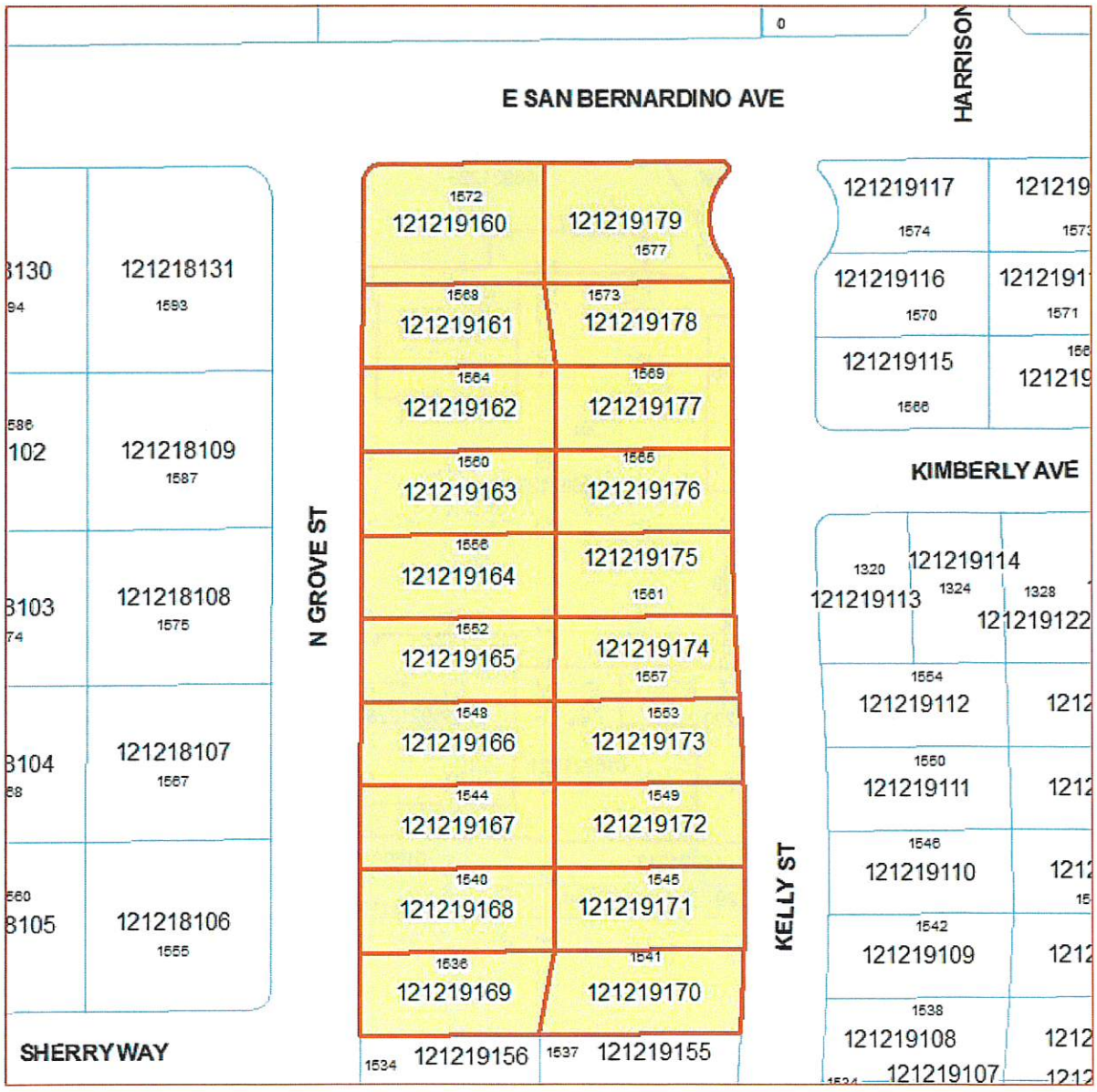
CRA 346

Annexation S1-W



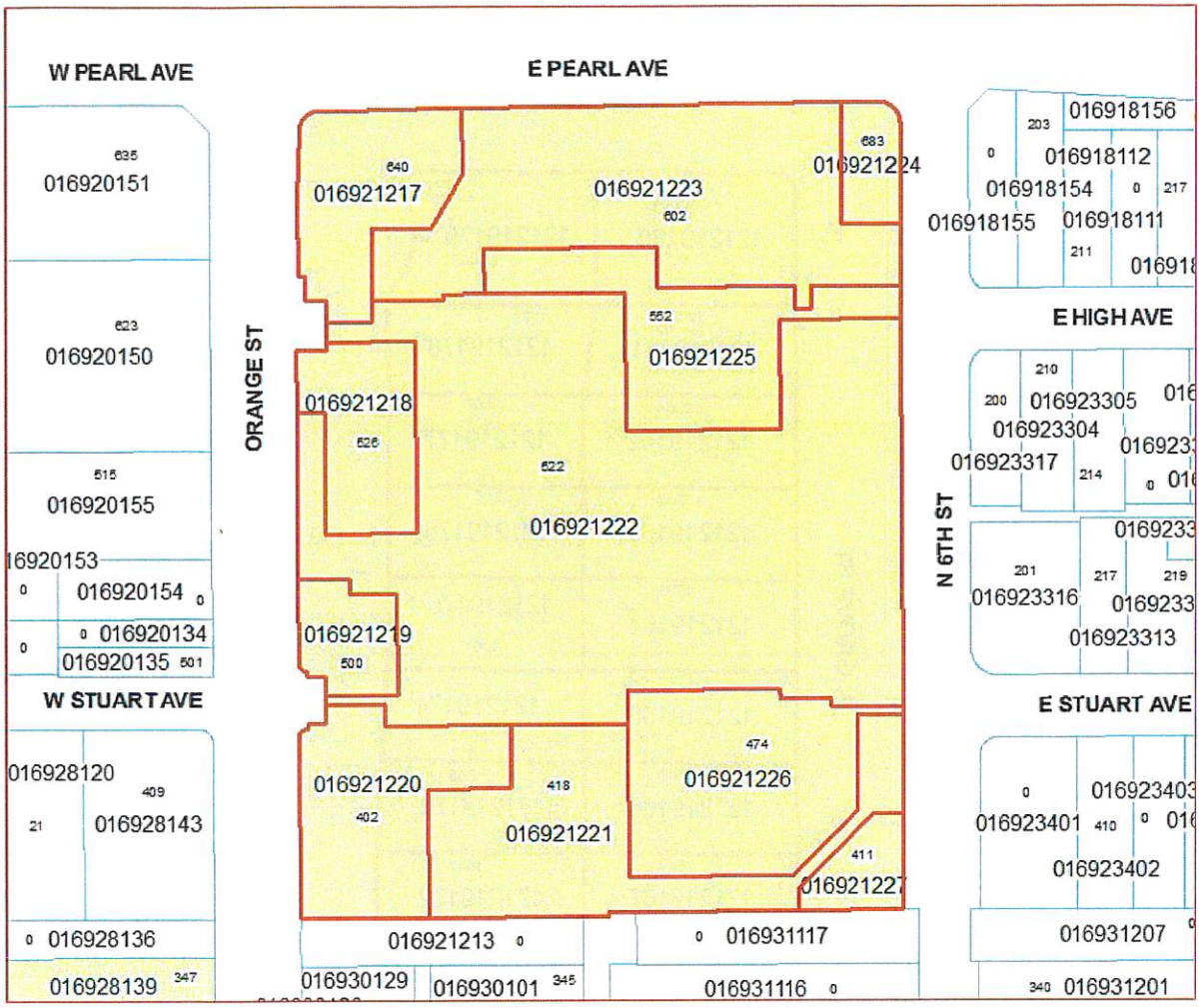
CRA 607

Annexation S1-X



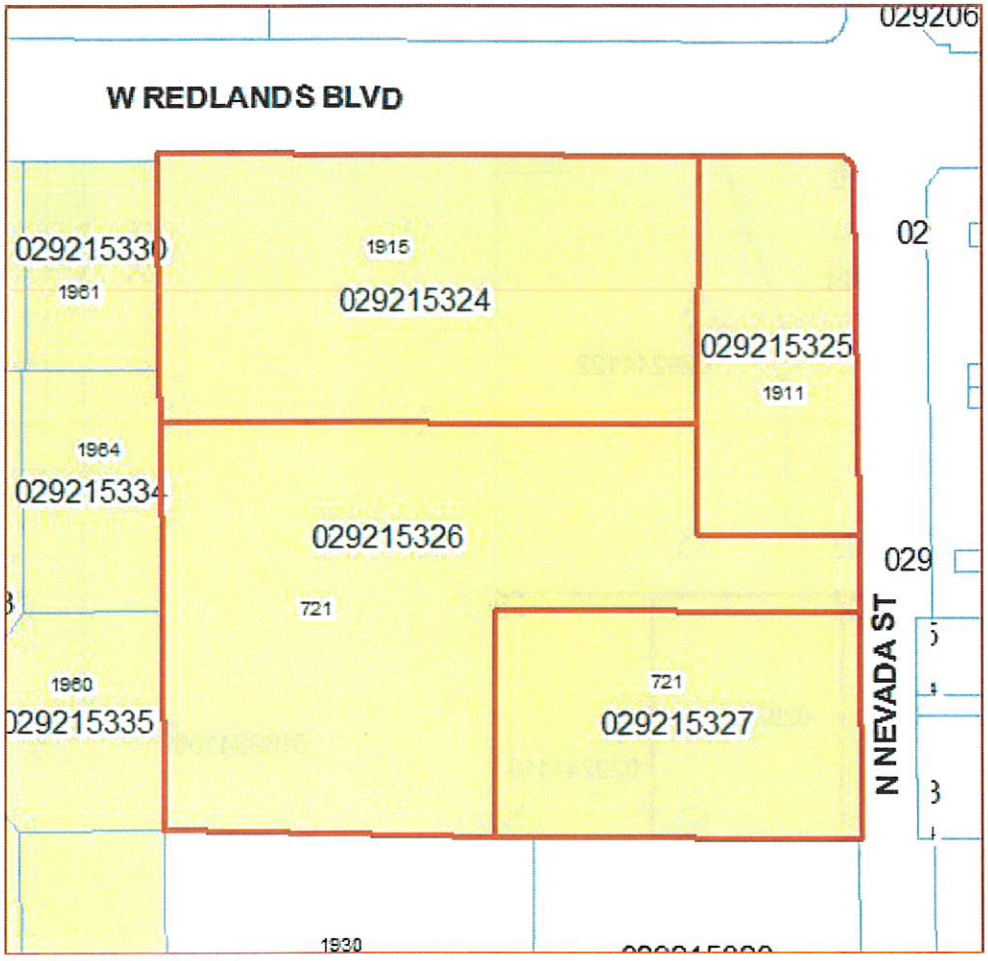
Tract 12461

Annexation S1-Y



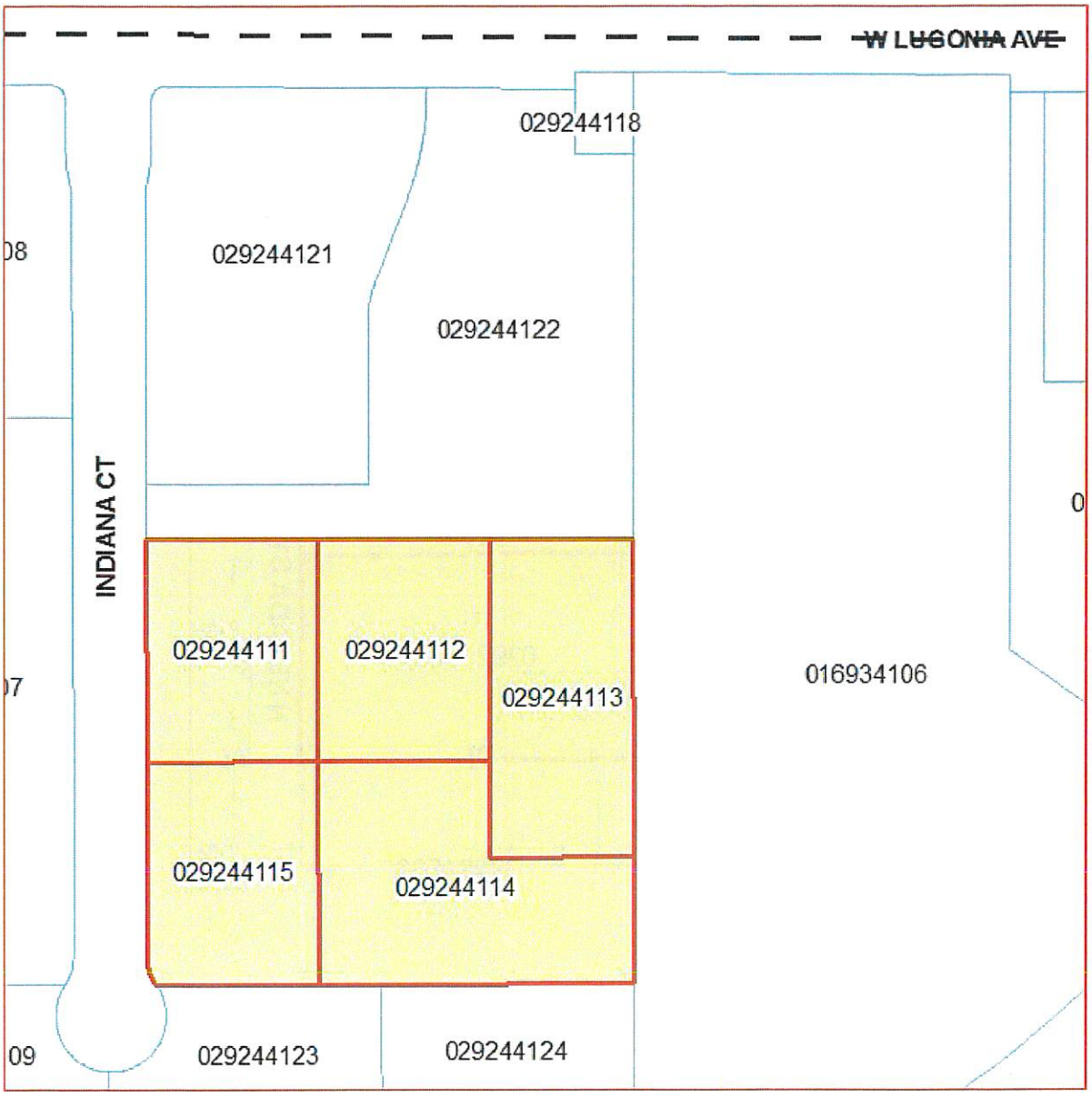
Parcel Map 12022

Annexation S2-A



Parcel Map 12330

Annexation S2-B

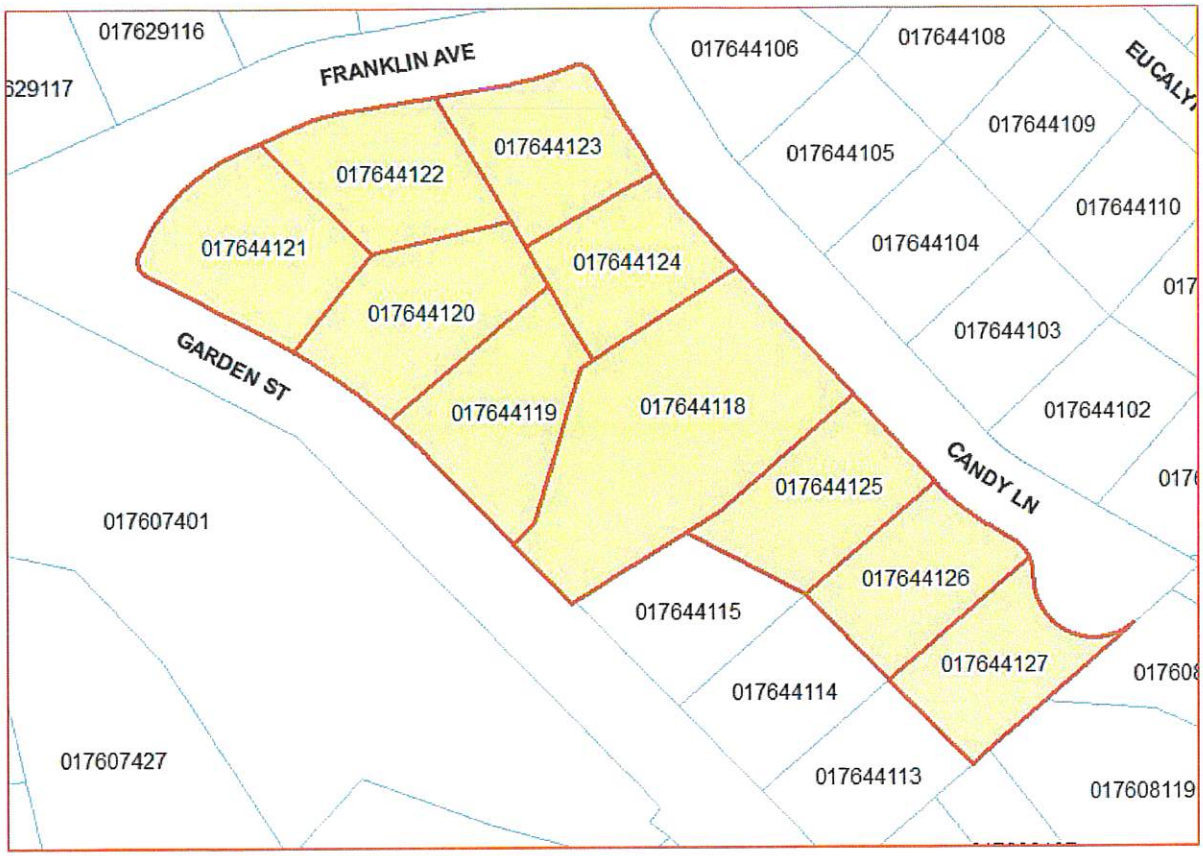


Parcel Map 12940

Annexation S2-C

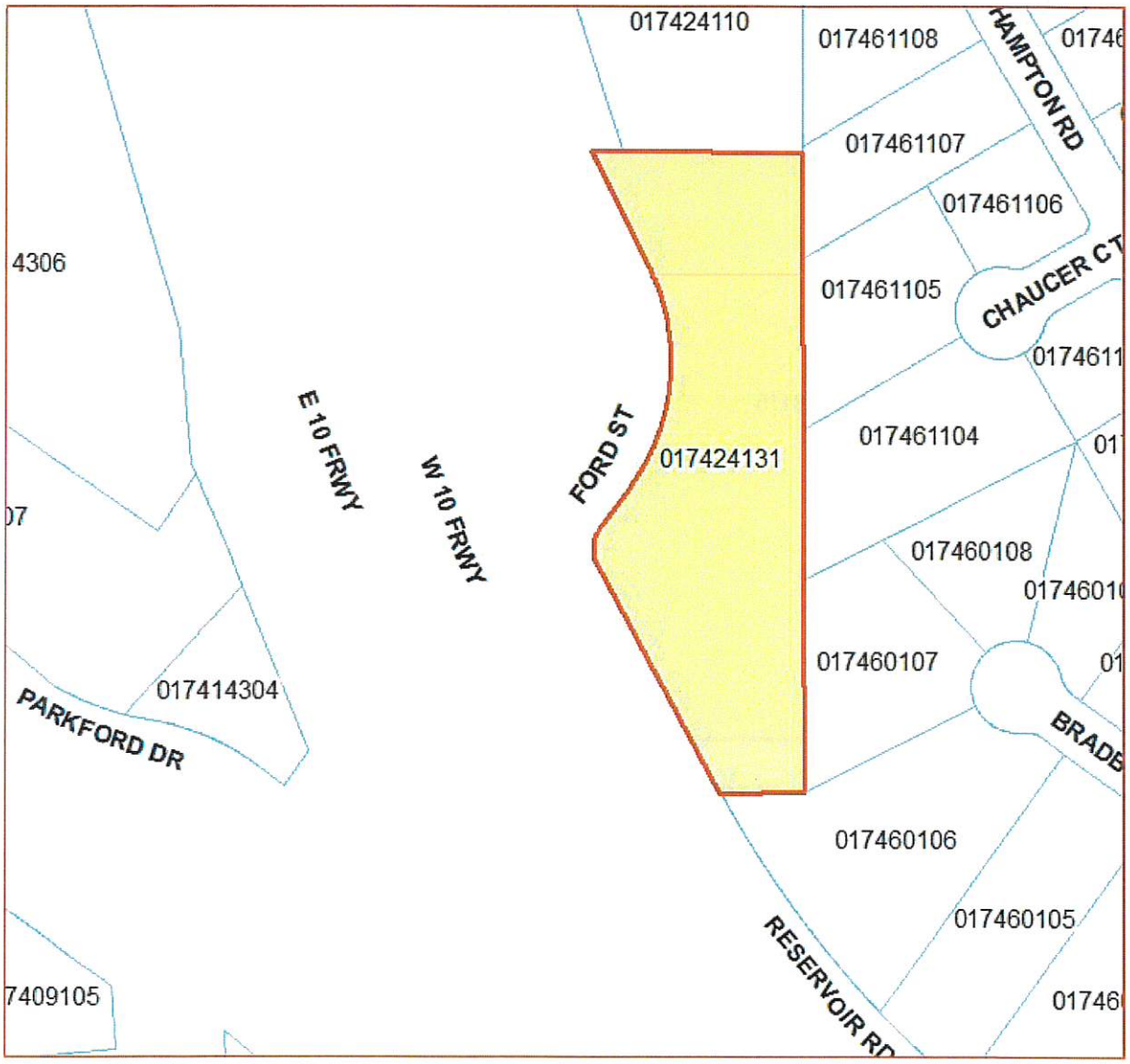
This Annexation has been removed. It was a duplicate of Annexation S1-D.

Annexation S2-D



Tract Map 14556

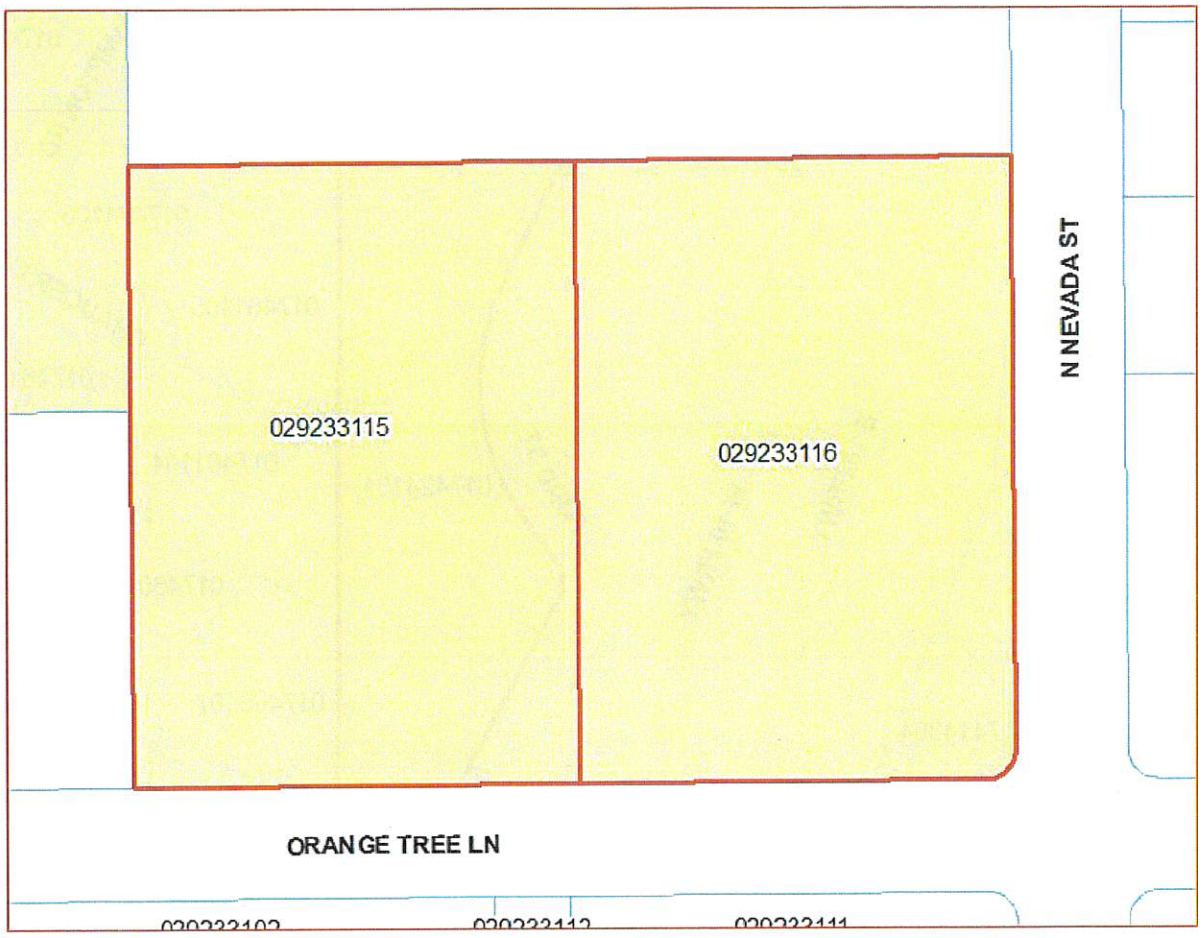
Annexation S2-E



CRA 611

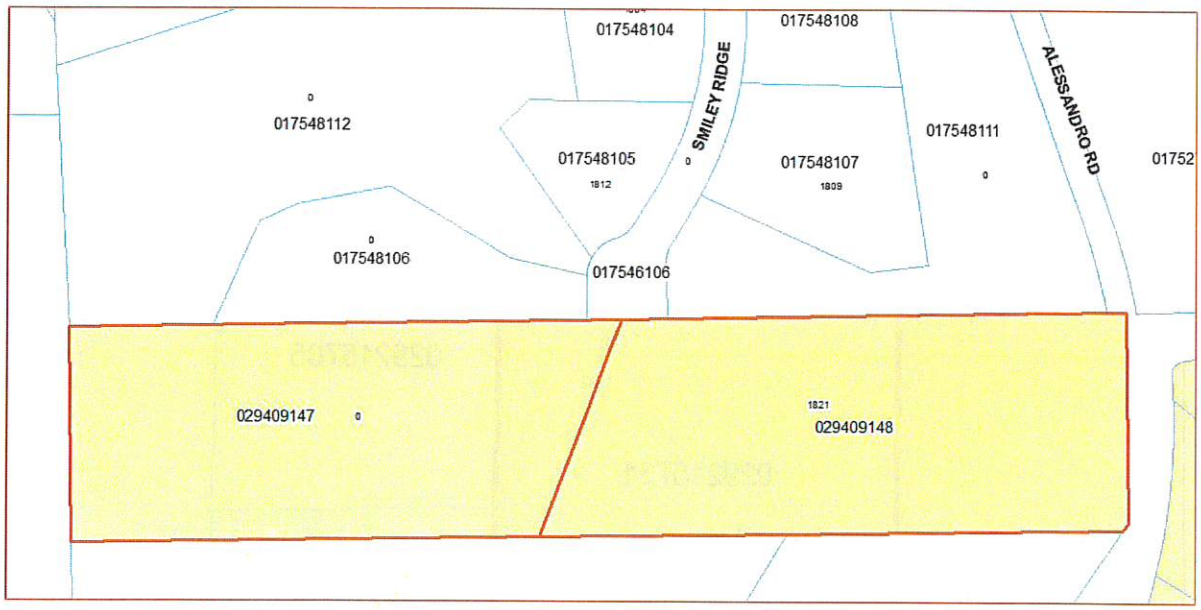
This parcel is not assessed.

Annexation S2-F



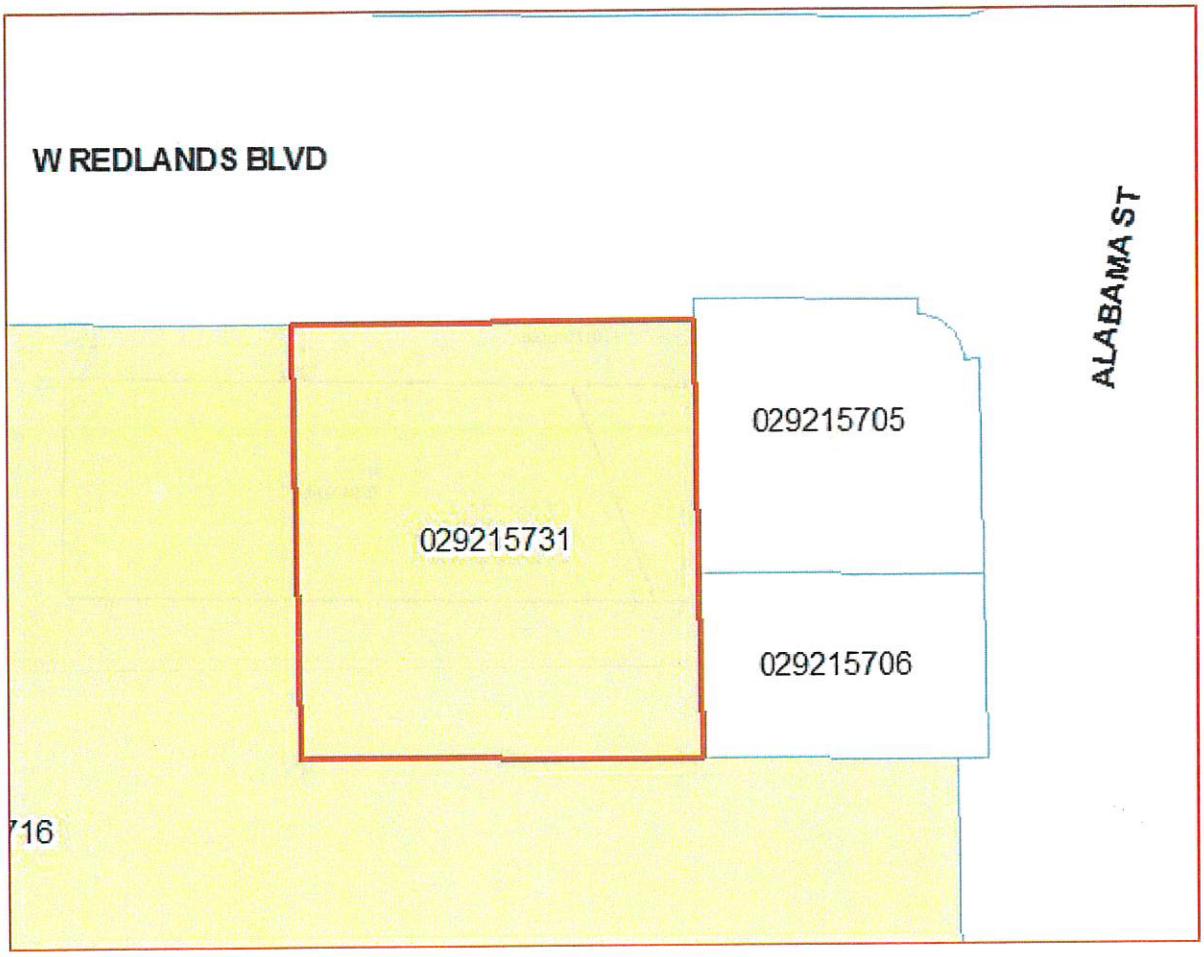
MS 196

Annexation S2-G



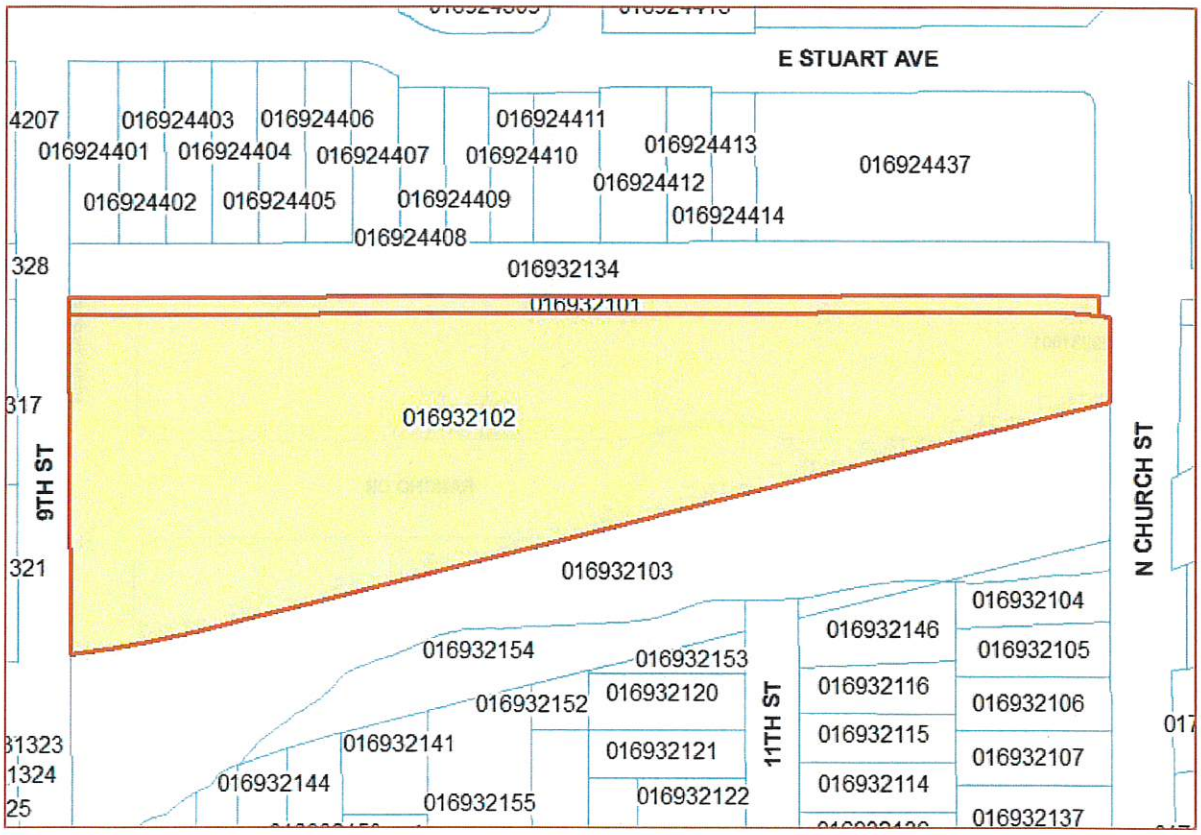
Parcel Map 11189

Annexation S2-H



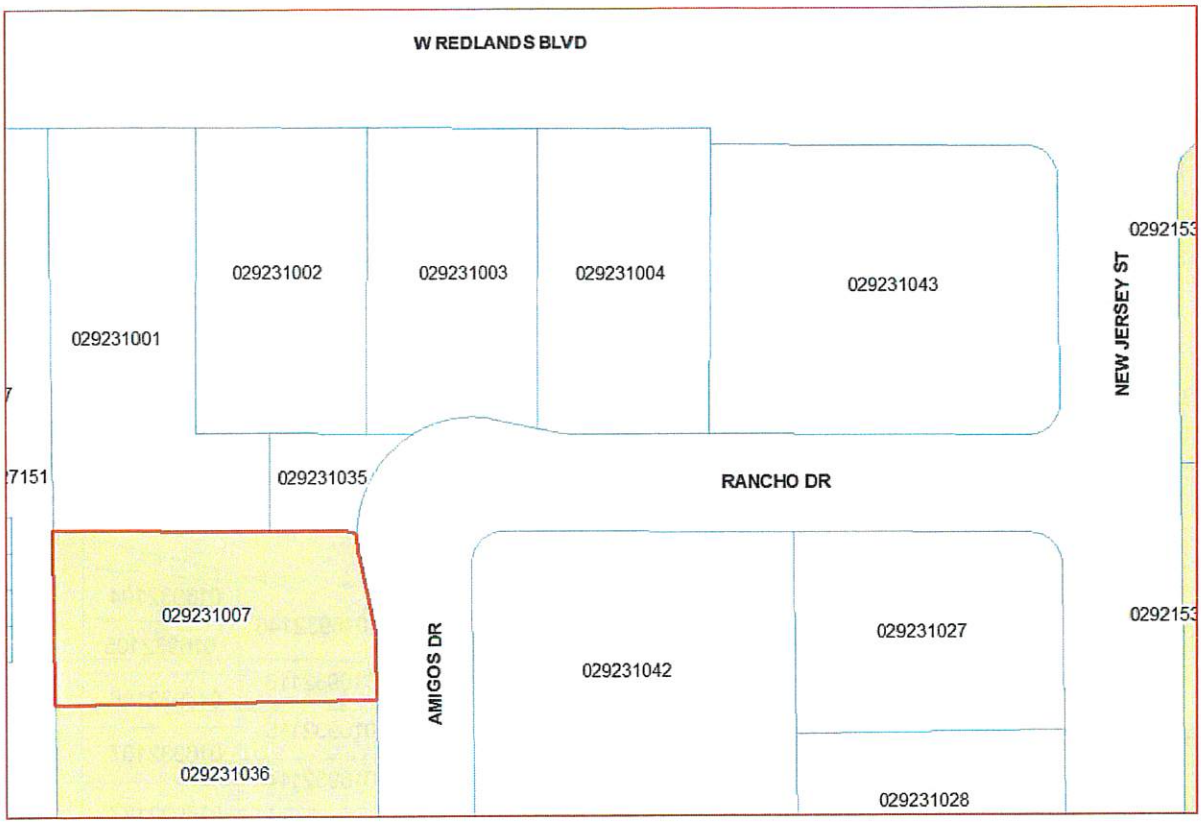
CRA 615

Annexation S3-A



CRA 517

Annexation S3-B



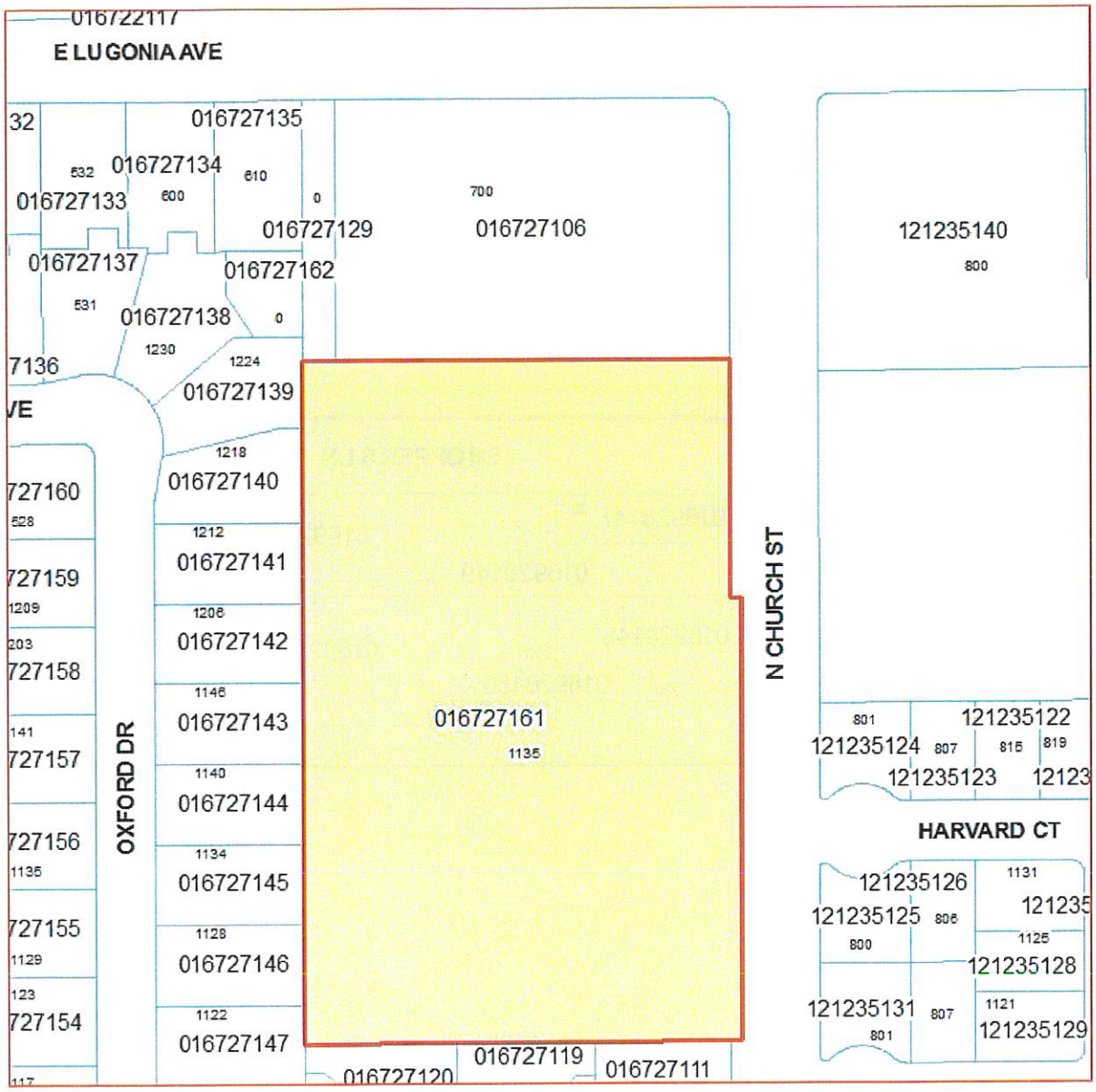
CRA 628

Annexation S3-C



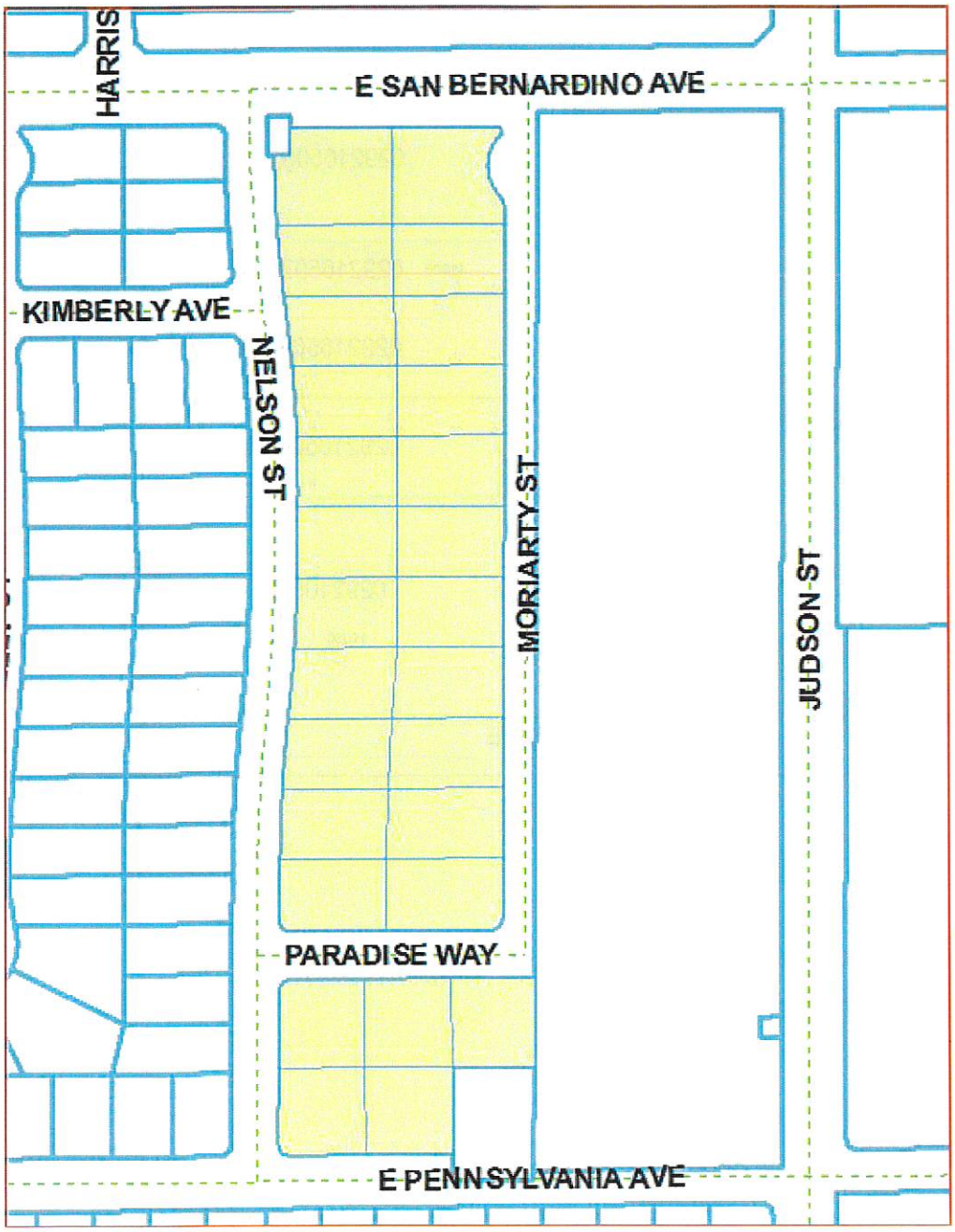
CRA 624

Annexation S3-D



CUP 532, CRA 305

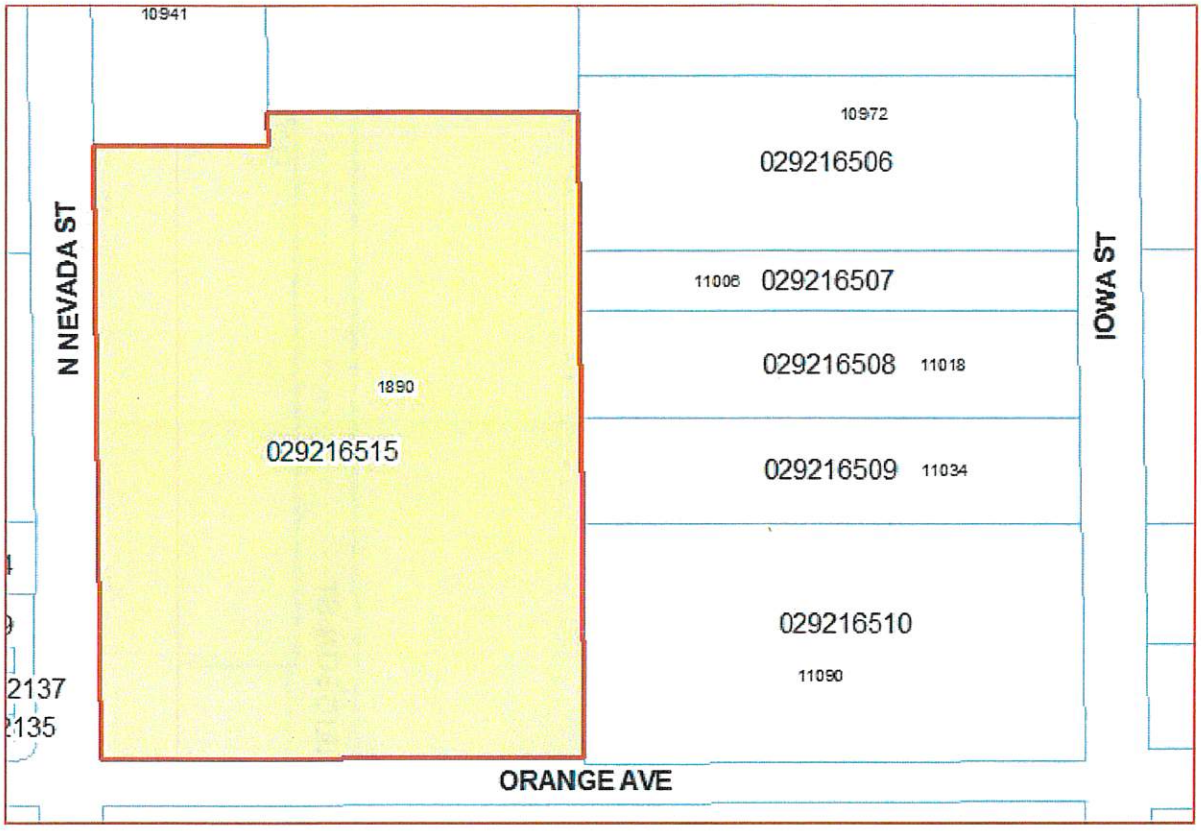
Annexation S3-E



Tract 13575

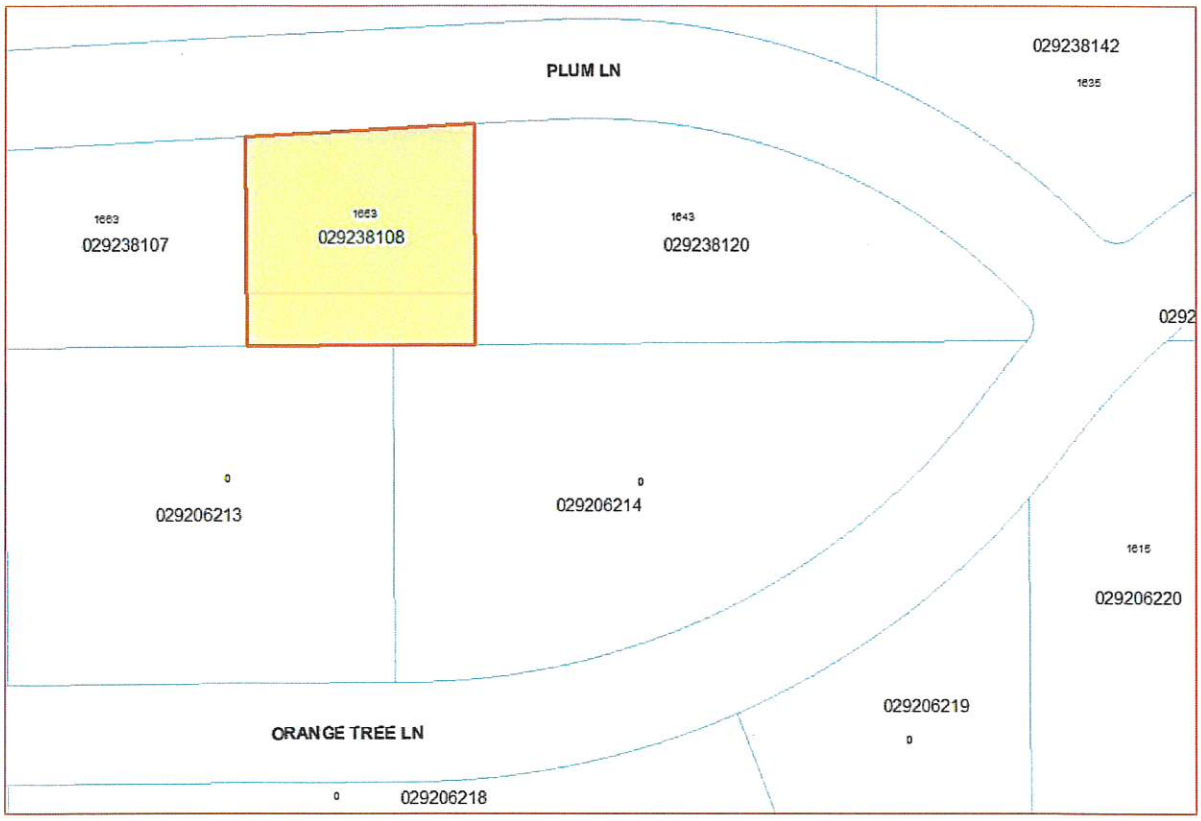
APN 1212-201-01 thru -27

Annexation S3-F



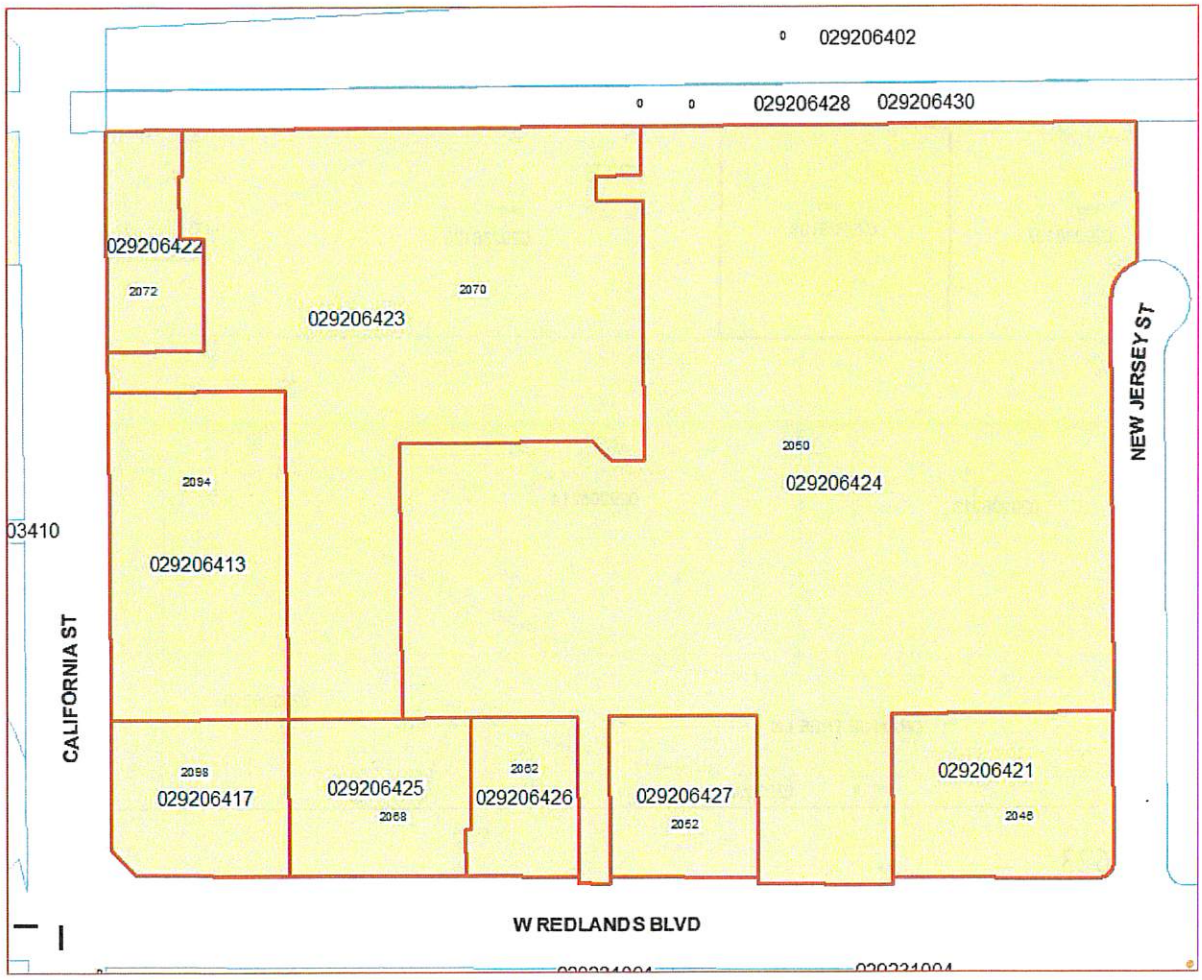
CUP 550

Annexation S3-G



CRA 623

Annexation S3-H

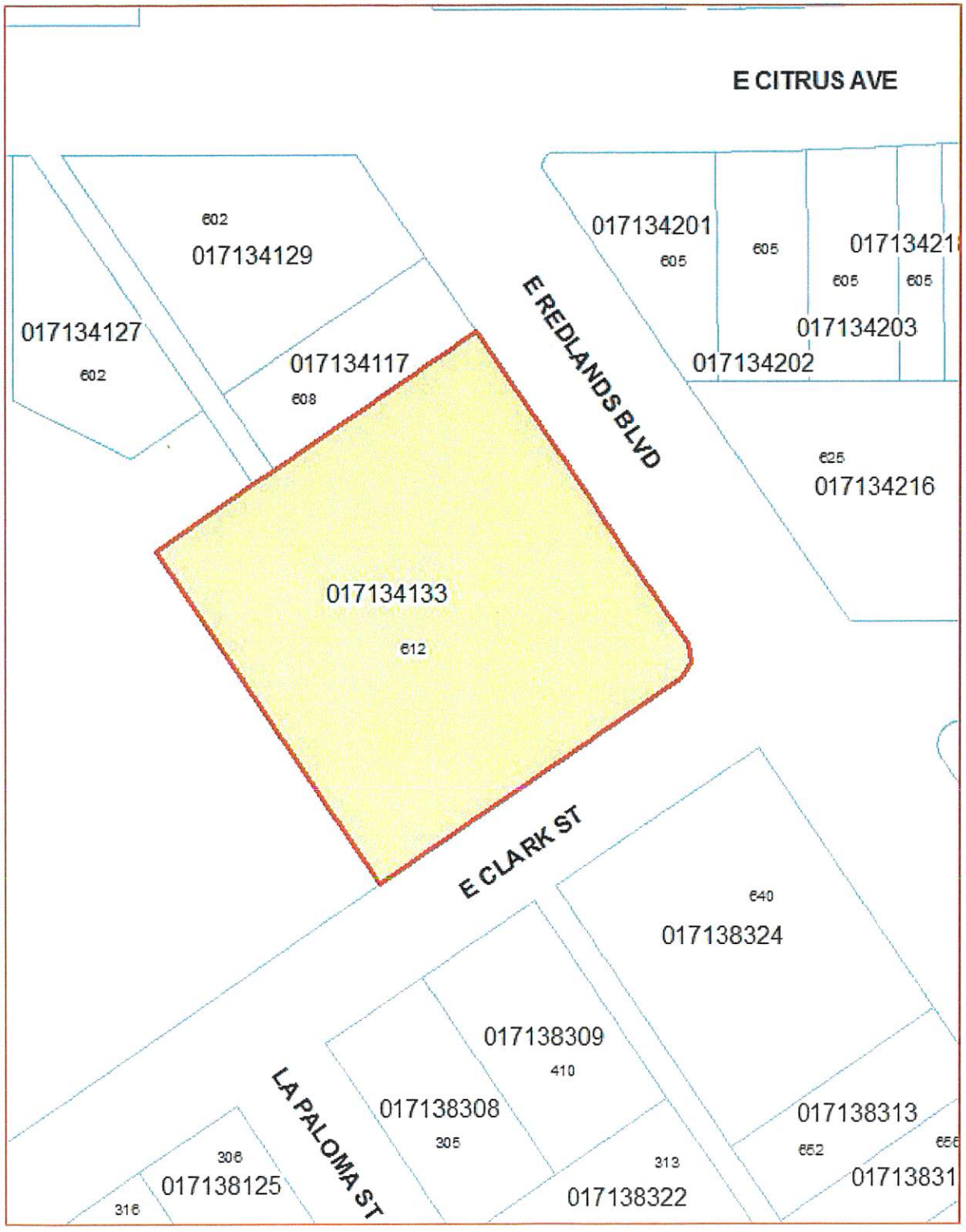


CUP 542, Parcel Map 13542

Annexation S3-I

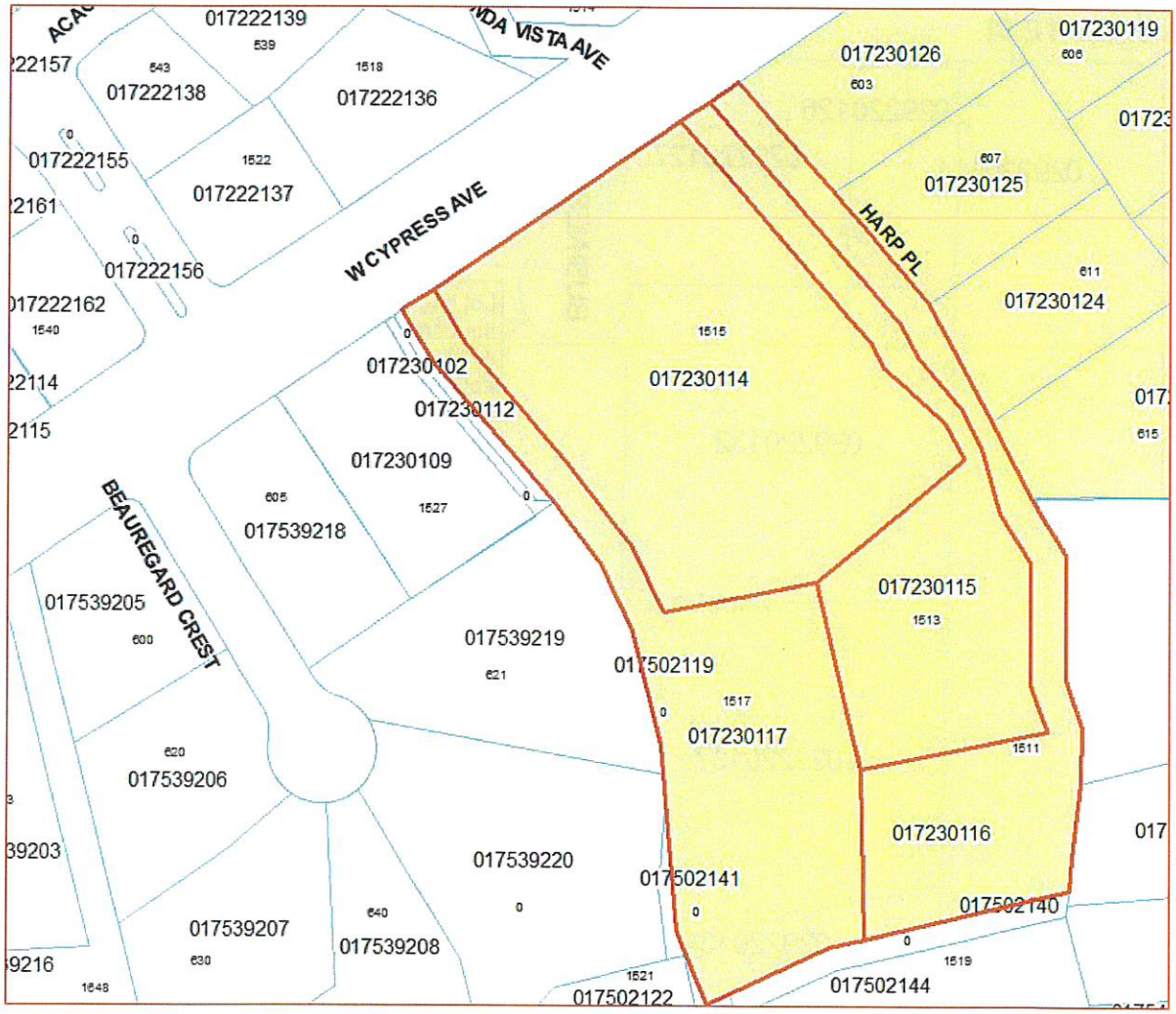
There is no Annexation S3-I

Annexation S3-J



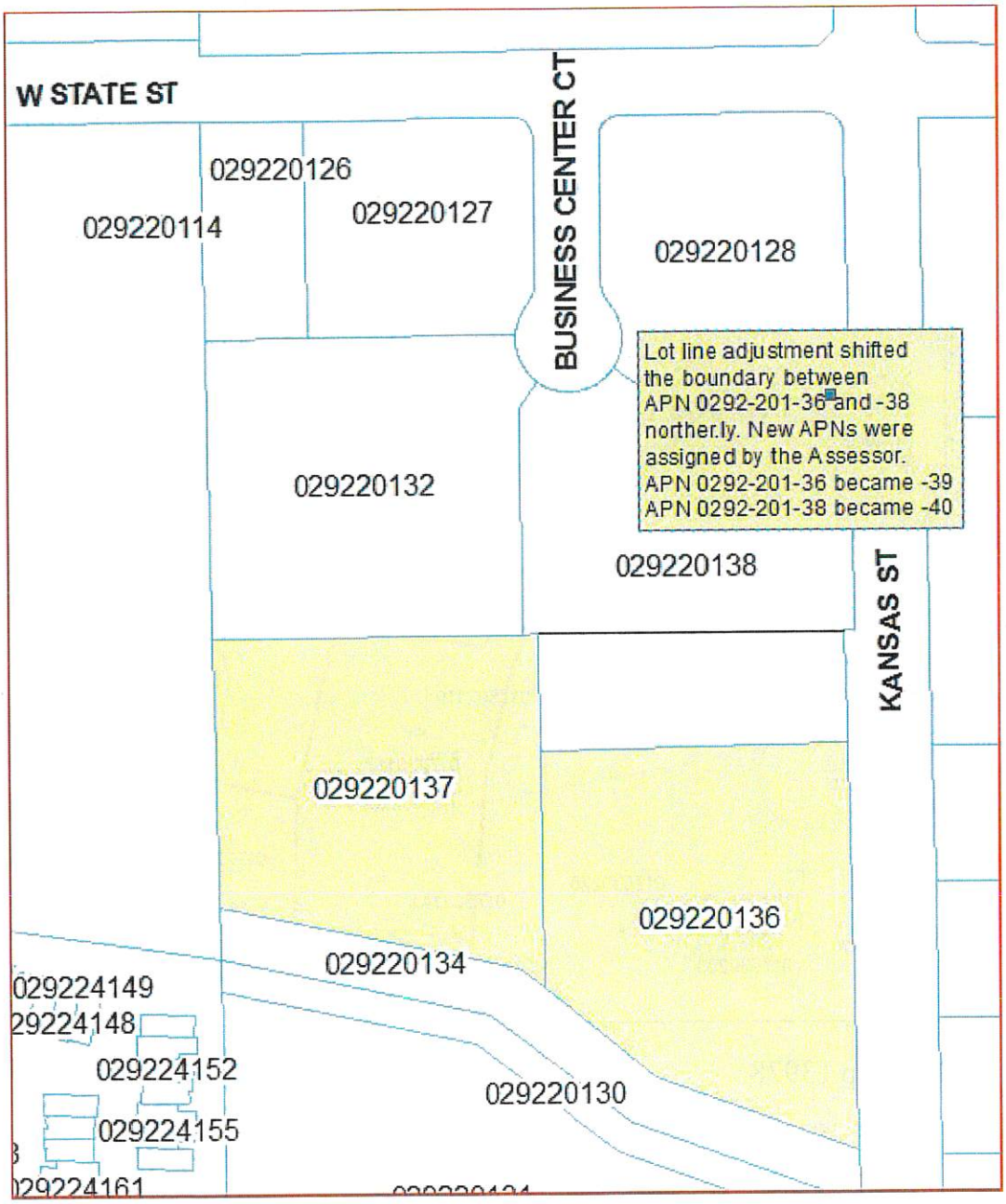
CUP 314, CUP 324, CUP 383

Annexation S4-A



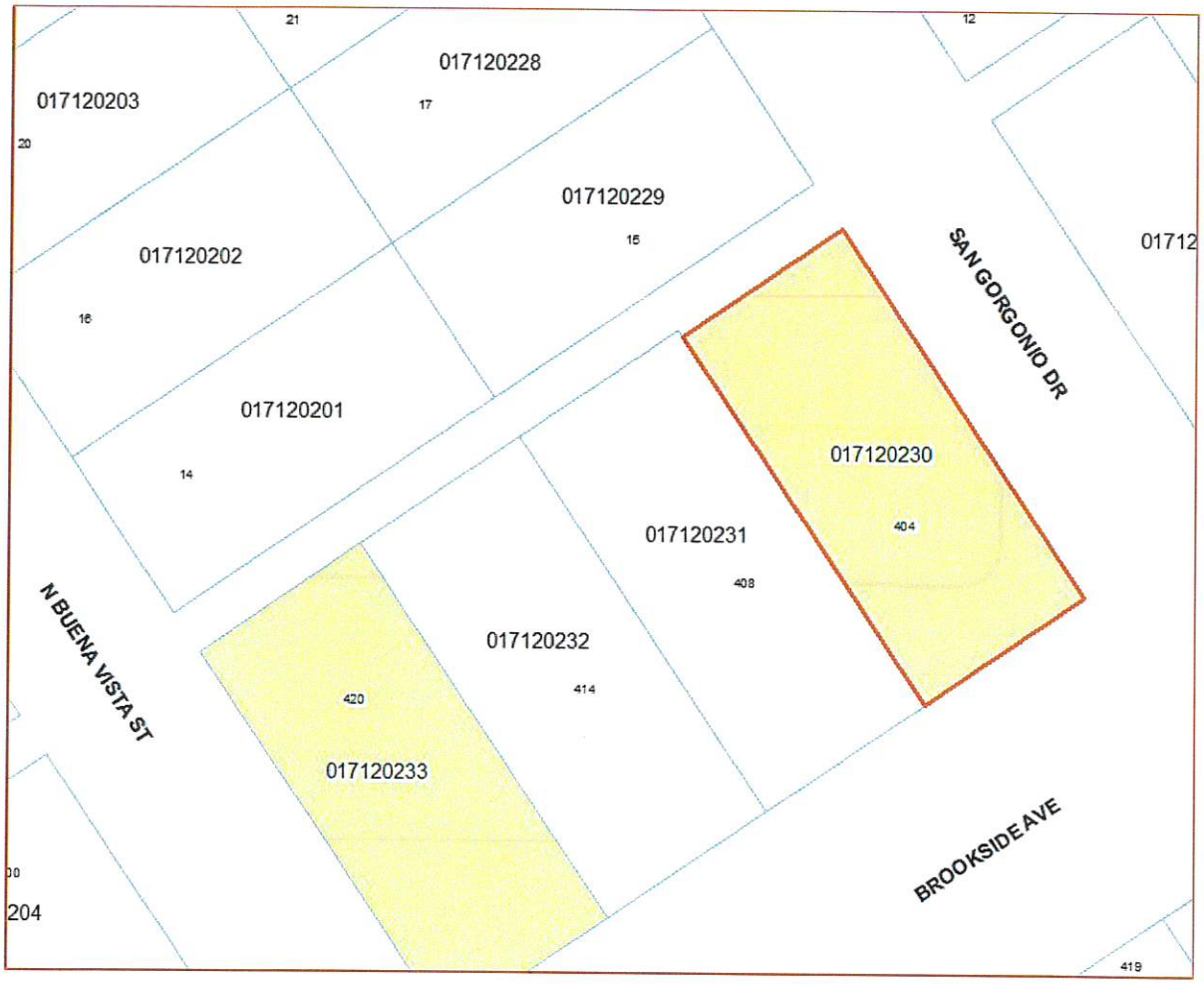
MS 213, Parcel Map 13978

Annexation S4-B



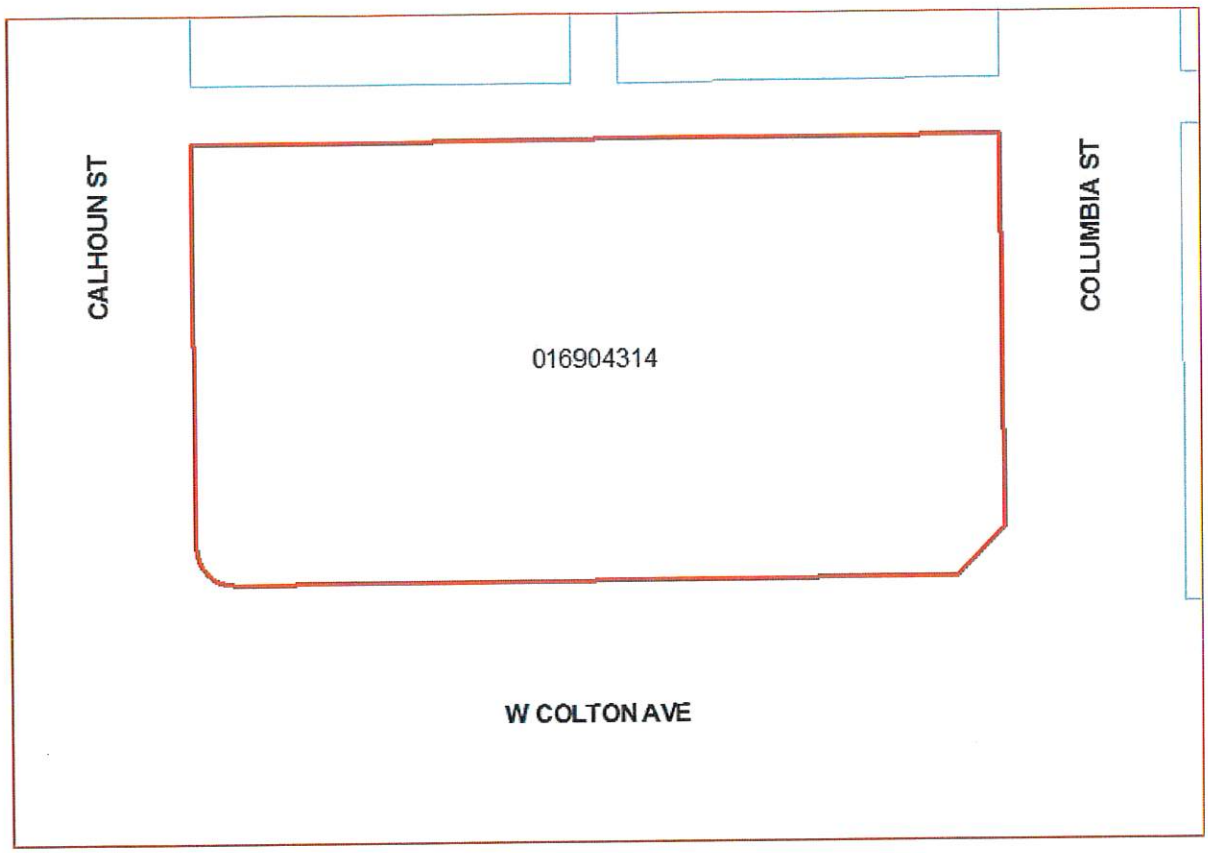
MS 211

Annexation S4-C



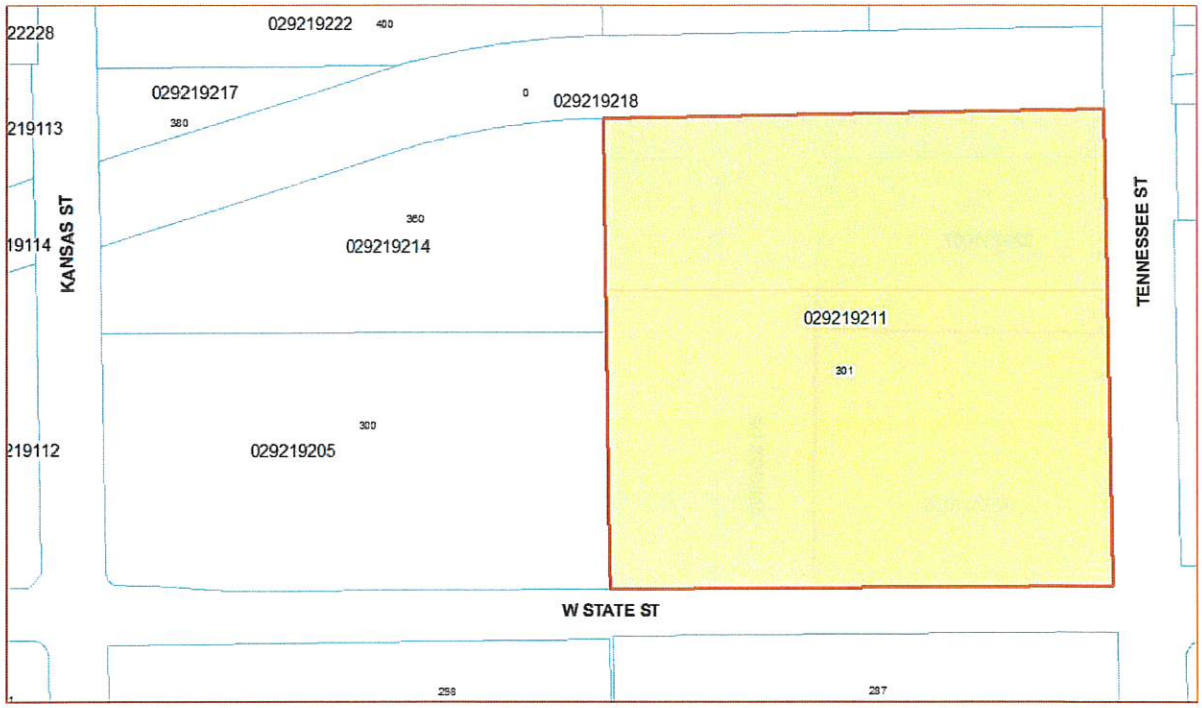
CUP 559

Annexation S4-D



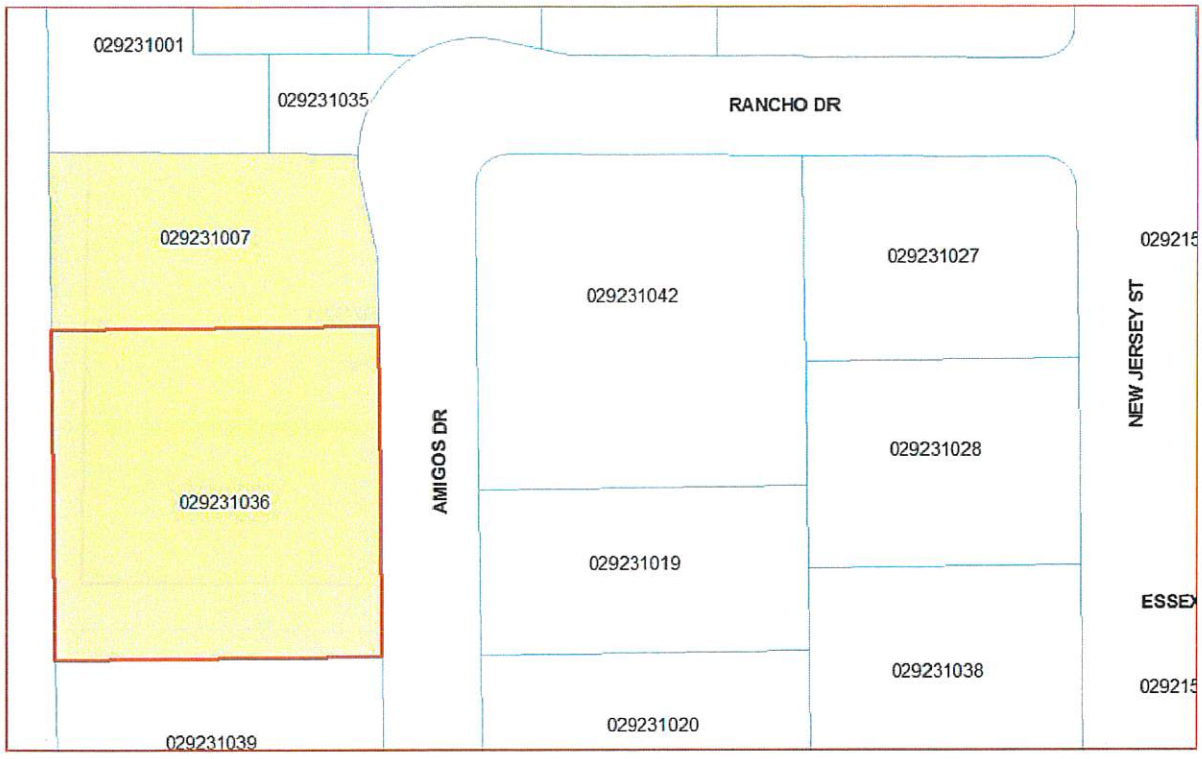
CRA 636

Annexation S4-E



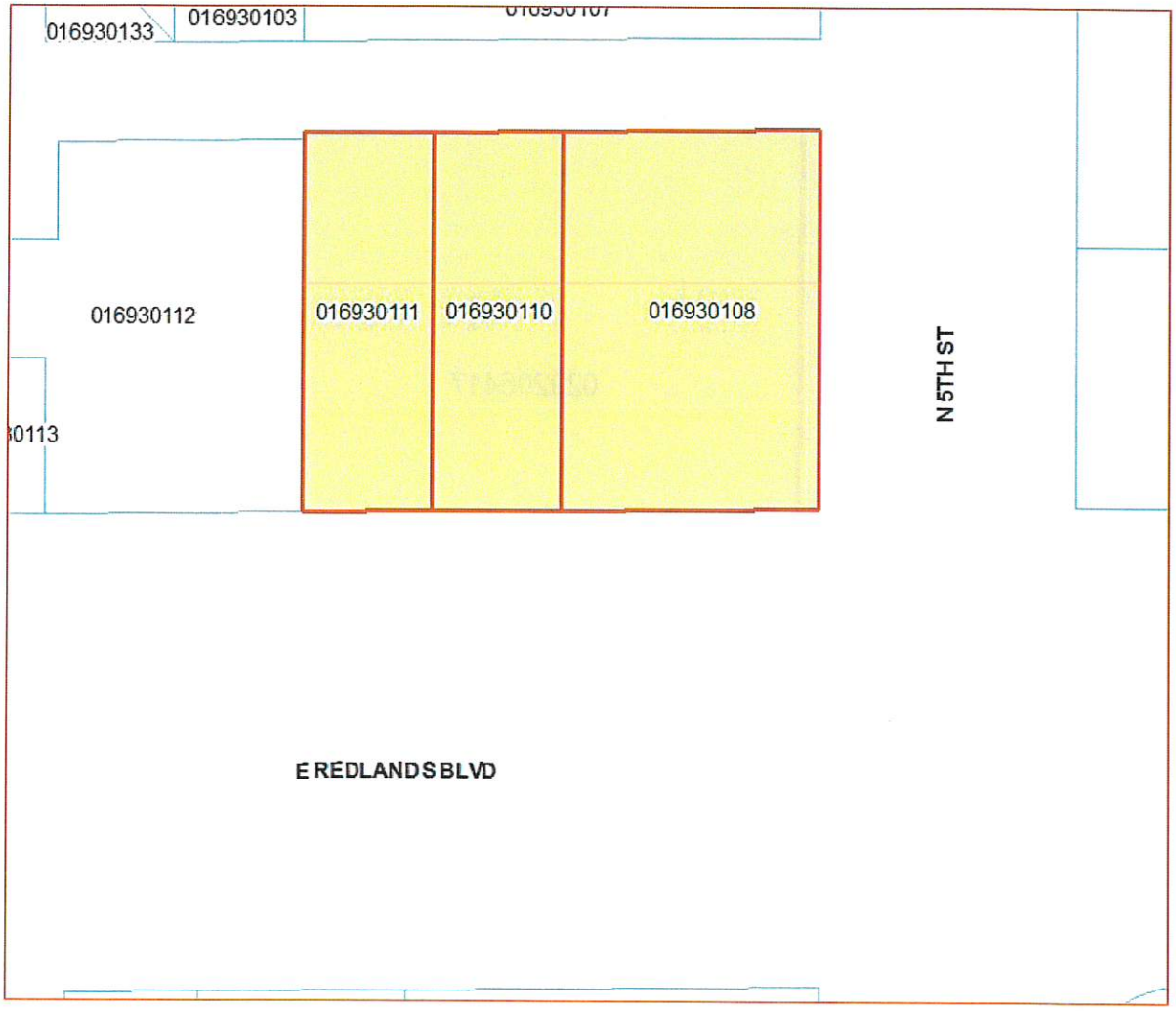
CRA 546

Annexation S4-F



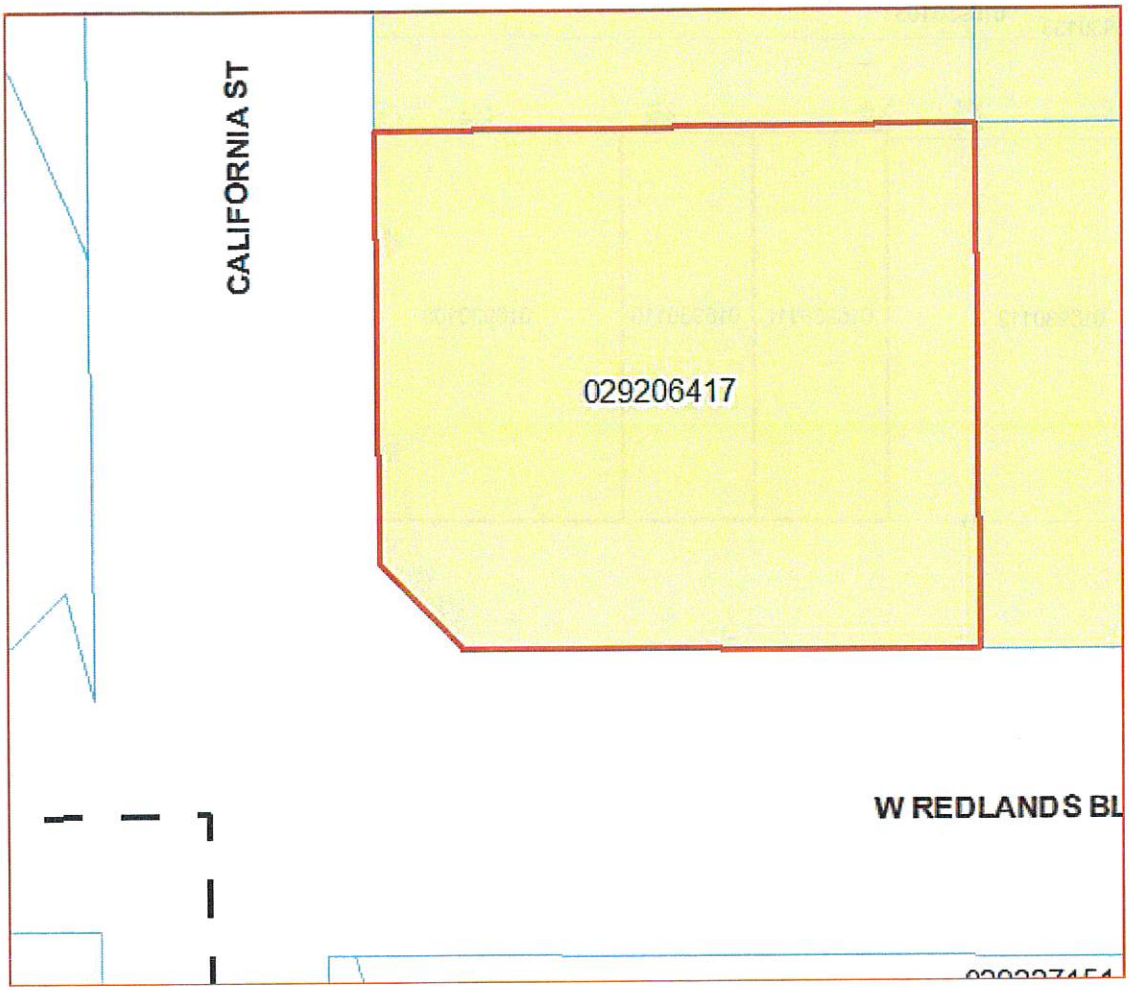
CRA 641 – originally two parcels that have been combined into a single parcel.

Annexation S4-G



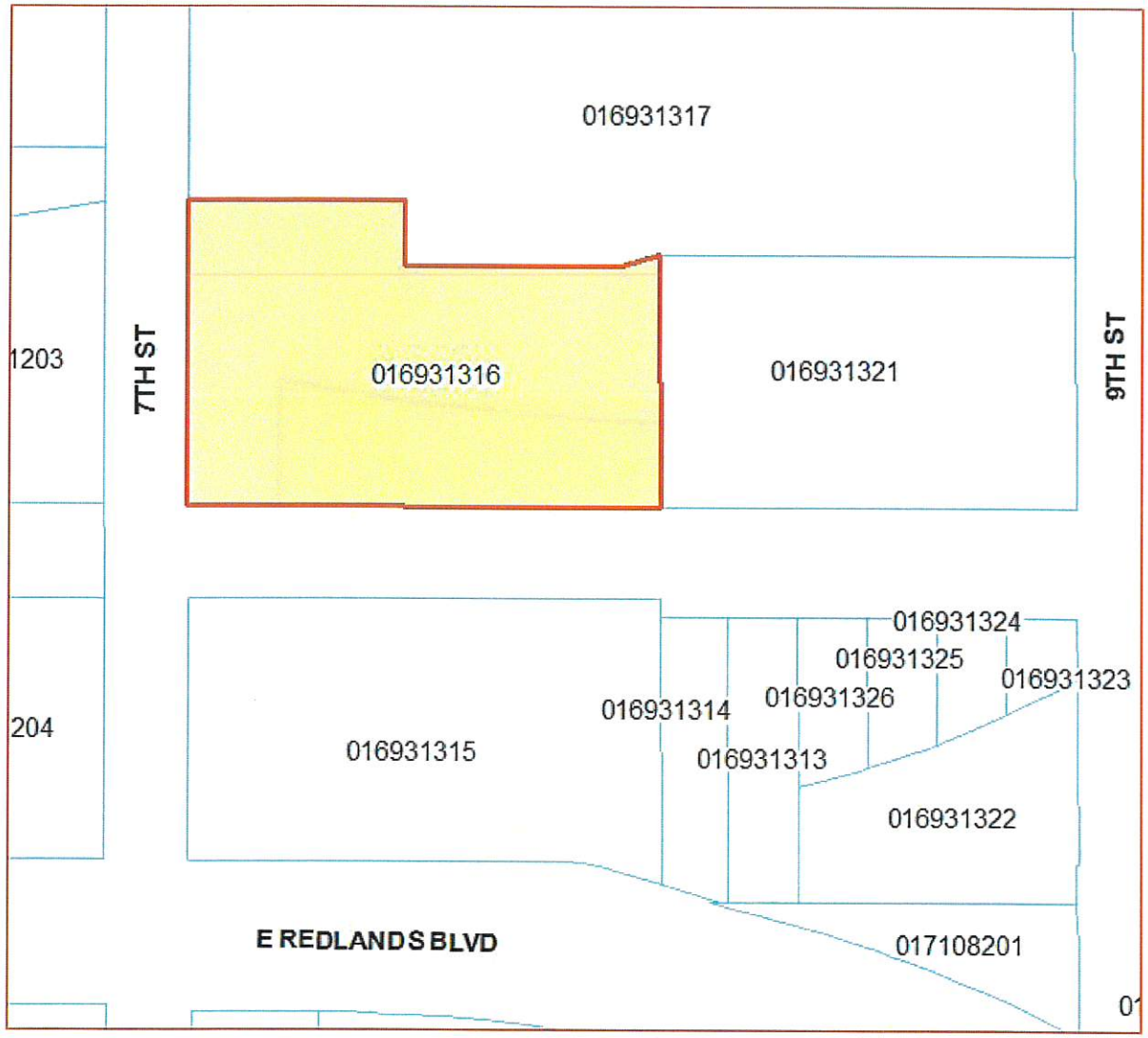
CRA 640

Annexation S4-H



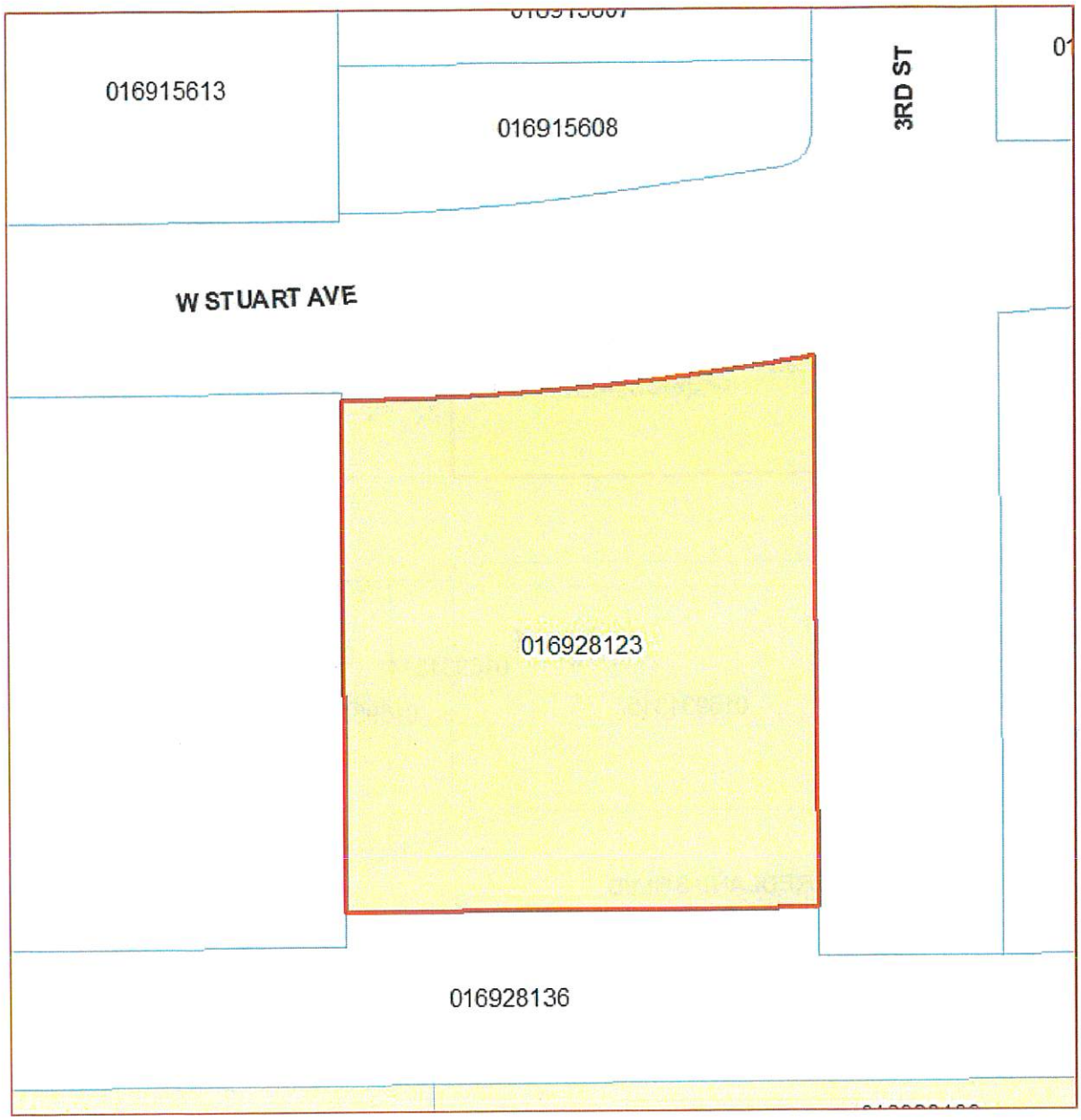
CUP 562

Annexation S4-I



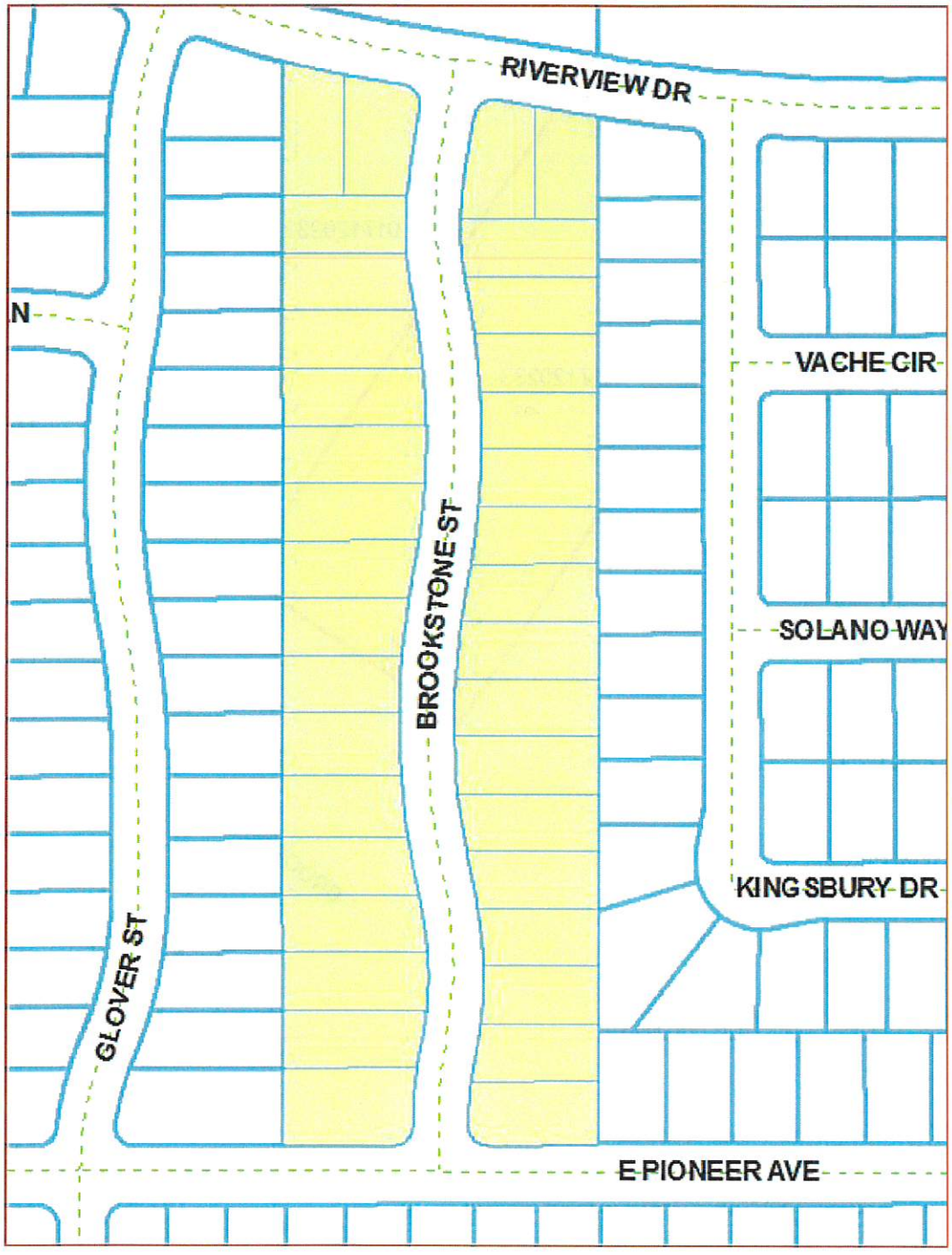
CUP 548

Annexation S5-A



CRA 637

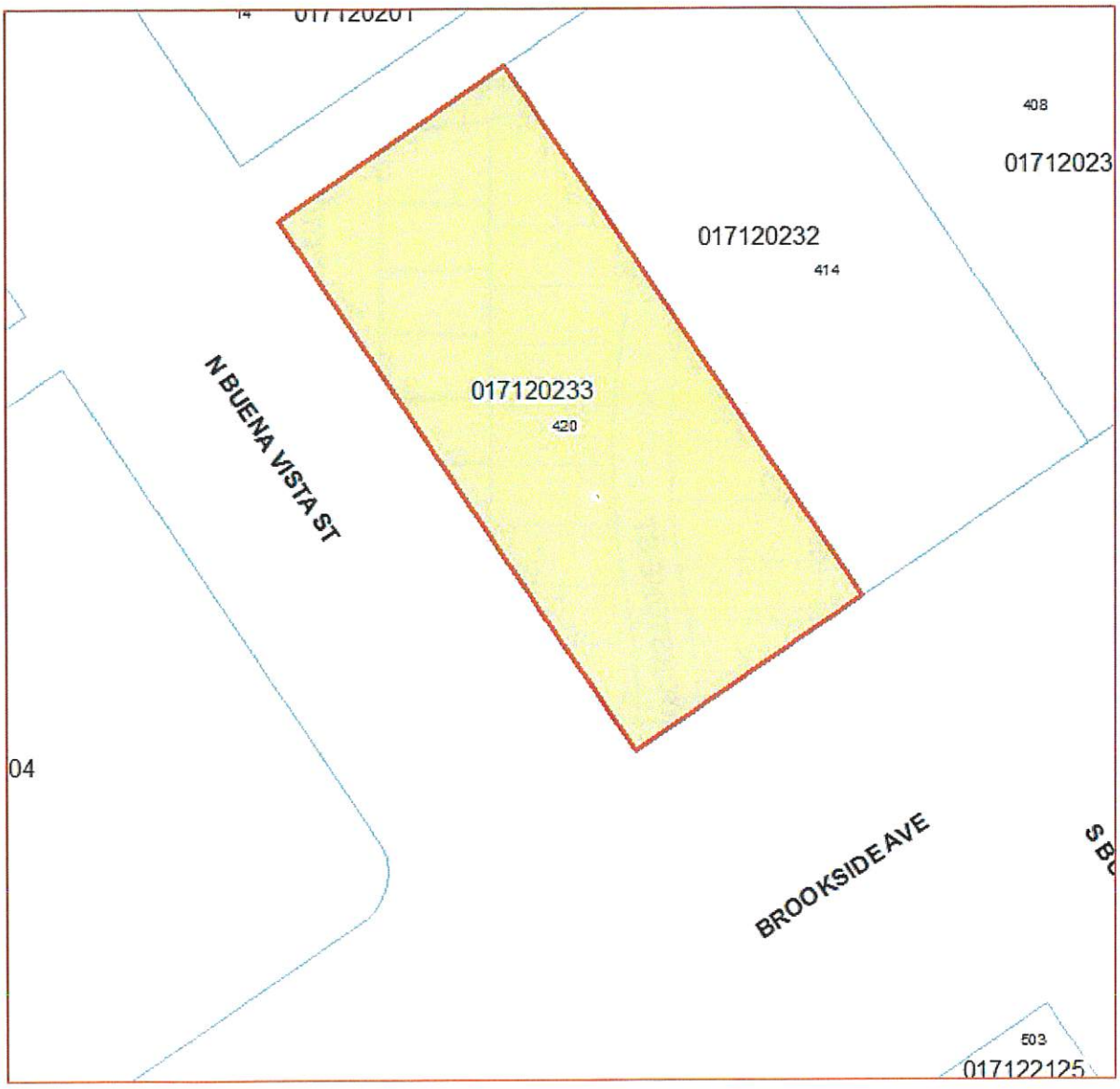
Annexation S5-B



Tract Map 10179

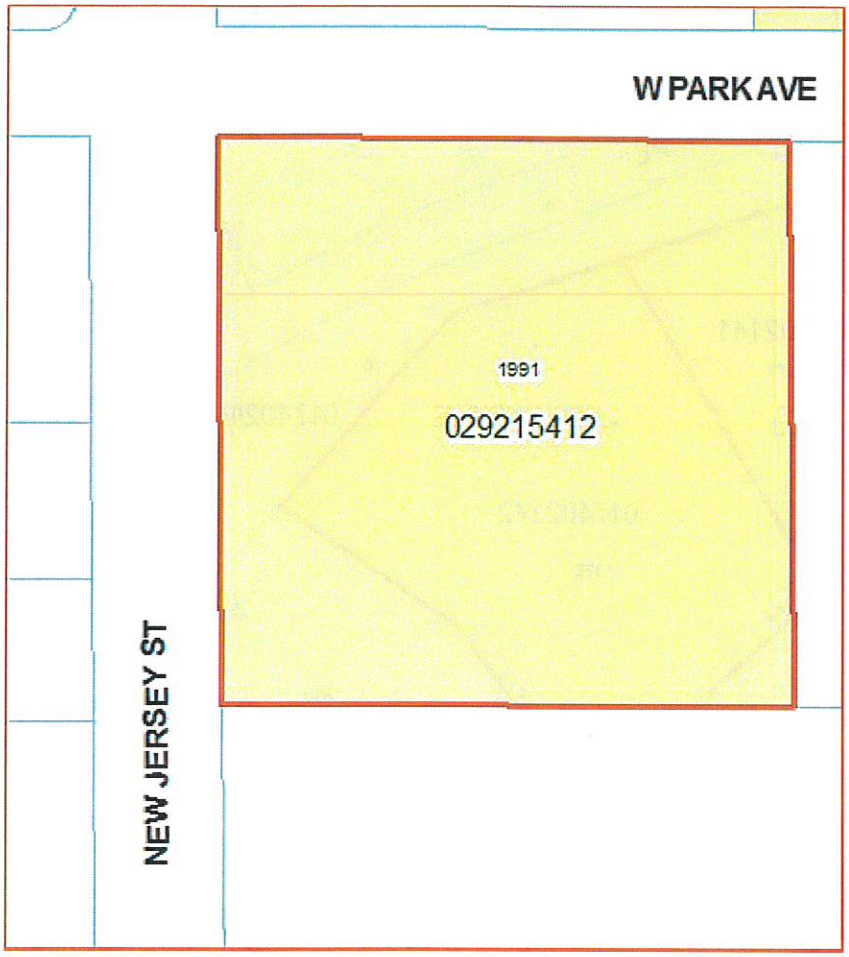
APN 0167-851-39 thru -56
APN 0167-861-37 thru -54

Annexation S5-C



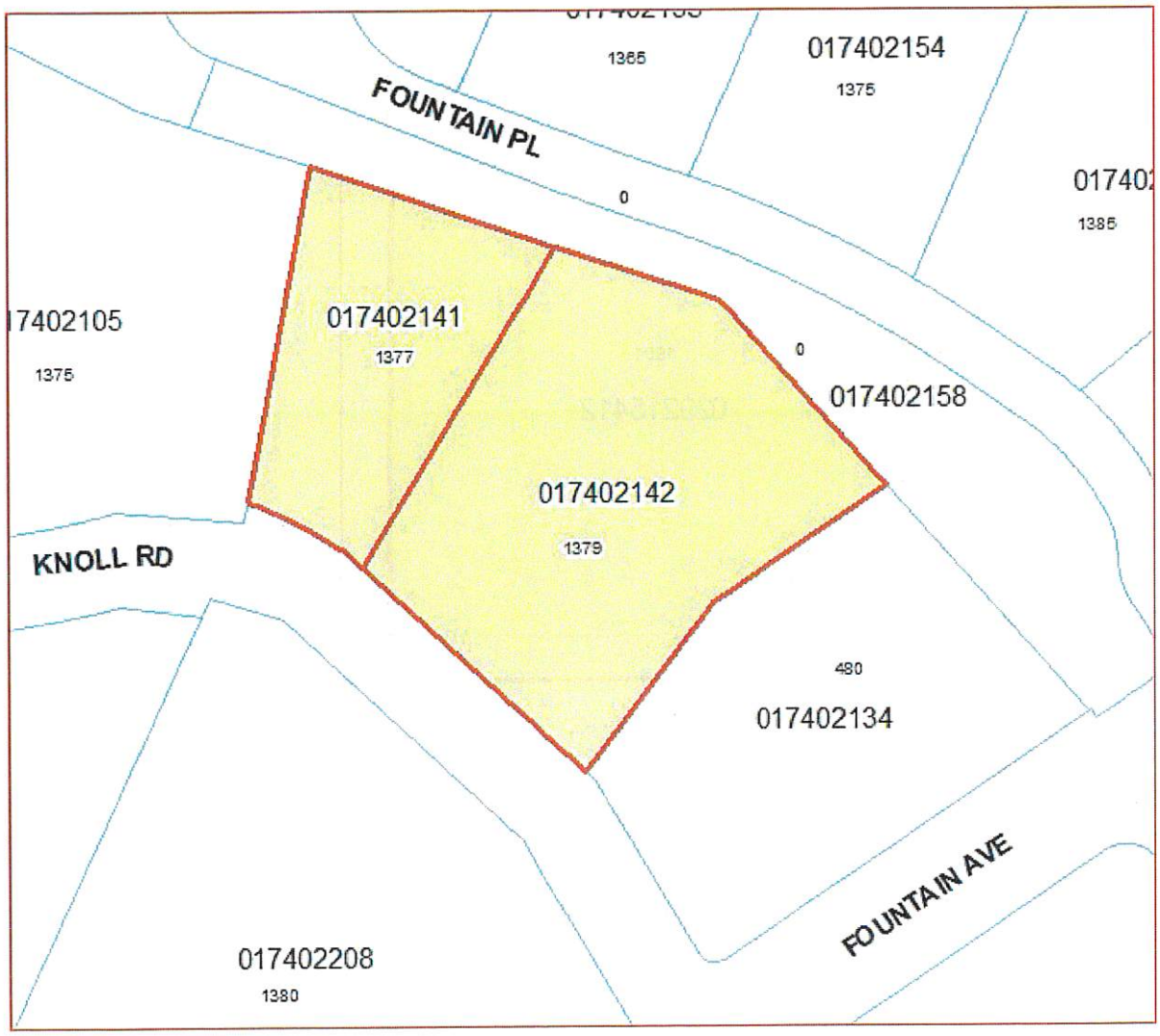
CUP 574

Annexation S5-D



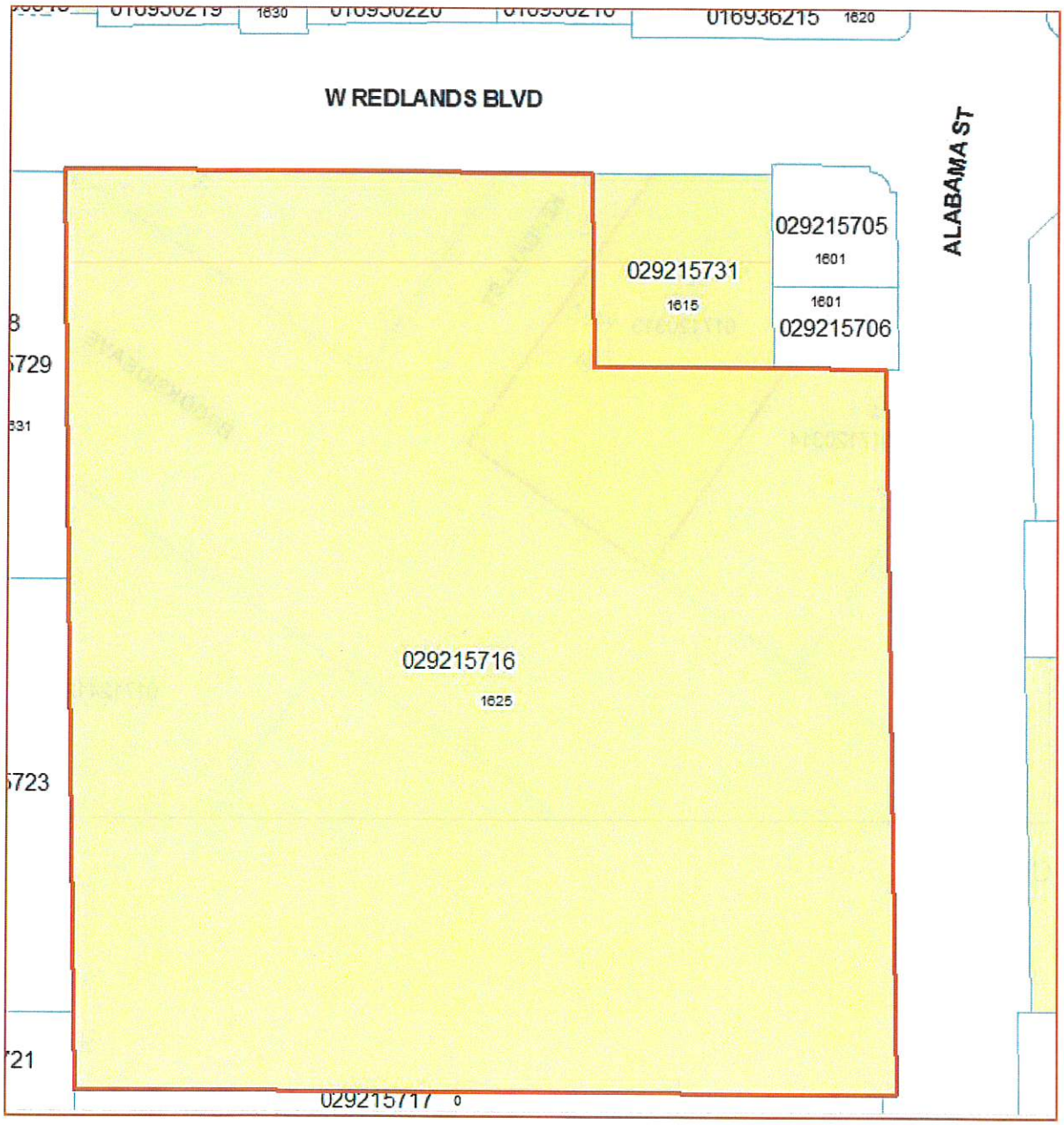
CRA 642

Annexation S5-E



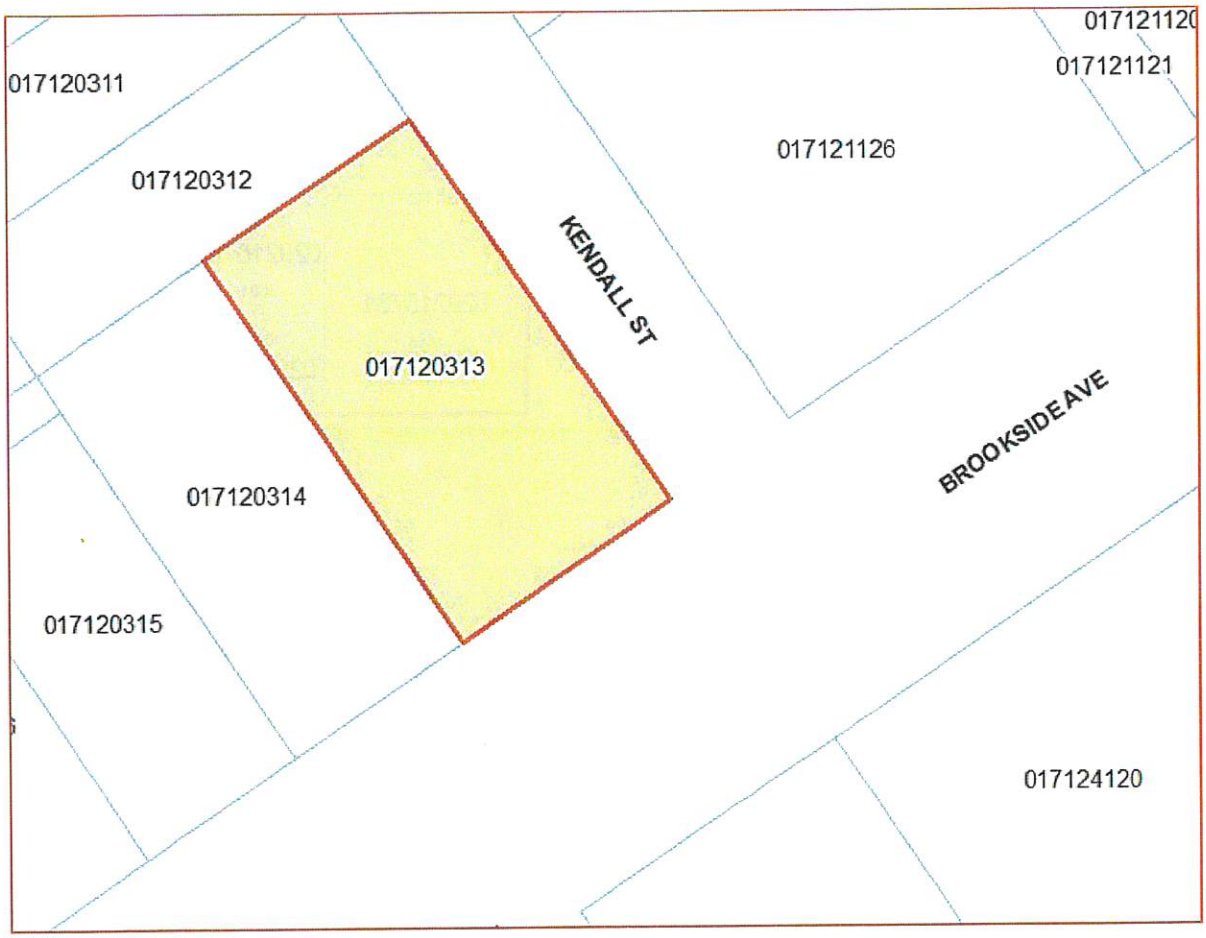
Parcel Map 14090

Annexation S6-A



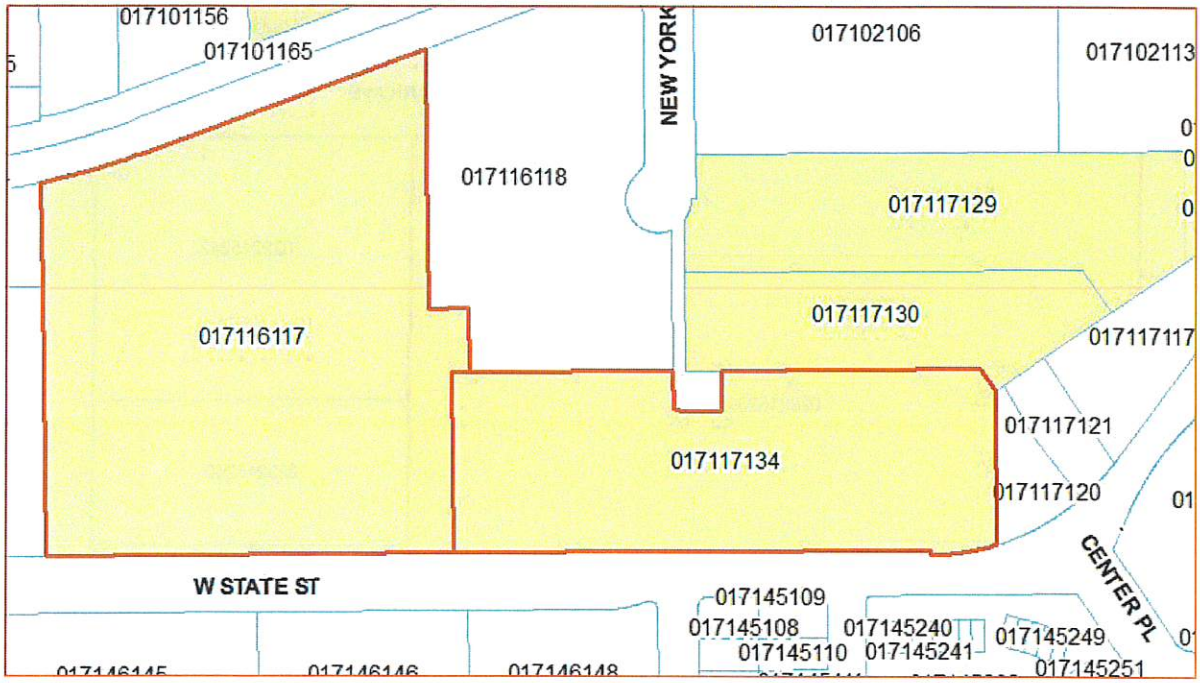
CRA 648

Annexation S6-B



CUP 581

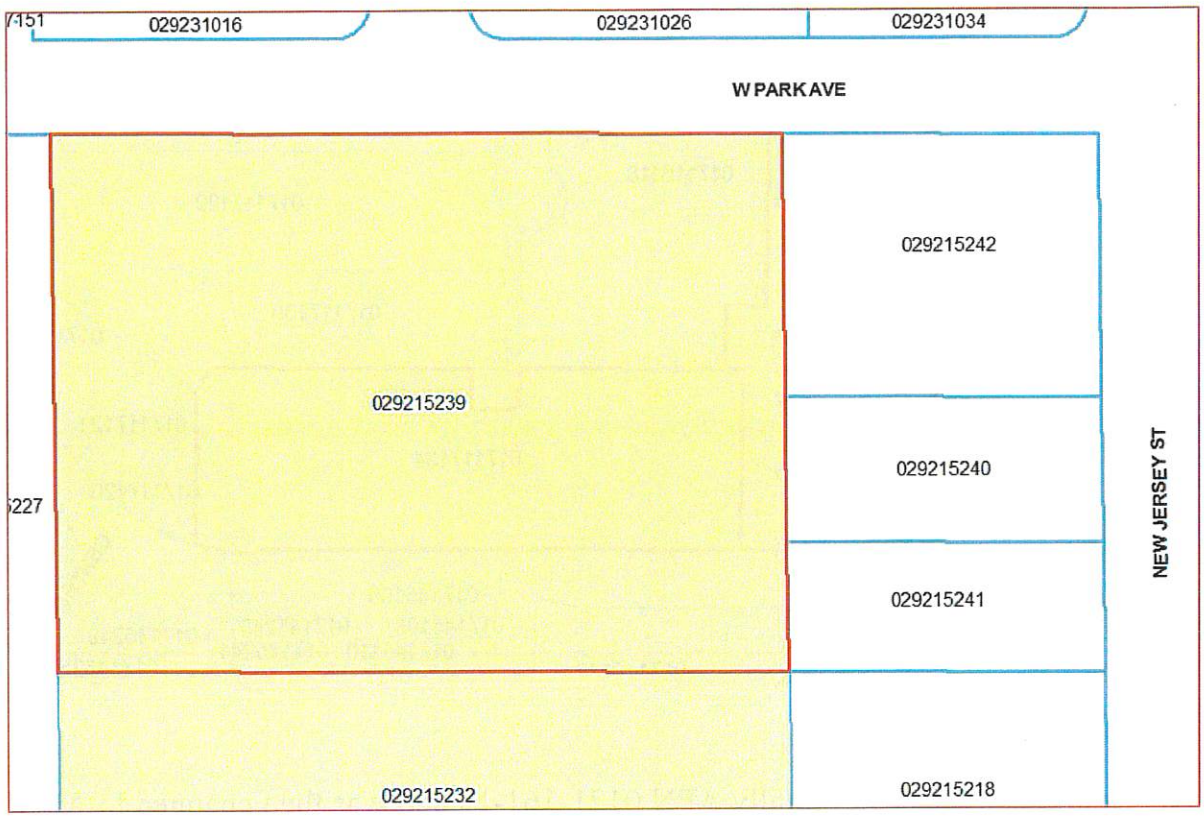
Annexation S7-A



MS 228

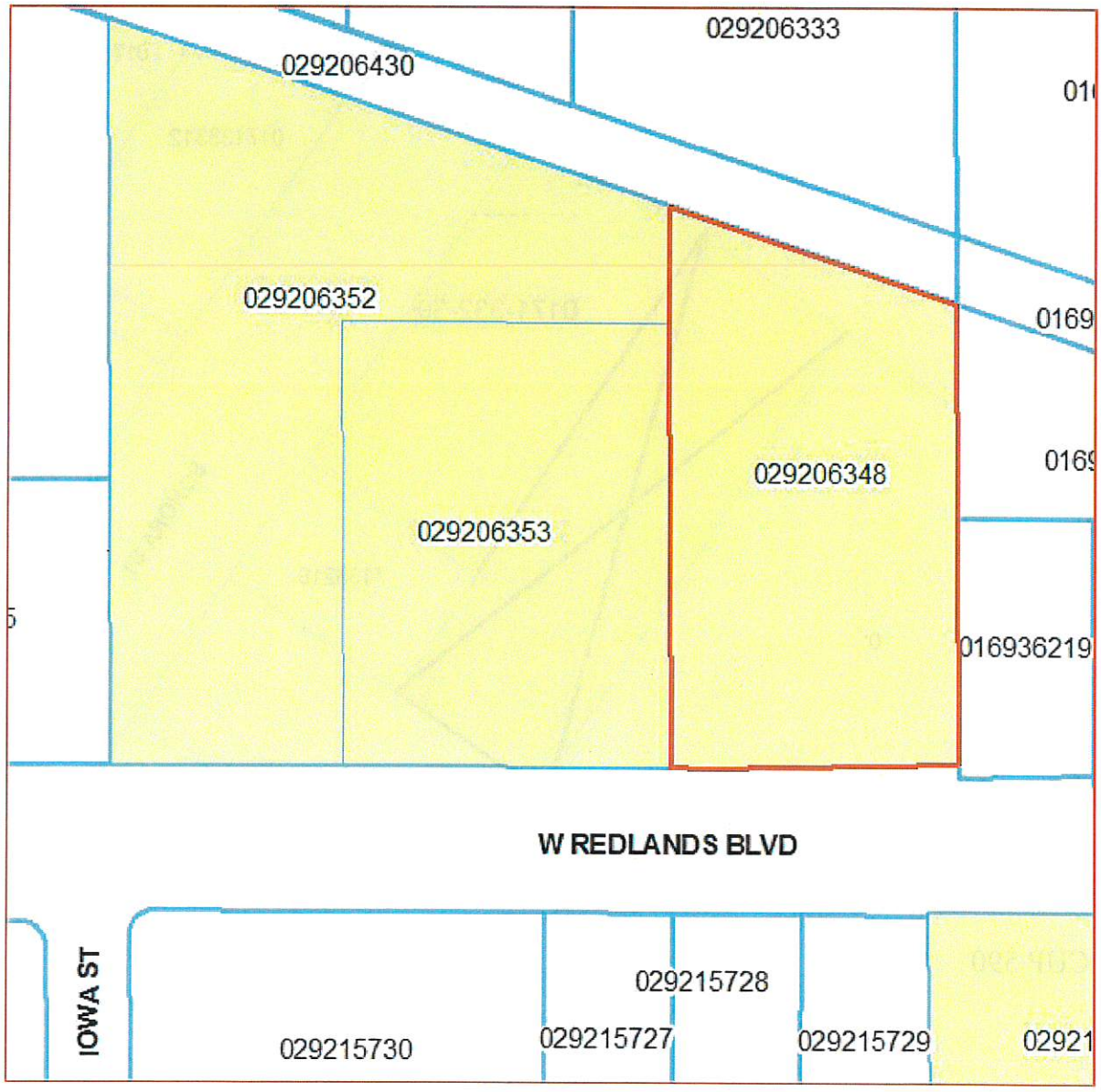
Annexation S7-A was originally APN 0171-161-13 and was then changed to APN 0171-161-14 and -15. Annexation S1-S was originally APN 0171-171-18, -22, and -23. Assessments for Annexation S7-A and S1-S were combined and then adjusted proportionately. New APNs for both annexations are 0171-161-17 and 0171-171-34. Assessment spread proportionately. 4/20/2020

Annexation S7-B



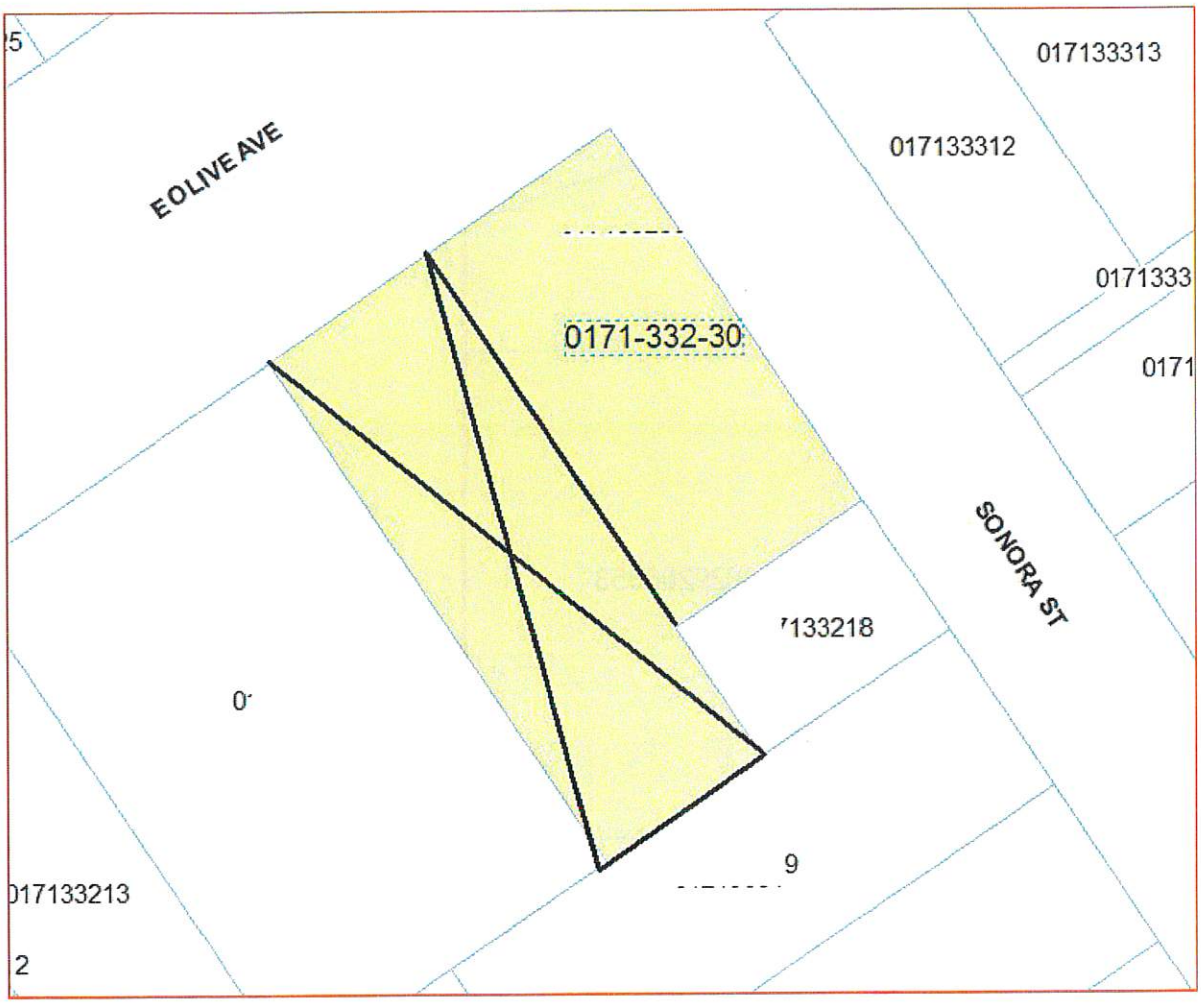
CRA 639

Annexation S7-C



CUP 602

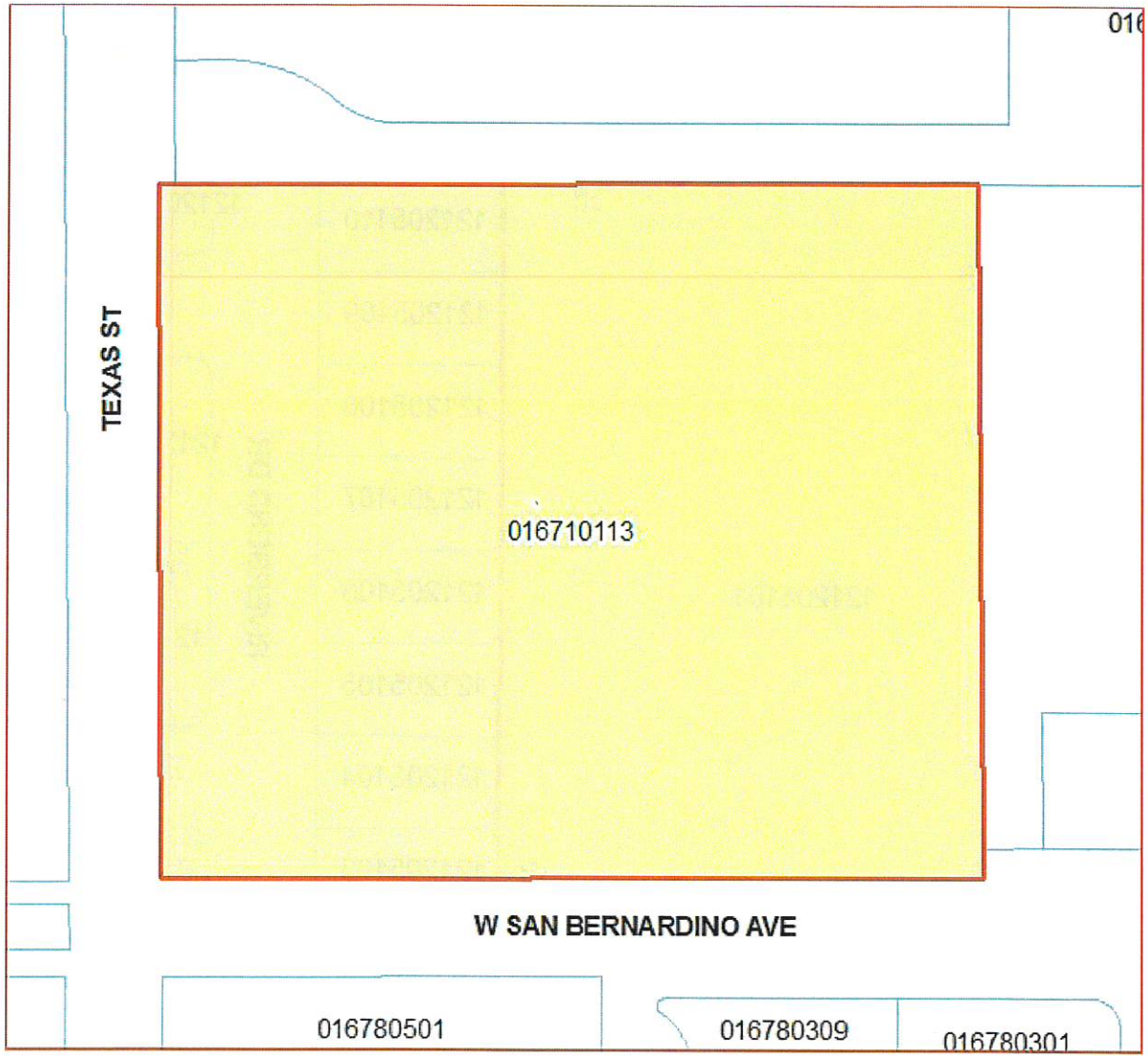
Annexation S7-D



CUP 590

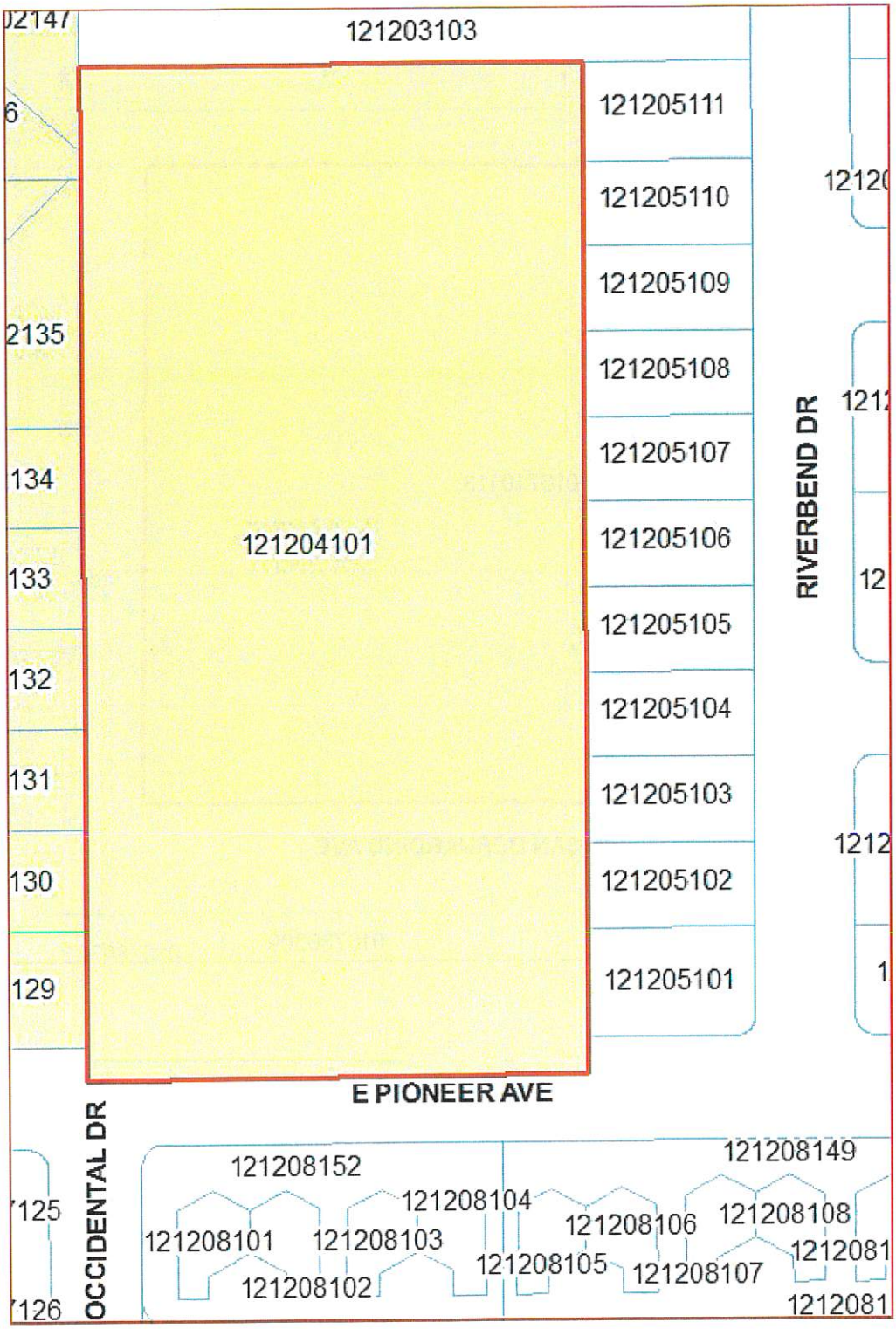
The east half of the property was the original Annexation S7-D when it was a separate parcel.

Annexation S7-E



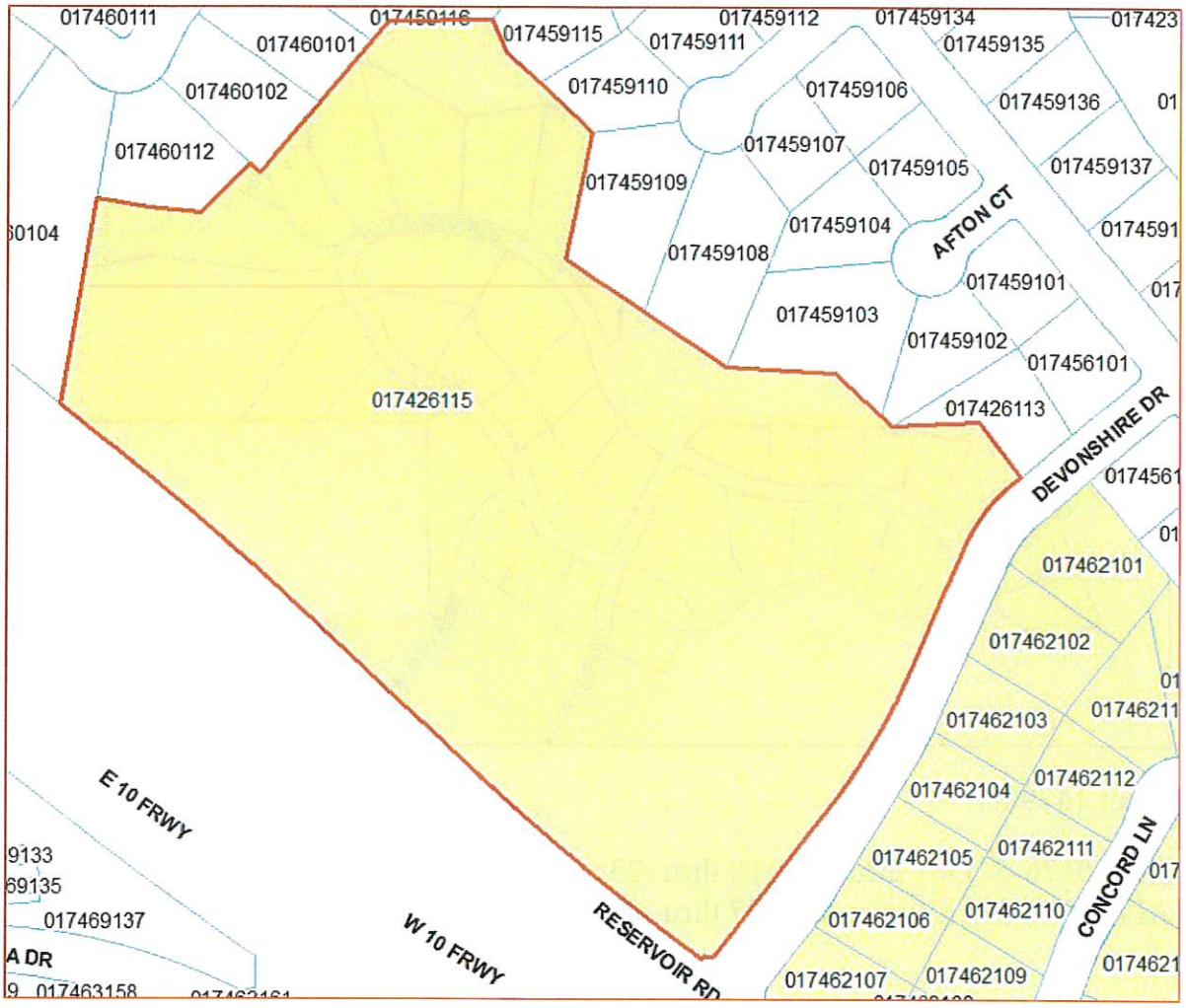
CUP 607

Annexation S7-F



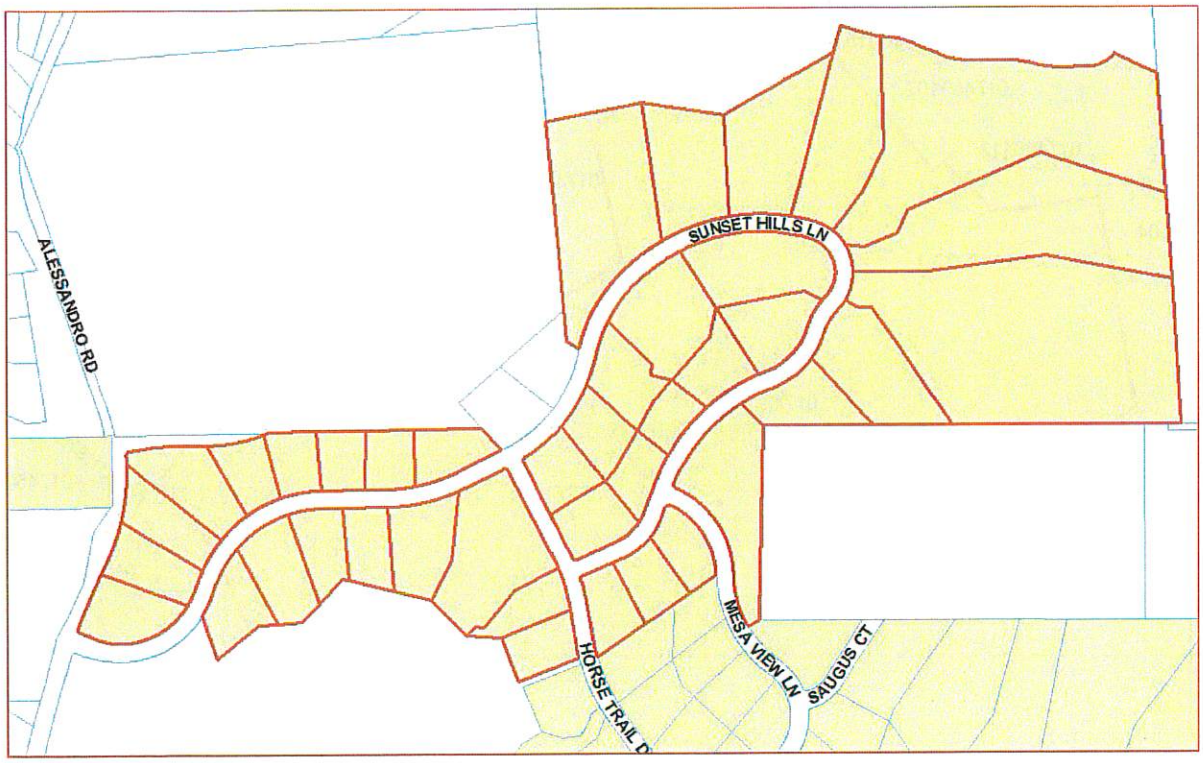
CUP 577

Annexation S7-G



CUP 541

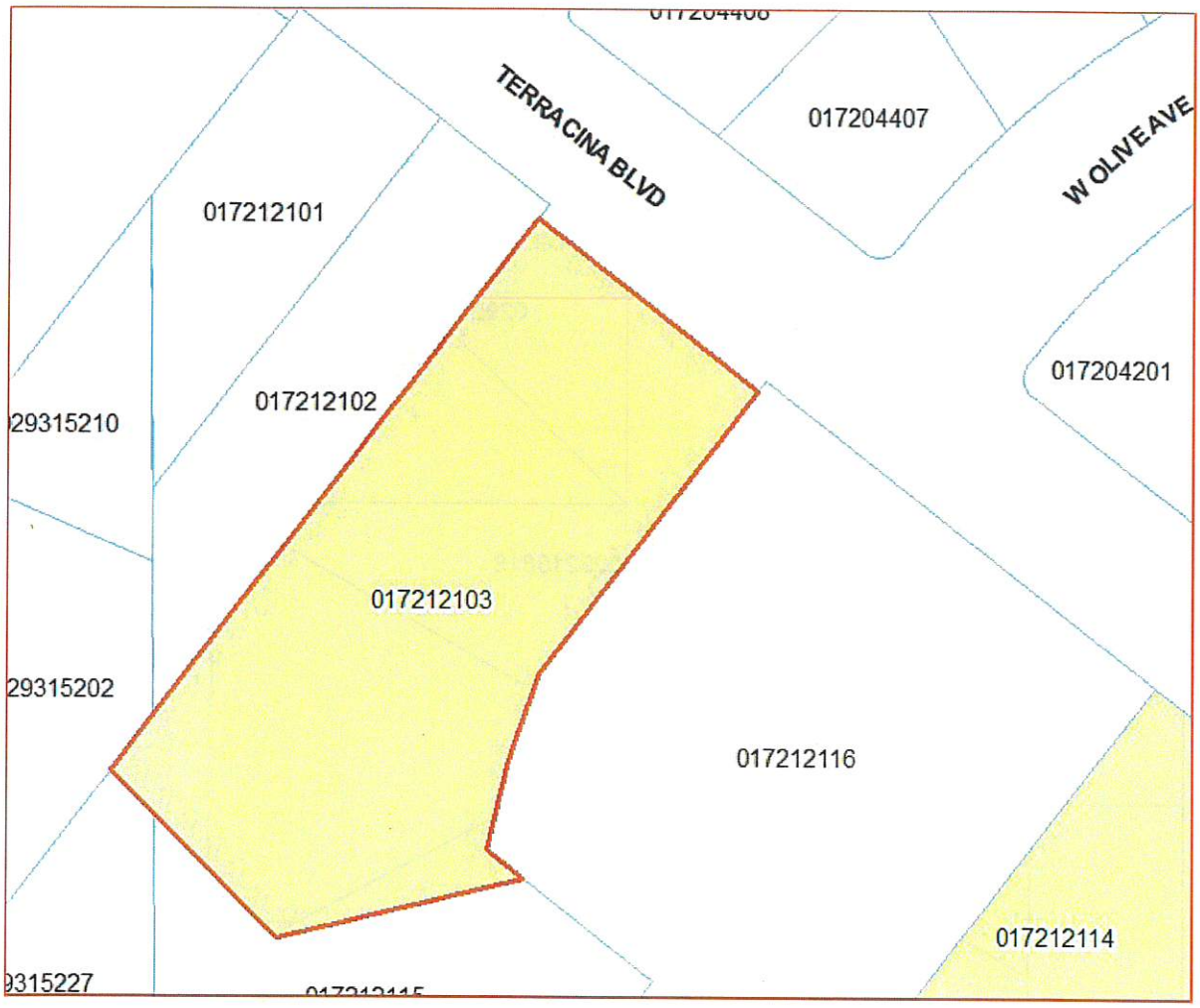
Annexation S7-H



Tract 14790-1

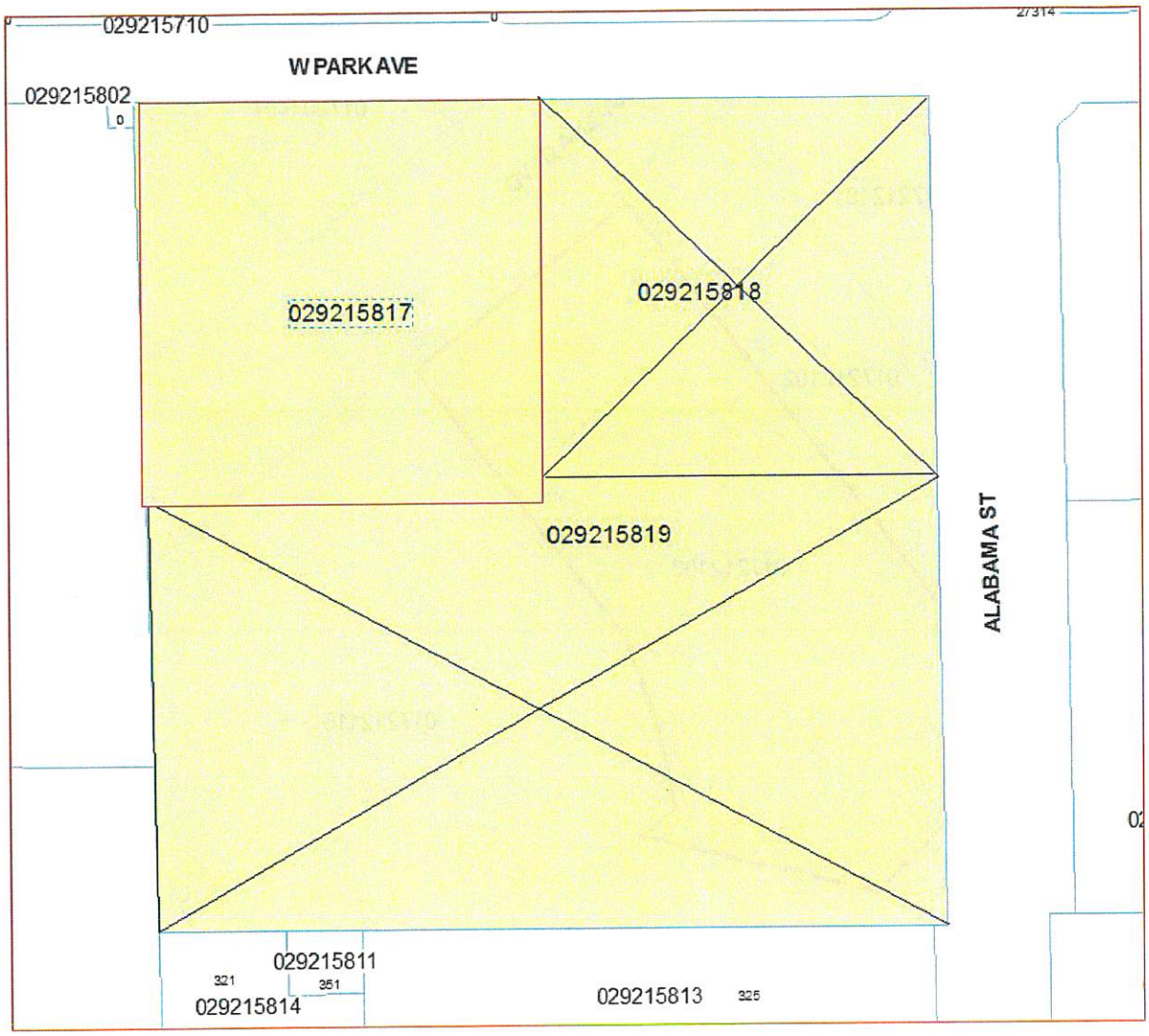
APN 0176-521-01 thru -13, -18 thru -23, -27 thru -32
APN 0176-531-01 thru -03, -07 thru -09, -12, -13, -18, -20 thru -22, -24 thru -26

Annexation S8-A



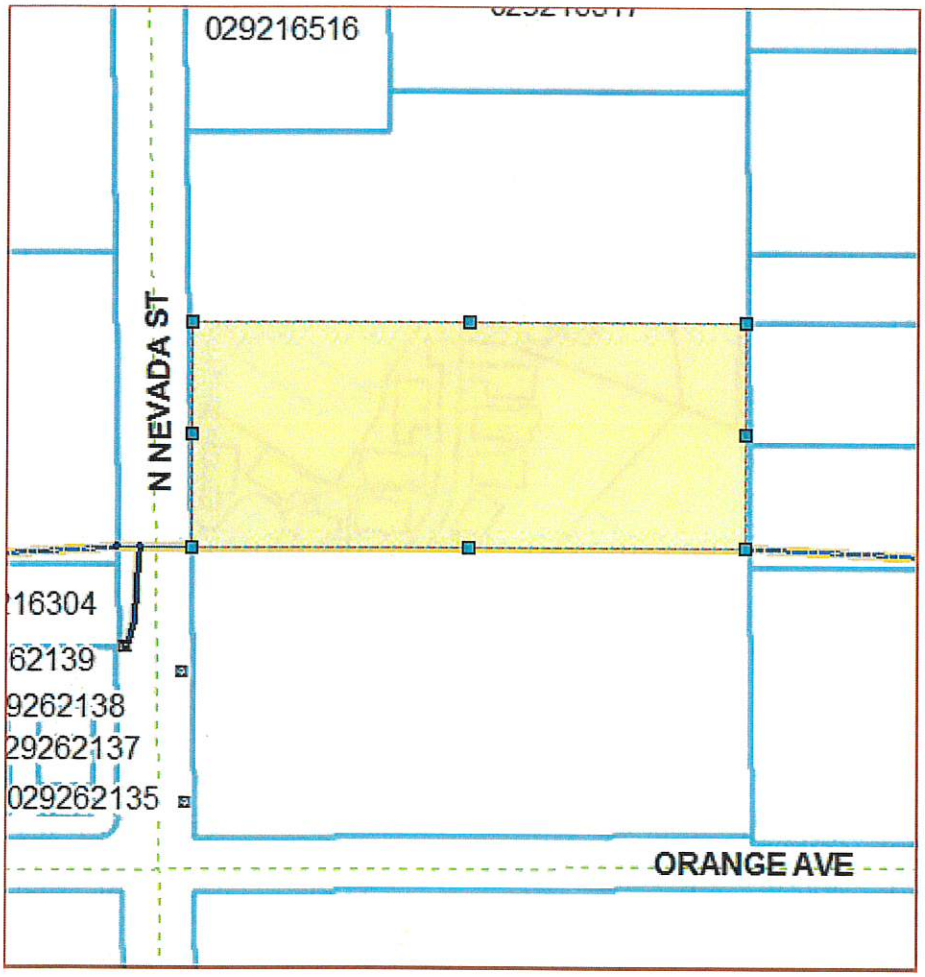
CUP 584

Annexation S8-B



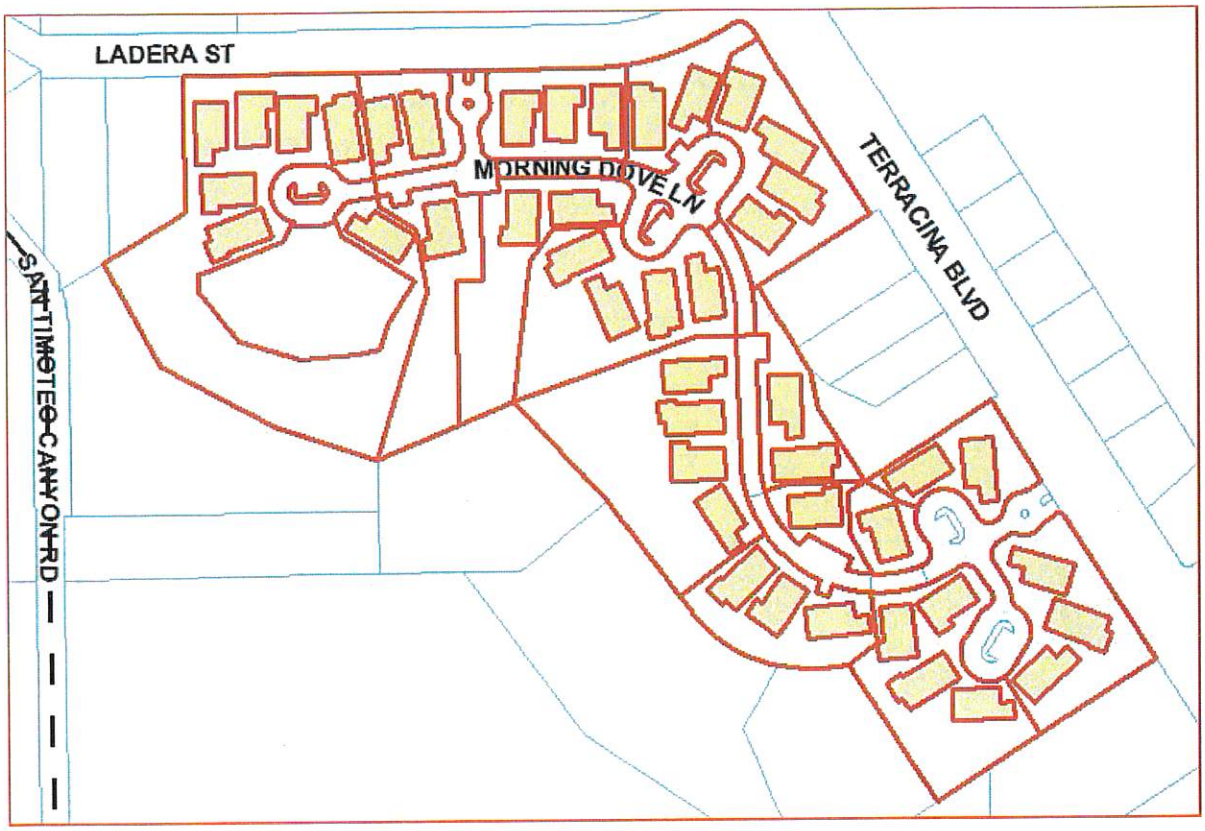
CRA 666

Annexation S8-C, CUP 616



The portion of this parcel that was Annexation S-8C is no longer assessed.

Annexation S9-A

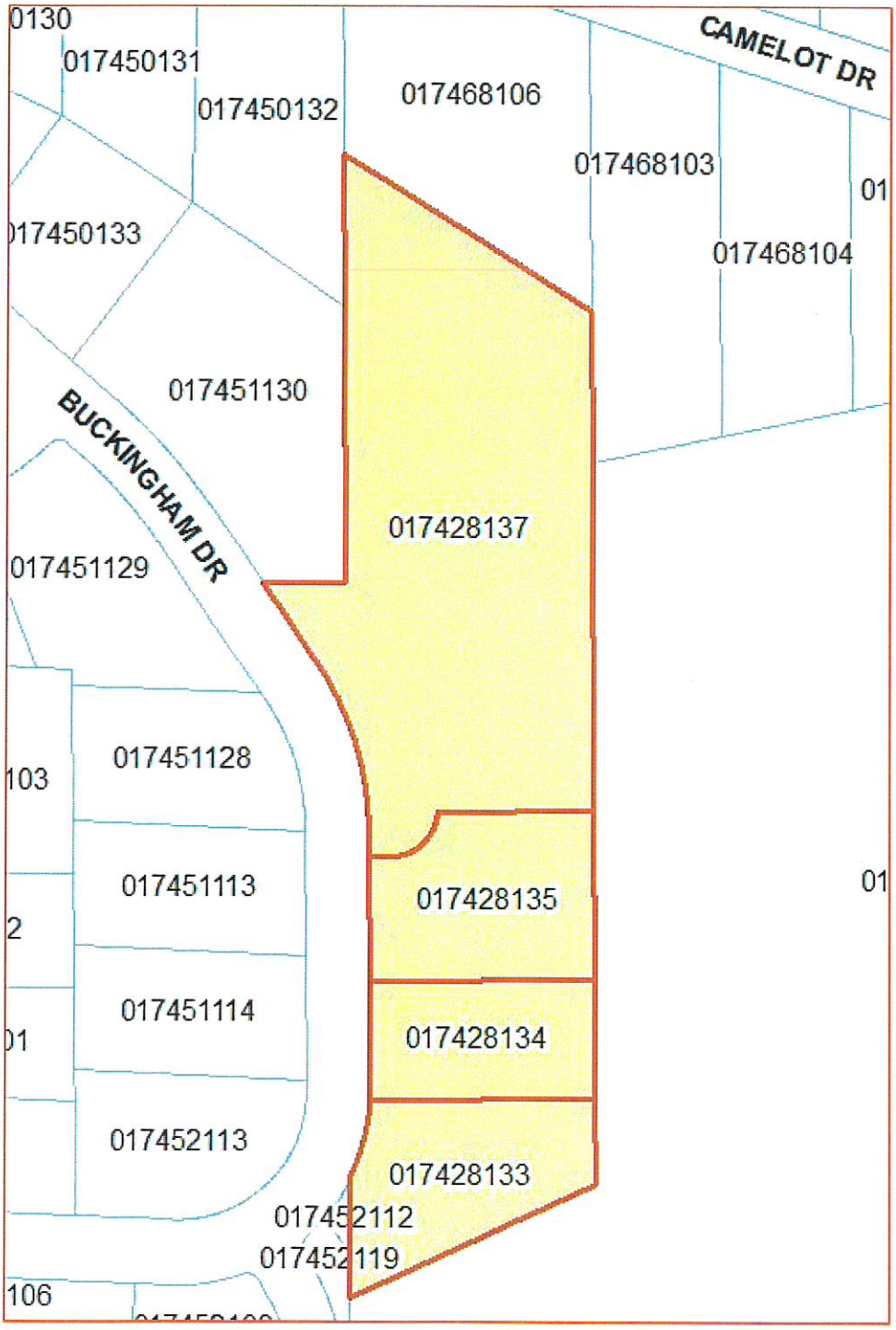


Tract 15589

Assessor's Parcel Numbers

0293-421-01 thru -45

Annexation S9-B



MS 221, Parcel Map 14285

Annexation S9-C

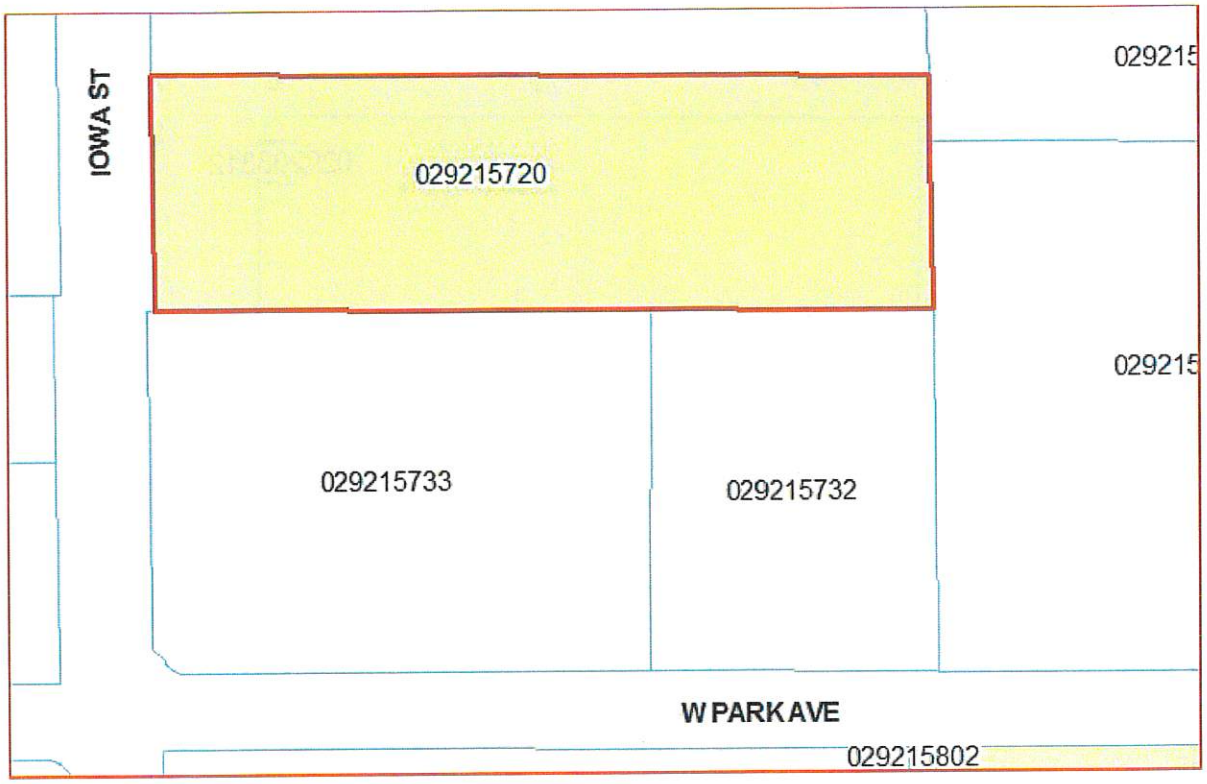
There is no Annexation S9-C.

Annexation S9-D



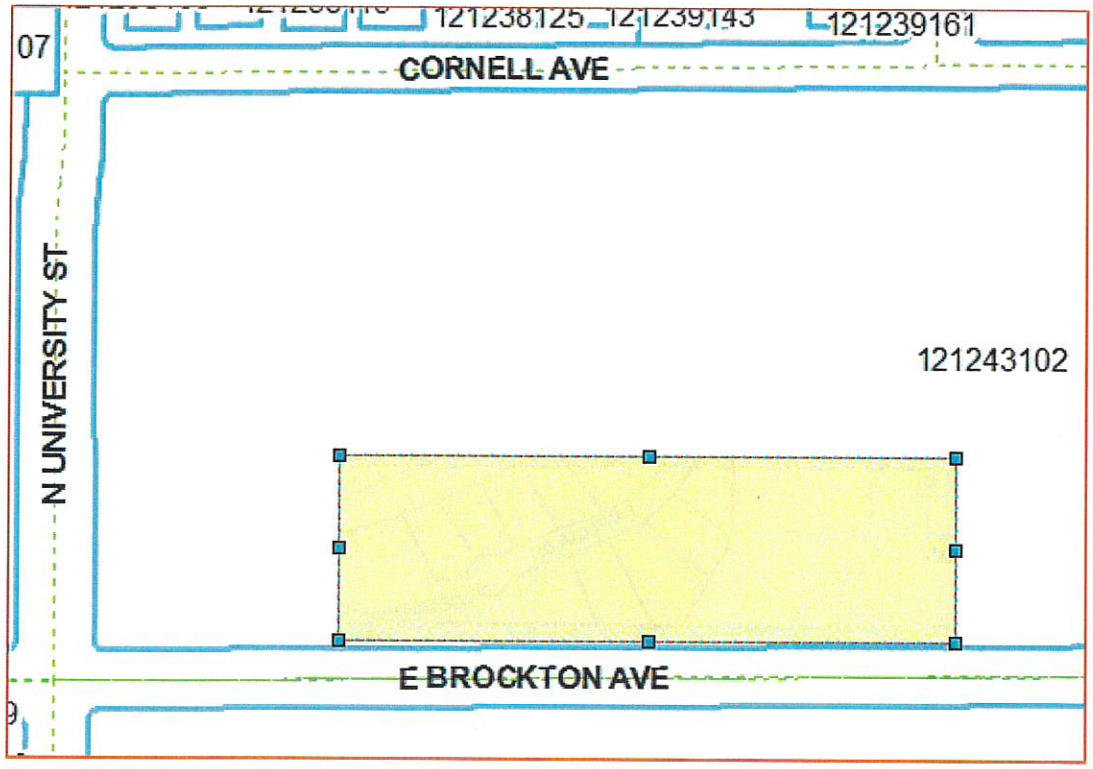
CUP 617

Annexation S9-E



CRA 670

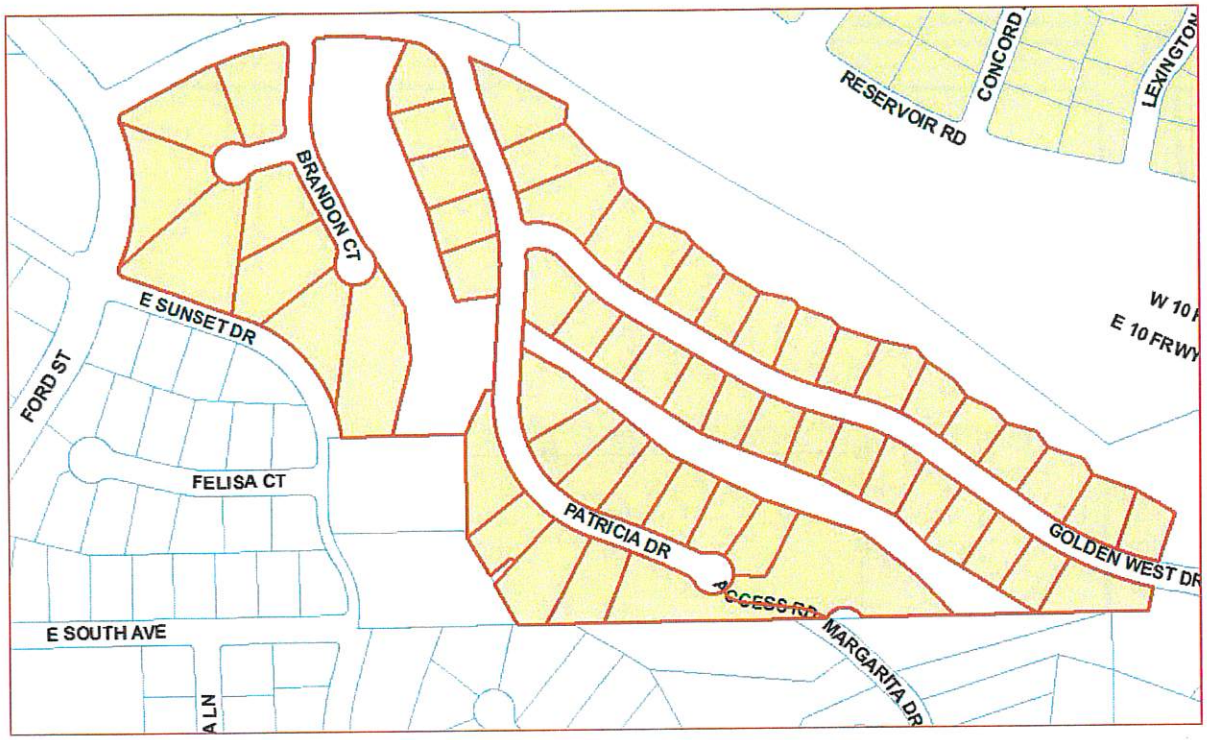
Annexation S9-F



CUP 629

Boundary of area of original annexation is shown. That parcel has since been incorporated into the larger parcel.

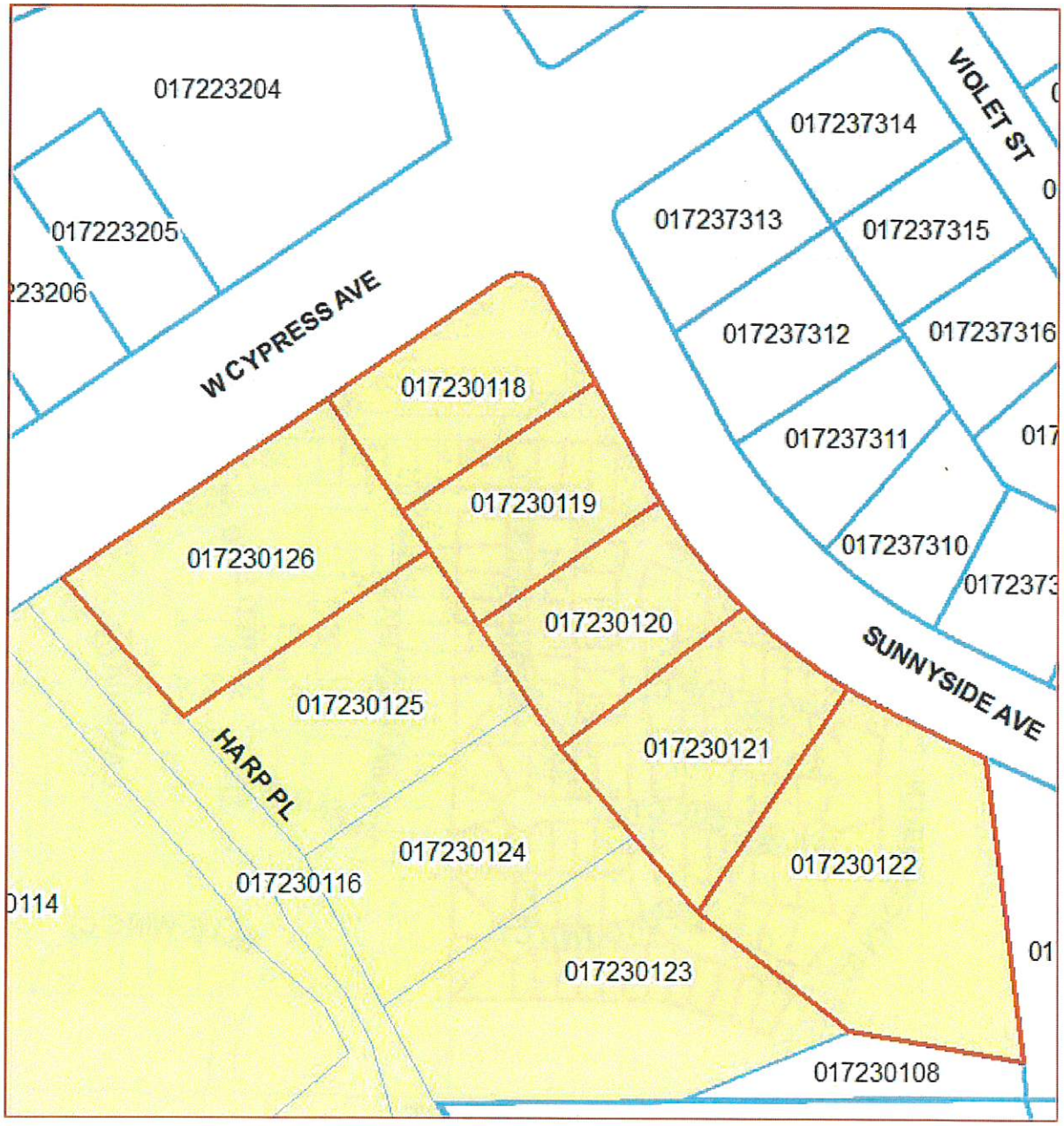
Annexation S10-A



Tract 15040

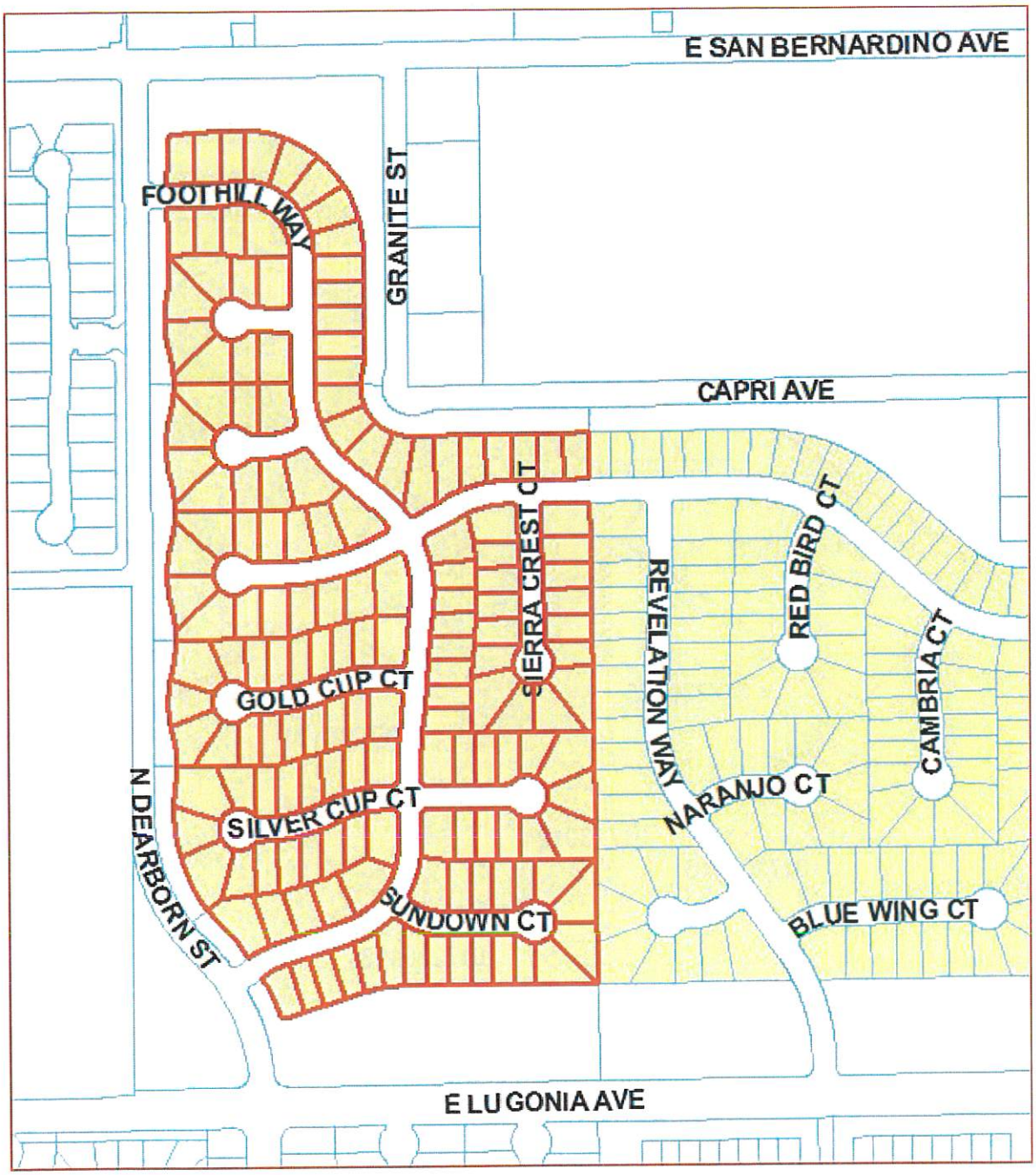
APN 174-631-01 thru -09, -11 thru -35
APN 174-631-37 thru -58
APN 0174-631-63, -64

Annexation S10-B



Tract 15832

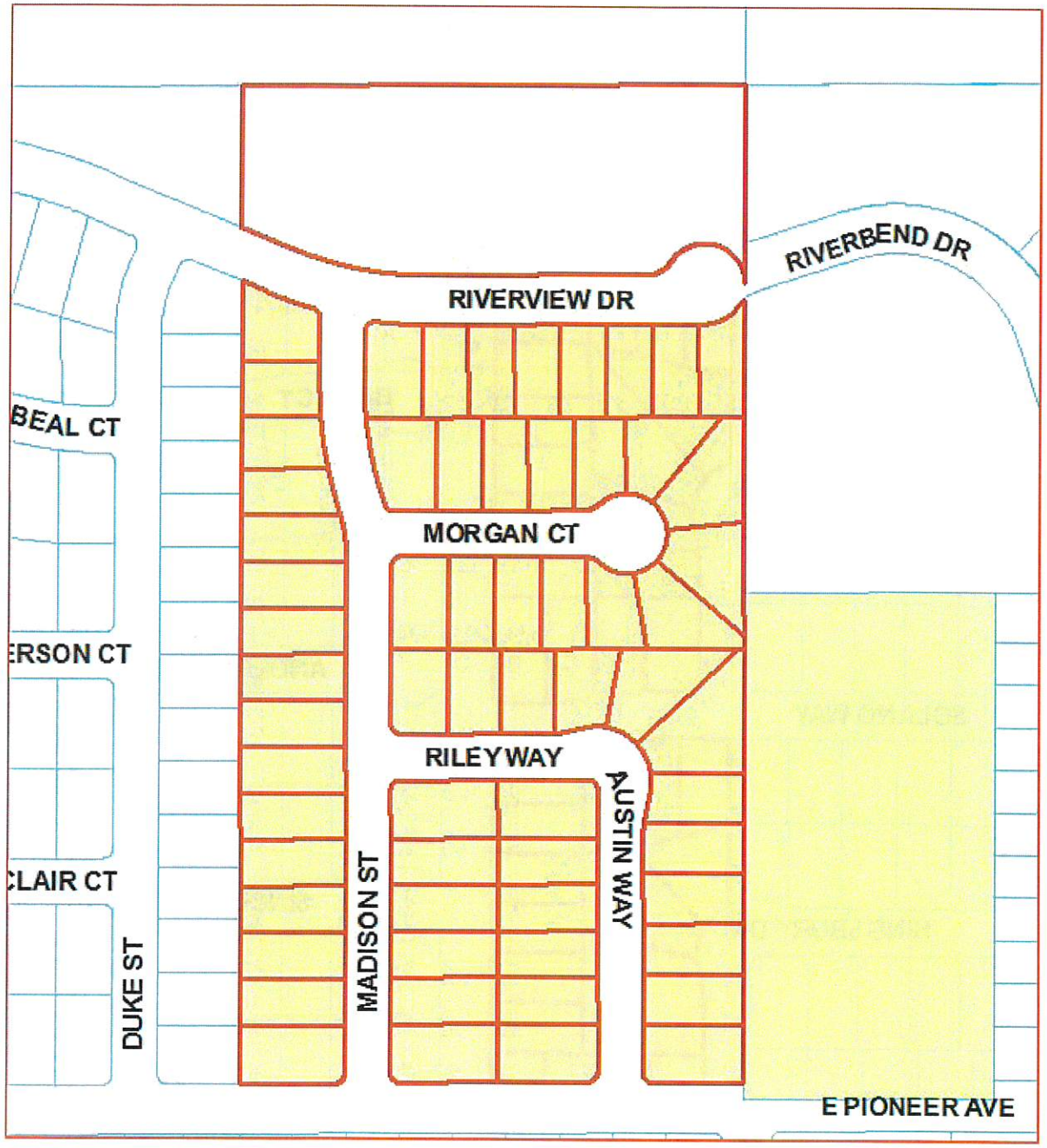
Annexation S10-C



Tract 15937

APN 0168-731-01 thru -25
APN 0168-741-01 thru -78
APN 0168-751-01 thru -56

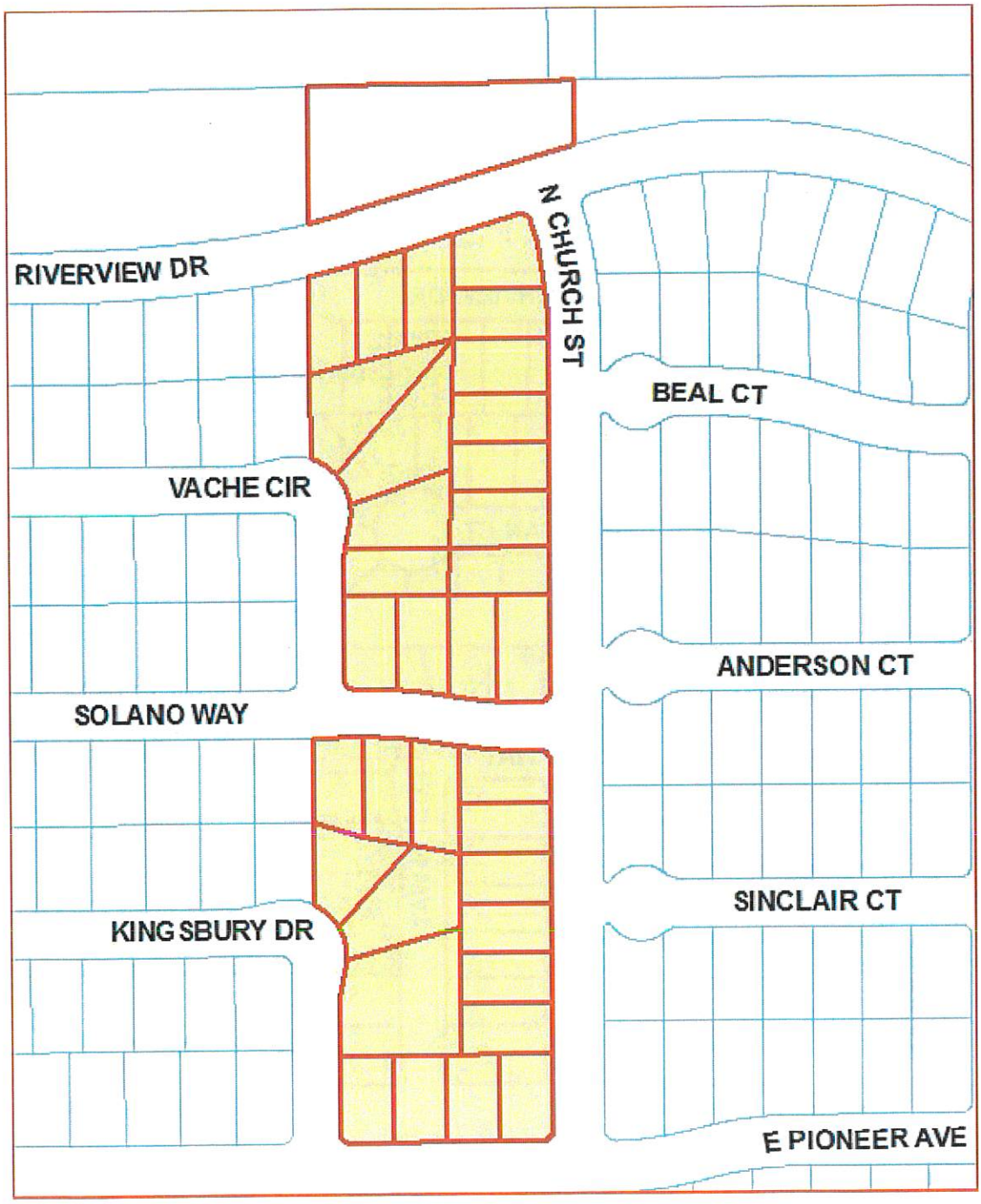
Annexation S10-D



Tract 16015

APN 168-761-01 thru 168-761-62

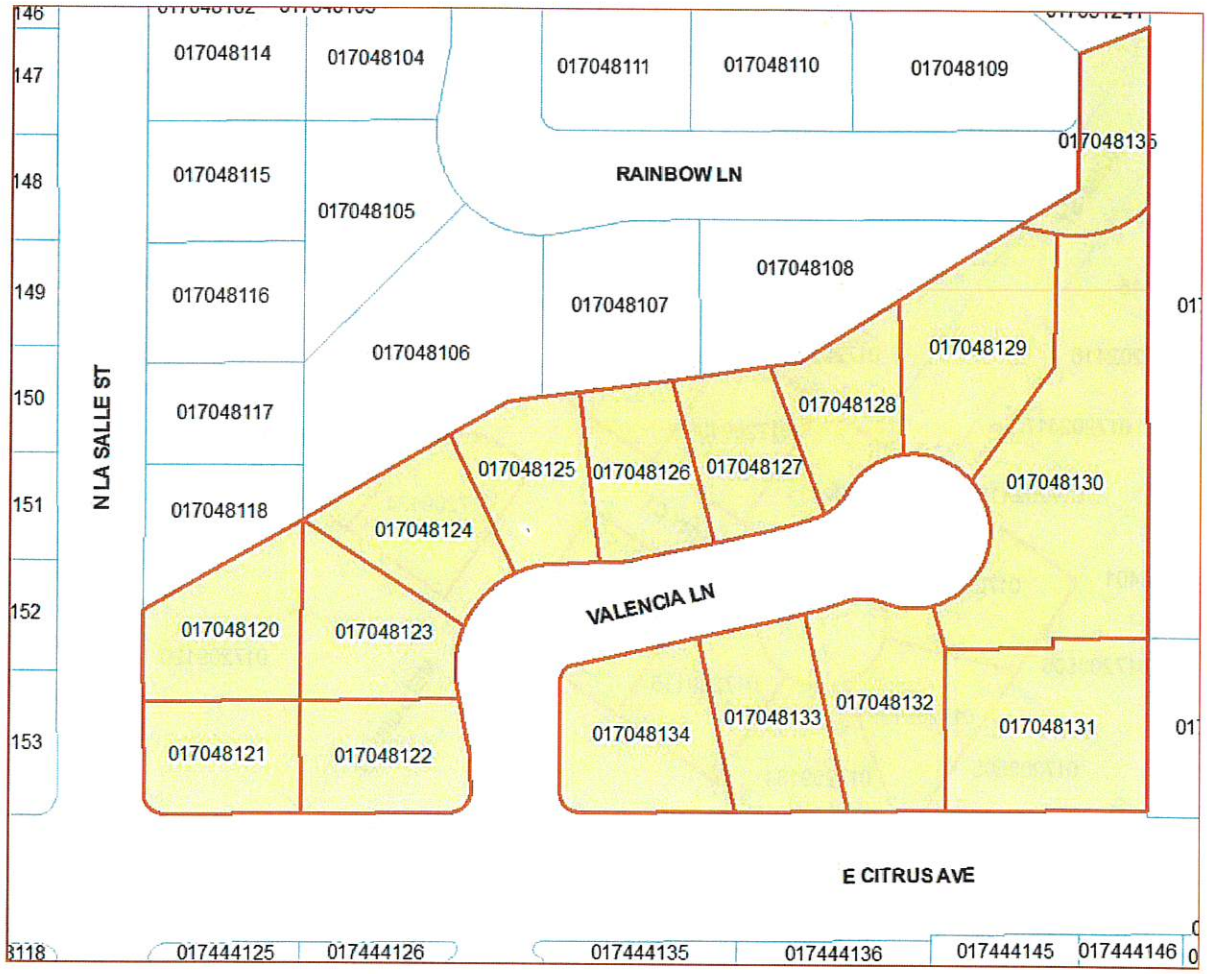
Annexation S10-E



Tract 16029

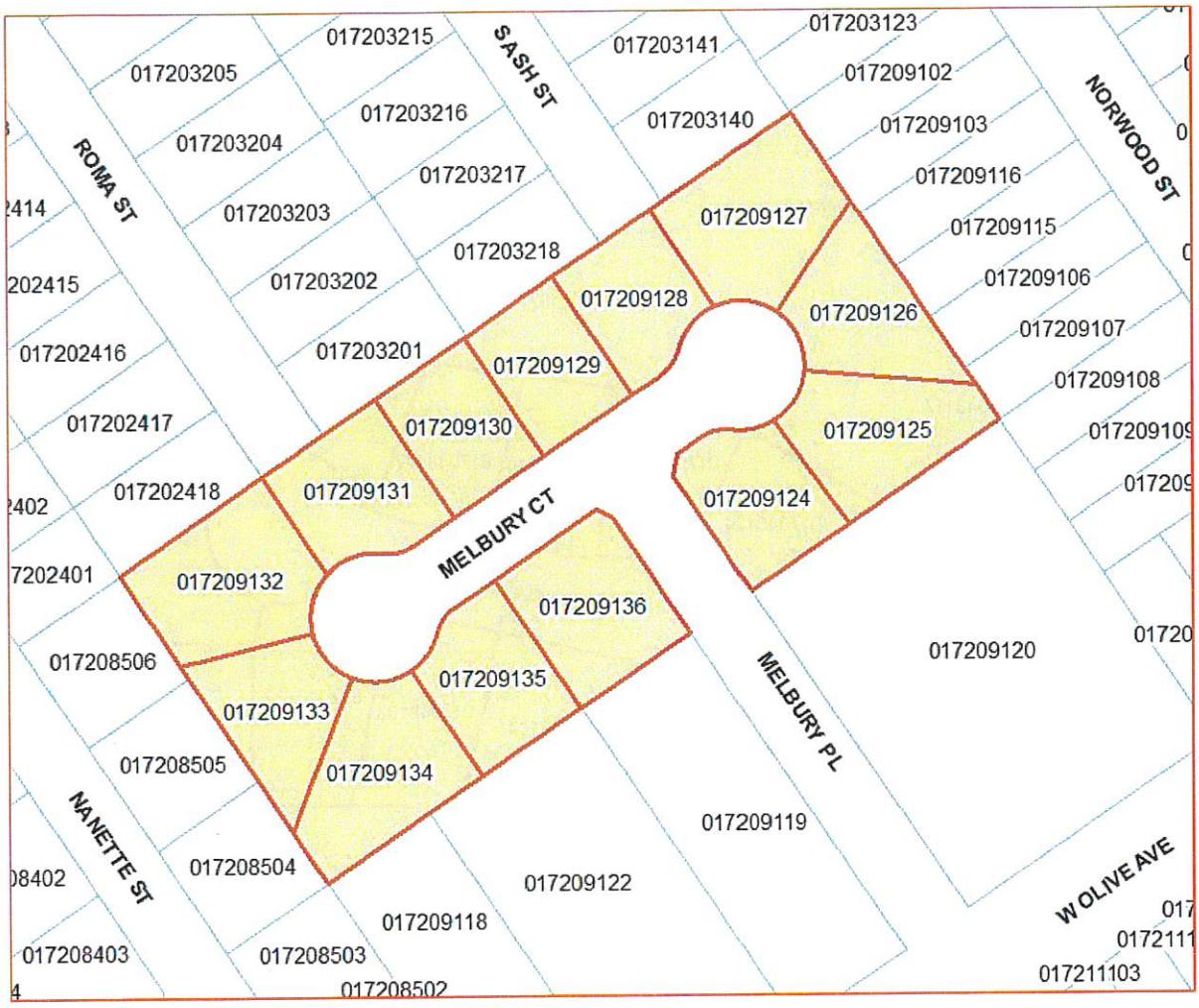
APN 167-081-13 thru 167-081-45

Annexation S10-F



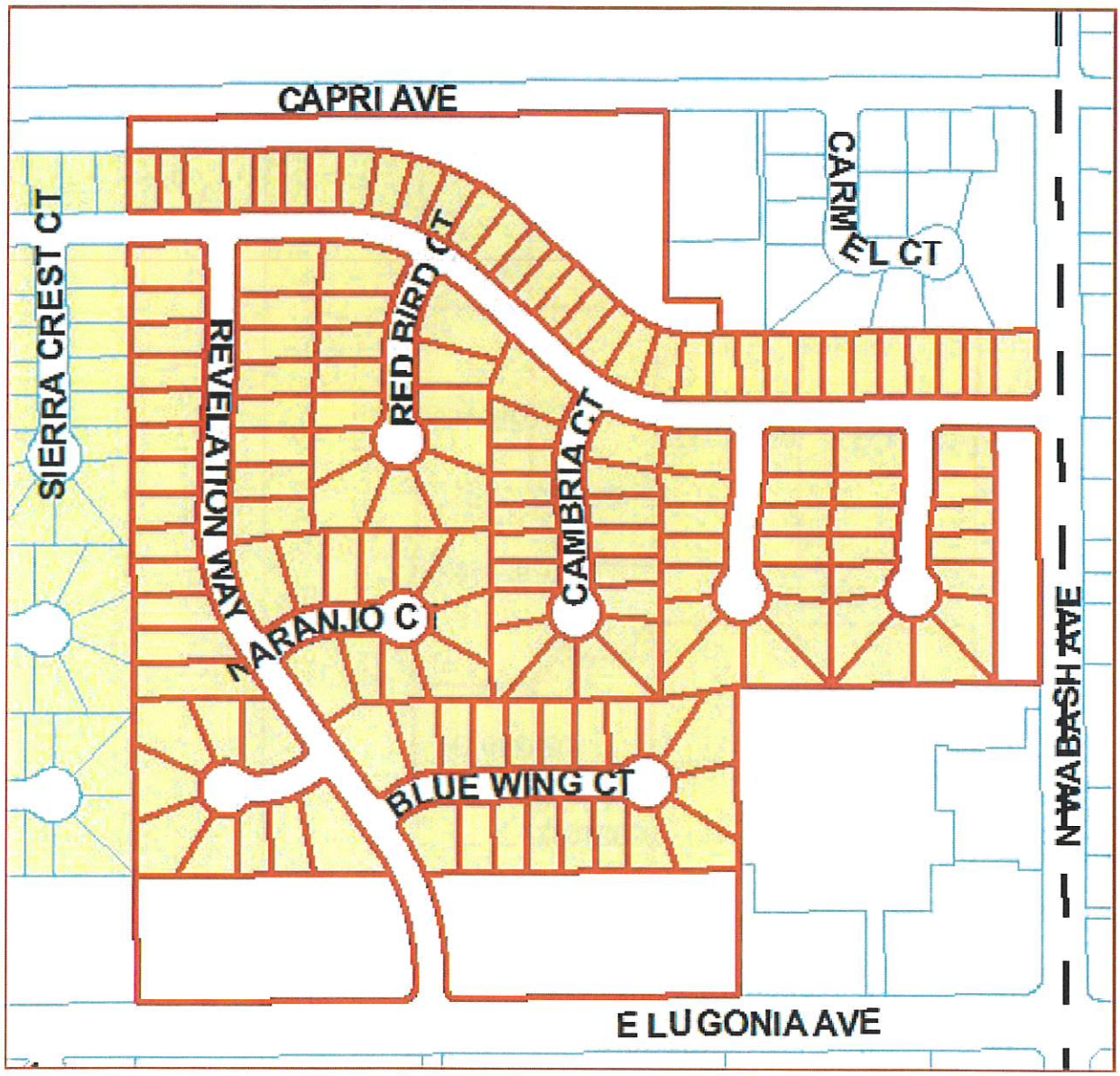
Tract 16032

Annexation S10-G



Tract 16082

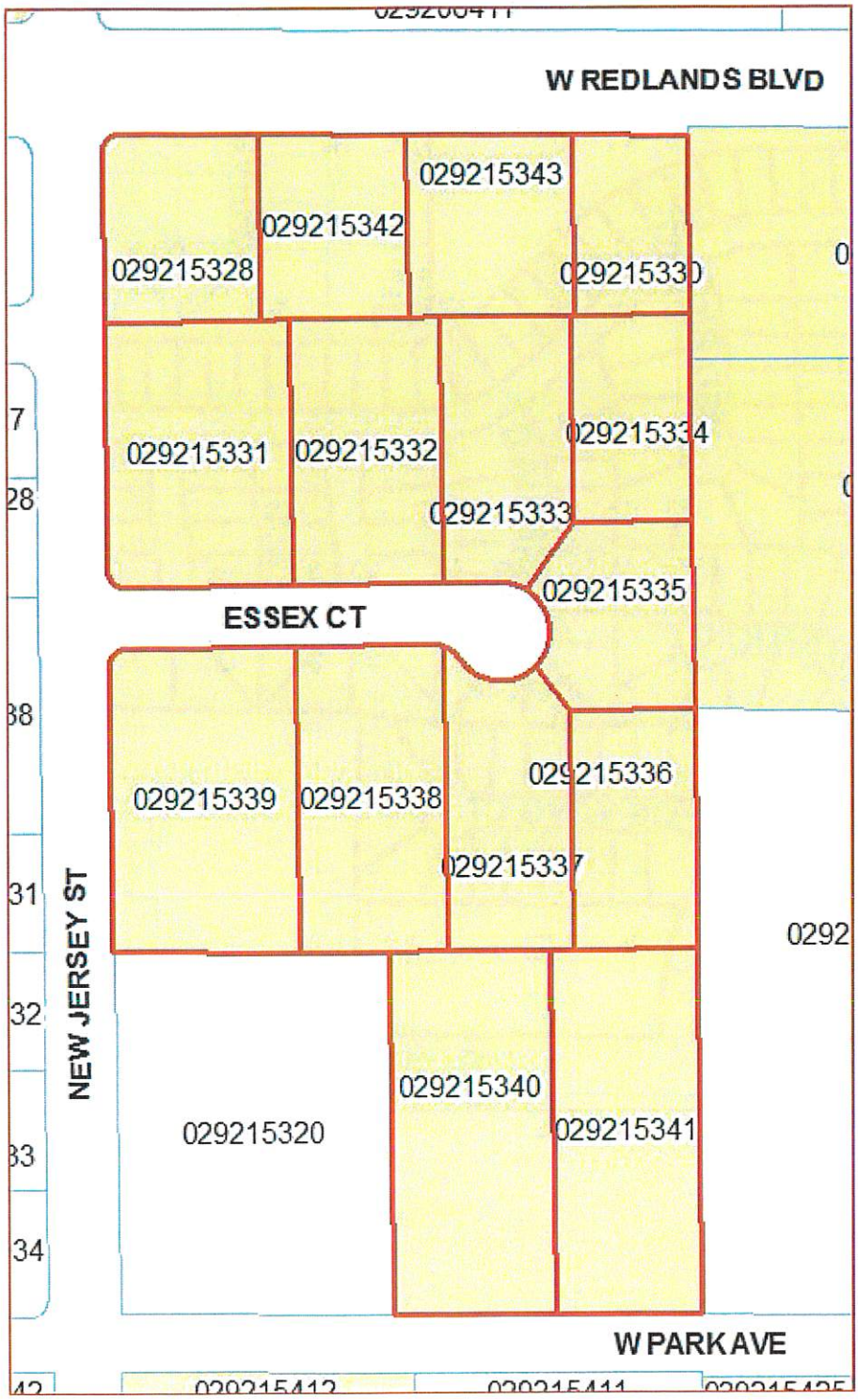
Annexation S10-H



Tract 16101

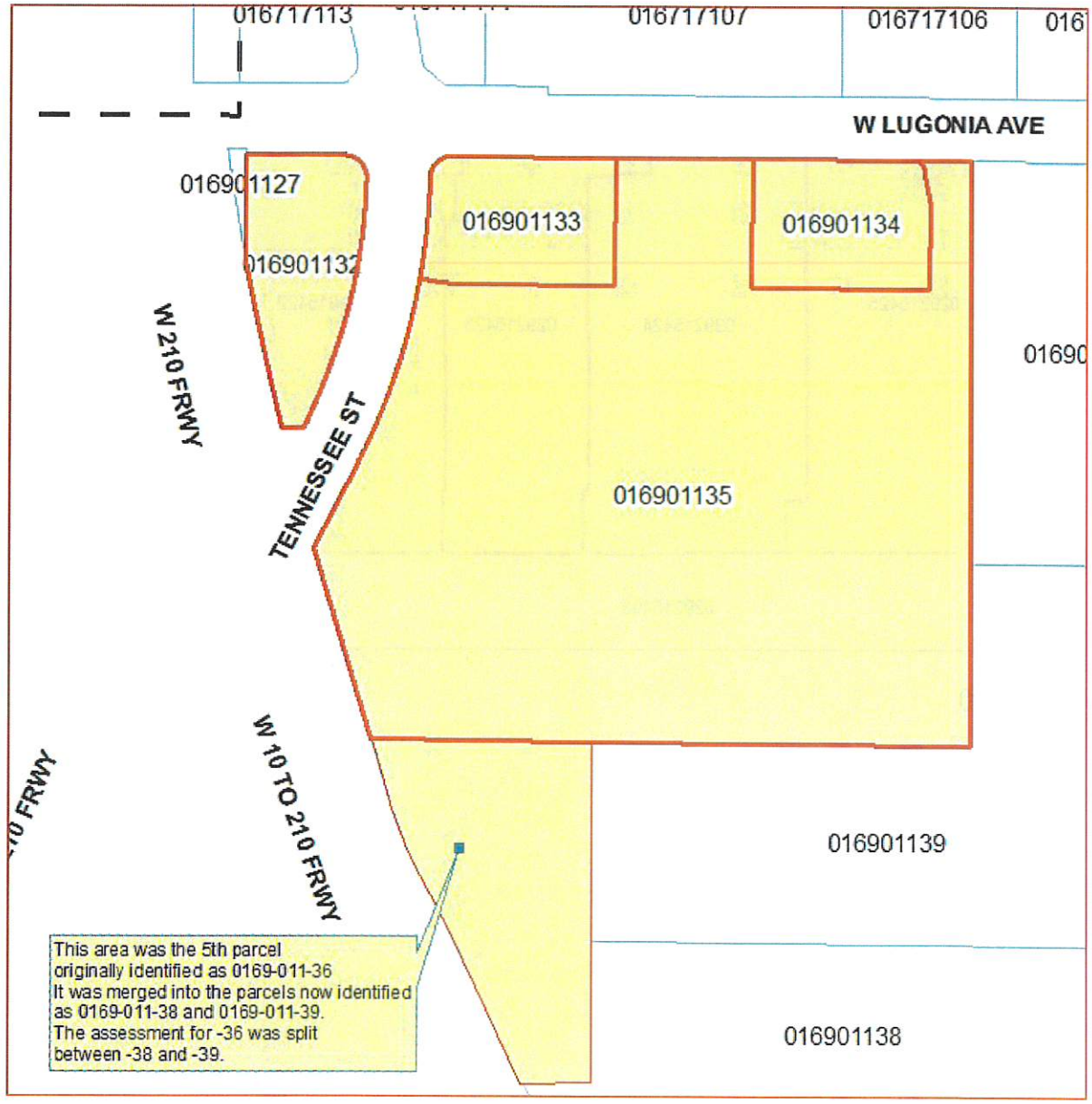
APN 168-771-01 thru -50
APN 168-761-01 thru -34
APN 168-791-01 thru -28
APN 168-801-01 thru -38

Annexation S10-I



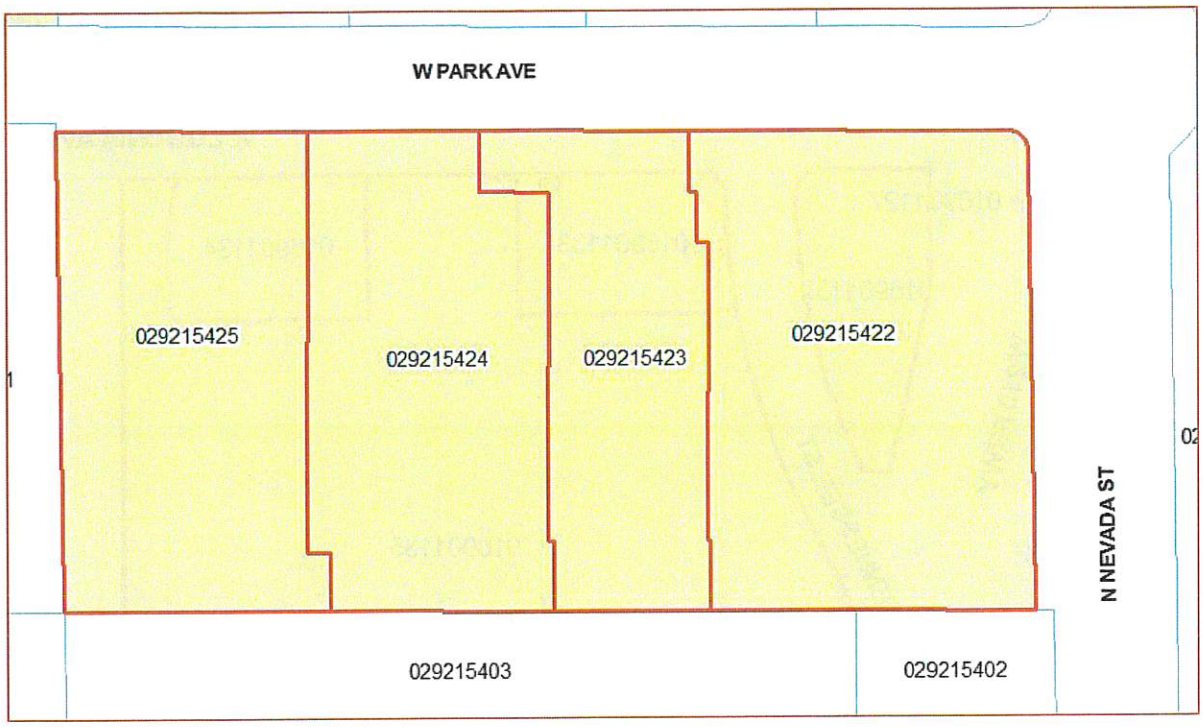
Parcel Map 15530 and Parcel Map 15617

Annexation S10-J



Parcel Map 15492

Annexation S10-K

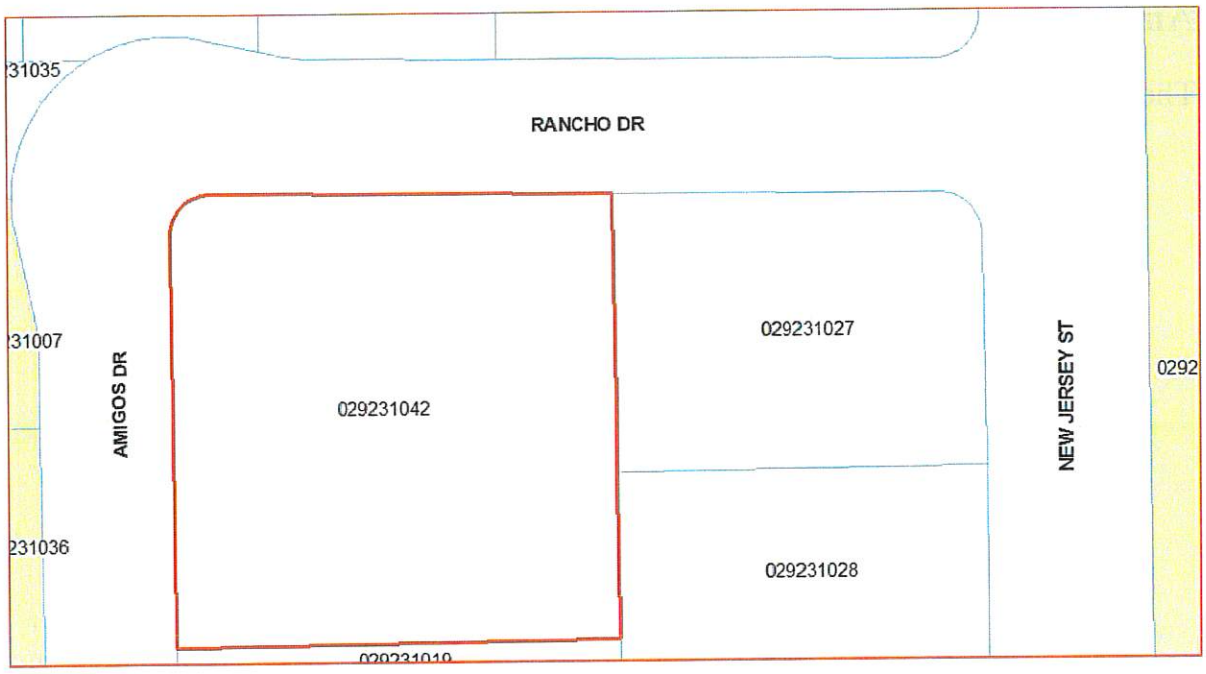


CRA 720

Annexation S10-L

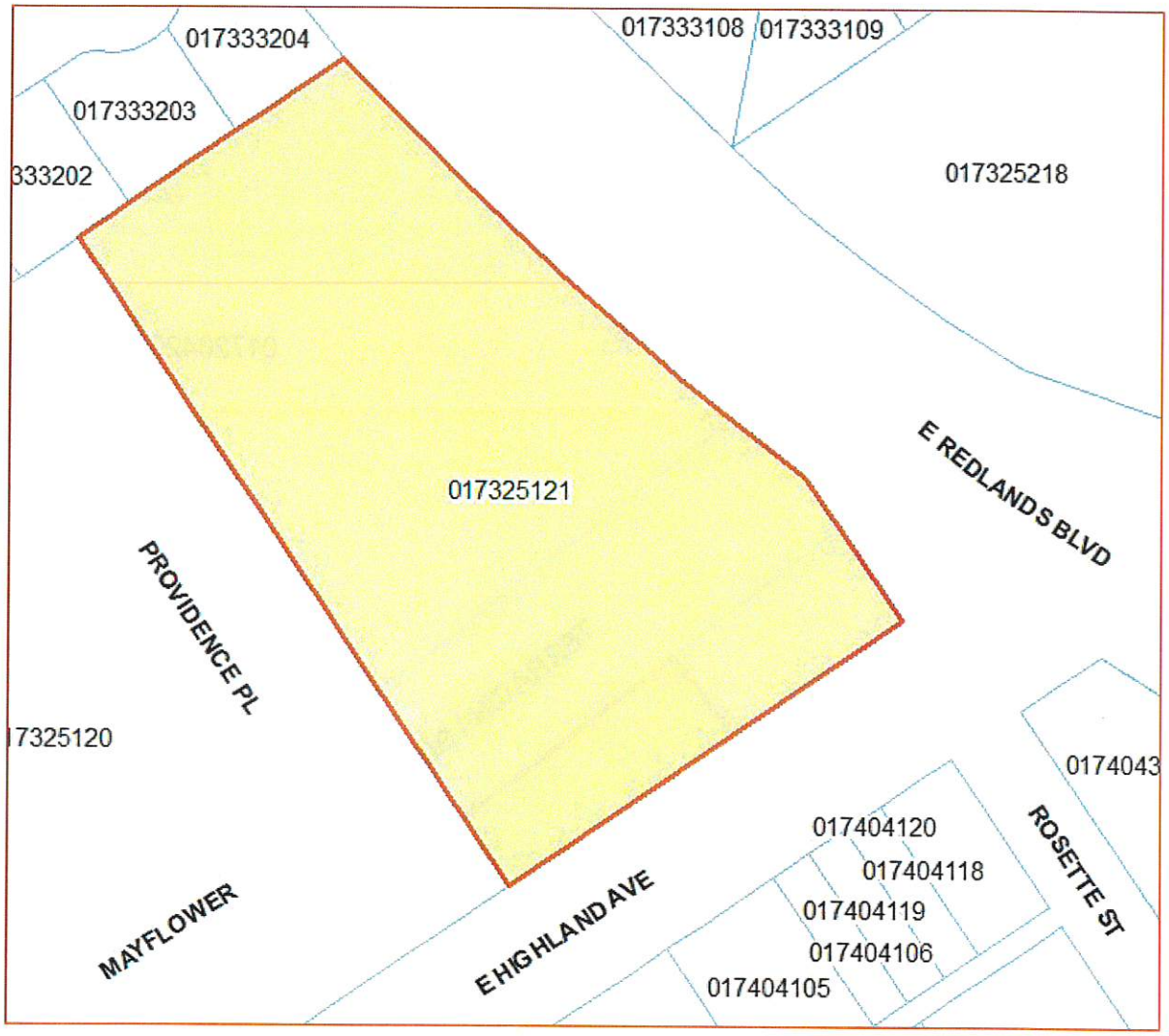
There is no Annexation S10-L

Annexation S10-M



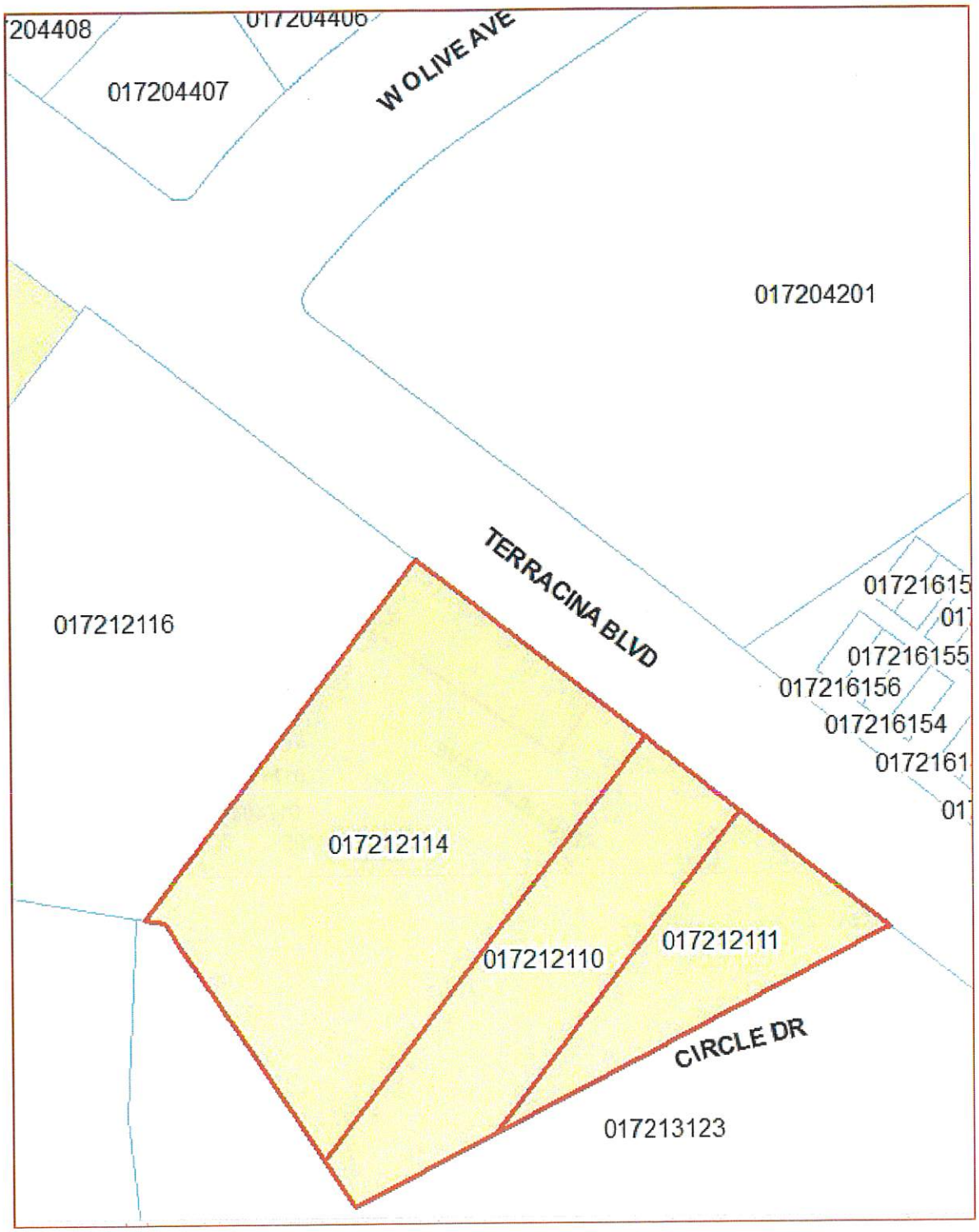
CRA 679

Annexation S10-N



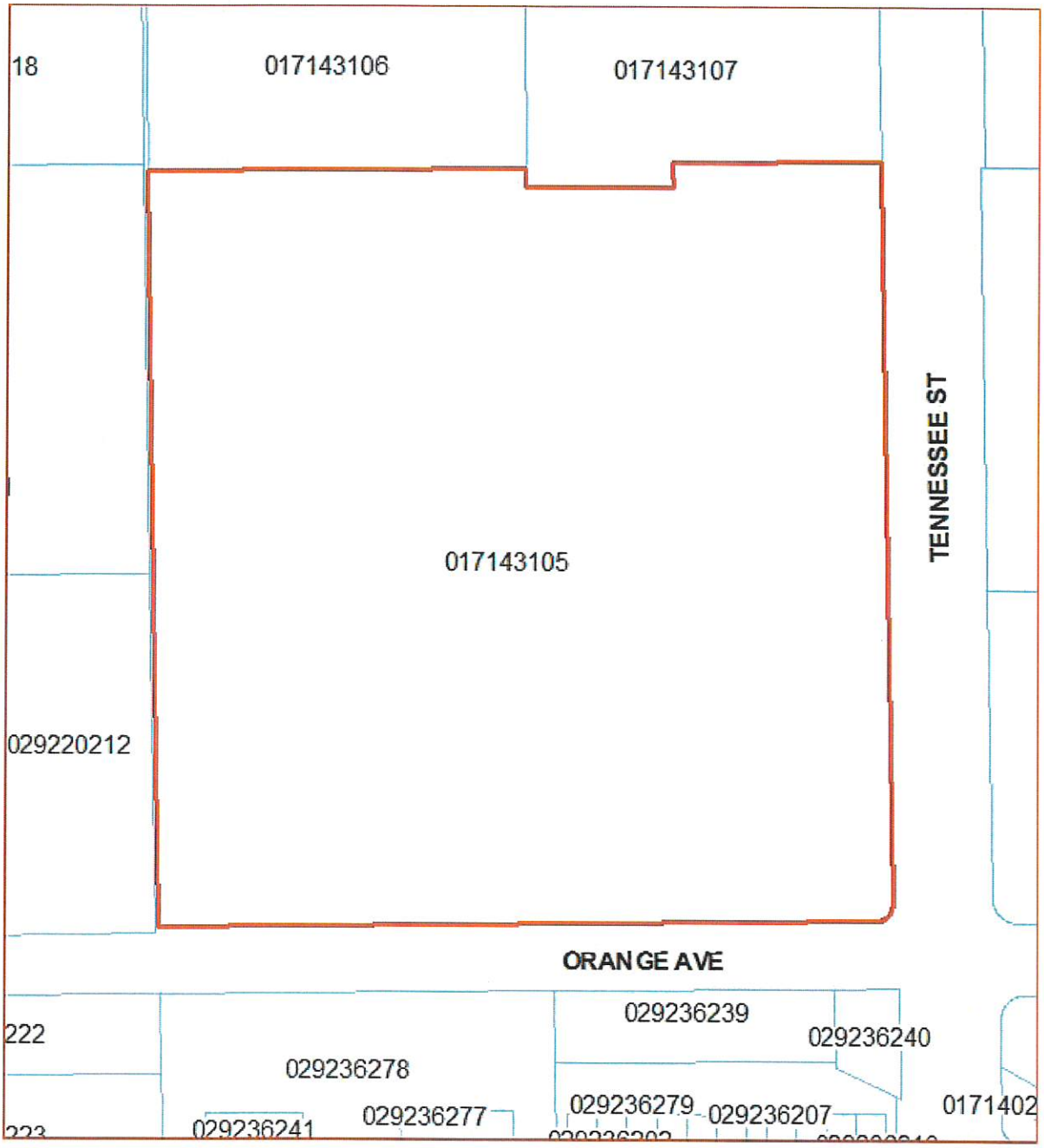
CUP 35, Rev. 2

Annexation S10-O



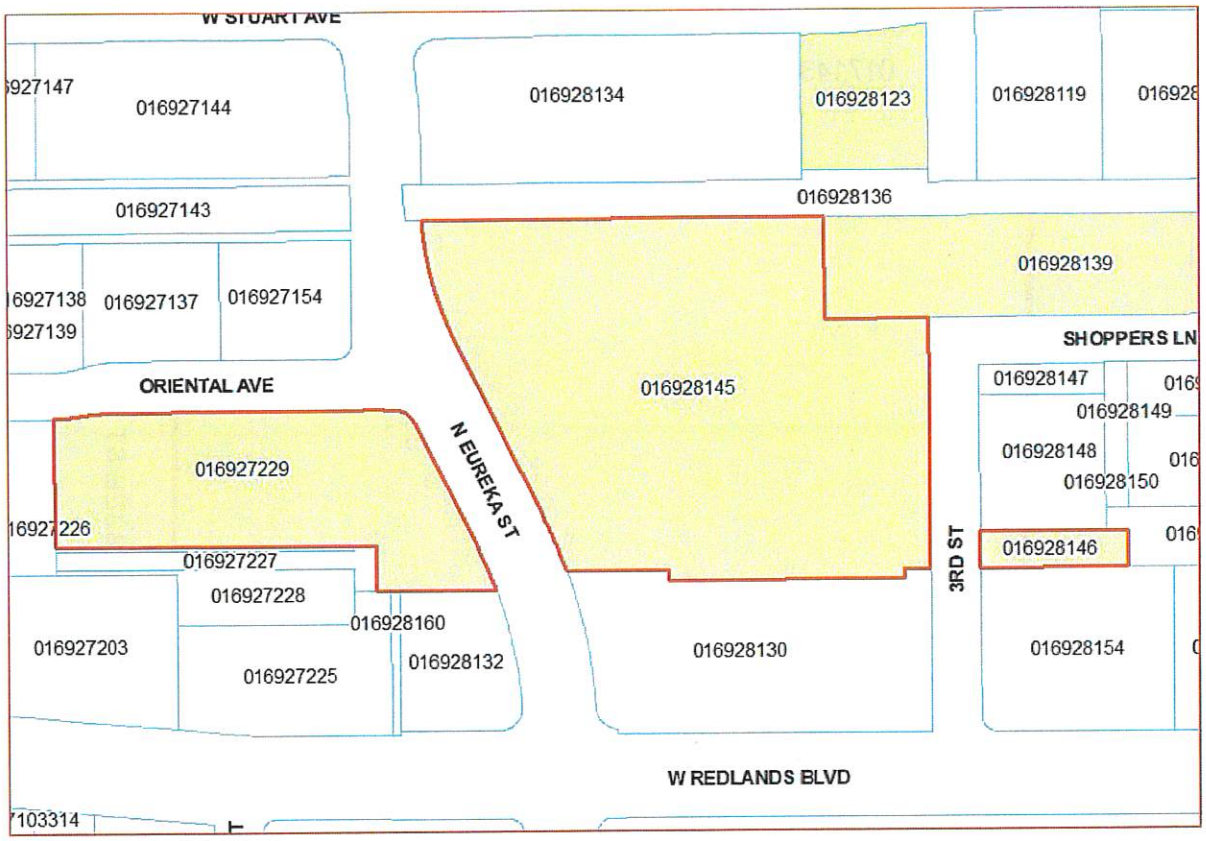
CUP 355, Rev 8

Annexation S10-P



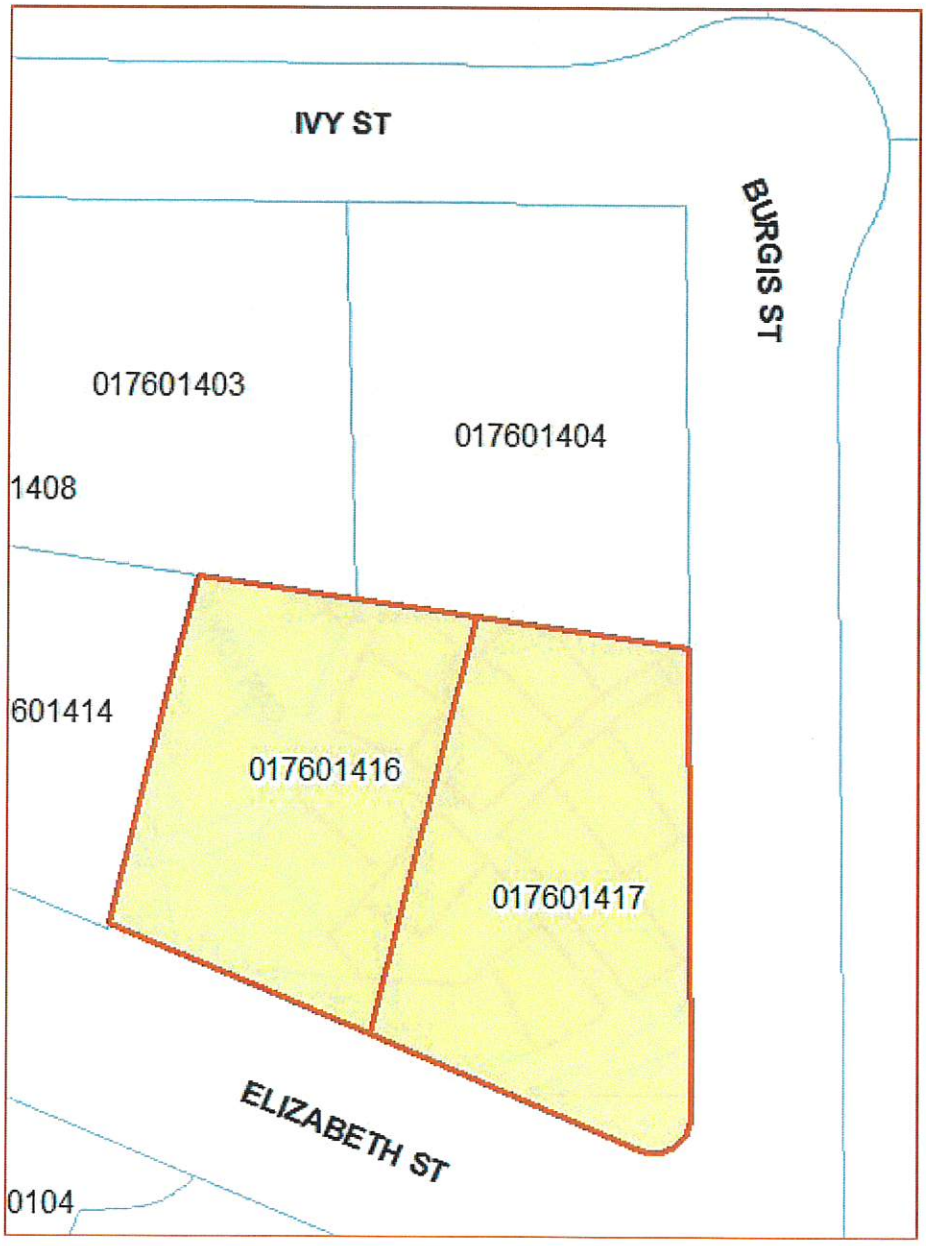
CUP 543

Annexation S10-Q



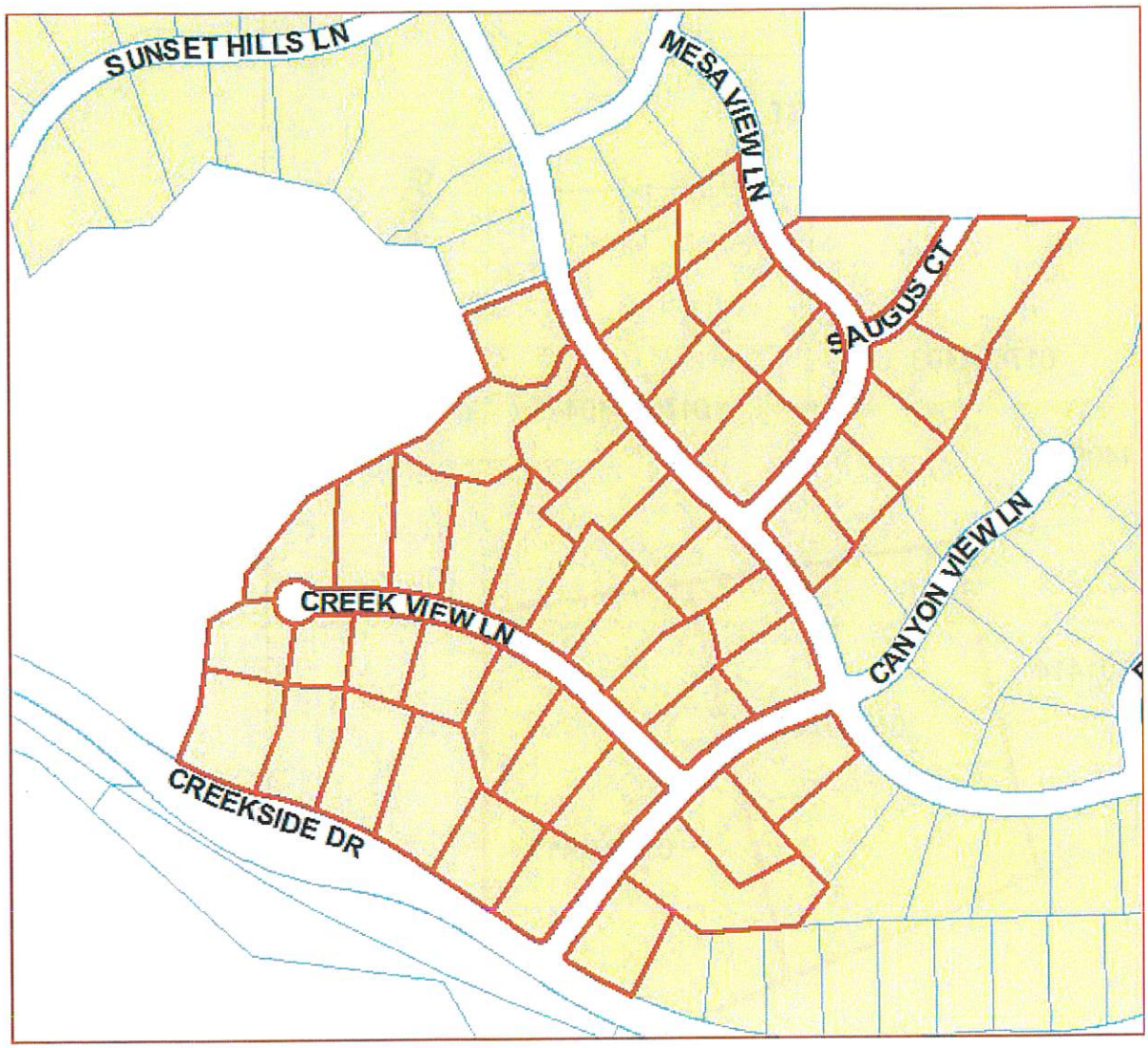
MS 234, Parcel Map 14891

Annexation S10-R



MS 251, Parcel Map 15414

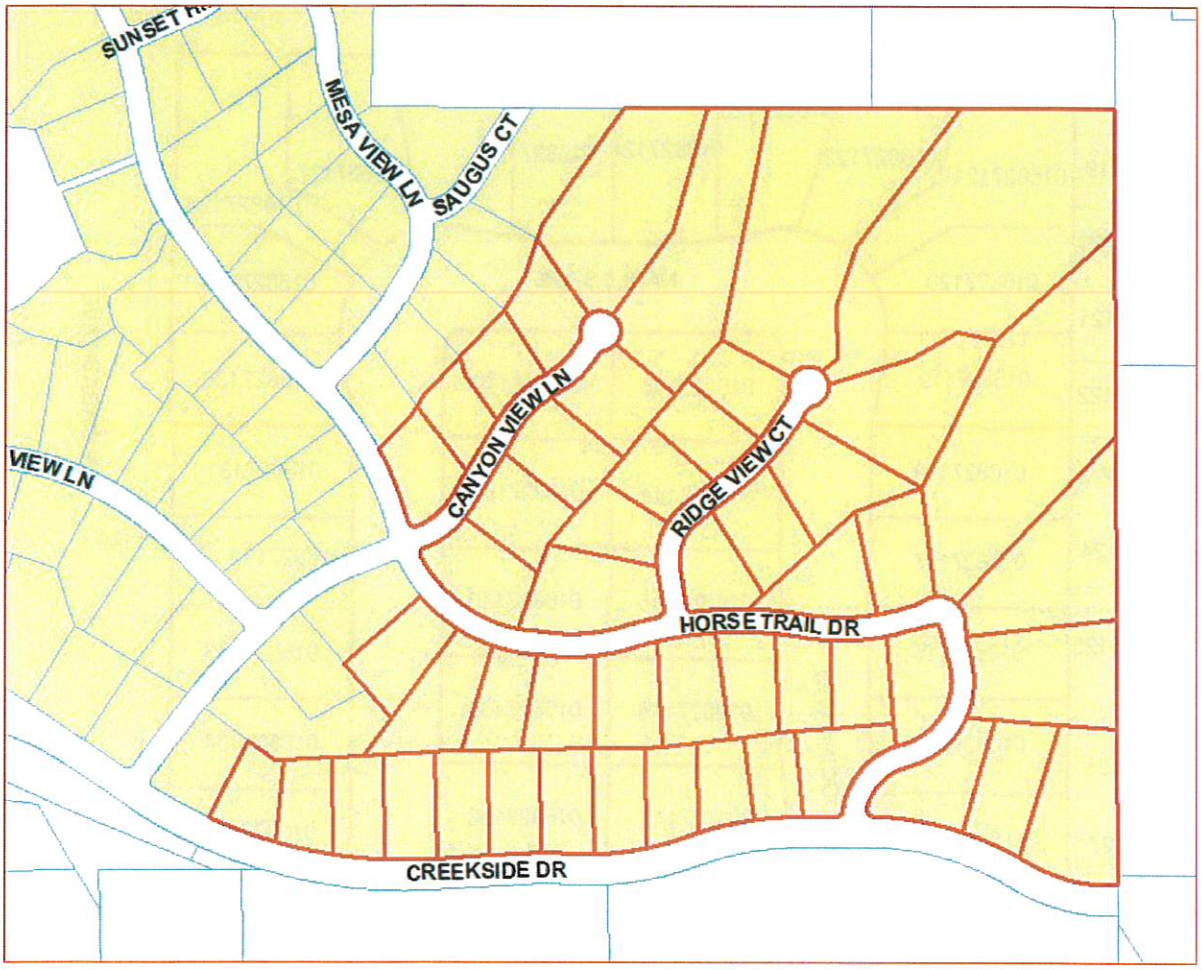
Annexation S10-S



Tract 14790-2

APN 0294-181-02 thru -15
APN 0294-191-01 thru -04, -06 thru -12, -16 thru -20
APN 0294-201-09, -11, -13, -15, -19, -21, -27, -28
APN 0294-211-02 thru -04, -06 thru -10, -12, -13

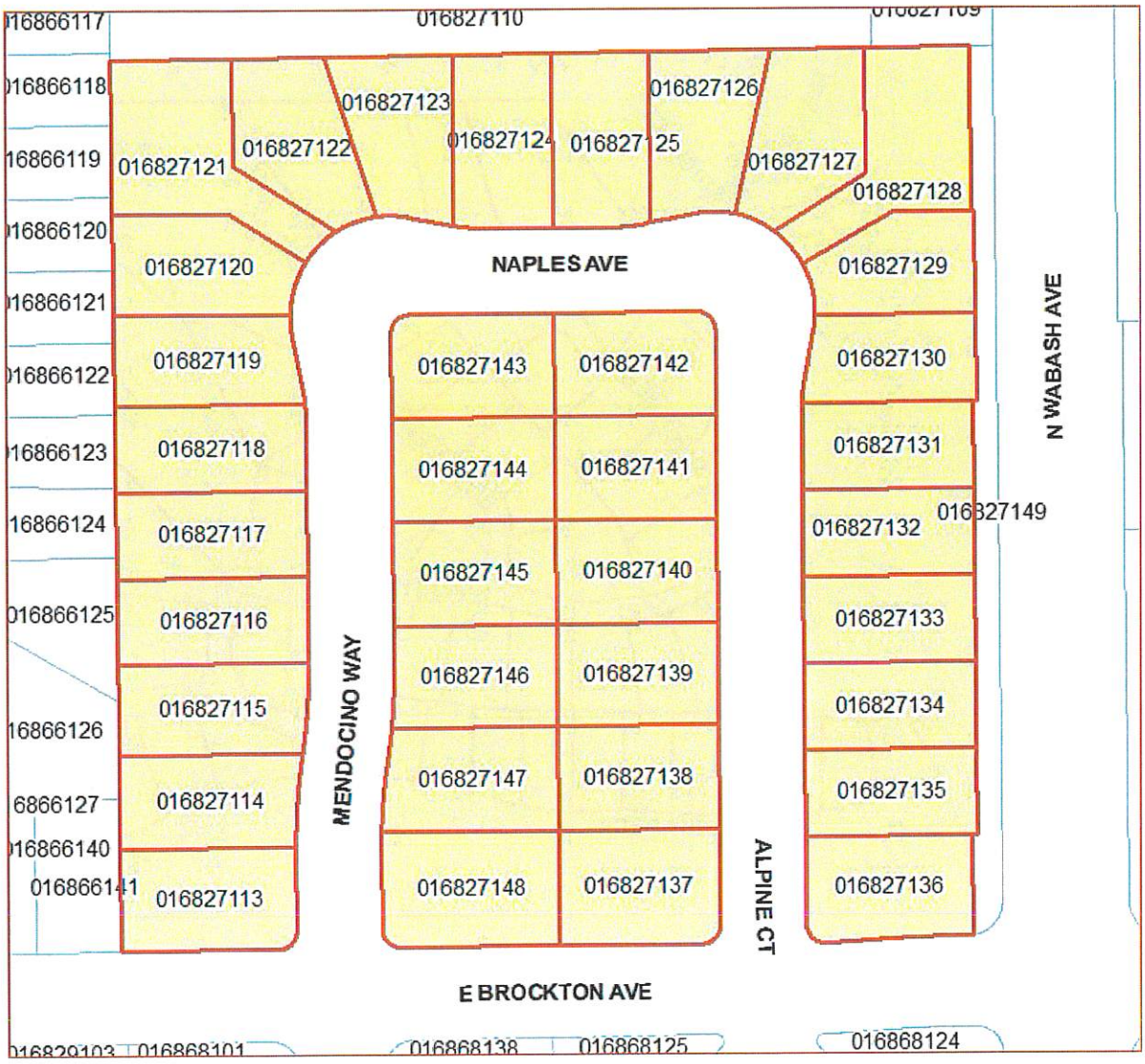
Annexation S10-T



Tract 14790-3

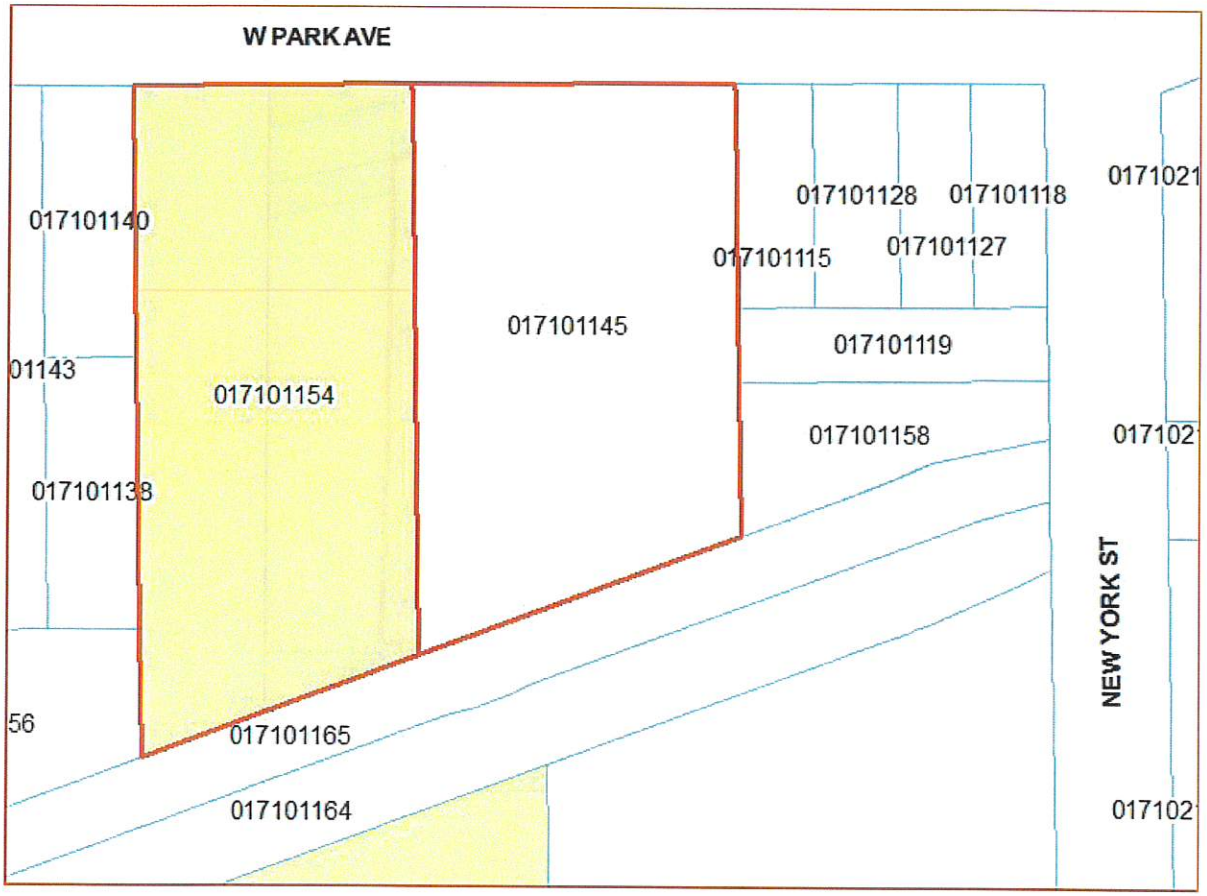
APN 0294-222-01 thru -12
APN 0294-232-01 thru -07
APN 0294-242-01 thru -06
APN 0294-252-01 thru -13
APN 0294-262-01 thru -13

Annexation S10-U



Tract 15532

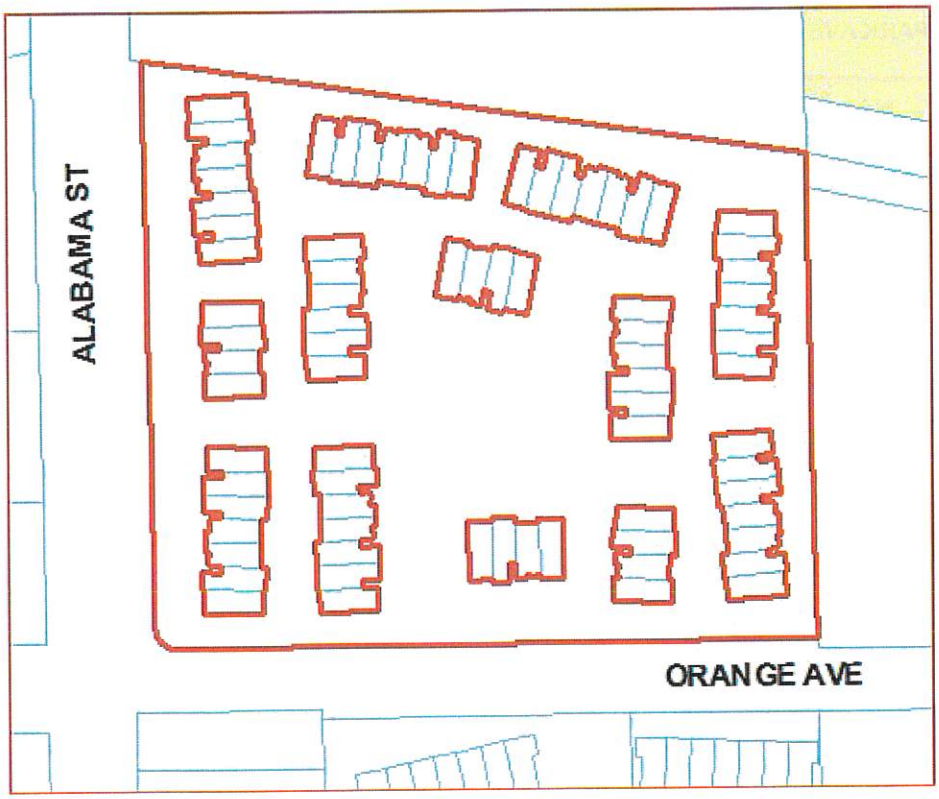
Annexation S10-V



CUP 652

APN 0171-011-54 was the original Annexation 10-V. That parcel was merged with the parcel immediately to the east (APN 0171-011-45). The new parcel was assigned APN 0171-011-67.

Annexation S10-W



MS 240

Original APN 0292-201-22 has been subdivided into a condo complex.

There is no assessment for Annexation S10-W

CITY OF REDLANDS
STREET LIGHTING DISTRICT NO. 1

APPENDIX C

RESOLUTIONS and ORDINANCE

Resolution No. 8651 – Institute proceedings and appointment of engineer

Resolution No. 8652 – Preliminary approval of engineer's report

Resolution No. 8653 – Declaring intention to levy assessments

Ordinance No. 2977 – Confirming assessments

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RESOLUTION NO. 8434

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS INSTITUTING PROCEEDINGS FOR THE CONTINUED LEVY OF ASSESSMENTS, APPOINTING AN ASSESSMENT ENGINEER, AND ORDERING THE PREPARATION OF AN ENGINEER'S REPORT IN THE MATTER OF STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (this "City Council") has determined that the public interest, convenience and necessity requires the installation, operation and maintenance of a street lighting system and other facilities as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, it has been determined by the City Council of the City of Redlands (this "City Council"), that the public interest, convenience and necessity requires the maintenance of landscaping as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, this City Council has formed Redlands' Street Lighting District No. 1 to pay the costs associated with the installation, operation and maintenance of such street lighting system and other facilities; and

WHEREAS, this City Council has formed Redlands' Landscape Maintenance District No. 1 to pay the costs for the maintenance such landscaping; and

WHEREAS, it is the desire of this City Council to initiate proceedings and order the preparation of an engineer's report to levy assessments for fiscal year 2023-2024 upon properties located within Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, this City Council further desires to appoint Redlands' City Engineer, Goutam Dobey, RCE No. 75646, as the "Assessment Engineer" for Street Lighting District No. 1 and Landscape Maintenance District No. 1;

NOW, THEREFORE, the City Council of the City of Redlands does hereby find, determine and resolve as follows:

Section 1. That the public interest, convenience and necessity requires the continued levy of assessments within Street Lighting District No. 1 for the purpose of installing, operating and maintaining street lights and associated facilities as authorized by Section 22620 of the California Streets and Highways Code and in compliance with Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 2. That the public interest, convenience and necessity requires the continued levy of assessments within Landscape Maintenance District No. 1 for the purpose of maintaining landscaping and improvements as authorized by Section 22620 of the California Streets and

Highways Code and in compliance with the requirements of Article XIIID and Section 19 of Article XVI of the California Constitution.

Section 3. That the properties to be assessed for the installation, operation and maintenance of the street lighting facilities shall be those properties located within the boundaries of Street Lighting District No. 1.

Section 4. That the properties to be assessed for the maintenance and operation of the landscaping and improvements shall be those properties located within the boundaries of Landscape Maintenance District No. 1.

Section 5. That the proceedings for the continued levy of assessments within Street Lighting District No. 1 and Landscape Maintenance District No. 1 shall be conducted in accordance the with provisions of Division 15 of the California Streets and Highways Code (the Landscaping and Lighting Act of 1972) and in compliance with the requirements of Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 6. That Redlands' City Engineer, Goutam Dobey, RCE No. 75646, having an office located at 35 Cajon Street, Suite 15A, Redlands, California, is hereby appointed "Assessment Engineer" and shall have the authority conferred upon the Assessment Engineer by the Landscaping and Lighting Act of 1972.

Section 7. That the Assessment Engineer is hereby ordered to prepare a report in accordance with the Landscaping and Lighting Act of 1972.

ADOPTED, SIGNED AND APPROVED this 2nd day of May, 2023.

_____
Eddie Tejeda, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof, held on the 2nd day of May, 2023 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8435

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS GIVING PRELIMINARY APPROVAL OF THE ENGINEER'S REPORTS FOR FISCAL YEAR 2023-2024 FOR STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (the "City Council") has heretofore determined that the public interest, convenience and necessity require the maintenance and operation of street lighting and appurtenant facilities, as set forth in Section 22525 of the Streets and Highways Code, within the incorporated boundaries of the City of Redlands; and

WHEREAS, the City Council has heretofore determined that the public interest, convenience and necessity require the maintenance of landscape and irrigation facilities set forth in Section 22525 of the Streets and Highways Code, State of California, within the incorporated boundaries of the City of Redlands; and

WHEREAS, Goutam Dobey, City of Redlands' City Engineer, 35 Cajon Street, Suite 15A, Redlands, California, has been appointed "Assessment Engineer" with all provisions of Part 2 of Division 15 of the Streets and Highways Code applicable to the Engineer being applied to the "Assessment Engineer;" and

WHEREAS, Sections 22622 and 22623 of the Streets and Highways Code require that an Engineer's Report be prepared and filed annually, specifying the assessments to be levied against the benefitting properties within the City's Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, the City of Redlands City Engineer, as the Assessment Engineer, has prepared and filed with the City Clerk reports in writing as required by the Landscaping and Lighting Act of 1972 and in compliance with Article XIIID of the California Constitution; and

WHEREAS, the City Council has duly considered said reports and each and every part thereof; and finds that each and every part of said reports is sufficient, and that no part of said reports requires modification in any respect;

NOW, THEREFORE, be it resolved by the City Council of the City of Redlands as follows:

Section 1. That the Engineer's estimate of the itemized costs and expenses of said work and of the incidental expenses in connection therewith, contained in said reports be, and each of them are hereby, preliminarily approved and confirmed.

Section 2. That the diagram showing the Street Lighting District No. 1 and Landscape Maintenance District No. 1 referred to and described in said reports, and the boundaries of the lots and parcels of land within such assessment district as the same existed at the time of passage of this resolution, are hereby preliminarily approved and confirmed.

Section 3. That the proposed assessment upon the properties in Street Lighting District No. 1 and Landscape Maintenance District No. 1, in proportion to the estimated benefit to be received by such properties, respectively, from said work and of the incidental expenses thereof, as contained in said report is hereby preliminarily approved and confirmed.

Section 4. That said reports shall stand as the Engineer's Report for the purposes of all subsequent proceedings for Street Lighting District No. 1 and Landscape Maintenance District No. 1.

APPROVED AND ADOPTED this 6th day of June, 2023.

_____
Eddie Tejeda, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 6th day of June, 2023, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____

Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8436

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS WITHIN REDLANDS' STREET LIGHTING ASSESSMENT DISTRICT NO. 1 AND LANDSCAPE ASSESSMENT DISTRICT NO. 1 FOR FISCAL YEAR 2023-2024 PURSUANT TO THE LANDSCAPING AND LIGHTING ACT OF 1972, AND ESTABLISHING A TIME AND PLACE FOR PUBLIC HEARINGS FOR THE TWO DISTRICTS TO CONSIDER PROTESTS

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The City Council of the City of Redlands hereby (1) finds that the public interest and convenience requires, and (2) declares its intention to levy and collect, assessments against the lots and parcels of property within an existing assessment districts designated "Redlands' Street Lighting Assessment District No. 1 and Landscape Assessment District No. 1" (the "Districts") pursuant to the provisions of the Landscaping and Lighting Act of 1972, Part 2 of Division 15 of the Streets and Highways Code (commencing with Section 22500) (the "Act") for fiscal year 2023-2024, commencing July 1, 2023, and ending June 30, 2024, to pay for the costs and expenses of the improvements described in Section 3 hereof.

Section 2. Reference is hereby made to a map on file in the office of the City Clerk and open for public inspection for a description of the exterior boundaries of the Districts.

Section 3. The proposed improvements are briefly described as follows: The operation, maintenance and servicing of public within the District, including the operation, maintenance and servicing of public lighting facilities and landscaping, including safety lighting, traffic signals, trees, shrubs, grass and other ornamental vegetation, and appurtenant facilities, located along public roadways, streets and rights-of-way within the boundaries of the Districts. "Maintenance" means the furnishing of services and materials for the ordinary and usual maintenance, operation and servicing of the public lighting and landscaping facilities, and appurtenant facilities, including repair, removal or replacement of all or part of any of the public lighting and landscaping facilities, or appurtenant facilities. "Servicing" means the maintenance of any of the public lighting and landscaping facilities or appurtenant facilities, including the furnishing of electric current, energy or gas for the operation of any of the lighting facilities and the furnishing of water for the irrigation of any of the landscaping facilities.

Section 4. The assessments to be levied and collected against the assessable lots and parcels of property within the Districts for fiscal year 2023-2024 are not proposed to increase from the assessments levied and collected for fiscal year 1997-1998.

Section 5. Public property owned by any public agency and in use in the performance of a public function which is included within the boundaries of the Districts shall not be subject to assessment to be made under these proceedings to cover any of the costs and expenses of the improvements.

Section 6. All railroad, gas, water and electric utility rights-of-way are included within the Districts and shall be assessed in accordance with the benefits received from the improvements.

Section 7. Reference is hereby made to the Reports of the Engineer entitled "City of Redlands Street Lighting District No. 1 Engineer's Report for Fiscal Year 2023-2024" and "City of Redlands Landscape Maintenance District No. 1 Engineer's Report for Fiscal Year 2023-2024" on file in the office of the City Clerk for a full and detailed description of the improvements, the boundaries of the District and any zones therein and the proposed assessments upon assessable lots and parcels of land within the District.

Section 8. NOTICE IS HEREBY GIVEN THAT THE CITY COUNCIL APPOINTS TUESDAY, THE 20TH DAY OF JUNE, 2023, AT THE HOUR OF 6:00 P.M., OR AS SOON THEREAFTER AS THE MATTER MAY BE HEARD, IN THE COUNCIL CHAMBERS AT CITY HALL, CITY OF REDLANDS, 35 CAJON STREET, SUITE 2, REDLANDS, CALIFORNIA 92373, AS THE TIME AND PLACE FOR TWO PUBLIC HEARINGS TO CONSIDER PROTESTS OR OBJECTIONS TO THE LEVY OF THE PROPOSED ASSESSMENTS IN CONNECTION WITH THE DISTRICTS. All interested persons shall be afforded the opportunity to hear and be heard. Any interested person may file a written protest with the City Clerk prior to the conclusion of the hearing. A written protest shall state all grounds of objection. A protest by a property owner shall contain a description sufficient to identify the property owned by the signer thereof. The City Council shall consider all oral statements and all written protests made or filed by any interested person.

Section 9. The City Clerk is hereby authorized and directed to give notice of such hearing in accordance with law.

Section 10. The City Council hereby determines and declares that the proposed assessments constitute a continuation of assessments existing on the effective date of Article XIIID, that the assessments are imposed exclusively to finance the maintenance and operation expenses for streets and that the assessments are exempt from the requirements of Article XIIID, Section 4 of the California Constitution.

Section 11. The City Council hereby designates Goutam Dobey, City Engineer, telephone number (909) 798-7584 x2, to answer inquiries regarding the hearing, protest proceedings and procedural or technical matters.

ADOPTED, SIGNED AND APPROVED this 6th day of June, 2023.

_____
Eddie Tejeda, Mayor

ATTEST:

_____

Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was duly adopted by the City Council, at a regular meeting thereof, held on the 6th day of June, 2023, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8437

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS CONFIRMING A DIAGRAM AND ASSESSMENT FOR THE 2023-2024 FISCAL YEAR IN CONNECTION WITH LANDSCAPE MAINTENANCE DISTRICT NO. 1 PURSUANT TO THE LANDSCAPING AND LIGHTING ACT OF 1972, PART 2 OF DIVISION 15 OF THE CALIFORNIA STREETS AND HIGHWAYS CODE

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. Pursuant to its adoption of a prior resolution, the City Council of the City of Redlands initiated proceedings and declared its intention to levy an assessment against the assessable lots and parcels of property within an existing assessment district designated "Landscape Maintenance District No 1" (the District) pursuant to the provisions of the Landscaping and Lighting Act of 1972, Part 2 of Division 15 of the California Streets and Highways Code (commencing with Section 22500) (the "Act") for the fiscal year commencing July 1, 2023, and ending June 30, 2024, and ordered the City Engineer, Goutam Dobey, to prepare and file a written report in accordance with Article 4 of Chapter 1 of the Act. The City Council, by prior resolution, approved such Engineer's Report.

Section 2. Following notice duly given in accordance with law, this City Council has held a full and fair public hearing regarding the Engineer's Report and the levy and collection of the proposed assessment within the District for fiscal year 2023-2024 to pay for the costs and expenses of the improvements described in the Engineer's Report pursuant to the terms and provisions of the Act. All interested persons were afforded the opportunity to hear, and be heard regarding, protests and objections to the levy and collection of the proposed assessment against lots or parcels of property within the District. The City Council considered all oral and written statements, protests and communications made or filed by interested persons.

Section 3. Based upon its review of the Engineer's Report and other reports and information, this City Council hereby finds and determines that (i) the land within the District will be benefited by the improvements described in the Engineer's Report (ii) the District includes all of the lands so benefited, and (iii) the net amount to be assessed upon the lands with the District for the 2023-2024 fiscal year in accordance with the Engineer's Report is apportioned by a formula and method which fairly distributes the net amount among all assessable lots or parcels in proportion to the estimated benefits to be received by each such lot or parcel from the improvements. Any and all oral and written protests and objections are hereby overruled by the City Council.

Section 4. The City Council declares that the diagram and assessment in the Engineer's Report are hereby confirmed as filed.

Section 5. The City Council hereby orders the improvements described in the Engineer's Report to be made.

Section 6. The assessment is in compliance with the provisions of the Act and the City Council has complied with all law pertaining to the levy of an annual assessment pursuant to the Act.

Section 7. The assessments to be levied and collected against the assessable lots and parcels of property within the District for fiscal year 2023-2024 are not proposed to increase from the assessment levied and collected for fiscal year 1997-1998.

Section 8. The assessment is levied without regard to property valuation.

Section 9. Public property owned by any public agency and in use in the performance of a public function which is included within the boundaries of the District shall not be subject to assessment to be made under these proceedings to pay for any of the costs and expenses of the improvements.

Section 10. The assessment is levied for the purpose of paying the costs and expenses of the improvements described in the Engineer's Report for fiscal year 2023-2024.

Section 11. The improvements described in the Engineer's Report shall be performed pursuant to law.

Section 12. The County Auditor of San Bernardino County shall enter on the County Assessment Roll opposite each lot or parcel of land the amount of the assessment and such assessments shall then be collected at the same time and in the same manner as the County taxes collected. After collection by the County, the net amount of the assessments shall be paid to the City Treasurer.

Section 13. The City Treasurer shall deposit all moneys representing assessments collected by the County to the credit of a special fund for Landscape Maintenance District No. 1.

Section 14. The adoption of this Resolution constitutes the levy of an assessment against the lots and parcels of land in the District for the fiscal year commencing July 1, 2023, and ending June 30, 2024.

Section 15. The City Clerk is hereby authorized and directed to file the diagram and assessment, or a certified copy of the diagram and assessment, with the County Auditor, together with a certified copy of this Resolution upon its adoption.

Section 16. A certified copy of the assessment and diagram shall be filed in the City's Municipal Utilities and Engineering Department, with a duplicate copy on file in the office of the City Clerk and open for public inspection.

ADOPTED, SIGNED AND APPROVED this 20th day of June, 2023.

_____
Eddie Tejeda, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was adopted by the City Council, at a regular meeting thereof, held on the 20th day of June, 2023 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was adopted by the City Council, at a regular meeting thereof, held on the 20th day of June, 2023 by the following vote:

AYES:
NOES:
ABSENT
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

CITY OF REDLANDS
LANDSCAPE MAINTENANCE DISTRICT NO. 1

APPENDIX C – RESOLUTIONS

Resolution No. 8651 – Institute proceedings and appointment of engineer

Resolution No. 8652 – Preliminary approval of engineer's report

Resolution No. 8653 – Declaring intention to levy assessments

Ordinance No. 2976 – Confirming a diagram and assessments

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RESOLUTION NO. 8651

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS INSTITUTING PROCEEDINGS FOR THE CONTINUED LEVY OF ASSESSMENTS, APPOINTING AN ASSESSMENT ENGINEER, AND ORDERING THE PREPARATION OF AN ENGINEER'S REPORT IN THE MATTER OF STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (this "City Council") has determined that the public interest, convenience and necessity requires the installation, operation and maintenance of a street lighting system and other facilities as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, it has been determined by the City Council of the City of Redlands (this "City Council"), that the public interest, convenience and necessity requires the maintenance of landscaping as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, this City Council has formed Redlands' Street Lighting District No. 1 to pay the costs associated with the installation, operation and maintenance of such street lighting system and other facilities; and

WHEREAS, this City Council has formed Redlands' Landscape Maintenance District No. 1 to pay the costs for the maintenance such landscaping; and

WHEREAS, it is the desire of this City Council to initiate proceedings and order the preparation of an engineer's report to levy assessments for fiscal year 2025-2026 upon properties located within Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, this City Council further desires to appoint Redlands' City Engineer, Donald Young, RCE No. 49918, as the "Assessment Engineer" for Street Lighting District No. 1 and Landscape Maintenance District No. 1;

NOW, THEREFORE, the City Council of the City of Redlands does hereby find, determine and resolve as follows:

Section 1. That the public interest, convenience and necessity requires the continued levy of assessments within Street Lighting District No. 1 for the purpose of installing, operating and maintaining street lights and associated facilities as authorized by Section 22620 of the California Streets and Highways Code and in compliance with Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 2. That the public interest, convenience and necessity requires the continued levy of assessments within Landscape Maintenance District No. 1 for the purpose of maintaining landscaping and improvements as authorized by Section 22620 of the California Streets and

Highways Code and in compliance with the requirements of Article XIIID and Section 19 of Article XVI of the California Constitution.

Section 3. That the properties to be assessed for the installation, operation and maintenance of the street lighting facilities shall be those properties located within the boundaries of Street Lighting District No. 1.

Section 4. That the properties to be assessed for the maintenance and operation of the landscaping and improvements shall be those properties located within the boundaries of Landscape Maintenance District No. 1.

Section 5. That the proceedings for the continued levy of assessments within Street Lighting District No. 1 and Landscape Maintenance District No. 1 shall be conducted in accordance the with provisions of Division 15 of the California Streets and Highways Code (the Landscaping and Lighting Act of 1972) and in compliance with the requirements of Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 6. That Redlands' City Engineer, Goutam Dobey, RCE No. 75646, having an office located at 35 Cajon Street, Suite 15A, Redlands, California, is hereby appointed "Assessment Engineer" and shall have the authority conferred upon the Assessment Engineer by the Landscaping and Lighting Act of 1972.

Section 7. That the Assessment Engineer is hereby ordered to prepare a report in accordance with the Landscaping and Lighting Act of 1972.

ADOPTED, SIGNED AND APPROVED this 6th day of May, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof, held on the 6th day of May, 2025 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8652

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS GIVING PRELIMINARY APPROVAL OF THE ENGINEER'S REPORTS FOR FISCAL YEAR 2025-2026 FOR STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (the "City Council") has heretofore determined that the public interest, convenience and necessity require the maintenance and operation of street lighting and appurtenant facilities, as set forth in Section 22525 of the Streets and Highways Code, within the incorporated boundaries of the City of Redlands; and

WHEREAS, the City Council has heretofore determined that the public interest, convenience and necessity require the maintenance of landscape and irrigation facilities set forth in Section 22525 of the Streets and Highways Code, State of California, within the incorporated boundaries of the City of Redlands; and

WHEREAS, Donald Young, One Stop Permit Center Manager, 35 Cajon Street, Suite 15A, Redlands, California, has been appointed "Assessment Engineer" with all provisions of Part 2 of Division 15 of the Streets and Highways Code applicable to the Engineer being applied to the "Assessment Engineer;" and

WHEREAS, Sections 22622 and 22623 of the Streets and Highways Code require that an Engineer's Report be prepared and filed annually, specifying the assessments to be levied against the benefitting properties within the City's Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, the City of Redlands City Engineer, as the Assessment Engineer, has prepared and filed with the City Clerk reports in writing as required by the Landscaping and Lighting Act of 1972 and in compliance with Article XIIID of the California Constitution; and

WHEREAS, the City Council has duly considered said reports and each and every part thereof; and finds that each and every part of said reports is sufficient, and that no part of said reports requires modification in any respect;

NOW, THEREFORE, be it resolved by the City Council of the City of Redlands as follows:

Section 1. That the Engineer's estimate of the itemized costs and expenses of said work and of the incidental expenses in connection therewith, contained in said reports be, and each of them are hereby, preliminarily approved and confirmed.

Section 2. That the diagram showing the Street Lighting District No. 1 and Landscape Maintenance District No. 1 referred to and described in said reports, and the boundaries of the lots and parcels of land within such assessment district as the same existed at the time of passage of this resolution, are hereby preliminarily approved and confirmed.

Section 3. That the proposed assessment upon the properties in Street Lighting District No. 1 and Landscape Maintenance District No. 1, in proportion to the estimated benefit to be received by such properties, respectively, from said work and of the incidental expenses thereof, as contained in said report is hereby preliminarily approved and confirmed.

Section 4. That said reports shall stand as the Engineer's Report for the purposes of all subsequent proceedings for Street Lighting District No. 1 and Landscape Maintenance District No. 1.

APPROVED AND ADOPTED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____

Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8653

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS WITHIN REDLANDS' STREET LIGHTING ASSESSMENT DISTRICT NO. 1 AND LANDSCAPE ASSESSMENT DISTRICT NO. 1 FOR FISCAL YEAR 2025-2026 PURSUANT TO THE LANDSCAPING AND LIGHTING ACT OF 1972, AND ESTABLISHING A TIME AND PLACE FOR PUBLIC HEARINGS FOR THE TWO DISTRICTS TO CONSIDER PROTESTS

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The City Council of the City of Redlands hereby (1) finds that the public interest and convenience requires, and (2) declares its intention to levy and collect, assessments against the lots and parcels of property within an existing assessment districts designated "Redlands' Street Lighting Assessment District No. 1 and Landscape Assessment District No. 1" (the "Districts") pursuant to the provisions of the Landscaping and Lighting Act of 1972, Part 2 of Division 15 of the Streets and Highways Code (commencing with Section 22500) (the "Act") for fiscal year 2025-2026, commencing July 1, 2025, and ending June 30, 2026, to pay for the costs and expenses of the improvements described in Section 3 hereof.

Section 2. Reference is hereby made to a map on file in the office of the City Clerk and open for public inspection for a description of the exterior boundaries of the Districts.

Section 3. The proposed improvements are briefly described as follows: The operation, maintenance and servicing of public within the District, including the operation, maintenance and servicing of public lighting facilities and landscaping, including safety lighting, traffic signals, trees, shrubs, grass and other ornamental vegetation, and appurtenant facilities, located along public roadways, streets and rights-of-way within the boundaries of the Districts. "Maintenance" means the furnishing of services and materials for the ordinary and usual maintenance, operation and servicing of the public lighting and landscaping facilities, and appurtenant facilities, including repair, removal or replacement of all or part of any of the public lighting and landscaping facilities, or appurtenant facilities. "Servicing" means the maintenance of any of the public lighting and landscaping facilities or appurtenant facilities, including the furnishing of electric current, energy or gas for the operation of any of the lighting facilities and the furnishing of water for the irrigation of any of the landscaping facilities.

Section 4. The assessments to be levied and collected against the assessable lots and parcels of property within the Districts for fiscal year 2025-2026 are not proposed to increase from the assessments levied and collected for fiscal year 1997-1998.

Section 5. Public property owned by any public agency and in use in the performance of a public function which is included within the boundaries of the Districts shall not be subject to assessment to be made under these proceedings to cover any of the costs and expenses of the improvements.

Section 6. All railroad, gas, water and electric utility rights-of-way are included within the Districts and shall be assessed in accordance with the benefits received from the improvements.

Section 7. Reference is hereby made to the Reports of the Engineer entitled "City of Redlands Street Lighting District No. 1 Engineer's Report for Fiscal Year 2025-2026" and "City of Redlands Landscape Maintenance District No. 1 Engineer's Report for Fiscal Year 2025-2026" on file in the office of the City Clerk for a full and detailed description of the improvements, the boundaries of the District and any zones therein and the proposed assessments upon assessable lots and parcels of land within the District.

Section 8. NOTICE IS HEREBY GIVEN THAT THE CITY COUNCIL APPOINTS TUESDAY, THE 17TH DAY OF JUNE, 2025, AT THE HOUR OF 6:00 P.M., OR AS SOON THEREAFTER AS THE MATTER MAY BE HEARD, IN THE COUNCIL CHAMBERS AT CITY HALL, CITY OF REDLANDS, 35 CAJON STREET, SUITE 2, REDLANDS, CALIFORNIA 92373, AS THE TIME AND PLACE FOR TWO PUBLIC HEARINGS TO CONSIDER PROTESTS OR OBJECTIONS TO THE LEVY OF THE PROPOSED ASSESSMENTS IN CONNECTION WITH THE DISTRICTS. All interested persons shall be afforded the opportunity to hear and be heard. Any interested person may file a written protest with the City Clerk prior to the conclusion of the hearing. A written protest shall state all grounds of objection. A protest by a property owner shall contain a description sufficient to identify the property owned by the signer thereof. The City Council shall consider all oral statements and all written protests made or filed by any interested person.

Section 9. The City Clerk is hereby authorized and directed to give notice of such hearing in accordance with law.

Section 10. The City Council hereby determines and declares that the proposed assessments constitute a continuation of assessments existing on the effective date of Article XIIID, that the assessments are imposed exclusively to finance the maintenance and operation expenses for streets and that the assessments are exempt from the requirements of Article XIIID, Section 4 of the California Constitution.

Section 11. The City Council hereby designates Donald Young, One Stop Permit Center Manager, telephone number (909) 798-7585 x6, to answer inquiries regarding the hearing, protest proceedings and procedural or technical matters.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was duly adopted by the City Council, at a regular meeting thereof, held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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ORDINANCE NO. 2977

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF REDLANDS ESTABLISHING FISCAL YEAR 2025/26 ANNUAL ASSESSMENTS FOR STREET LIGHTING MAINTENANCE DISTRICT NO. 1 IN ACCORDANCE WITH THE LIGHTING AND LANDSCAPING ACT OF 1972

WHEREAS, on September 19, 1989, City Council ordered the formation of Street Lighting District No. 1 (the "District"), pursuant to Chapter 2.5 of Part 1 of Division 2 of Title 5 (commencing with Section 53311) of the California Government Code, commonly known as the "Mello-Roos Community Facilities Act of 1982" (the "Act"); and

WHEREAS, the purpose of the District is to ensure satisfactory levels of funding for street lighting maintenance are provided. District assessments provide funding to generate funding for electricity to power street lights, labor, material, and equipment to replace burned out or damaged street light bulbs, and damaged street light poles for properties annexed into the district, and to provide administrative management of the District; and,

WHEREAS, on May 6, 2025, City Council approved Donald Young, One Stop Permit Center Manager, as the Assessment Engineer for the District and the Assessment Engineer, Mr. Young is responsible for the preparation of the Engineer's Report required to levy the annual assessment in accordance with the California Government Code; and,

WHEREAS, on June 3, 2025 City Council adopted Resolution No. 8652, preliminarily approving the Engineer's Report for the District; and,

WHEREAS, on June 3, 2025, City Council adopted Resolution No. 8653, setting June 17, 2025 as the Public Hearing date for consideration of levying Fiscal Year 2025/2026 assessments in accordance with the Lighting and Landscaping Act of 1972.

NOW, THEREFORE, the City Council of the City of Redlands, acting in its capacity as the legislative body of Street Lighting Maintenance District No. 1, ORDAINS as follows:

Section 1. The above recitals are all true and correct.

Section 2. By the passage of this Ordinance, the Council authorizes the levy of a special tax at a rate in accordance with the rate and method of apportionment set forth in the Engineer's Report for the District on file with City Clerk of the City of Redlands, incorporated by reference herein, being the rate and method of apportionment specified in the Resolution of Intention to Establish the District.

Section 3. Properties or entities of the state, federal or other local governments shall, except as otherwise provided in Sections 53317.3 and 53317.5 of the Act, be exempt from the special tax.

Section 4. Only those properties identified in the Engineer's Report are subject to assessments of the District with assessment amounts as listed in Exhibit "A" attached hereto and incorporated by reference herein.

Section 5. All of the collections of the special tax shall be used as provided for in the Act and the Resolution of Formation.

Section 6. The special tax shall be collected in the same manner as ordinary ad valorem property taxes are collected and shall be subject to the same penalties and the same procedure, sale and lien priority in case of delinquency as is provided for ad valorem taxes, as such procedure may be modified by law from time to time.

Section 7. The City Council hereby determines that the adoption of this ordinance is exempt from review under the California Environmental Quality Act ("CEQA") pursuant to State CEQA Guidelines section 15061(b)(3) because this City Council determines that it can be seen with certainty that approval of this ordinance will have no direct or indirect impact on the physical environment, and that approval of this ordinance is not a "project" under CEQA as that term is defined in Public Resources Code section 21065.

Section 8. Severability. If any section, sentence, clause or phrase of this ordinance or the application thereof to any entity, person or circumstance is held for any reason to be invalid or unconstitutional, such invalidity or unconstitutionality shall not affect other provisions or applications of this ordinance which can be given effect without the invalid provisions or application, and to this end the provisions of this ordinance are severable. The City Council of the City of Redlands hereby declares that it would have adopted this ordinance and each section, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsections, sentences, clauses or phrases be declared invalid or unconstitutional.

Section 9. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect as provided by law.

Section 10. The District Assessment Engineer is hereby authorized to transmit a certified copy of this ordinance and necessary documents to the San Bernardino County Assessor and Treasurer-Tax Collector, and to perform all other acts which are required by the Act, this ordinance, or by law in order to accomplish the purpose of this ordinance.

ADOPTED, SIGNED AND APPROVED this 17th day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was adopted by the City Council, at a regular meeting thereof, held on the 17th day of June, 2025 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

APPENDIX D

ASSESSMENT ROLL

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City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0167-081-13-0000		Annexation S10-E	Zone 1 & 3	$13.76
0167-081-14-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-15-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-16-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-17-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-18-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-19-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-20-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-21-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-22-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-23-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-24-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-25-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-26-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-27-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-28-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-29-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-30-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-31-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-32-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-33-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-34-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-35-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-36-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-37-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-38-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-39-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-40-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-41-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-42-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-43-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-44-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-081-45-0000		Annexation S10-E	Zone 1 & 3	13.76
0167-101-13-0000		Annexation S7-E	Zone 1 & 3	198.10
0167-231-19-0000		Annexation S1-D	Zone 3	20.05
0167-231-20-0000		Annexation S1-D	Zone 3	20.05
0167-231-21-0000		Annexation S1-D	Zone 3	20.05
0167-271-61-0000		Annexation S3-D	Zone 3	100.25
0167-851-39-0000		Annexation S5-B	Zone 1	14.05
0167-851-40-0000		Annexation S5-B	Zone 1	14.05
0167-851-41-0000		Annexation S5-B	Zone 1	14.05
0167-851-42-0000		Annexation S5-B	Zone 1	14.05
0167-851-43-0000		Annexation S5-B	Zone 1	14.05
0167-851-44-0000		Annexation S5-B	Zone 1	14.05
0167-851-45-0000		Annexation S5-B	Zone 1	14.05
0167-851-46-0000		Annexation S5-B	Zone 1	14.05
0167-851-47-0000		Annexation S5-B	Zone 1	14.05
0167-851-48-0000		Annexation S5-B	Zone 1	14.05
0167-851-49-0000		Annexation S5-B	Zone 1	14.05
0167-851-50-0000		Annexation S5-B	Zone 1	14.05
0167-851-51-0000		Annexation S5-B	Zone 1	14.05
0167-851-52-0000		Annexation S5-B	Zone 1	14.05
0167-851-53-0000		Annexation S5-B	Zone 1	14.05
0167-851-54-0000		Annexation S5-B	Zone 1	14.05

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0167-851-55-0000		Annexation S5-B	Zone 1	14.05
0167-851-56-0000		Annexation S5-B	Zone 1	14.05
0167-861-37-0000		Annexation S5-B	Zone 1	14.05
0167-861-38-0000		Annexation S5-B	Zone 1	14.05
0167-861-39-0000		Annexation S5-B	Zone 1	14.05
0167-861-40-0000		Annexation S5-B	Zone 1	14.05
0167-861-41-0000		Annexation S5-B	Zone 1	14.05
0167-861-42-0000		Annexation S5-B	Zone 1	14.05
0167-861-43-0000		Annexation S5-B	Zone 1	14.05
0167-861-44-0000		Annexation S5-B	Zone 1	14.05
0167-861-45-0000		Annexation S5-B	Zone 1	14.05
0167-861-46-0000		Annexation S5-B	Zone 1	14.05
0167-861-47-0000		Annexation S5-B	Zone 1	14.05
0167-861-48-0000		Annexation S5-B	Zone 1	14.05
0167-861-49-0000		Annexation S5-B	Zone 1	14.05
0167-861-50-0000		Annexation S5-B	Zone 1	14.05
0167-861-51-0000		Annexation S5-B	Zone 1	14.05
0167-861-52-0000		Annexation S5-B	Zone 1	14.05
0167-861-53-0000		Annexation S5-B	Zone 1	14.05
0167-861-54-0000		Annexation S5-B	Zone 1	14.05
0168-271-13-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-14-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-15-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-16-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-17-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-18-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-19-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-20-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-21-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-22-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-23-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-24-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-25-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-26-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-27-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-28-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-29-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-30-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-31-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-32-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-33-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-34-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-35-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-36-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-37-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-38-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-39-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-40-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-41-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-42-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-43-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-44-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-45-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-46-0000		Annexation S10-U	Zone 1, 3 & 4	14.32

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-271-47-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-271-48-0000		Annexation S10-U	Zone 1, 3 & 4	14.32
0168-731-01-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-02-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-03-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-04-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-05-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-06-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-07-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-08-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-09-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-10-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-11-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-12-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-13-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-14-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-15-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-16-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-17-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-18-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-19-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-20-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-21-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-22-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-23-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-24-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-731-25-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-01-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-02-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-03-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-04-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-05-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-06-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-07-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-08-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-09-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-10-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-11-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-12-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-13-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-14-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-15-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-16-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-17-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-18-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-19-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-20-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-21-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-22-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-23-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-24-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-25-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-26-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-27-0000		Annexation S10-C	Zone 1, 3 & 4	17.12

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-741-28-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-29-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-30-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-31-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-32-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-33-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-34-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-35-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-36-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-37-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-38-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-39-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-40-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-41-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-42-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-43-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-44-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-45-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-46-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-47-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-48-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-49-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-50-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-51-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-52-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-53-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-54-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-55-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-56-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-57-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-58-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-59-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-60-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-61-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-62-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-63-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-64-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-65-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-66-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-67-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-68-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-69-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-70-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-71-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-72-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-73-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-74-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-75-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-76-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-77-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-741-78-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-01-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-02-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-03-0000		Annexation S10-C	Zone 1, 3 & 4	17.12

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-751-04-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-05-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-06-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-07-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-08-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-09-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-10-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-11-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-12-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-13-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-14-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-15-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-16-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-17-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-18-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-19-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-20-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-21-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-22-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-23-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-24-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-25-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-26-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-27-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-28-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-29-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-30-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-31-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-32-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-33-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-34-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-35-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-36-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-37-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-38-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-39-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-40-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-41-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-42-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-43-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-44-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-45-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-46-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-47-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-48-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-49-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-50-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-51-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-52-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-53-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-54-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-55-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-751-56-0000		Annexation S10-C	Zone 1, 3 & 4	17.12
0168-771-01-0000		Annexation S10-H	Zone 1 & 4	15.27

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-771-02-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-03-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-04-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-05-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-06-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-07-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-08-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-09-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-10-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-11-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-12-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-13-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-14-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-15-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-16-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-17-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-18-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-19-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-20-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-21-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-22-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-23-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-24-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-25-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-26-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-27-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-28-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-29-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-30-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-31-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-32-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-33-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-34-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-35-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-36-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-37-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-38-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-39-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-40-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-41-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-42-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-43-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-44-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-45-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-46-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-47-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-48-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-49-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-771-50-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-01-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-02-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-03-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-04-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-05-0000		Annexation S10-H	Zone 1 & 4	15.27

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-781-06-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-07-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-08-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-09-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-10-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-11-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-12-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-13-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-14-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-15-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-16-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-17-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-18-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-19-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-20-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-21-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-22-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-23-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-24-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-25-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-26-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-27-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-28-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-29-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-30-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-31-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-32-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-33-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-781-34-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-01-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-02-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-03-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-04-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-05-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-06-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-07-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-08-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-09-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-10-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-11-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-12-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-13-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-14-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-15-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-16-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-17-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-18-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-19-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-20-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-21-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-22-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-23-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-24-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-25-0000		Annexation S10-H	Zone 1 & 4	15.27

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0168-791-26-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-27-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-791-28-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-01-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-02-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-03-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-04-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-05-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-06-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-07-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-08-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-09-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-10-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-11-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-12-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-13-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-14-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-15-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-16-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-17-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-18-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-19-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-20-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-21-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-22-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-23-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-24-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-25-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-26-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-27-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-28-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-29-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-30-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-31-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-32-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-33-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-34-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-35-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-36-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-37-0000		Annexation S10-H	Zone 1 & 4	15.27
0168-801-38-0000		Annexation S10-H	Zone 1 & 4	15.27
0169-011-32-0000		Annexation S10-J	Zone 4	29.44
0169-011-33-0000		Annexation S10-J	Zone 4	29.44
0169-011-34-0000		Annexation S10-J	Zone 4	29.44
0169-011-35-0000		Annexation S10-J	Zone 4	29.44
0169-011-38-0000		Annexation S10-J	Zone 4	14.72
0169-011-39-0000		Annexation S10-J	Zone 4	14.72
0169-043-14-0000		Annexation S4-D	Zone 1	58.35
0169-053-12-0000		Annexation S1-L	Zone 3	20.05
0169-131-33-0000		Annexation S1-F	Zone 1	19.45
0169-142-11-0000		Annexation S1-I	Zone 3	20.05
0169-182-02-0000		Annexation S1-P	Zone 1	12.97
0169-182-03-0000		Annexation S1-P	Zone 1	12.97
0169-182-04-0000		Annexation S1-P	Zone 1	12.97

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0169-212-17-0000		Annexation S1-Y	Zone 3	60.15
0169-212-18-0000		Annexation S1-Y	Zone 3	20.05
0169-212-19-0000		Annexation S1-Y	Zone 3	20.05
0169-212-20-0000		Annexation S1-Y	Zone 3	40.10
0169-212-21-0000		Annexation S1-Y	Zone 3	80.20
0169-212-22-0000		Annexation S1-Y	Zone 3	60.15
0169-212-23-0000		Annexation S1-Y	Zone 3	20.05
0169-212-24-0000		Annexation S1-Y	Zone 3	20.05
0169-212-25-0000		Annexation S1-Y	Zone 3	20.05
0169-212-26-0000		Annexation S1-Y	Zone 3	20.05
0169-212-27-0000		Annexation S1-Y	Zone 3	20.05
0169-272-29-0000		Annexation S10-Q	Zone 1	65.48
0169-281-39-0000		Annexation S3-C	Zone 3	20.05
0169-281-45-0000		Annexation S10-Q	Zone 2	98.22
0169-281-46-0000		Annexation S10-Q	Zone 1	32.74
0169-301-08-0000		Annexation S4-G	Zone 4	7.01
0169-301-10-0000		Annexation S4-G	Zone 4	7.01
0169-301-11-0000		Annexation S4-G	Zone 4	7.01
0169-313-16-0000		Annexation S4-I	Zone 1	77.80
0169-321-01-0000		Annexation S3-A	Zone 3	40.10
0169-321-02-0000		Annexation S3-A	Zone 3	40.10
0169-343-07-0000		Annexation S1-T	Zone 3	20.05
0169-411-07-0000		Annexation S1-H	Zone 4	105.15
0170-481-20-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-21-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-22-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-23-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-24-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-25-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-26-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-27-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-28-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-29-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-30-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-31-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-32-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-33-0000		Annexation S10-F	Zone 1 & 4	17.28
0170-481-34-0000		Annexation S10-F	Zone 1 & 4	17.28
0171-011-67-0000		Annexation S10-V	Zone 1	19.45
0171-161-17-0000		Annexation S7-A	Zone 3	181.54
0171-171-34-0000		Annexation S1-S	Zone 3	99.15
0171-202-30-0000		Annexation S4-C	Zone 3	40.10
0171-202-33-0000		Annexation S5-C	Zone 1	19.45
0171-203-13-0000		Annexation S6-B	Zone 1	38.90
0171-331-04-0000		Annexation S1-J	Zone 3	20.05
0171-332-30-0000		Annexation S7-D	Zone 1	38.90
0171-341-33-0000		Annexation S3-J	Zone 3	80.20
0171-383-19-0000		Annexation S1-E	Zone 3	20.05
0171-383-20-0000		Annexation S1-E	Zone 3	20.05
0171-431-05-0000		Annexation S10-P	Zone 3	120.30
0172-031-49-0000		Annexation S1-M	Zone 3	20.05
0172-091-24-0000		Annexation S10-G	Zone 1	26.93
0172-091-25-0000		Annexation S10-G	Zone 1	26.93
0172-091-26-0000		Annexation S10-G	Zone 1	26.93

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0172-091-27-0000		Annexation S10-G	Zone 1	26.93
0172-091-28-0000		Annexation S10-G	Zone 1	26.93
0172-091-29-0000		Annexation S10-G	Zone 1	26.93
0172-091-30-0000		Annexation S10-G	Zone 1	26.93
0172-091-31-0000		Annexation S10-G	Zone 1	26.93
0172-091-32-0000		Annexation S10-G	Zone 1	26.93
0172-091-33-0000		Annexation S10-G	Zone 1	26.93
0172-091-34-0000		Annexation S10-G	Zone 1	26.93
0172-091-35-0000		Annexation S10-G	Zone 1	26.93
0172-091-36-0000		Annexation S10-G	Zone 1	26.93
0172-121-03-0000		Annexation S8-A	Zone 3	20.05
0172-121-10-0000		Annexation S10-O	Zone 3	26.73
0172-121-11-0000		Annexation S10-O	Zone 3	26.73
0172-121-14-0000		Annexation S10-O	Zone 3	26.73
0172-301-14-0000		Annexation S4-A	Zone 4	25.24
0172-301-15-0000		Annexation S4-A	Zone 4	12.62
0172-301-16-0000		Annexation S4-A	Zone 4	12.62
0172-301-17-0000		Annexation S4-A	Zone 4	12.62
0172-301-18-0000		Annexation S10-B	Zone 1 & 4	23.48
0172-301-19-0000		Annexation S10-B	Zone 1 & 4	23.48
0172-301-20-0000		Annexation S10-B	Zone 1 & 4	23.48
0172-301-21-0000		Annexation S10-B	Zone 1 & 4	23.48
0172-301-22-0000		Annexation S10-B	Zone 1 & 4	23.48
0172-301-26-0000		Annexation S10-B	Zone 1 & 4	23.48
0173-251-21-0000		Annexation S10-N	Zone 3	60.15
0174-021-41-0000		Annexation S5-E	Zone 1	19.45
0174-021-42-0000		Annexation S5-E	Zone 1	19.45
0174-261-15-0000		Annexation S7-G	Zone 1	155.60
0174-281-33-0000		Annexation S9-B	Zone 1	14.59
0174-281-34-0000		Annexation S9-B	Zone 1	14.59
0174-281-35-0000		Annexation S9-B	Zone 1	14.59
0174-281-37-0000		Annexation S9-B	Zone 1	14.59
0174-621-01-0000		Annexation S1-N	Zone 1	19.45
0174-621-02-0000		Annexation S1-N	Zone 1	19.45
0174-621-03-0000		Annexation S1-N	Zone 1	19.45
0174-621-04-0000		Annexation S1-N	Zone 1	19.45
0174-621-05-0000		Annexation S1-N	Zone 1	19.45
0174-621-06-0000		Annexation S1-N	Zone 1	19.45
0174-621-07-0000		Annexation S1-N	Zone 1	19.45
0174-621-08-0000		Annexation S1-N	Zone 1	19.45
0174-621-09-0000		Annexation S1-N	Zone 1	19.45
0174-621-10-0000		Annexation S1-N	Zone 1	19.45
0174-621-11-0000		Annexation S1-N	Zone 1	19.45
0174-621-12-0000		Annexation S1-N	Zone 1	19.45
0174-621-13-0000		Annexation S1-N	Zone 1	19.45
0174-621-14-0000		Annexation S1-N	Zone 1	19.45
0174-621-15-0000		Annexation S1-N	Zone 1	19.45
0174-621-16-0000		Annexation S1-N	Zone 1	19.45
0174-621-17-0000		Annexation S1-N	Zone 1	19.45
0174-621-18-0000		Annexation S1-N	Zone 1	19.45
0174-621-19-0000		Annexation S1-N	Zone 1	19.45
0174-621-20-0000		Annexation S1-N	Zone 1	19.45
0174-621-21-0000		Annexation S1-N	Zone 1	19.45
0174-621-22-0000		Annexation S1-N	Zone 1	19.45

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0174-621-23-0000		Annexation S1-N	Zone 1	19.45
0174-621-24-0000		Annexation S1-N	Zone 1	19.45
0174-621-25-0000		Annexation S1-N	Zone 1	19.45
0174-621-26-0000		Annexation S1-N	Zone 1	19.45
0174-621-27-0000		Annexation S1-N	Zone 1	19.45
0174-621-28-0000		Annexation S1-N	Zone 1	19.45
0174-621-29-0000		Annexation S1-N	Zone 1	19.45
0174-621-30-0000		Annexation S1-N	Zone 1	19.45
0174-621-31-0000		Annexation S1-N	Zone 1	19.45
0174-621-32-0000		Annexation S1-N	Zone 1	19.45
0174-621-33-0000		Annexation S1-N	Zone 1	19.45
0174-621-34-0000		Annexation S1-N	Zone 1	19.45
0174-621-35-0000		Annexation S1-N	Zone 1	19.45
0174-631-01-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-02-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-03-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-04-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-05-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-06-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-07-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-08-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-09-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-11-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-12-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-13-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-14-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-15-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-16-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-17-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-18-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-19-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-20-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-21-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-22-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-23-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-24-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-25-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-26-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-27-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-28-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-29-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-30-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-31-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-32-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-33-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-34-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-35-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-37-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-38-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-39-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-40-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-41-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-42-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-43-0000		Annexation S10-A	Zone 1 & 3	25.19

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0174-631-44-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-45-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-46-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-47-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-48-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-49-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-50-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-51-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-52-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-53-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-54-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-55-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-56-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-57-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-58-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-63-0000		Annexation S10-A	Zone 1 & 3	25.19
0174-631-64-0000		Annexation S10-A	Zone 1 & 3	25.19
0176-014-16-0000		Annexation S10-R	Zone 3	30.08
0176-014-17-0000		Annexation S10-R	Zone 3	30.08
0176-441-18-0000		Annexation S2-D	Zone 1	33.07
0176-441-19-0000		Annexation S2-D	Zone 1	33.07
0176-441-20-0000		Annexation S2-D	Zone 1	33.07
0176-441-21-0000		Annexation S2-D	Zone 1	33.07
0176-441-22-0000		Annexation S2-D	Zone 1	33.07
0176-441-23-0000		Annexation S2-D	Zone 1	33.07
0176-441-24-0000		Annexation S2-D	Zone 1	33.07
0176-441-25-0000		Annexation S2-D	Zone 1	33.07
0176-441-26-0000		Annexation S2-D	Zone 1	33.07
0176-441-27-0000		Annexation S2-D	Zone 1	33.07
0176-521-01-0000		Annexation S7-H	Zone 2	41.50
0176-521-02-0000		Annexation S7-H	Zone 2	41.50
0176-521-03-0000		Annexation S7-H	Zone 2	41.50
0176-521-04-0000		Annexation S7-H	Zone 2	41.50
0176-521-05-0000		Annexation S7-H	Zone 2	41.50
0176-521-06-0000		Annexation S7-H	Zone 2	41.50
0176-521-07-0000		Annexation S7-H	Zone 2	41.50
0176-521-08-0000		Annexation S7-H	Zone 2	41.50
0176-521-09-0000		Annexation S7-H	Zone 2	41.50
0176-521-10-0000		Annexation S7-H	Zone 2	41.50
0176-521-11-0000		Annexation S7-H	Zone 2	41.50
0176-521-12-0000		Annexation S7-H	Zone 2	41.50
0176-521-13-0000		Annexation S7-H	Zone 2	41.50
0176-521-18-0000		Annexation S7-H	Zone 2	41.50
0176-521-19-0000		Annexation S7-H	Zone 2	41.50
0176-521-20-0000		Annexation S7-H	Zone 2	41.50
0176-521-21-0000		Annexation S7-H	Zone 2	41.50
0176-521-22-0000		Annexation S7-H	Zone 2	41.50
0176-521-23-0000		Annexation S7-H	Zone 2	41.50
0176-521-27-0000		Annexation S7-H	Zone 2	41.50
0176-521-28-0000		Annexation S7-H	Zone 2	41.50
0176-521-29-0000		Annexation S7-H	Zone 2	41.50
0176-521-30-0000		Annexation S7-H	Zone 2	41.50
0176-521-31-0000		Annexation S7-H	Zone 2	41.50
0176-521-32-0000		Annexation S7-H	Zone 2	41.50

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0176-531-01-0000		Annexation S7-H	Zone 2	41.50
0176-531-02-0000		Annexation S7-H	Zone 2	41.50
0176-531-03-0000		Annexation S7-H	Zone 2	41.50
0176-531-07-0000		Annexation S7-H	Zone 2	41.50
0176-531-08-0000		Annexation S7-H	Zone 2	41.50
0176-531-09-0000		Annexation S7-H	Zone 2	41.50
0176-531-12-0000		Annexation S7-H	Zone 2	41.50
0176-531-13-0000		Annexation S7-H	Zone 2	41.50
0176-531-26-0000		Annexation S7-H	Zone 2	41.50
0176-531-18-0000		Annexation S7-H	Zone 2	41.50
0176-531-20-0000		Annexation S7-H	Zone 2	41.50
0176-531-21-0000		Annexation S7-H	Zone 2	41.50
0176-531-22-0000		Annexation S7-H	Zone 2	41.50
0176-531-24-0000		Annexation S7-H	Zone 2	41.50
0176-531-25-0000		Annexation S7-H	Zone 2	41.50
0292-032-39-0000		Original District	Zone 3	200.50
0292-032-40-0000		Original District	Zone 3	40.10
0292-032-41-0000		Original District	Zone 3	60.15
0292-032-42-0000		Original District	Zone 3	320.80
0292-033-11-0000		Annexation S1-C	Zone 4	231.33
0292-033-13-0000		Annexation S9-D	Zone 3	80.20
0292-034-16-0000		Annexation S1-O	Zone 3	20.05
0292-063-45-0000		Annexation S7-C	Zone 4	42.06
0292-064-13-0000		Annexation S3-H	Zone 4	84.12
0292-064-17-0000		Annexation S3-H	Zone 4	84.12
0292-064-21-0000		Annexation S3-H	Zone 4	84.12
0292-064-22-0000		Annexation S3-H	Zone 4	42.06
0292-064-23-0000		Annexation S3-H	Zone 4	42.06
0292-064-24-0000		Annexation S3-H	Zone 4	147.21
0292-064-25-0000		Annexation S3-H	Zone 4	42.06
0292-064-26-0000		Annexation S3-H	Zone 4	21.03
0292-064-27-0000		Annexation S3-H	Zone 4	21.03
0292-152-39-0000		Annexation S7-B	Zone 3	100.25
0292-153-24-0000		Annexation S2-A	Zone 3	80.20
0292-153-25-0000		Annexation S2-A	Zone 3	80.20
0292-153-26-0000		Annexation S2-A	Zone 3	40.10
0292-153-27-0000		Annexation S2-A	Zone 3	40.10
0292-153-28-0000		Annexation S10-I	Zone 1 & 4	59.43
0292-153-30-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-31-0000		Annexation S10-I	Zone 1 & 4	59.43
0292-153-32-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-33-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-34-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-35-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-36-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-37-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-38-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-39-0000		Annexation S10-I	Zone 1 & 4	79.24
0292-153-40-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-41-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-42-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-153-43-0000		Annexation S10-I	Zone 1 & 4	19.81
0292-154-12-0000		Annexation S5-D	Zone 3	100.25
0292-154-22-0000		Annexation S10-K	Zone 1 & 4	80.96

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0292-154-23-0000		Annexation S10-K	Zone 1 & 4	19.45
0292-154-24-0000		Annexation S10-K	Zone 1 & 4	19.45
0292-154-25-0000		Annexation S10-K	Zone 1 & 4	19.45
0292-156-21-0000		Annexation S1-W	Zone 3	120.30
0292-157-16-0000		Annexation S6-A	Zone 4	189.27
0292-157-20-0000		Annexation S9-E	Zone 1	19.45
0292-157-31-0000		Annexation S2-H	Zone 4	21.03
0292-158-17-0000		Annexation S8-B	Zone 3	40.10
0292-165-15-0000		Annexation S3-F	Zone 3 & 4	222.51
0292-166-11-0000		Annexation S1-K	Zone 4	273.39
0292-182-30-0000		Annexation S1-U	Zone 4	21.03
0292-182-31-0000		Annexation S1-U	Zone 4	21.03
0292-192-11-0000		Annexation S4-E	Zone 4	231.33
0292-201-37-0000		Annexation S4-B	Zone 3	40.10
0292-201-39-0000		Annexation S4-B	Zone 3	47.57
0292-310-07-0000		Annexation S3-B	Zone 1	19.45
0292-310-36-0000		Annexation S4-F	Zone 1	38.90
0292-310-42-0000		Annexation S10-M	Zone 1	19.45
0292-321-10-0000		Annexation S1-G	Zone 4	105.15
0292-331-15-0000		Annexation S2-F	Zone 3	80.20
0292-331-16-0000		Annexation S2-F	Zone 3	80.20
0292-381-08-0000		Annexation S3-G	Zone 1	19.45
0292-441-11-0000		Annexation S2-B	Zone 3	12.03
0292-441-12-0000		Annexation S2-B	Zone 3	12.03
0292-441-13-0000		Annexation S2-B	Zone 3	12.03
0292-441-14-0000		Annexation S2-B	Zone 3	12.03
0292-441-15-0000		Annexation S2-B	Zone 3	12.03
0293-172-16-0000		Annexation S1-B	Zone 4	126.18
0293-172-17-0000		Annexation S1-B	Zone 4	126.18
0293-172-18-0000		Annexation S1-B	Zone 4	21.03
0293-421-01-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-02-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-03-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-04-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-05-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-06-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-07-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-08-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-09-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-10-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-11-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-12-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-13-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-14-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-15-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-16-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-17-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-18-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-19-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-20-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-21-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-22-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-23-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-24-0000		Annexation S9-A	Zone 1 & 4	4.50

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0293-421-25-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-26-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-27-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-28-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-29-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-30-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-31-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-32-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-33-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-34-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-35-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-36-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-37-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-38-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-39-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-40-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-41-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-42-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-43-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-44-0000		Annexation S9-A	Zone 1 & 4	4.50
0293-421-45-0000		Annexation S9-A	Zone 1 & 4	4.50
0294-181-02-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-03-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-04-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-05-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-06-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-07-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-08-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-09-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-10-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-11-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-12-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-13-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-14-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-181-15-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-01-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-02-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-03-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-04-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-06-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-07-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-08-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-09-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-10-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-11-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-12-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-16-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-17-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-18-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-19-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-191-20-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-09-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-11-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-13-0000		Annexation S10-S	Zone 1 & 3	49.54

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0294-201-15-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-19-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-21-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-27-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-201-28-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-02-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-03-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-04-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-06-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-07-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-08-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-09-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-10-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-12-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-211-13-0000		Annexation S10-S	Zone 1 & 3	49.54
0294-222-01-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-02-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-03-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-04-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-05-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-06-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-07-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-08-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-09-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-10-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-11-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-222-12-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-01-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-02-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-03-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-04-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-05-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-06-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-232-07-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-01-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-02-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-03-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-04-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-05-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-242-06-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-01-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-02-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-03-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-04-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-05-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-06-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-07-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-08-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-09-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-10-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-11-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-12-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-252-13-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-01-0000		Annexation S10-T	Zone 1 & 3	36.13

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
0294-262-02-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-03-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-04-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-05-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-06-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-07-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-08-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-09-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-10-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-11-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-12-0000		Annexation S10-T	Zone 1 & 3	36.13
0294-262-13-0000		Annexation S10-T	Zone 1 & 3	36.13
1212-021-01-0000		Annexation S10-D	Zone 1	16.94
1212-021-02-0000		Annexation S10-D	Zone 1	16.94
1212-021-03-0000		Annexation S10-D	Zone 1	16.94
1212-021-04-0000		Annexation S10-D	Zone 1	16.94
1212-021-05-0000		Annexation S10-D	Zone 1	16.94
1212-021-06-0000		Annexation S10-D	Zone 1	16.94
1212-021-07-0000		Annexation S10-D	Zone 1	16.94
1212-021-08-0000		Annexation S10-D	Zone 1	16.94
1212-021-09-0000		Annexation S10-D	Zone 1	16.94
1212-021-10-0000		Annexation S10-D	Zone 1	16.94
1212-021-11-0000		Annexation S10-D	Zone 1	16.94
1212-021-12-0000		Annexation S10-D	Zone 1	16.94
1212-021-13-0000		Annexation S10-D	Zone 1	16.94
1212-021-14-0000		Annexation S10-D	Zone 1	16.94
1212-021-15-0000		Annexation S10-D	Zone 1	16.94
1212-021-16-0000		Annexation S10-D	Zone 1	16.94
1212-021-17-0000		Annexation S10-D	Zone 1	16.94
1212-021-18-0000		Annexation S10-D	Zone 1	16.94
1212-021-19-0000		Annexation S10-D	Zone 1	16.94
1212-021-20-0000		Annexation S10-D	Zone 1	16.94
1212-021-21-0000		Annexation S10-D	Zone 1	16.94
1212-021-22-0000		Annexation S10-D	Zone 1	16.94
1212-021-23-0000		Annexation S10-D	Zone 1	16.94
1212-021-24-0000		Annexation S10-D	Zone 1	16.94
1212-021-25-0000		Annexation S10-D	Zone 1	16.94
1212-021-26-0000		Annexation S10-D	Zone 1	16.94
1212-021-27-0000		Annexation S10-D	Zone 1	16.94
1212-021-28-0000		Annexation S10-D	Zone 1	16.94
1212-021-29-0000		Annexation S10-D	Zone 1	16.94
1212-021-30-0000		Annexation S10-D	Zone 1	16.94
1212-021-31-0000		Annexation S10-D	Zone 1	16.94
1212-021-32-0000		Annexation S10-D	Zone 1	16.94
1212-021-33-0000		Annexation S10-D	Zone 1	16.94
1212-021-34-0000		Annexation S10-D	Zone 1	16.94
1212-021-35-0000		Annexation S10-D	Zone 1	16.94
1212-021-36-0000		Annexation S10-D	Zone 1	16.94
1212-021-37-0000		Annexation S10-D	Zone 1	16.94
1212-021-38-0000		Annexation S10-D	Zone 1	16.94
1212-021-39-0000		Annexation S10-D	Zone 1	16.94
1212-021-40-0000		Annexation S10-D	Zone 1	16.94
1212-021-41-0000		Annexation S10-D	Zone 1	16.94
1212-021-42-0000		Annexation S10-D	Zone 1	16.94

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
1212-021-43-0000		Annexation S10-D	Zone 1	16.94
1212-021-44-0000		Annexation S10-D	Zone 1	16.94
1212-021-45-0000		Annexation S10-D	Zone 1	16.94
1212-021-46-0000		Annexation S10-D	Zone 1	16.94
1212-021-47-0000		Annexation S10-D	Zone 1	16.94
1212-021-48-0000		Annexation S10-D	Zone 1	16.94
1212-021-49-0000		Annexation S10-D	Zone 1	16.94
1212-021-50-0000		Annexation S10-D	Zone 1	16.94
1212-021-51-0000		Annexation S10-D	Zone 1	16.94
1212-021-52-0000		Annexation S10-D	Zone 1	16.94
1212-021-53-0000		Annexation S10-D	Zone 1	16.94
1212-021-54-0000		Annexation S10-D	Zone 1	16.94
1212-021-55-0000		Annexation S10-D	Zone 1	16.94
1212-021-56-0000		Annexation S10-D	Zone 1	16.94
1212-021-57-0000		Annexation S10-D	Zone 1	16.94
1212-021-58-0000		Annexation S10-D	Zone 1	16.94
1212-021-59-0000		Annexation S10-D	Zone 1	16.94
1212-021-60-0000		Annexation S10-D	Zone 1	16.94
1212-021-61-0000		Annexation S10-D	Zone 1	16.94
1212-021-62-0000		Annexation S10-D	Zone 1	16.94
1212-041-01-0000		Annexation S7-F	Zone 1	77.80
1212-191-60-0000		Annexation S1-X	Zone 1	19.45
1212-191-61-0000		Annexation S1-X	Zone 1	19.45
1212-191-62-0000		Annexation S1-X	Zone 1	19.45
1212-191-63-0000		Annexation S1-X	Zone 1	19.45
1212-191-64-0000		Annexation S1-X	Zone 1	19.45
1212-191-65-0000		Annexation S1-X	Zone 1	19.45
1212-191-66-0000		Annexation S1-X	Zone 1	19.45
1212-191-67-0000		Annexation S1-X	Zone 1	19.45
1212-191-68-0000		Annexation S1-X	Zone 1	19.45
1212-191-69-0000		Annexation S1-X	Zone 1	19.45
1212-191-70-0000		Annexation S1-X	Zone 1	19.45
1212-191-71-0000		Annexation S1-X	Zone 1	19.45
1212-191-72-0000		Annexation S1-X	Zone 1	19.45
1212-191-73-0000		Annexation S1-X	Zone 1	19.45
1212-191-74-0000		Annexation S1-X	Zone 1	19.45
1212-191-75-0000		Annexation S1-X	Zone 1	19.45
1212-191-76-0000		Annexation S1-X	Zone 1	19.45
1212-191-77-0000		Annexation S1-X	Zone 1	19.45
1212-191-78-0000		Annexation S1-X	Zone 1	19.45
1212-191-79-0000		Annexation S1-X	Zone 1	19.45
1212-201-01-0000		Annexation S3-E	Zone 1	25.93
1212-201-02-0000		Annexation S3-E	Zone 1	25.93
1212-201-03-0000		Annexation S3-E	Zone 1	25.93
1212-201-04-0000		Annexation S3-E	Zone 1	25.93
1212-201-05-0000		Annexation S3-E	Zone 1	25.93
1212-201-06-0000		Annexation S3-E	Zone 1	25.93
1212-201-07-0000		Annexation S3-E	Zone 1	25.93
1212-201-08-0000		Annexation S3-E	Zone 1	25.93
1212-201-09-0000		Annexation S3-E	Zone 1	25.93
1212-201-10-0000		Annexation S3-E	Zone 1	25.93
1212-201-11-0000		Annexation S3-E	Zone 1	25.93
1212-201-12-0000		Annexation S3-E	Zone 1	25.93
1212-201-13-0000		Annexation S3-E	Zone 1	25.93

City of Redlands
Street Lighting District No. 1 - Appendix D
Fiscal Year 2025-2026
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	ZONE	CHARGE
1212-201-14-0000		Annexation S3-E	Zone 1	25.93
1212-201-15-0000		Annexation S3-E	Zone 1	25.93
1212-201-16-0000		Annexation S3-E	Zone 1	25.93
1212-201-17-0000		Annexation S3-E	Zone 1	25.93
1212-201-18-0000		Annexation S3-E	Zone 1	25.93
1212-201-19-0000		Annexation S3-E	Zone 1	25.93
1212-201-20-0000		Annexation S3-E	Zone 1	25.93
1212-201-21-0000		Annexation S3-E	Zone 1	25.93
1212-201-22-0000		Annexation S3-E	Zone 1	25.93
1212-201-23-0000		Annexation S3-E	Zone 1	25.93
1212-201-24-0000		Annexation S3-E	Zone 1	25.93
1212-201-25-0000		Annexation S3-E	Zone 1	25.93
1212-201-26-0000		Annexation S3-E	Zone 1	25.93
1212-201-27-0000		Annexation S3-E	Zone 1	25.93
1212-431-02-0000		Annexation S9-F	Zone 3	100.25

Summary Fields	Value
APN total count:	987
CHARGE total sum:	$25,452.67

CITY OF REDLANDS
LANDSCAPE MAINTENANCE DISTRICT NO. 1
ENGINEER'S REPORT
FOR FISCAL YEAR 2025-2026

CITY OF REDLANDS
FACILITIES AND COMMUNITY SERVICES DEPARTMENT

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ENGINEER'S REPORT AFFIDAVIT

Landscape Maintenance District No. 1

City of Redlands
San Bernardino County, State of California

This Report describes the Landscape Maintenance District No. 1 ("District") and services therein including the improvements, budgets, parcels and assessments to be levied for Fiscal Year 2025-2026as they existed at the time of the passage of the Resolution of Intention. Reference is hereby made to the San Bernardino County Assessor's maps for a detailed description of the lines and dimensions of parcels within the District. The undersigned respectfully submits the enclosed Report as directed by the City Council.

Dated this 3rd day of June, 2025



By:_____

Donald Young
One Stop Permit Center Manager
R.C.E # 49918

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TABLE OF CONTENTS

I. AUTHORITY FOR REPORT

II. GENERAL DESCRIPTION

III. PLANS AND SPECIFICATIONS

IV. IMPROVEMENTS

V. ASSESSMENT DIAGRAM

VI. ESTIMATED COSTS AND MAINTENANCE

VII. ASSESSMENT ROLL

VIII. PROPOSED BASIS FOR ASSESSMENTS

IX. CALCULATION OF MAINTENANCE AND INCIDENTAL COSTS

X. ESTIMATED ASSESSMENTS FOR FY 2025-2026

APPENDIX A: CALCULATION OF MAINTENANCE AND INCIDENTAL COST TABLE
APPENDIX B: DISTRICT ASSESSMENT DIAGRAM
APPENDIX C: RESOLUTIONS
APPENDIX D: ASSESSMENT ROLL

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I. AUTHORITY FOR REPORT

This report is prepared by order of the City Council of the City of Redlands, California (City). This report is in compliance with the requirements of Chapter 1, Article 4, and Chapter 3 of Division 15 of the Streets and Highway Code of the State of California (Landscape and Lighting Act of 1972) and Article XIIID of the California Constitution.

II. GENERAL DESCRIPTION

The City Council of the City of Redlands, California has heretofore elected to form Landscape Maintenance District No. 1 (District) and annexed territories to said District. The boundaries of said District and annexations thereto are entitled "Assessment Diagram of Landscape Maintenance District No. 1," and are on file in the office of the City Clerk of the City of Redlands.

III. PLANS AND SPECIFICATIONS

The plans and specifications for the landscaping either have been or are being prepared by the developers. The plans and specifications for the landscaping will be in conformance with the requirements of the City's Development Services Department, Planning Division and Land Use Engineering Division (DSD) and the Facilities and Community Services Department (FCS).

Reference is hereby made to the subject tract or parcel maps and assessment diagrams for the exact location of the landscaped areas. The plans and specifications by reference are hereby made a part of this report to the same extent as if said plans and specifications were attached hereto.

IV. IMPROVEMENTS

All areas within the Landscape Maintenance District No. 1, identified in this report as the Original District and Annexation No. L1 through L12, are to be maintained by the District. For FY 2025/26 the Original District (A, B and C), and Annexations L1-A, L1-B, L2-A, L4-C, L4-W, L5-C and L6-E are the only Annexations currently maintained. The remaining Annexations are either not yet developed or the landscaping has not been accepted for maintenance by the Facilities and Community Services Department.

The City, through the Facilities and Community Services Department, has developed procedures for inspections, acceptance and maintenance of the landscaping improvements. It is anticipated that the Facilities and Community Services Department will be assigned the overall maintenance responsibilities once landscape improvements for individual Annexations have been accepted for maintenance.

V. ASSESSMENT DIAGRAM

The assessment District locations for the Original District and subsequent Annexations are shown in Appendix B. The assessment diagrams by reference are hereby made a part of this report. The original diagram document used in prior Engineer's Reports was updated in 2021 for purposes of clarity.

VI. ESTIMATED COSTS AND MAINTENANCE

It is anticipated that the City, through its Facilities and Community Services Department, will provide maintenance services for the District. The City's record keeping will be required to be sufficiently accurate to detail the expenses so that actual cost of maintaining the District and Annexations are documented.

The District and Annexations which are maintained and those Annexations which are not maintained at this time, have been in existence for a number of years. Over the years the existing assessments have not kept pace with the true annual cost of maintenance and administration. As a result, the surplus balances established at the formation of the District and Annexations have depleted to cover expenses.

Approximately fifty-one (51) percent of the general administration and engineering costs are charged to the District and Annexations having landscaping maintained by the City. Forty-nine (49) percent is spread to properties on an equal assessment per lot with on-site development, but with either no landscaping installed or landscaping which is not yet accepted for maintenance by the City. The latter assessment has not changed as compared to the last fiscal year and remains at $6.00 per lot.

The assessment per lot for general administration and engineering areas with landscaping maintained by the City is approximately $4.39 per lot for the Original District B and C, and Annexations L1-A, L1-B, L2-A, L4-W and L6-E. For Original District A, this amount is $36.16 per lot and for Annexation L5C it is $8.50 per lot. Annexation L4-C is maintained by the District but the assessment remains at $6.00 per lot.

Since there were numerous locations as part of Annexation Nos. 1, 2, 3, 4, etc. they were identified on the diagram as Original A, 1-1A, 1-1B, etc. Prefix L is added to the identification on the later annexations to identify that it is within the District. The description of the annexations will be within Sections IX and X of this report.

VII. ASSESSMENT ROLL

Following the public hearing for FY 2025-2026 (FY 25/26) assessments and the City Council's approval of the assessments, an assessment roll will be prepared. The assessment roll will include the assessment parcel number, the San Bernardino County Assessor's parcel number and the confirmed assessment for each parcel. The assessment roll will be

filed with the City Clerk and will subsequently be transmitted to the San Bernardino County Auditor/Tax Collector.

VIII. PROPOSED BASIS FOR ASSESSMENTS

The City Council has heretofore determined that it will be necessary to utilize the provisions of the Landscaping and Lighting Act of 1972, a benefit assessment act, for the Original District and the subsequent Annexations to the District and to assess benefitting properties in proportion to the benefits that the various properties will receive.

IX. CALCULATION OF MAINTENANCE AND INCIDENTAL COST

For a breakdown of the Maintenance and Incidental Costs see Appendix A – Calculation of Maintenance and Incidental Cost Table

X. ESTIMATED ASSESSMENTS FOR FY 2025-2026

The City Council, in forming the District and in annexing territories to the District, has maintained the philosophy that the subdivider or developer is responsible for the plantings, irrigation system and the maintenance of the improvements until they become well established. The assessments for maintenance thus only include anticipated costs incurred subsequent to the acceptance of the established improvements by FCS.

The maintenance of the landscaping is vital for the protection of both economic and humanistic values of the development. The City Council has heretofore determined that for the preservation of values incorporated within developments adjacent to landscaped areas, the parcels within the developments should be included in a maintenance district to ensure satisfactory levels of maintenance. The establishment of the assessment for each development must be on a unit-by-unit basis, which will preserve the integrity of each project.

The determination of benefit for the lots within the District and Annexations takes into consideration the following facts for the Original Districts and Annexations thereto:

Original District - Tracts 13282, 13434 and 13496

1. The purpose of landscaping is to provide an aesthetic impression on the area.

2. The maintained landscaping benefits all properties in the development.

3. The benefits to the lots that are not adjacent to the landscaped areas benefit by the uniform maintenance and appearance. All lots that are not abutting the landscaped areas benefit equally.

4. The landscaping on the Wabash Avenue and San Bernardino Avenue, boundaries of Tracts 13282 and 13434 respectively, is oriented away from the units adjacent to the landscaped areas; however, these properties were given a 10 percent surcharge to recognize proximity and support benefit.

5. The landscaping in the common area along the Alessandro Road frontage of Tract 13496 is oriented towards all units. Two of the lots abut the landscaped areas and were given a 20 percent surcharge to recognize proximity and support benefit.

6. The lots to receive a surcharge shall be considered to be within Assessment Zone "A".

Formula for Assessment

A = Assessment per interior lot

L = Number of lots that are not adjacent to landscaping areas on the Wabash Avenue frontage of Tract 13282, the San Bernardino Avenue frontage of 13434 and the Alessandro Road frontage of Tract 13496

P = Number of lots with a 10 percent or 20 percent surcharge

LA + P [(1.10) or (1.20)] A = Amount to be assessed

The FY 25/26 assessment will be spread based upon the preceding formula.

Original 1-A
Tract 13282

The total lot count in Tract 13282 is 38 lots, with 8 of those lots being adjacent to Wabash Avenue.

FY 25/26 Assessment

(20A) + 8 (1.10A) = $2,409
A = $62.09

APN 0168-681-01 thru 16, 25 thru 38

The amount of assessment for lots that are not adjacent to the landscaping areas on Wabash Avenue = $62.09

APN 0168-681-17 thru 24

The amount of assessment for lots adjacent to Wabash Avenue with a 10 percent surcharge = $68.30

Original 1-B
Tract 13434

The total lot count in Tract 13434 is 78 lots, with 4 of these lots being adjacent to San Bernardino Avenue.

FY 25/26 Assessment

(74A) + 4 (1.10A) = $2,826
A = $36.05

APN 0167-802-2 thru 7
APN 0167-803-2 thru 8
APN 0167-804-1 thru 19
APN 0167-823-1 thru 10
APN 0167-284-1 thru 32

The amount of assessment for lots that are not adjacent to the landscaping areas on San Bernardino Avenue = $36.05

APN 0167-802-01, 08
APN 0167-803-01, 09

The amount of assessments for lots adjacent to San Bernardino Avenue with a 10 percent surcharge = $39.65

Original 1-C
Tract 13496

The total lot count in Tract 13496 is 9 lots, with 2 of these lots being adjacent to Alessandro Road.

FY 2025/26Assessment

(7A) + 2 (1.2A) = $12,320
A = $1,310.64

APN 0175-491-02 thru 08

The amount of assessment for lots that are not adjacent to the landscaping areas on Alessandro Road = $1,310.64

APN 0175-491-01, 09

The amount of assessment for lots adjacent to Alessandro Road with a 20 percent surcharge = $1,572.77

Annexation No. L1-A – Tract 13745

1. The purpose of landscaping is to provide an aesthetic impression on the area.

2. The maintained landscaping benefits all properties in the development.

3. The benefit to the lots that are not adjacent to the landscaped areas benefit by the uniform maintenance and appearance. All lots that are not abutting the landscaped areas benefit equally.

4. The landscaping on San Bernardino Avenue is oriented away from the lots adjacent to the landscaped areas; however, these properties were given a 10 percent surcharge to recognize proximity and support benefit. These lots within Assessment Zone "A" are shown on the Assessment Diagram.

Formula for Assessment

A = Assessment per interior lot

L = Number of lots that are not adjacent to landscaping areas on San Bernardino Avenue

P = Number of lots with a 10 percent within Assessment Zone "A"

LA + P (1.10) A = Amount to be assessed

The FY 25/26 Assessment will be spread based upon the preceding formula. The total lot count in the tract is 38 lots, with 9 of these lots being adjacent to San Bernardino Avenue.

FY 25/26 Assessment

(29A) + 9 (1.10A) = $3,601
A = $92.57

APN 1212-141-01 thru 15, 25 thru 38

The amount of assessment for lots that are not adjacent to the landscaping areas on San Bernardino Avenue = $92.57

APN 1212-141-16 thru 24

The amount of assessments for lots within Assessment Zone "A" adjacent to the San Bernardino Avenue landscaping areas with a 10 percent surcharge = $101.83

Annexation No. L1-B – Tract 13765

1. The purpose of landscaping is to provide an aesthetic impression on the area.

2. The maintained landscaping benefits all properties in the development.

3. The benefit to the lots that are not adjacent to the landscaped areas benefit by the uniform maintenance and appearance. All lots that are not abutting the landscaped areas benefit equally.

4. The landscaping on San Bernardino Avenue is oriented away from the lots adjacent to the landscaped areas; however, these properties were given a 10 percent surcharge to recognize proximity and support benefit. These lots within Assessment Zone "A" as shown on the Assessment Diagram.

Formula for Assessment

A = Assessment per interior lot

L = Number of lots that are not adjacent to landscaping areas on San Bernardino Avenue

P = Number of lots with a 10 percent within Assessment Zone "A"

LA + P (1.10) A = Amount to be assessed

The FY 25/26 Assessment will be spread based upon the preceding formula. The total lot count in the tract is 25 lots, with 2 of these lots being adjacent to San Bernardino Avenue.

FY 25/26 Assessment

(23A) + 2 (1.10A) = $2,554
A = $101.35

APN 1212-081-54 thru -62

The amount of assessment for lots that are not adjacent to the landscaping areas on San Bernardino Avenue = $101.35

APN 1212-141-39 and -54

The amount of assessments for lots within Assessment Zone "A" adjacent to the San Bernardino Avenue landscaping areas with a 10 percent surcharge = $111.48

Annexation No. L2-A – Tract 13947

1. The purpose of landscaping is to provide an aesthetic impression on the area.

2. The maintained landscaping benefits all properties in the development.

3. The benefit to the lots that are not adjacent to the landscaped areas benefit by the uniform maintenance and appearance. All lots that are not abutting the landscaped areas benefit equally.

4. The landscaping on Reservoir Road is oriented away from the lots adjacent to the landscaped areas; however, these properties were given a 20 percent surcharge to recognize proximity and support benefit. These lots are within Assessment Zone "A" as shown on the Assessment Diagram

Formula for Assessment

A = Assessment per interior lot

L = Number of lots that are not adjacent to landscaping areas on Reservoir Road

P = Number of lots with a 20 percent within Assessment Zone "A"

LA + P (1.20) A = Amount to be assessed

FY 25/26 Assessment will be spread based upon the preceding formula. The total lot count in the tract is 35 lots, with 4 of these lots being adjacent to Reservoir Road.

FY 25/26 Assessment

(31A) + 4 (1.20A) = $1,595
A = $44.55

APN 0174-621-1 thru 7, 9 thru 25, 28 thru 34

The amount of assessment for lots that are not adjacent to the landscaping areas on Reservoir Road = $44.55

APN 0174-621-08, 26, 27, 35

The amount of assessments for lots within Assessment Zone "A" adjacent to the Reservoir Road landscaping areas with a 20 percent surcharge = $53.46.

Annexation No. L3-A – Parcel Map 11917

Formula for Assessment

T = Total length of perimeter landscaping = 3,099 feet

L = Individual lot length of perimeter landscaping

A = Amount to be assessed = $600

The FY 25/26 Assessment will be spread based upon the preceding formula. The total lot count in the tract is 4 lots.

FY 25/26 Assessment

Assessment per lot:

APN 0292-032-39	= 1010 ft/3099 ft	x $600 =	$195.55
APN 0292-032-40	= 206 ft/3099 ft	x $600 =	$39.88
APN 0292-032-41	= 324 ft/3099 ft	x $600 =	$62.73
APN 0292-032-42	= 1559 ft/3099 ft	x $600 =	$301.84

Annexation No. L5-C – Tract 14556

1. The purpose of landscaping is to provide an aesthetic impression on the area.

2. The maintained landscaping benefits all properties in the development.

3. The benefit to the lots that are not adjacent to the landscaped areas benefit by the uniform maintenance and appearance. All lots that are not abutting the landscaped areas benefit equally.

4. The landscaping on the median at the intersection of Franklin Avenue and Garden Street is oriented away from lots adjacent to the landscaped areas; however, these properties were given a 10 percent surcharge to recognize proximity and support benefit. These lots within Assessment Zone "A" as shown on the Assessment Diagram.

Formula for Assessment

A = Assessment per interior lot

L = Number of lots that are not adjacent to landscaping areas on Franklin Avenue and Garden Street

P = Number of lots with a 10 percent within Assessment Zone "A"

LA + P (1.10) A = Amount to be assessed

The FY 25/26 Assessment will be spread based upon the preceding formula. The total lot count in the tract is 10 lots, with 4 of these lots being in close proximity to the landscaped median at the intersection of Franklin Avenue and Garden Street.

FY 25/26 Assessment

(6A) + 4 (1.10A) = $815
A = $78.37

APN 0176-441-18, 23 thru 27

The amount of assessment for lots that are not adjacent to the landscaping areas = $78.37

APN 0174-441-19 thru 22

The amount of assessments for lots within Assessment Zone "A" adjacent to the landscaping areas with a 10 percent surcharge = $86.20

Annexation No. L4, L5 (except L5-C), L6, L7, L8, L9, L10, L11 and L12

No assessments are proposed to be levied on the parcels in these annexations in association with the landscape maintenance costs. However, these parcels will receive special benefit and be assessed for the per lot general City overhead charges and the prorated share of the Annual Engineer's Report to ensure that the required landscaping be maintained to the standards established by the City and anticipated when the improvements were initially required. The assessment will be $6.00 per lot in each of these annexations.

* * * * * * * * * * * *

The City Council will hold a public meeting on June 17, 2025 to determine the assessments based upon the costs for FY 2025-2026 which are anticipated to be incurred by the City and which are to be recovered through assessments as required by the Landscaping and Lighting District Act of 1972.

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APPENDIX A

CALCULATION OF MAINTENANCE AND INCIDENTAL COST TABLE

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APPENDIX A
COST TABLE
ENGINEER'S REPORT
LANDSCAPE MAINTENANCE DISTRICT NO. 1, FY 2025-2026

District Name	Original 1-A	Original 1-B	Original 1-C	Annexation L1-A	Annexation L1-B	Annexation L2-A	Annexation L3-A	Annexation L4-A	Annexation L4-B	Annexation L4-C	Annexation L4-D	Annexation L4-E	Annexation L4-F	Annexation L4-G	Annexation L4-H
Description	Tract 13282	Tract 13434	Tract 13496	Tract 13745	Tract 13765	Tract 13947	PM 11917	MS 185	MS 178	CUP 617	MS 184	CUP 382	CRA 606	CRA 486	CUP 253
Parcel Numbers	Wabash Avenue	San Bernardino Avenue	Alessandro Road	San Bernardino Avenue	San Bernardino Avenue	Reservoir Road	Lugonia Avenue		APN 293-172-16 THRU 18	APN 292-033-11	APN 167-231-19 THRU 21	APN 171-383-19 & 20	APN 169-131-33	APN 292-321-10	APN 169-411-07
Maintenance															
Contract Maintenance	$ 1,340	$ 1,340	$ 5,103	$ 1,190	$ 650	$ 550	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Water & Electric	$ 520	$ 940	$ 4,450	$ 1,865	$ 1,360	$ 1,300	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Field Inspections	$ 250	$ 250	$ 1,250	$ 250	$ 250		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ 50	$ 50	$ 50	$ 50	$ 50	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ 2,160**	**$ 2,580**	**$ 10,853**	**$ 3,355**	**$ 2,310**	**$ 1,850**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Incidental Expenses															
Engineering and Admin.	$ 250	$ 250	$ 1,475	$ 250	$ 250	$ 6	$ 600	$ -	$ 60	$ 6	$ 18	$ 12	$ 6	$ 6	$ 6
SUBTOTAL	**$ 250**	**$ 250**	**$ 1,475**	**$ 250**	**$ 250**	**$ 6**	**$ 600**	**$ -**	**$ 60**	**$ 6**	**$ 18**	**$ 12**	**$ 6**	**$ 6**	**$ 6**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 2,410**	**$ 2,830**	**$ 12,328**	**$ 3,605**	**$ 2,560**	**$ 1,856**	**$ 600**	**$ -**	**$ 60**	**$ 6**	**$ 18**	**$ 12**	**$ 6**	**$ 6**	**$ 6**
Levy Adjustments															
Fund Collection	$ (1)	$ (4)	$ (8)	$ (4)	$ (6)	$ (261)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ (1)**	**$ (4)**	**$ (8)**	**$ (4)**	**$ (6)**	**$ (261)**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Breakdown															
Non-Adjacent Lots	30	74	7	29	23	31	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	8	4	0	9	2	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	2	0	0	4	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	0	0	0	0	0	0	0	0	10	1	3	2	1	1	1
TOTAL LOTS	**38**	**78**	**9**	**38**	**25**	**35**	**0**	**0**	**10**	**1**	**3**	**2**	**1**	**1**	**1**
Non-Adjacent Rate per Lot	$ 62.09	$ 36.05	$ 1,310.64	$ 92.57	$ 101.35	$ 44.55	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ 68.30	$ 39.65	$ -	$ 101.83	$ 111.48	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ 1,572.77	$ -		$ 53.46	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 2,409.10**	**$ 2,826.30**	**$ 12,320.02**	**$ 3,601.00**	**$ 2,554.01**	**$ 1,594.89**	**$ 600.00**	**$ -**	**$ 60.00**	**$ 6.00**	**$ 18.00**	**$ 12.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**
Total # of Parcels	38	78	9	38	25	35	4	4	10	1	3	2	1	1	1
Total Parcels Levied	38	78	9	38	25	35	4	0	3	1	3	2	1	1	1

District Name	Annexation L4-I	Annexation L4-J	Annexation L4-K	Annexation L4-L	Annexation L4-M	Annexation L4-N	Annexation L4-O	Annexation L4-P	Annexation L4-Q	Annexation L4-R	Annexation L4-S	Annexation L4-T	Annexation L4-U	Annexation L4-V	Annexation L4-W
Description	CRA 608	CUP 519	CUP 516	CUP 518	CUP 522	CUP 521	CRA 605	PM 12087	MS 185	CUP 278	CUP 405	CRA 354	CRA 346	CRA 607	Tract 12461
Parcel Numbers	APN 169-142-11	APN 171-331-04	APN 292-166-11	APN 169-053-12	APN 172-031-49	APN 292-034-16	APN 169-182-02, -03, -04	APN 171-261-01	APN 176-044-14 & 15	APN 171-171-34	APN 169-343-07	APN 292-182-30 & 31	APN 292-061-25	APN 292-156-21	APN 1212-191-60 THRU 79
Maintenance															
Contract Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 550
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Water & Electric	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 630
Field Inspections	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,180**
Incidental Expenses															
Engineering and Admin.	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 18	$ -	$ 6	$ 18	$ 6	$ 12	$ -	$ 6	$ 88
SUBTOTAL	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 18**	**$ -**	**$ 6**	**$ 18**	**$ 6**	**$ 12**	**$ -**	**$ 6**	**$ 88**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 18**	**$ -**	**$ 6**	**$ 18**	**$ 6**	**$ 12**	**$ -**	**$ 6**	**$ 1,268**
Levy Adjustments															
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (1,148)
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ (1,148)**
Breakdown															
Non-Adjacent Lots	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	1	1	1	1	1	1	3	0	1	3	1	2	0	1	20
TOTAL LOTS	**1**	**1**	**1**	**1**	**1**	**1**	**3**	**0**	**1**	**3**	**1**	**2**	**0**	**1**	**20**
Non-Adjacent Rate per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -	$ 1.00	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 18.00**	**$ -**	**$ 6.00**	**$ 18.00**	**$ 6.00**	**$ 12.00**	**$ -**	**$ 6.00**	**$ 120.00**
Total # of Parcels	1	1	1	1	1	1	3	1	2	3	1	2	1	1	20
Total Parcels Levied	1	1	1	1	1	1	3	0	1	3	1	2	0	1	20

APPENDIX A
COST TABLE
ENGINEER'S REPORT
LANDSCAPE MAINTENANCE DISTRICT NO. 1, FY 2025-2026

District Name	Annexation L4-X	Annexation L5-A	Annexation L5-B	Annexation L5-C	Annexation L5-D	Annexation L5-E	Annexation L5-F	Annexation L5-G	Annexation L5-H	Annexation L6-A	Annexation L6-B	Annexation L6-C	Annexation L6-D	Annexation L6-E	Annexation L6-F
Description	PM 12022	MS 188	MS 189	Tract 14556	CRA 611	MS 196	MS 195	CRA 615	CRA 536	CRA 517	CRA 628	CRA 624	CRA 305	Tract 13575	CUP 550
Parcel Numbers	APN 169-212-17 THRU 27	APN 292-153-24 THRU 27	APN 292-441-11 THRU 15	APN 176-441-18 THRU 27	0174-241-31	APN 292-331-15 & 16	APN 294-091-47 & 48	APN 292-157-31	APN 292-381-17	APN 169-321-01 & 02	APN 292-310-07	APN 169-281-39	APN 167-271-61	APN 1212-201-01 THRU 27	APN 292-165-15
Maintenance															
Contract Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 550	$ -
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -
Water & Electric	$ -	$ -	$ -	$ 180	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 925	$ -
Field Inspections	$ -	$ -	$ -	$ 350	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ -	$ -	$ -	$ 200	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ 730**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,475**	**$ -**
Incidental Expenses															
Engineering and Admin.	$ 66	$ 24	$ 30	$ 85	$ 12	$ 12	$ 12	$ 6	$ -	$ 12	$ 6	$ 6	$ 6	$ 119	$ 6
SUBTOTAL	**$ 66**	**$ 24**	**$ 30**	**$ 85**	**$ 12**	**$ 12**	**$ 12**	**$ 6**	**$ -**	**$ 12**	**$ 6**	**$ 6**	**$ 6**	**$ 119**	**$ 6**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 66**	**$ 24**	**$ 30**	**$ 815**	**$ 12**	**$ 12**	**$ 12**	**$ 6**	**$ -**	**$ 12**	**$ 6**	**$ 6**	**$ 6**	**$ 1,594**	**$ 6**
Levy Adjustments															
Fund Collection	$ -	$ -	$ -	$ 0	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (1,432)	$ -
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ 0**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ (1,432)**	**$ -**
Breakdown															
Non-Adjacent Lots	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	11	4	5	0	2	2	2	1	0	2	1	1	1	27	1
TOTAL LOTS	**11**	**4**	**5**	**10**	**2**	**2**	**2**	**1**	**0**	**2**	**1**	**1**	**1**	**27**	**1**
Non-Adjacent Rate per Lot	$ -	$ -	$ -	$ 78.37	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	$ 86.20	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	$ -	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 66.00**	**$ 24.00**	**$ 30.00**	**$ 815.02**	**$ 12.00**	**$ 12.00**	**$ 12.00**	**$ 6.00**	**$ -**	**$ 12.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 162.00**	**$ 6.00**
Total # of Parcels	11	4	5	10	2	2	2	1	1	2	1	1	1	27	1
Total Parcels Levied	11	4	5	10	2	2	2	1	0	2	1	1	1	27	1

District Name	Annexation L6-G	Annexation L6-H	Annexation L6-I	Annexation L6-J	Annexation L7-A	Annexation L7-B	Annexation L7-C	Annexation L7-D	Annexation L7-E	Annexation L7-F	Annexation L7-G	Annexation L7-H	Annexation L7-I	Annexation L8-A	Annexation L8-B
Description	CRA 623	CUP 542	Tract 16310	MS 201	MS 213	MS 211	CUP 559	CRA 636	CRA 546	CRA 641	CRA 640	CUP 562	CUP 548	CRA 637	Tract 10179
Parcel Numbers	APN 292-381-08	APN 292-064-13, 17, 21 THRU 27	APN 173-052-31 THRU 42 & APN 173-062-01 THRU 39	APN 171-341-33	APN 172-301-14 THRU 17	APN 292-201-36, 37, 38 changed to 292-201-37, -39, and -40	APN 171-202-30	APN 169-043-14	APN 292-192-11	APN 292-310-36	APN 169-301-08, 10, 11	APN 292-064-17	APN 169-313-16	APN 169-281-23	APN 167-861-37 THRU 54, APN 167-851-39 THRU 56
Maintenance															
Contract Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Water & Electric	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Field Inspections	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Incidental Expenses															
Engineering and Admin.	$ 6	$ 54	$ 300	$ 6	$ 24	$ 18	$ 6	$ 6	$ 6	$ 6	$ 18	$ -	$ 6	$ -	$ 216
SUBTOTAL	**$ 6**	**$ 54**	**$ 300**	**$ 6**	**$ 24**	**$ 18**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 18**	**$ -**	**$ 6**	**$ -**	**$ 216**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 6**	**$ 54**	**$ 300**	**$ 6**	**$ 24**	**$ 18**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 18**	**$ -**	**$ 6**	**$ -**	**$ 216**
Levy Adjustments															
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Breakdown															
Non-Adjacent Lots	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	1	9	50	1	4	3	1	1	1	1	3	0	1	1	36
TOTAL LOTS	**1**	**9**	**50**	**1**	**4**	**3**	**1**	**1**	**1**	**1**	**3**	**0**	**1**	**1**	**36**
Non-Adjacent Rate per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ -	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 6.00**	**$ 54.00**	**$ 300.00**	**$ 6.00**	**$ 24.00**	**$ 18.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 18.00**	**$ -**	**$ 6.00**	**$ -**	**$ 216.00**
Total # of Parcels	1	9	51	1	4	3	1	1	1	1	3	1	1	1	36
Total Parcels Levied	1	9	50	1	4	3	1	1	1	1	3	0	1	0	36

APPENDIX A
COST TABLE
ENGINEER'S REPORT
LANDSCAPE MAINTENANCE DISTRICT NO. 1, FY 2025-2026

District Name	Annexation L8-C	Annexation L8-D	Annexation L8-E	Annexation L9-A	Annexation L9-B	Annexation L10-A	Annexation L10-B	Annexation L10-C	Annexation L10-D	Annexation L10-E	Annexation L10-F	Annexation L10-G	Annexation L10-H	Annexation L11-A
Description	CUP 574	CRA 642	MS 216 B	CRA 648	CUP 581	CRA 658	CRA 639	CRA 652	CUP 602	CUP 590	CUP 577	CUP 541	Tract 14790-1	CRA 664
Parcel Numbers	APN 171-202-33	APN 292-154-12	APN 174-021-41, 42	APN 292-157-16	APN171-203-13	APN 292-202-17 & 18	APN 292-152-39, 32	APN 292-063-45	APN 292-063-48, -52, -53	APN 171-332-30	APN 1212-041-01	APN 174-261-15	Multiple APNs	APN 292-341-24 & 25
Maintenance														
Contract Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Water & Electric	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Field Inspections	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Incidental Expenses														
Engineering and Admin.	$ 6	$ 6	$ 12	$ 6	$ 6	$ 12	$ 6	$ 6	$ -	$ 6	$ 6	$ 6	$ 240	$ 12
SUBTOTAL	**$ 6**	**$ 6**	**$ 12**	**$ 6**	**$ 6**	**$ 12**	**$ 6**	**$ 6**	**$ -**	**$ 6**	**$ 6**	**$ 6**	**$ 240**	**$ 12**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 6**	**$ 6**	**$ 12**	**$ 6**	**$ 6**	**$ 12**	**$ 6**	**$ 6**	**$ -**	**$ 6**	**$ 6**	**$ 6**	**$ 240**	**$ 12**
Levy Adjustments														
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Breakdown														
Non-Adjacent Lots	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	1	1	2	1	1	2	1	1	0	1	1	1	40	2
TOTAL LOTS	**1**	**1**	**2**	**1**	**1**	**2**	**1**	**1**	**0**	**1**	**1**	**1**	**40**	**2**
Non-Adjacent Rate per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ -	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 6.00**	**$ 6.00**	**$ 12.00**	**$ 6.00**	**$ 6.00**	**$ 12.00**	**$ 6.00**	**$ 6.00**	**$ -**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 240.00**	**$ 12.00**
Total # of Parcels	1	1	2	1	1	2	2	1	1	1	1	1	40	2
Total Parcels Levied	1	1	2	1	1	2	1	1	0	1	1	1	40	2

District Name	Annexation L11-B	Annexation L11-C	Annexation L12-A	Annexation L12-B	Annexation L12-C	Annexation L12-D	Annexation L12-E	Annexation L12-F	Annexation L12-G	Annexation L12-H	Annexation L12-I	Annexation L12-J
Description	CRA 666	Tract 11535	Tract 7202	Tract 7202	Tract 7202	Tract 7202	Tract 7202	Tract 15589	CUP 620	CUP 617	CRA 668	CRA 670
Parcel Numbers	APN 292-158-15	APN 292-351-08	APN 176-402-09	APN176-402-08	APN 176-402-07	APN 176-402-06	APN 176-402-04	APN 293-421-01 THRU 45	APN 292-251-10	APN292-033-13	APN 292-341-17	APN 292-157-20
Maintenance												
Contract Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repair Beyond Contract	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Water & Electric	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Field Inspections	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Supplies	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Incidental Expenses												
Engineering and Admin.	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 270	$ 6	$ 6	$ 6	$ 6
SUBTOTAL	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 270**	**$ 6**	**$ 6**	**$ 6**	**$ 6**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 6**	**$ 270**	**$ 6**	**$ 6**	**$ 6**	**$ 6**
Levy Adjustments												
Fund Collection	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
General Fund Contribution	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**
Breakdown												
Non-Adjacent Lots	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (10%)	0	0	0	0	0	0	0	0	0	0	0	0
Adjacent Lots (20%)	0	0	0	0	0	0	0	0	0	0	0	0
Per Lot City Overhead	1	1	1	1	1	1	1	45	1	1	1	1
TOTAL LOTS	**1**	**1**	**1**	**1**	**1**	**1**	**1**	**45**	**1**	**1**	**1**	**1**
Non-Adjacent Rate per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjacent Rate (20%) per Lot	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00	$ 6.00
TOTAL ASSESSMENT ALLOWABLE	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 270.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**	**$ 6.00**
Total # of Parcels	1	1	1	1	1	1	1	45	1	1	1	1
Total Parcels Levied	1	1	1	1	1	1	1	45	1	1	1	1

APPENDIX A
COST TABLE
ENGINEER'S REPORT
LANDSCAPE MAINTENANCE DISTRICT NO. 1, FY 2025-2026

District Name	Annexation L12-K	Annexation L12-L	Annexation L12-M	TOTALS
Description	MS 235	MS 221	CRA 661	
Parcel Numbers	Multiple APNs	APN 174-281-33, -34, -35, -37	APN 171-161-18	
Maintenance				
Contract Maintenance	$ -	$ -	$ -	**$ 11,273**
Repair Beyond Contract	$ -	$ -	$ -	**$ -**
Water & Electric	$ -	$ -	$ -	**$ 12,170**
Field Inspections	$ -	$ -	$ -	**$ 2,600**
Supplies	$ -	$ -	$ -	**$ 450**
SUBTOTAL	**$ -**	**$ -**	**$ -**	**$ 26,493**
Incidental Expenses				
Engineering and Admin.	$ -	$ 24	$ 6	**$ 5,155**
SUBTOTAL	**$ -**	**$ 24**	**$ 6**	**$ 5,155**
TOTAL MAINTENANCE & INCIDENTAL COSTS	**$ -**	**$ 24**	**$ 6**	**$ 31,648**
Levy Adjustments				
Fund Collection	$ -	$ -	$ -	**$ (2,864)**
General Fund Contribution	$ -	$ -	$ -	**$ -**
BALANCE TO LEVY	**$ -**	**$ -**	**$ -**	**$ (2,864)**
Breakdown				
Non-Adjacent Lots	0	0	0	**200**
Adjacent Lots (10%)	0	0	0	**27**
Adjacent Lots (20%)	0	0	0	**6**
Per Lot City Overhead	0	4	1	**345**
TOTAL LOTS	**0**	**4**	**1**	
Non-Adjacent Rate per Lot	$ -	$ -	$ -	
Adjacent Rate (10%) per Lot	$ -	$ -	$ -	
Adjacent Rate (20%) per Lot	$ -			
Per Lot City Overhead	$ 6.00	$ 6.00	$ 6.00	
TOTAL ASSESSMENT ALLOWABLE	**$ -**	**$ 24.00**	**$ 6.00**	**$ 28,784.34**
Total # of Parcels	21	4	1	**615**
Total Parcels Levied	0	4	1	**574**

APPENDIX B

DISTRICT DIAGRAM

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CITY OF REDLANDS
LANDSCAPE MAINTENANCE DISTRICT NO. 1

APPENDIX B - ASSESSMENT DIAGRAMS

Abbreviations

APN – Assessor's Parcel Number

CRA – Commission Review and Approval

CUP – Conditional Use Permit

MS – Minor Subdivision

PM – Parcel Map

TM – Tract Map

General comments

Each annexation has its own diagram.

North is up unless notated otherwise.

The assessor's parcel numbers are shown as a 9 digit number.

A dark red line delineates the boundary of each annexation.

A shaded background is typically used to indicate parcels within the Landscape Maintenance District.

Annexation #s

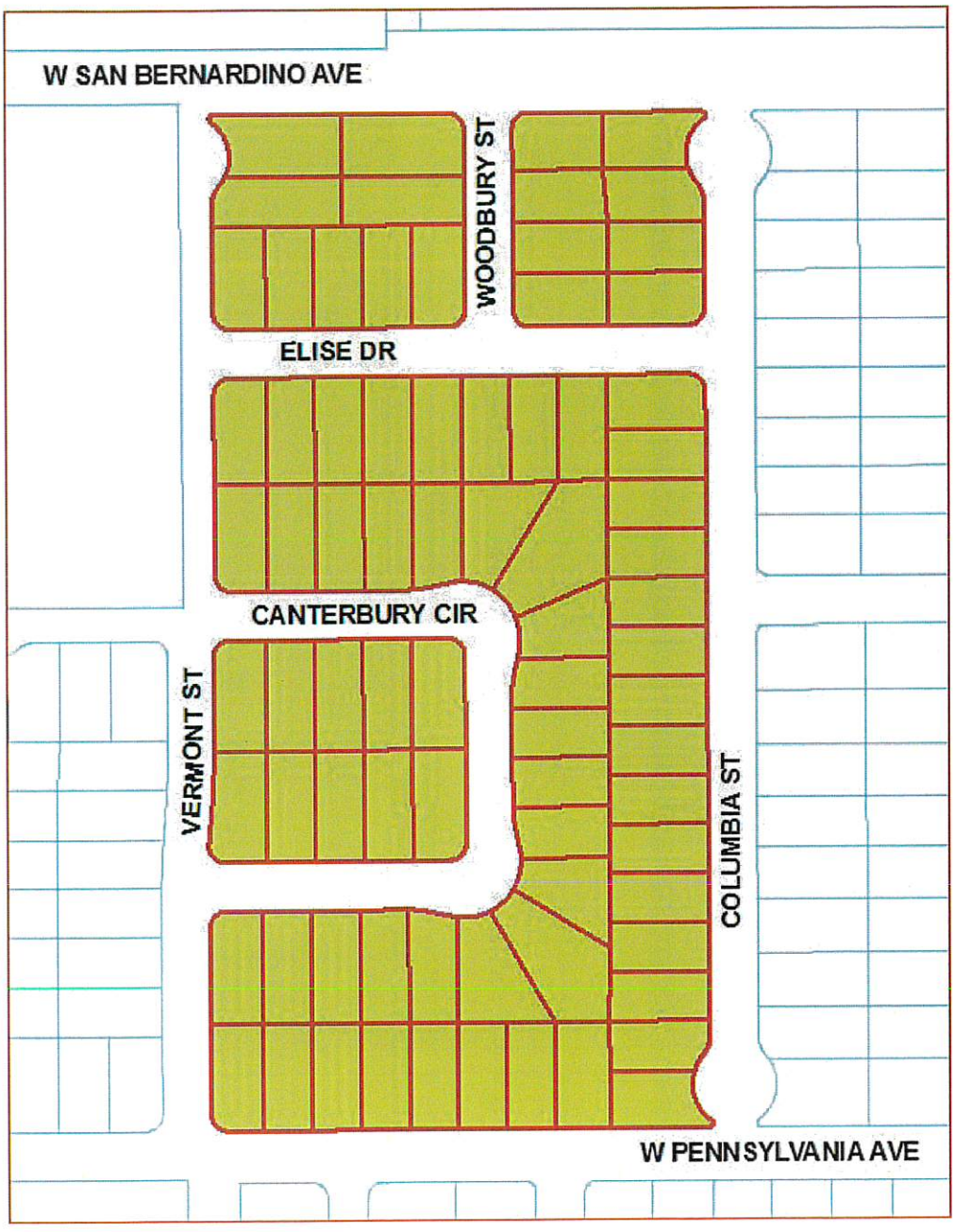
Original District A thru C
L1-A thru L1-B
L2-A
L3-A
L4-A thru L4-X
L5-A thru L5-H
L6-A thru L6-J
L7-A thru L7-I
L8-A thru L8-E
L9-A thru L9-B
L10-A thru L10-H
L11-A thru L11-C
L12-A thru L12-M

Initial District – A



Tract Map 13282

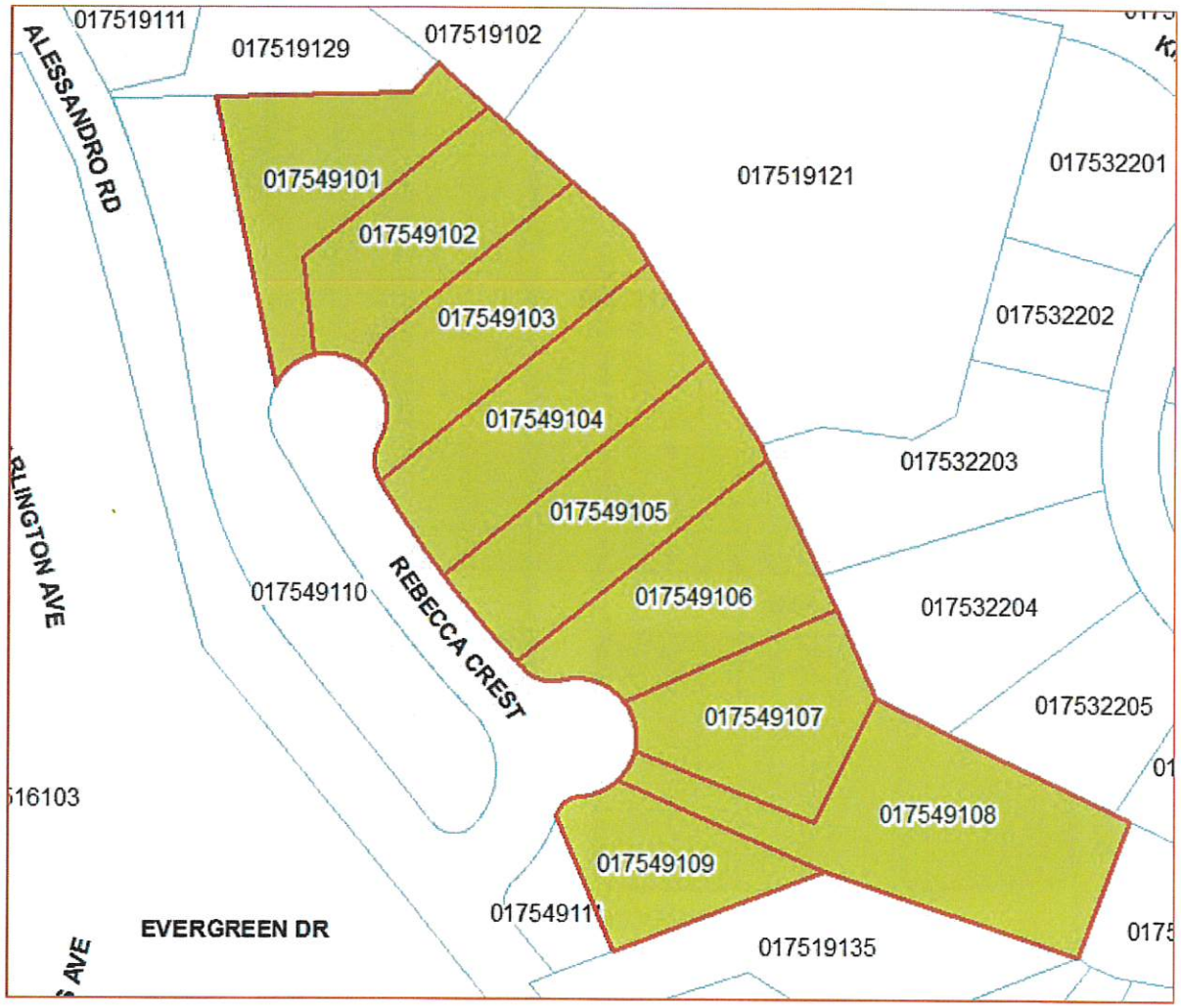
Initial District - B



Tract 13434

APN 167-802-01 thru 08, APN 167-803-01 thru -09, APN 167-804-01 thru -19, APN 167-823-01 thru 10, APN 167-824-01 thru -32,

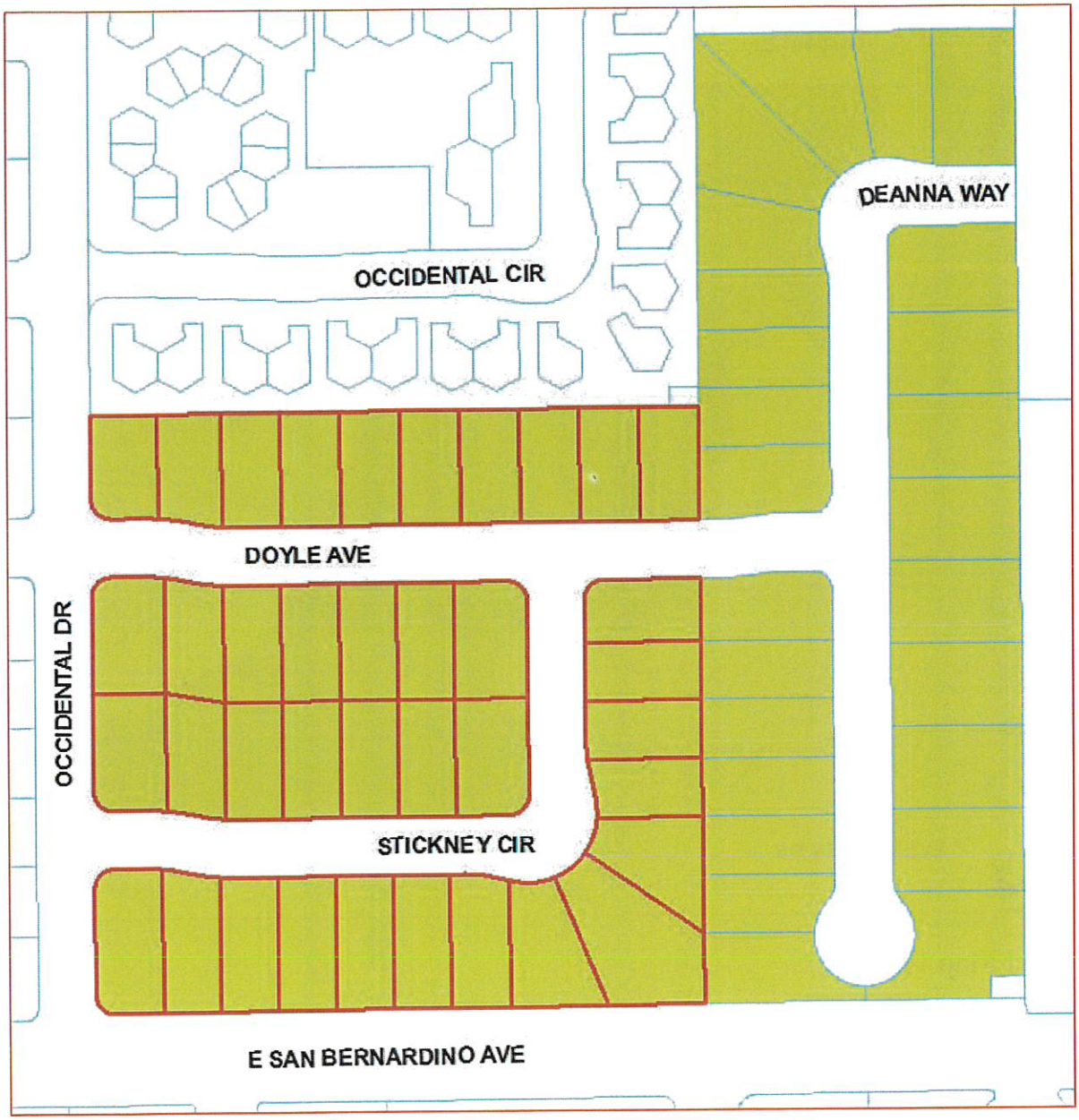
Initial District - C



Tract Map 13496

APN 0175-491-01 thru -09

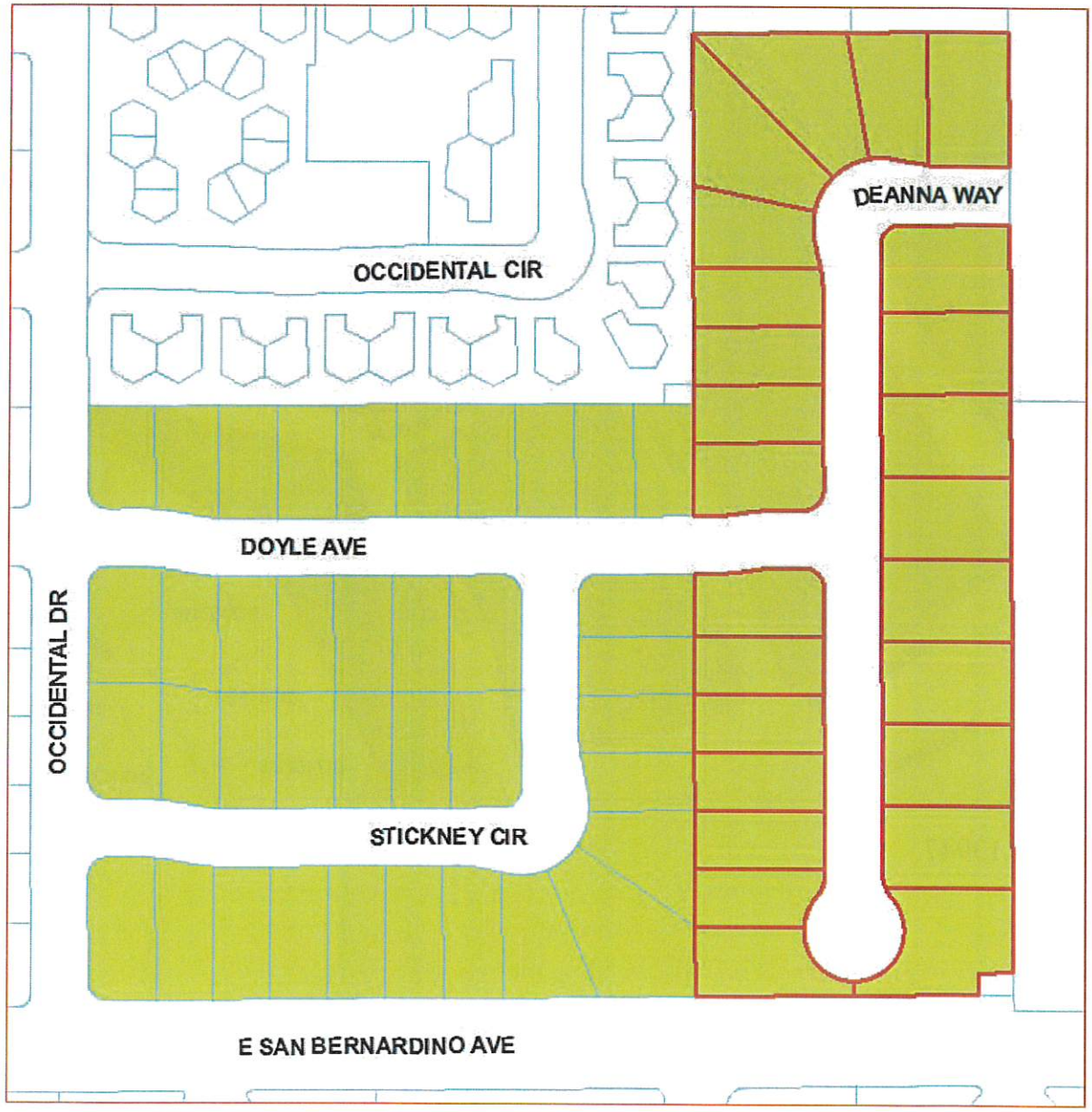
Annexation L1-A



Tract 13745

APN 1212-141-01 thru -38

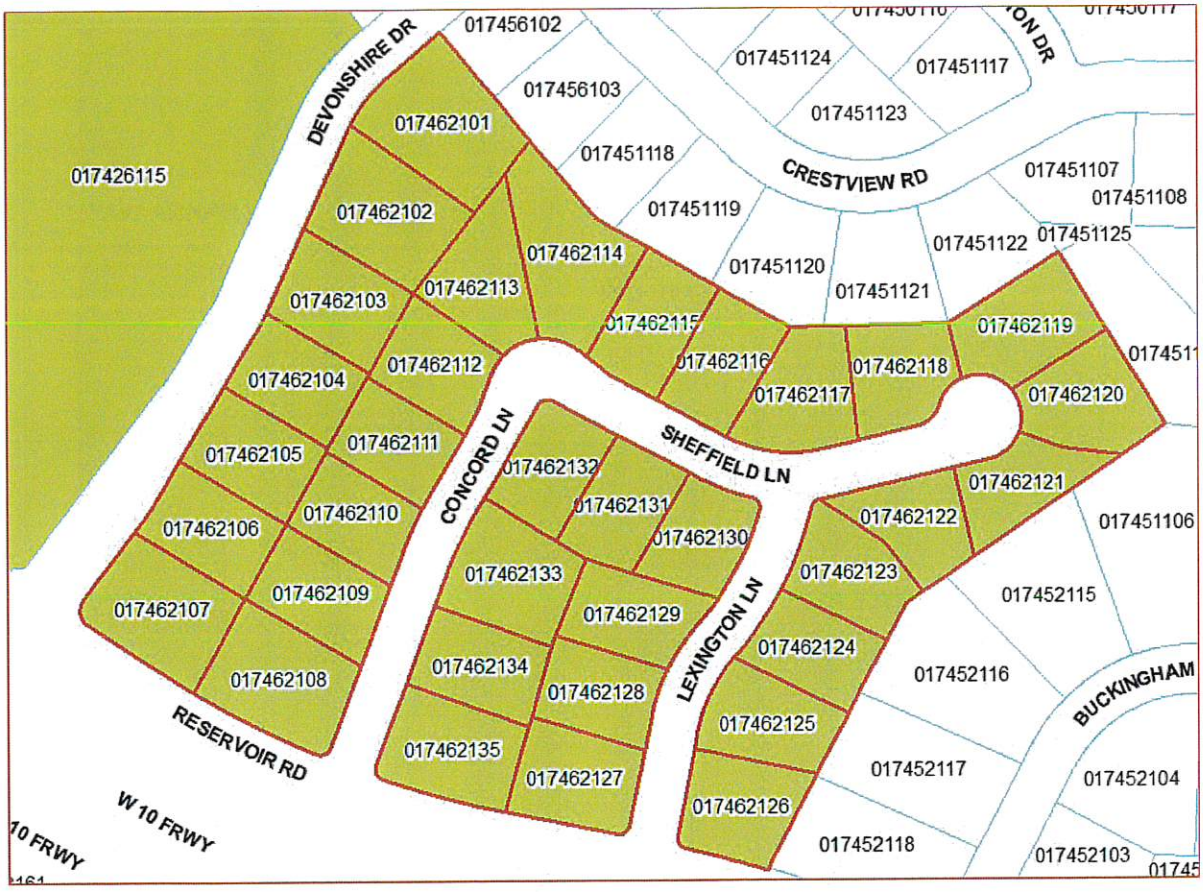
Annexation L1-B



Tract 13765

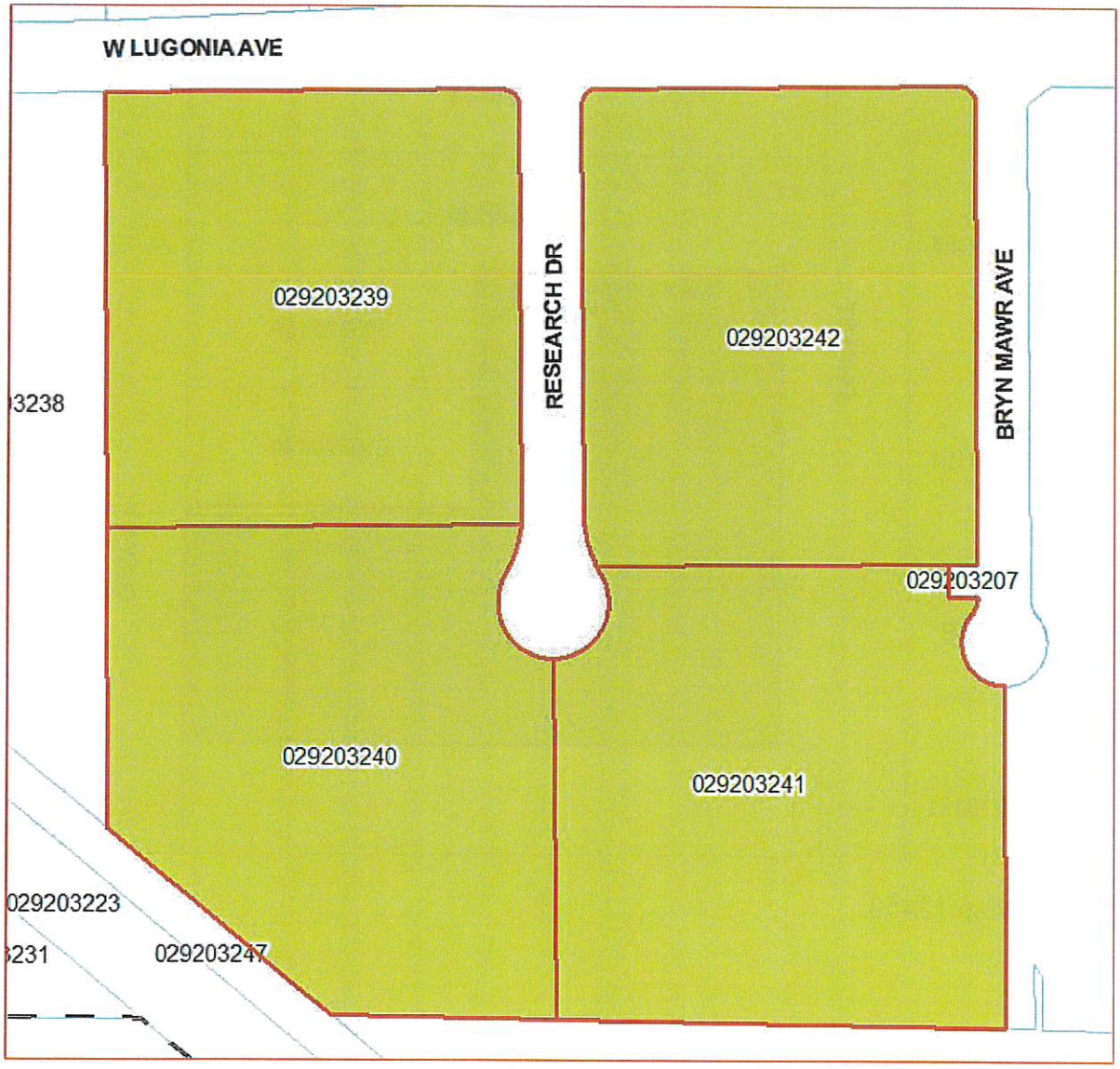
APN 1212-081-54 thru -62 and APN 1212-141-39 and -54

Annexation L2-A



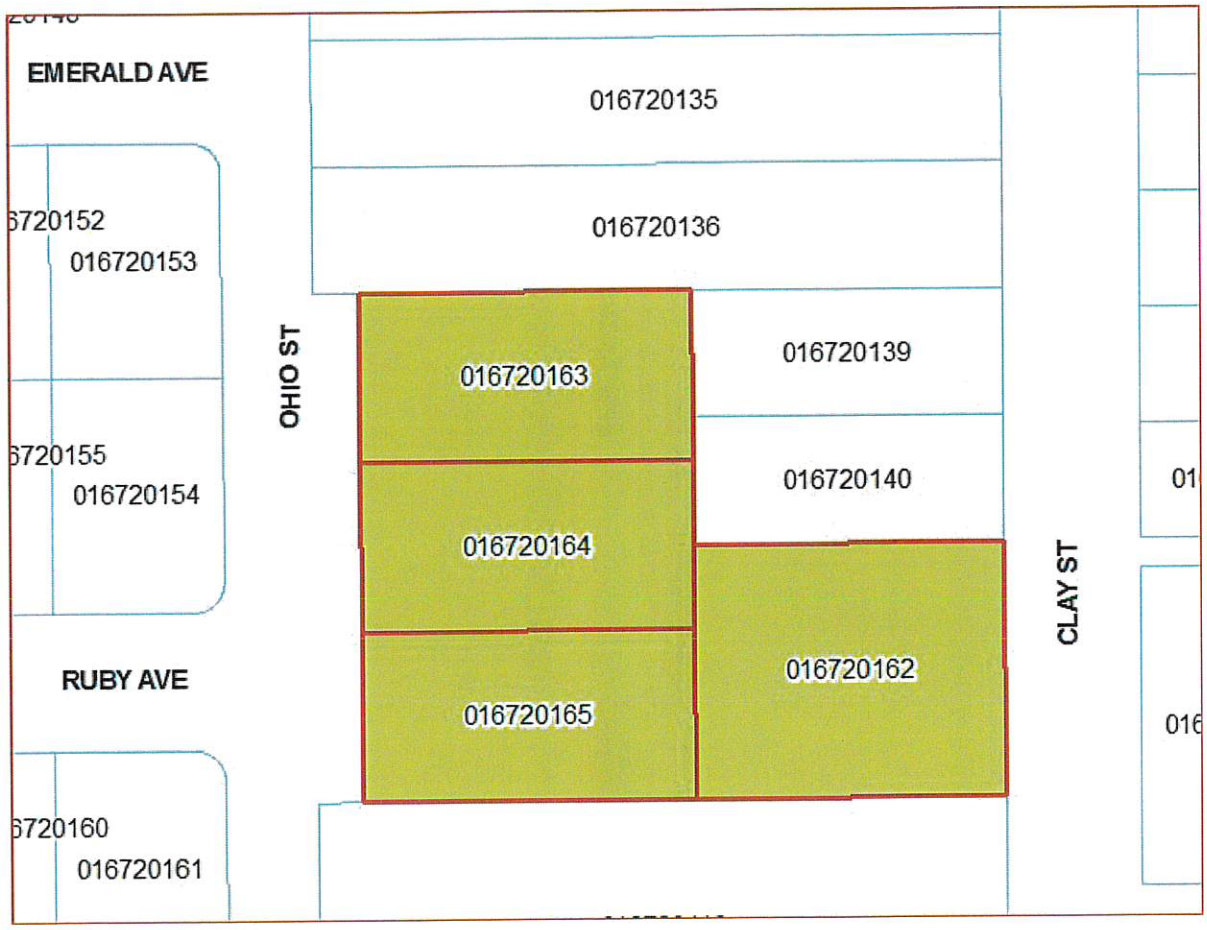
Tract 13947

Annexation L3-A



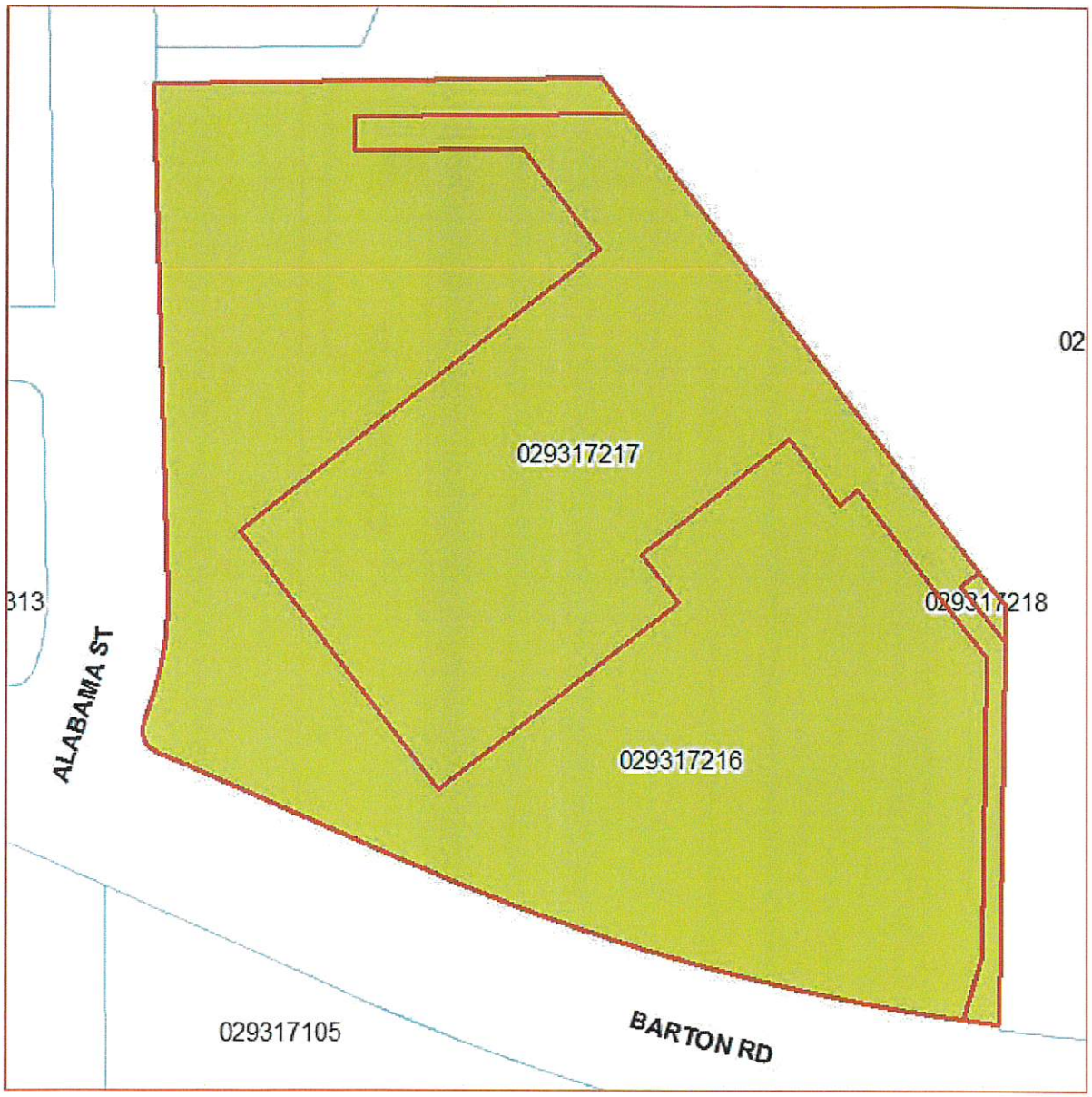
Parcel Map 11917

Annexation L4-A



Parcel Map 12450

Annexation L4-B



Parcel Map 11755

Annexation L4-C



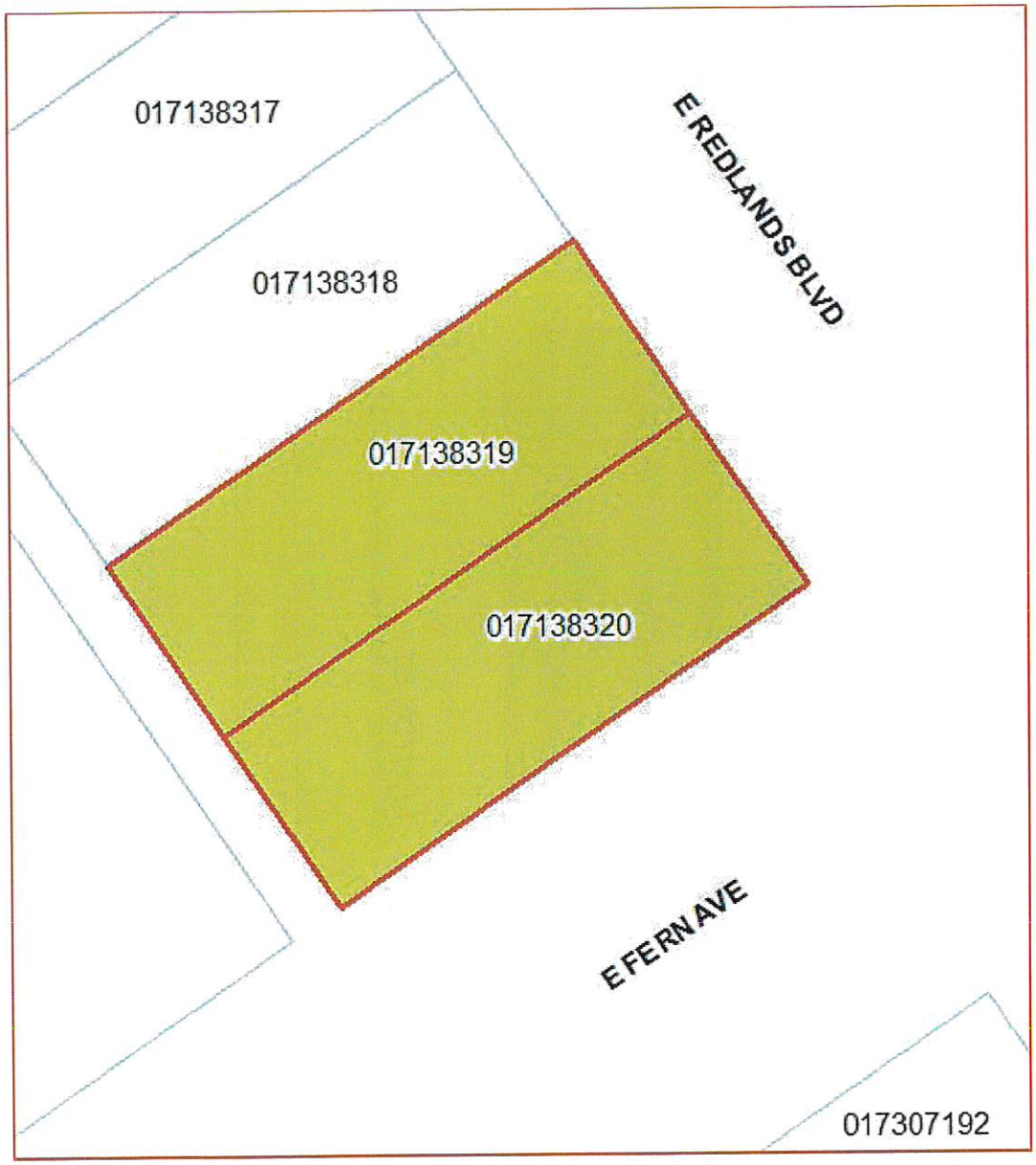
CUP 617

Annexation L4-D



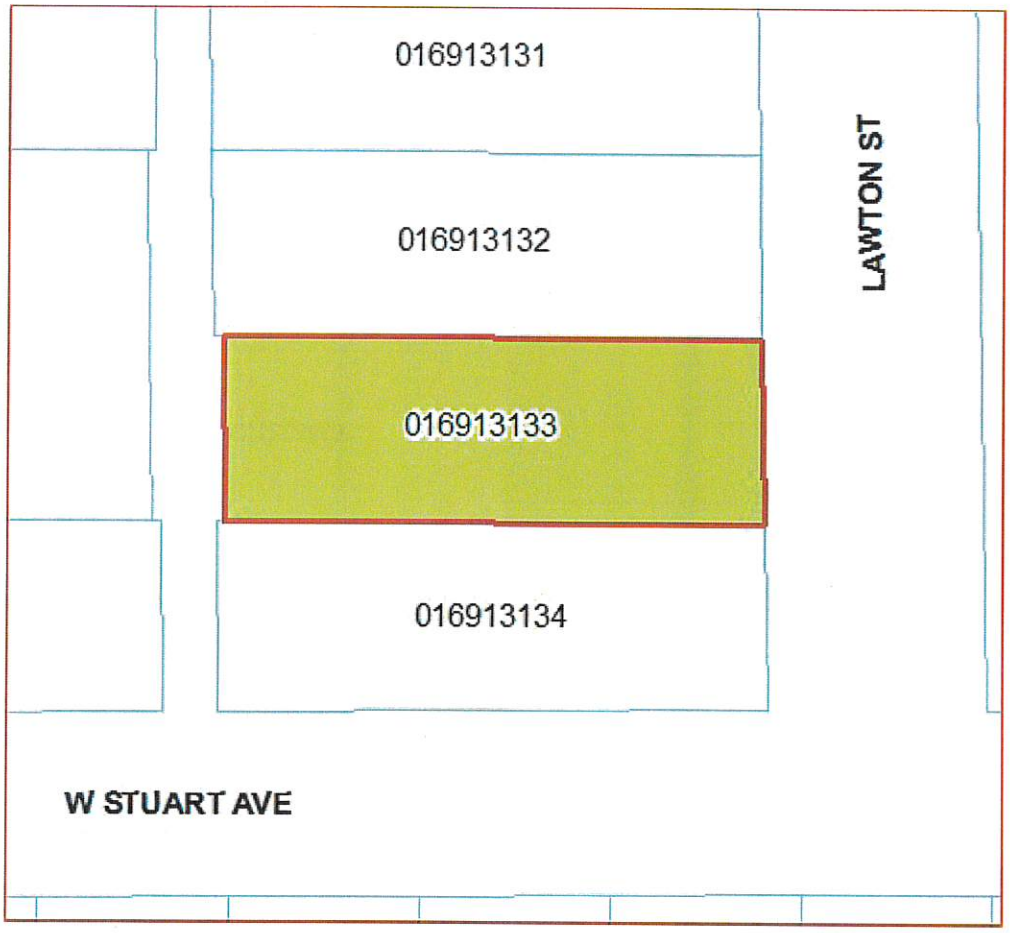
Parcel Map 12300

Annexation L4-E



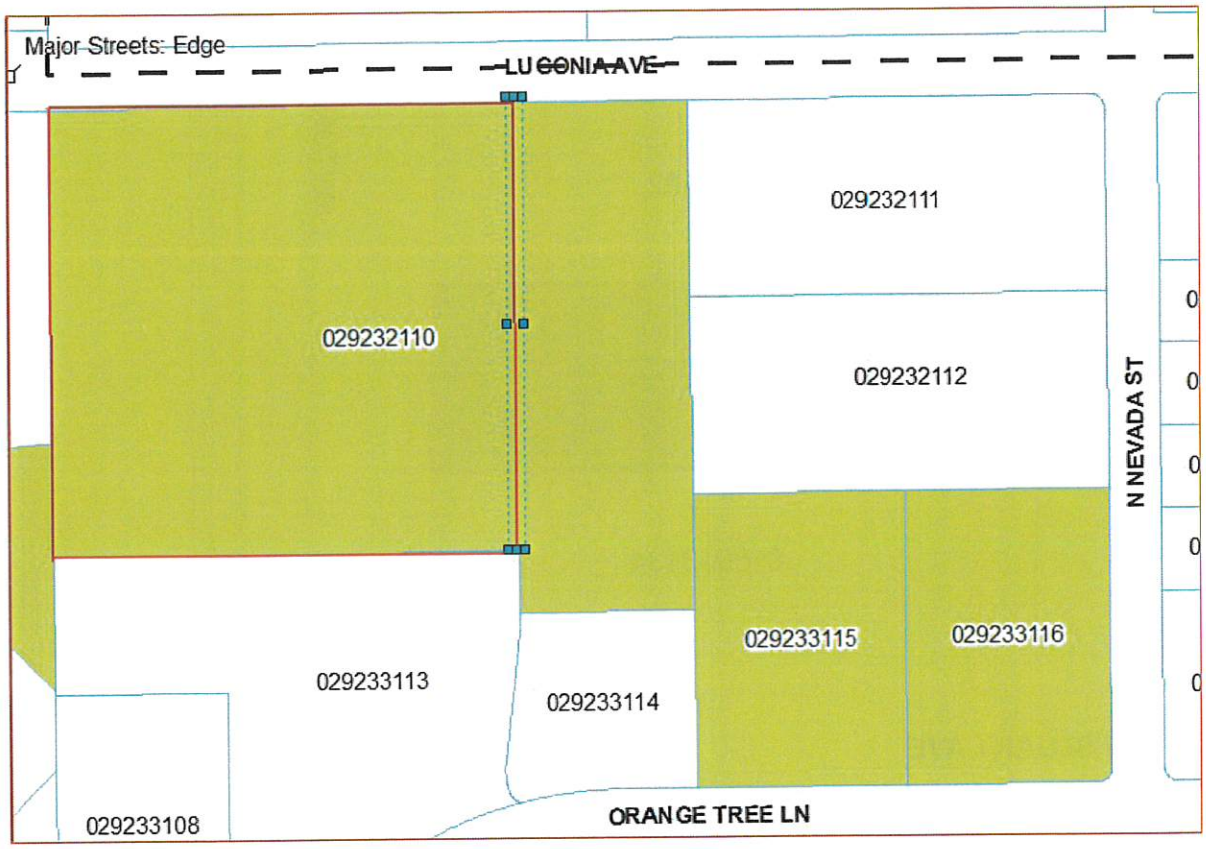
CUP 382

Annexation L4-F



CRA 606

Annexation L4-G



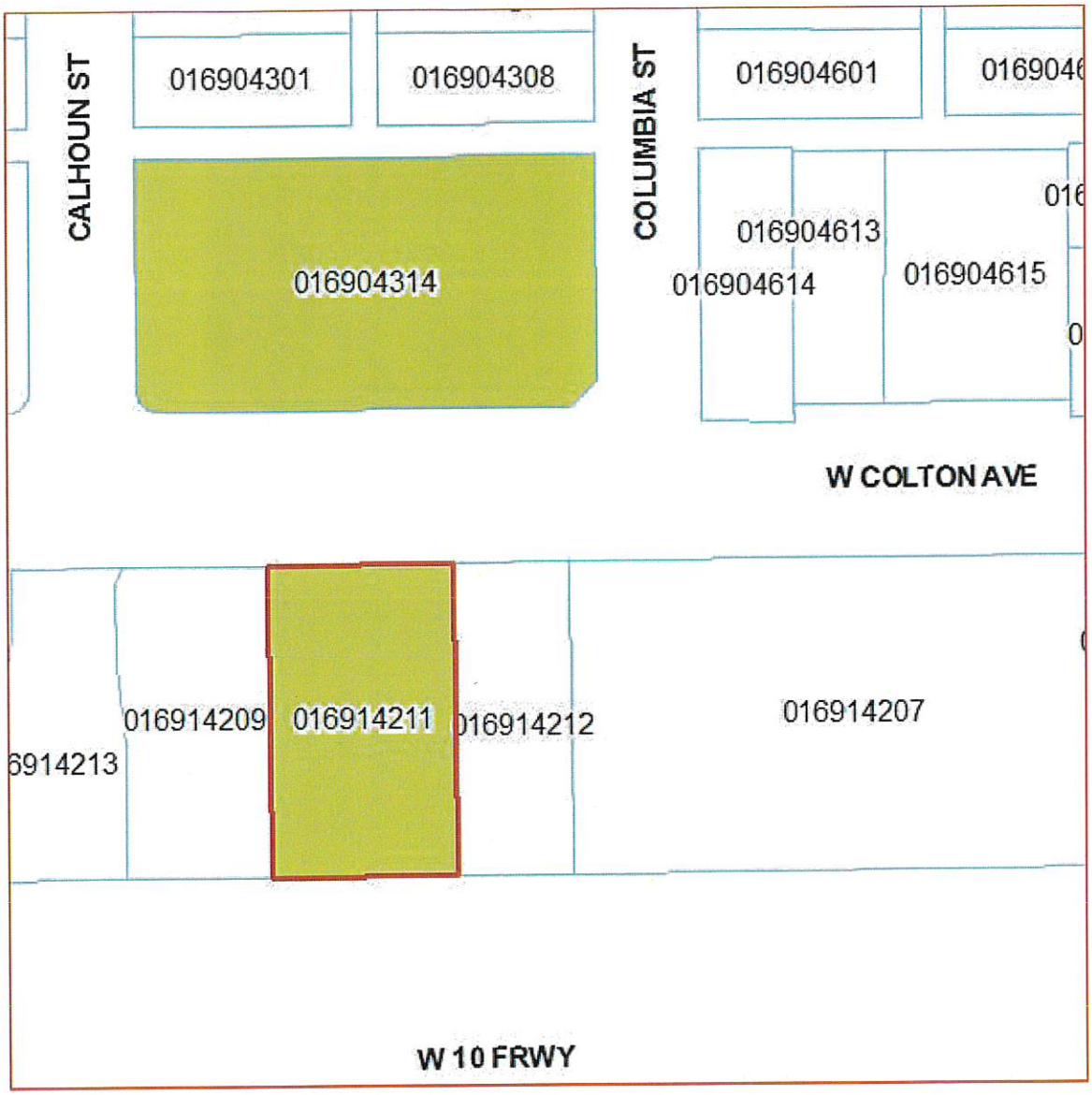
CRA 486

Annexation L4-H



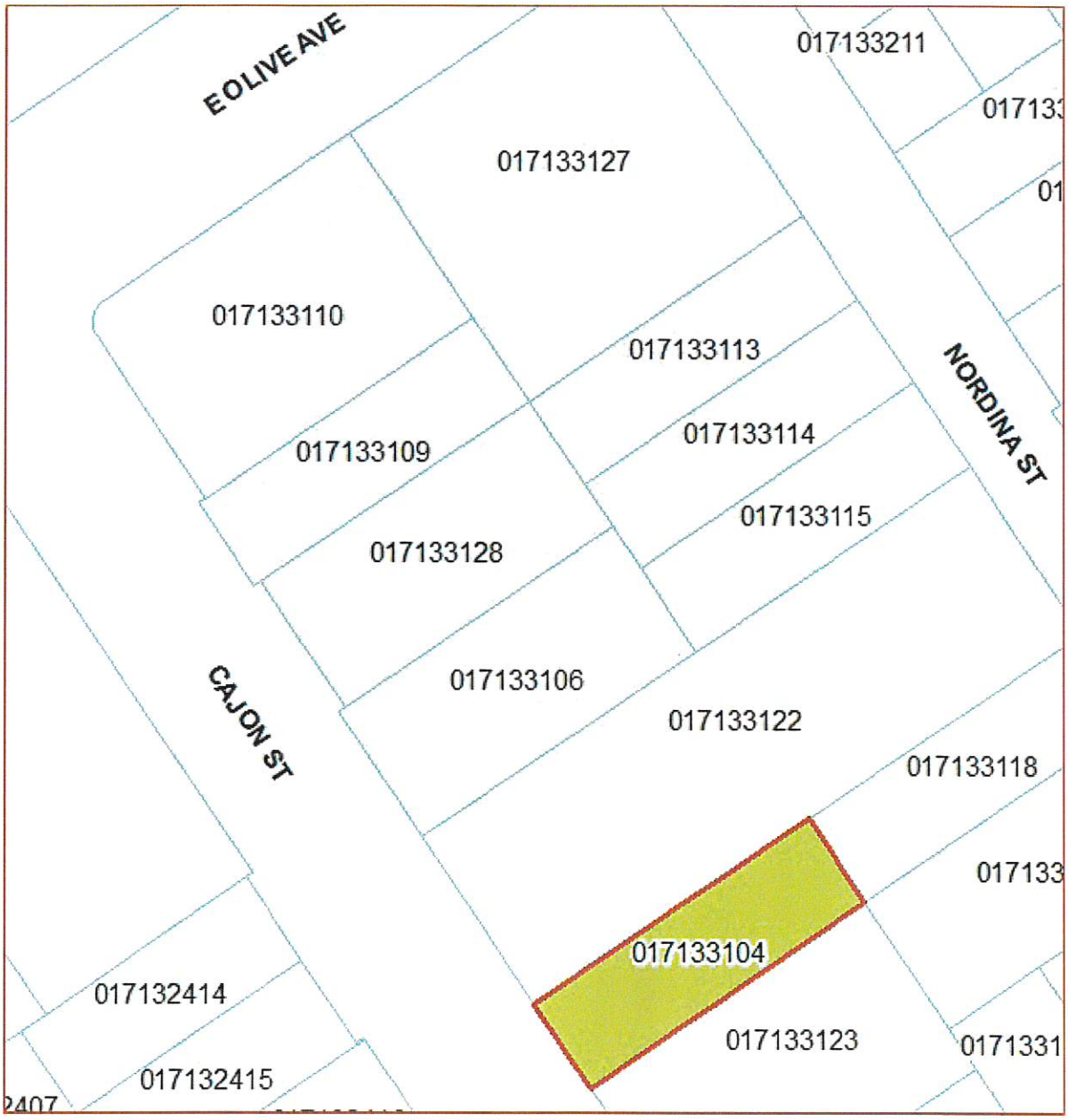
CUP 253

Annexation L4-I



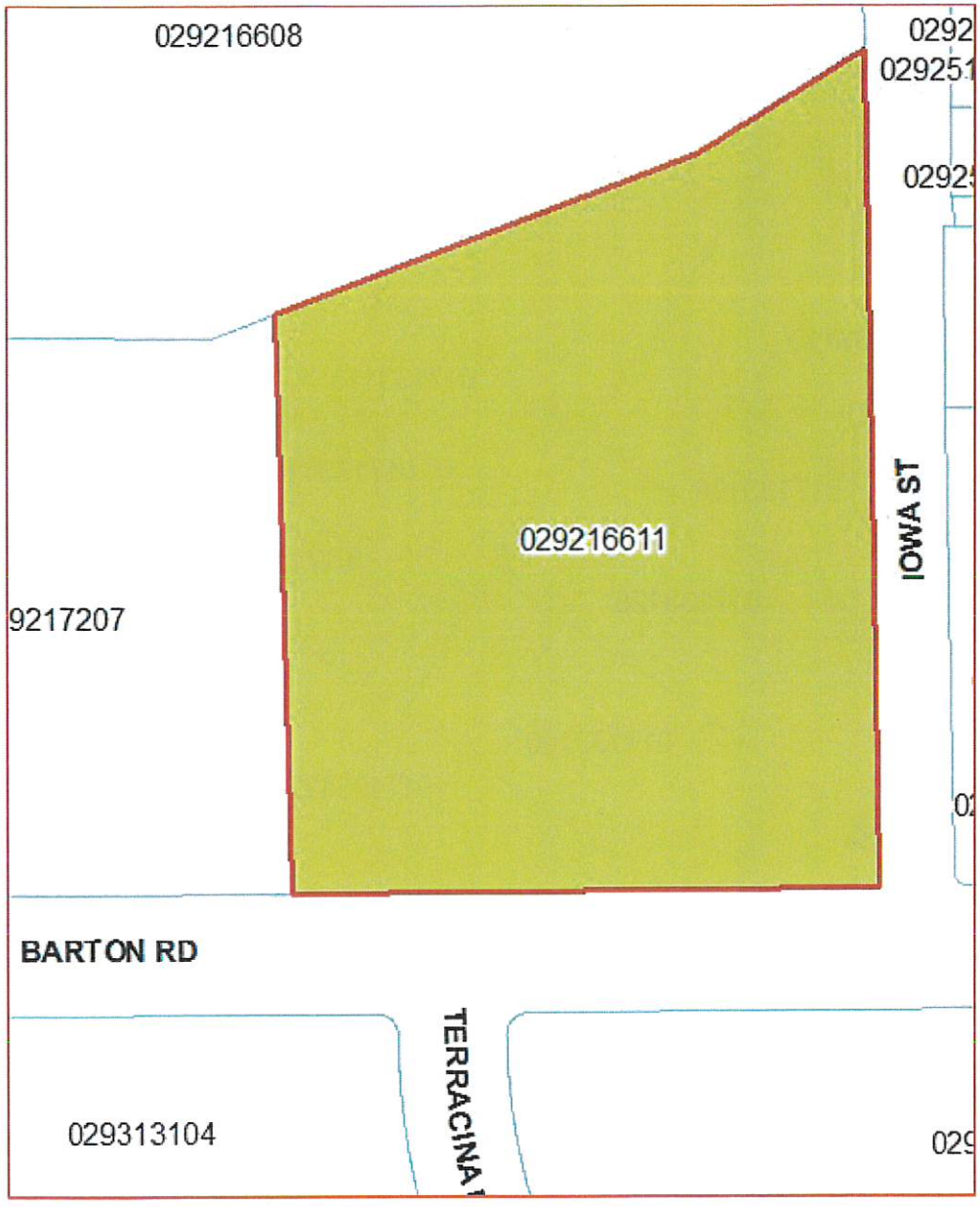
CRA 808

Annexation L4-J



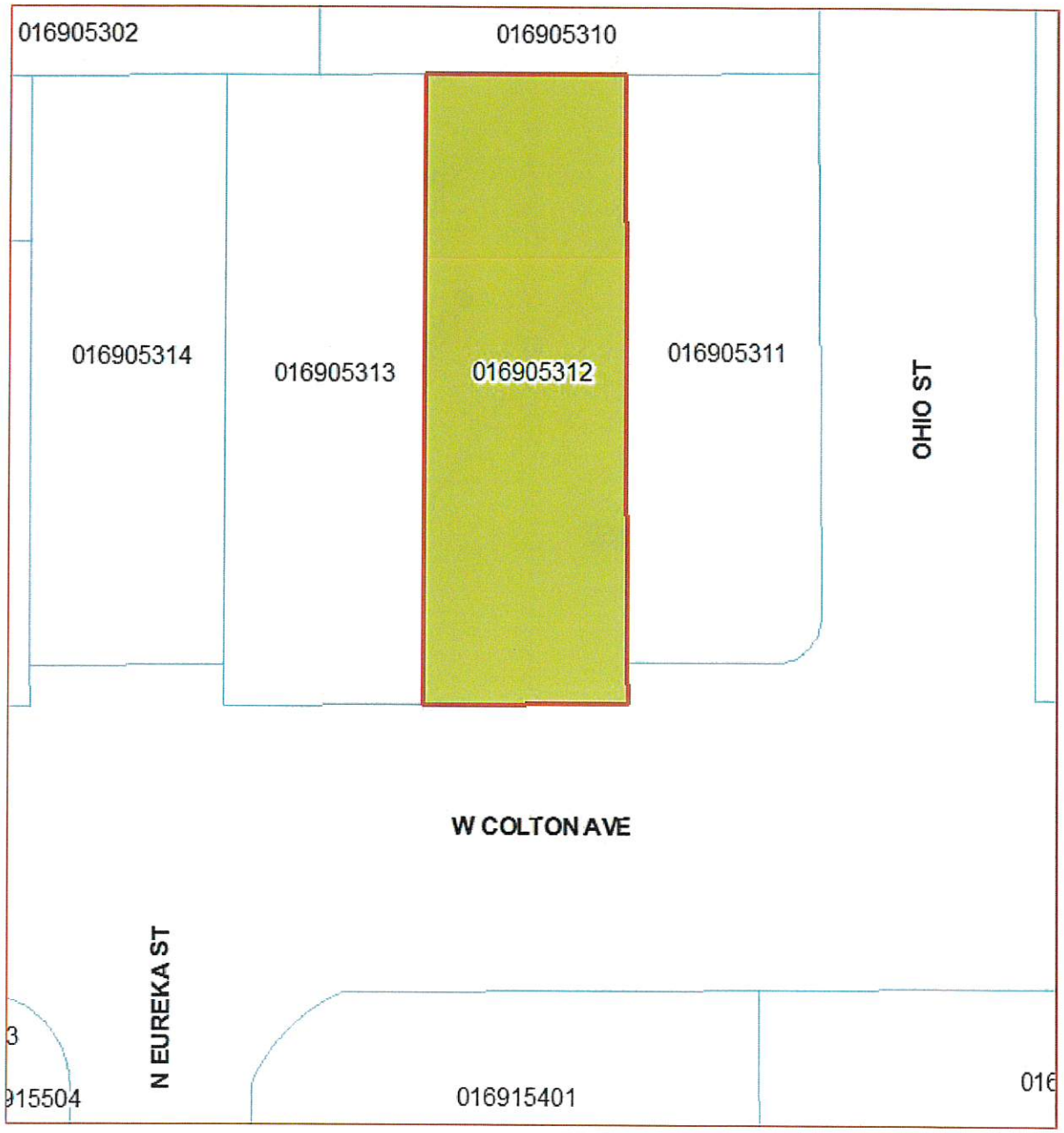
CUP 519

Annexation L4-K



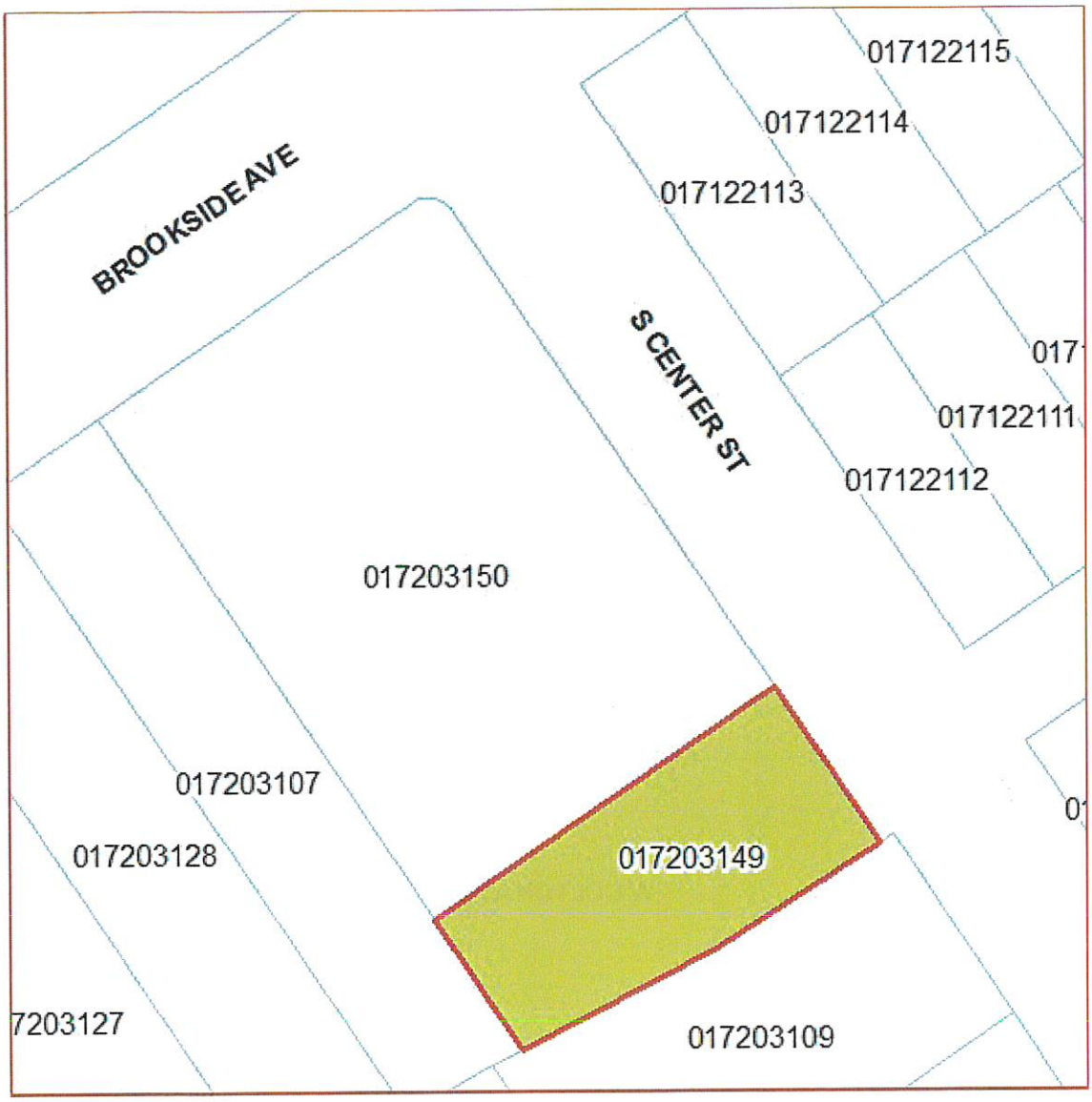
CUP 516

Annexation L4-L



CUP 518

Annexation L4-M



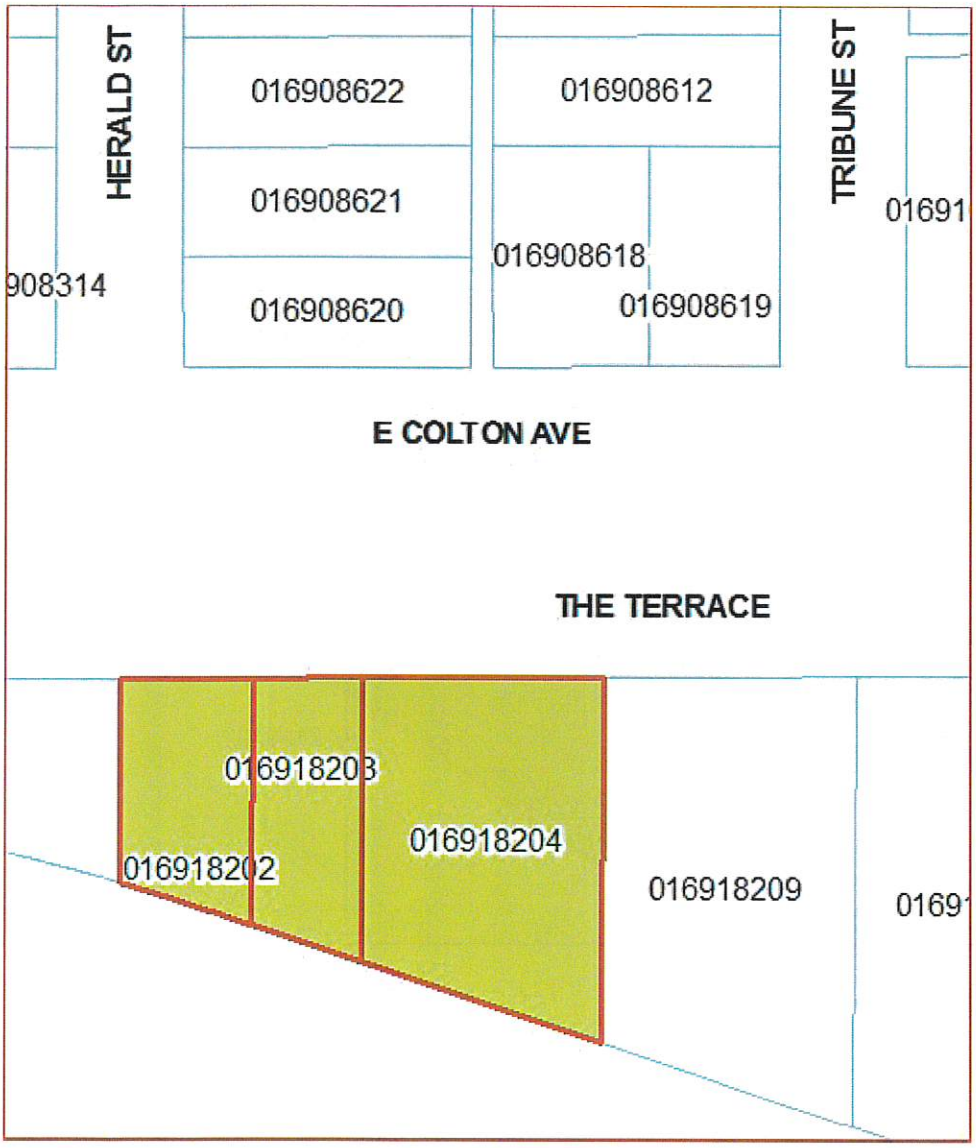
CUP 522

Annexation L4-N



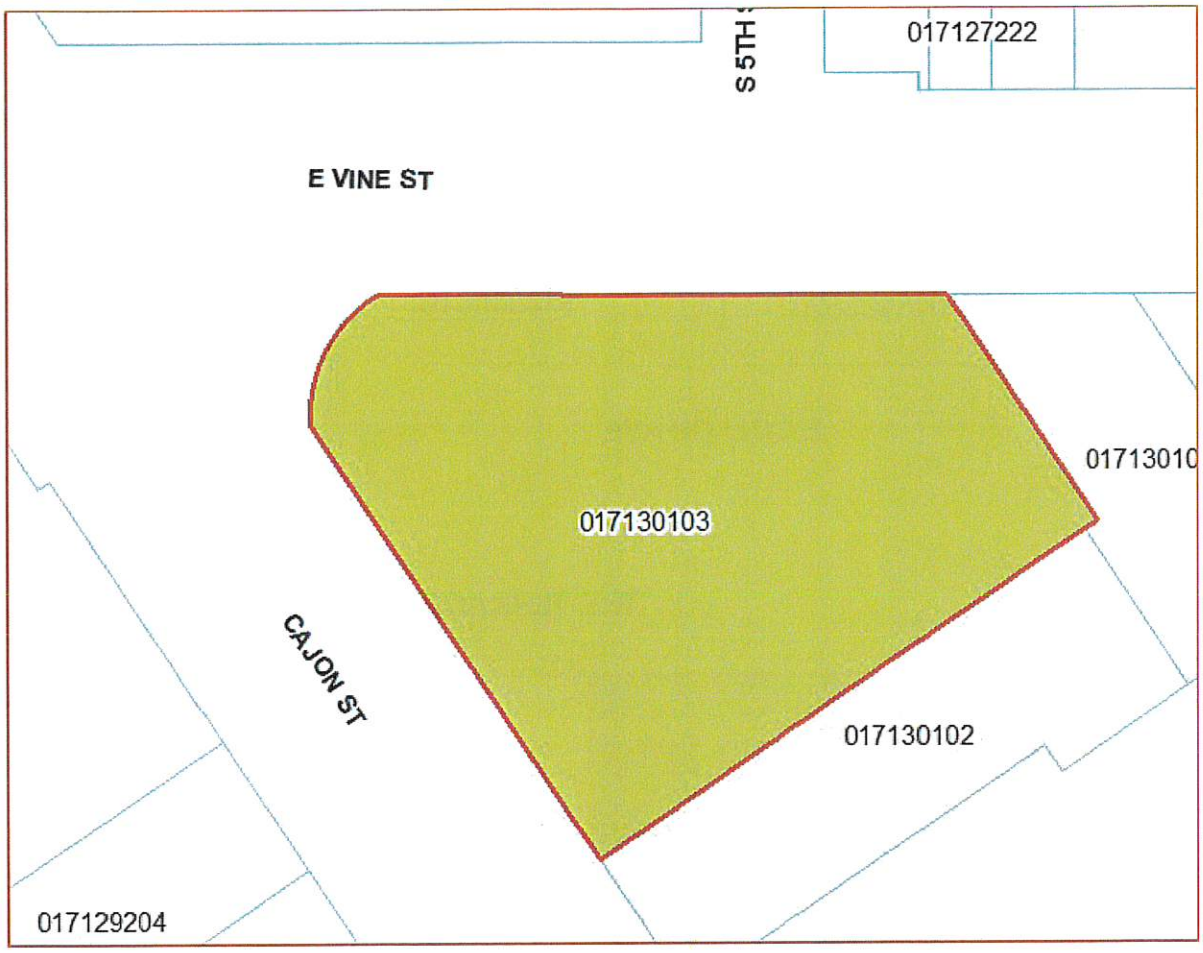
CUP 521

Annexation L4-O



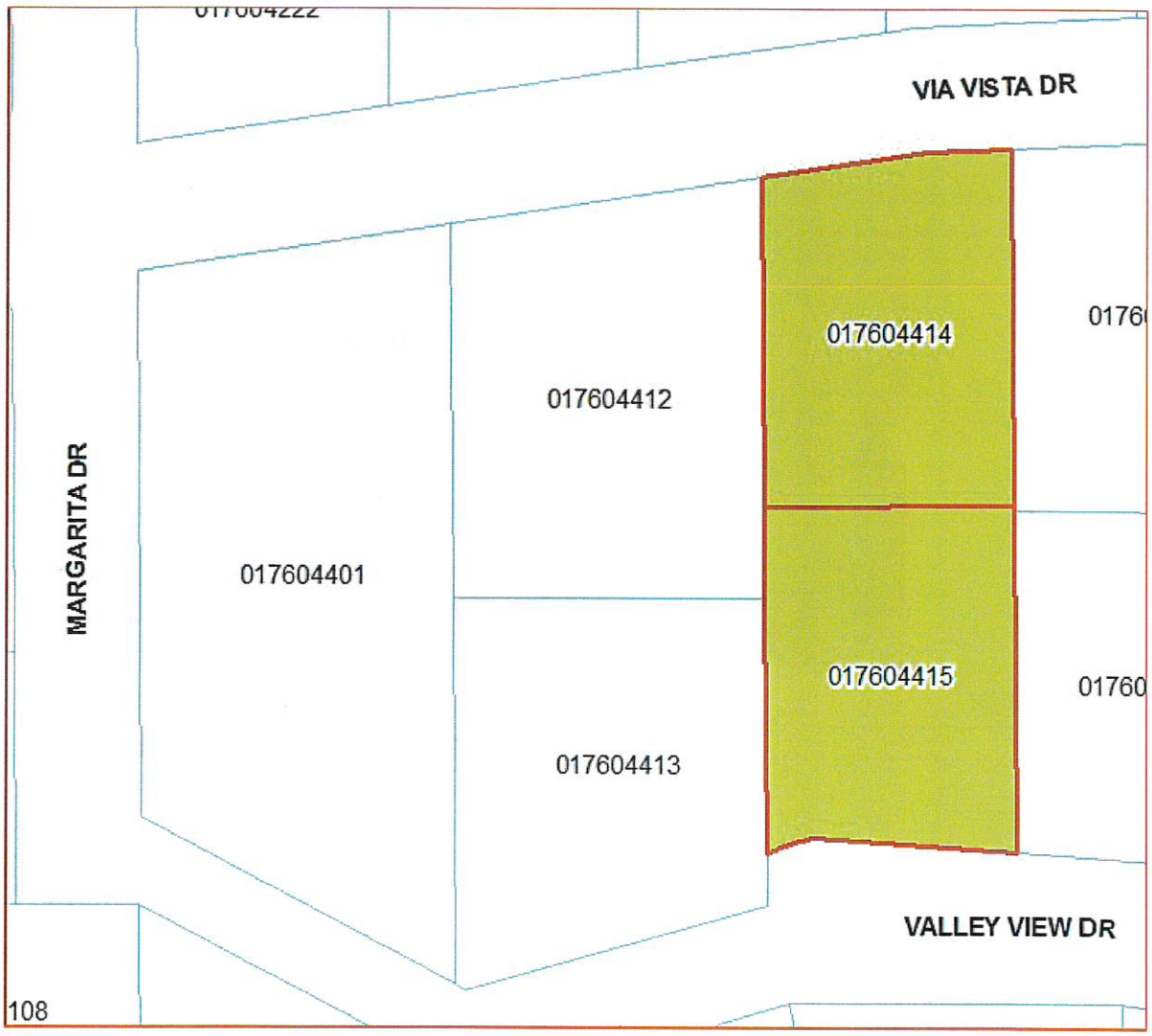
CRA 805

Annexation L4-P



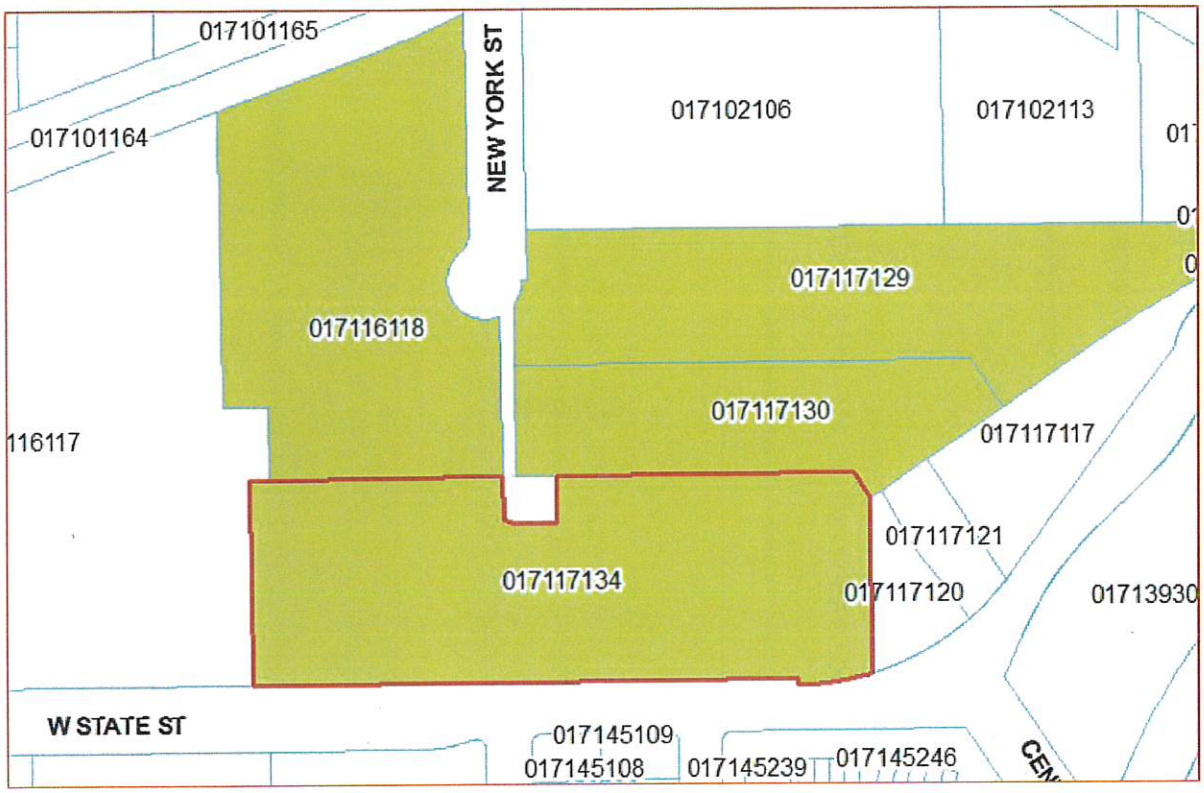
Parcel Map 12087

Annexation L4-Q



MS 185, Parcel Map 11904

Annexation L4-R



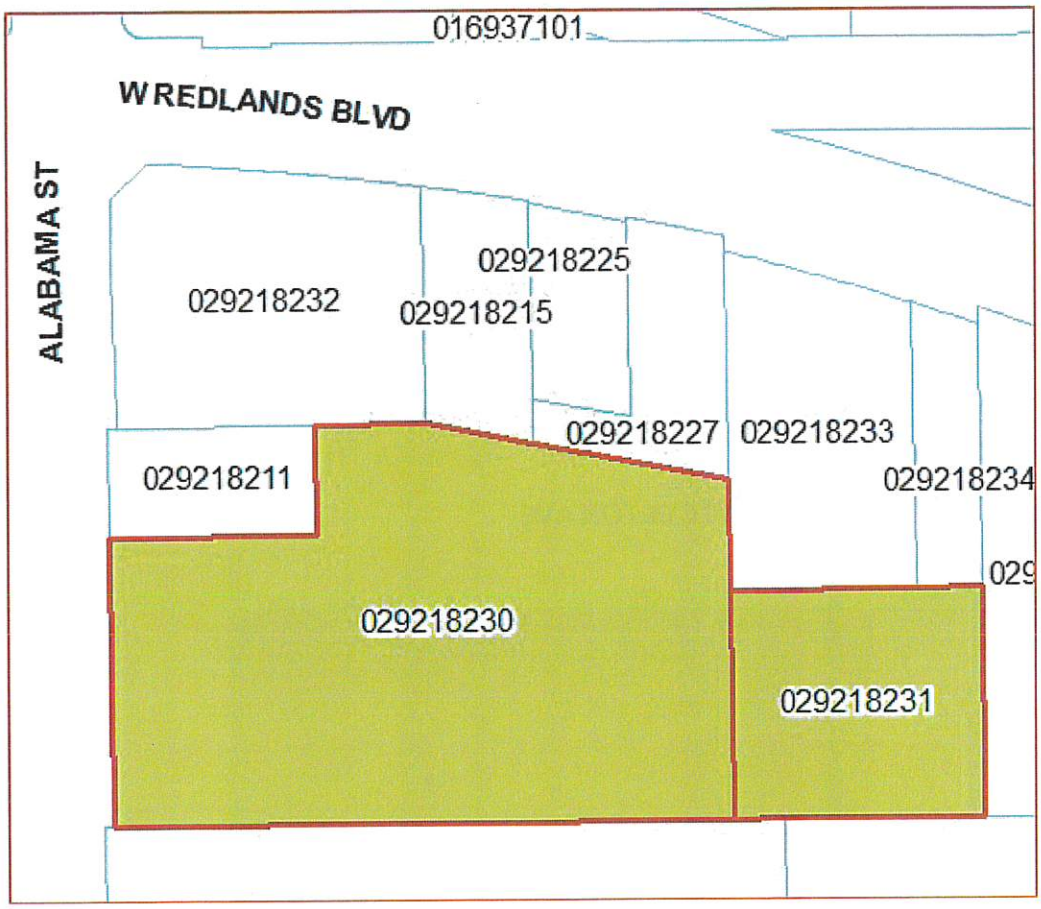
CUP 278

Annexation L4-S



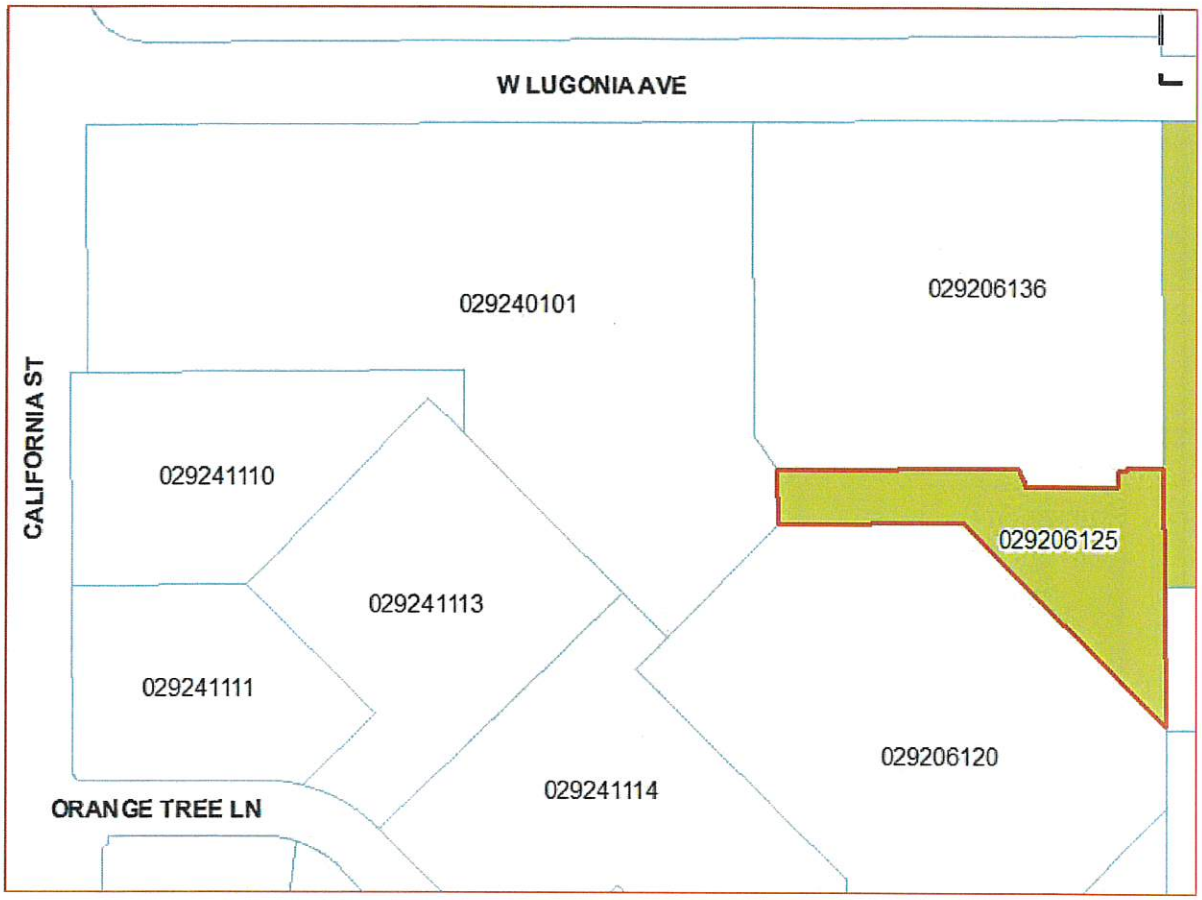
CUP 405

Annexation L4-T



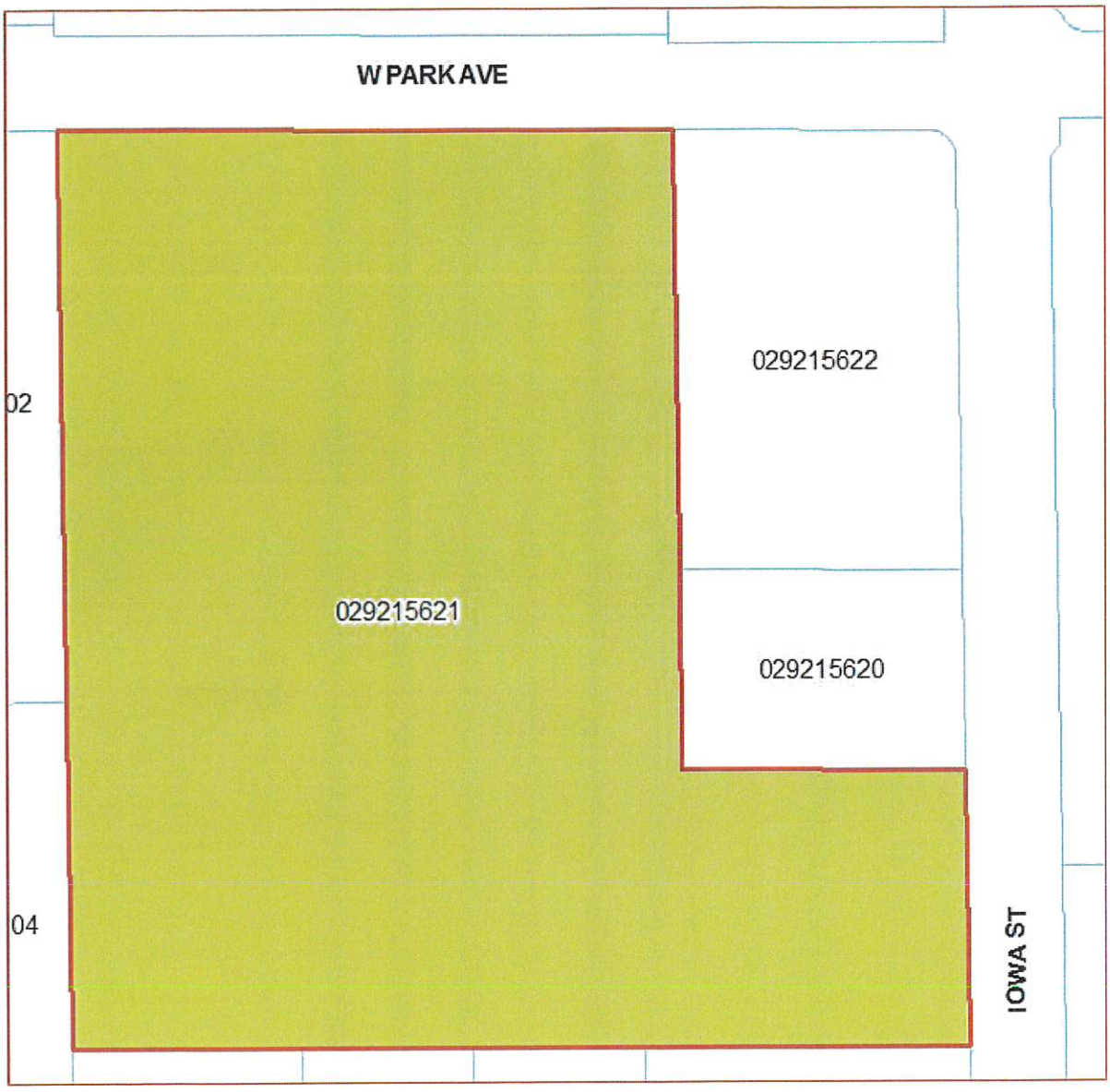
CRA 354

Annexation L4-U



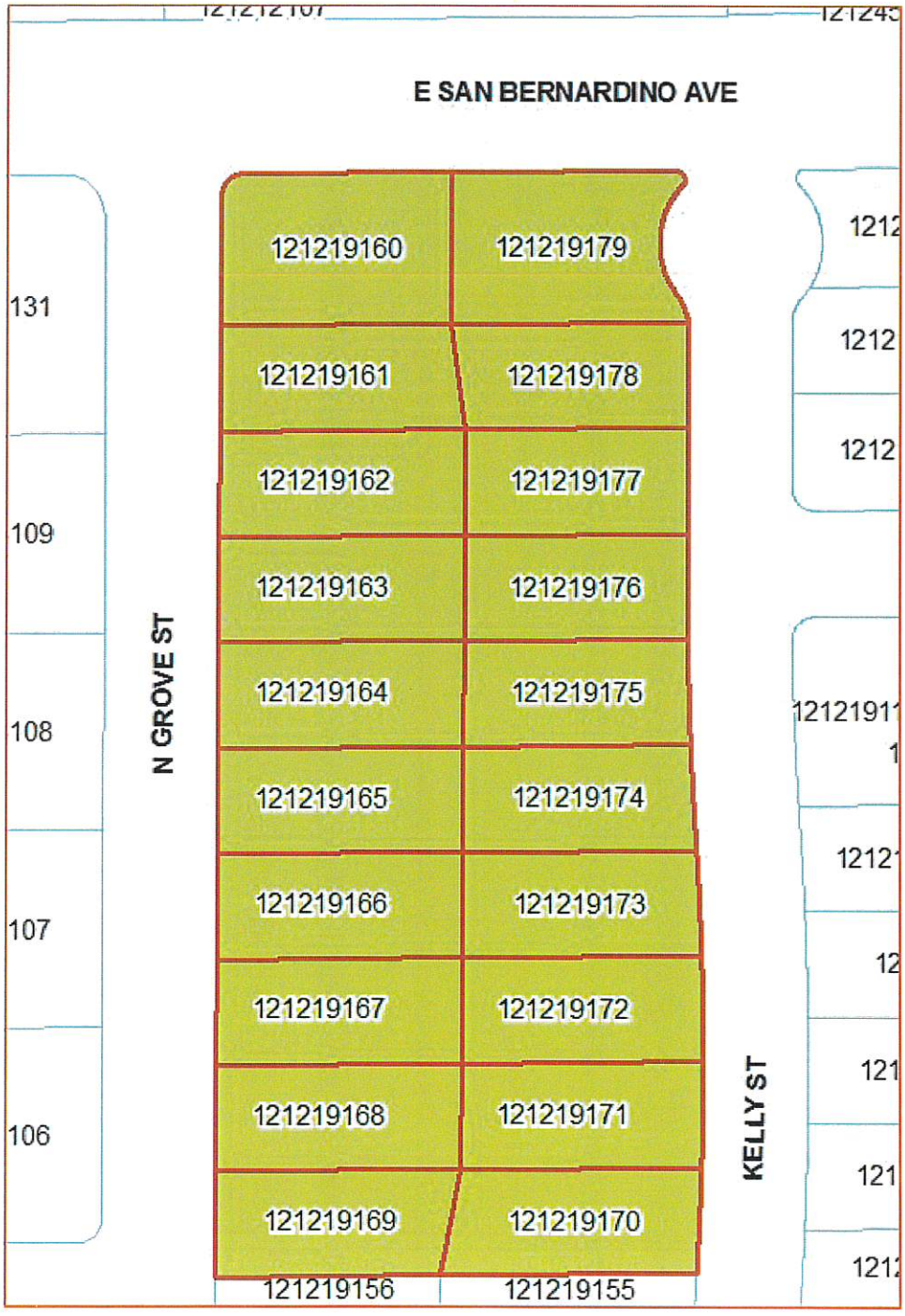
CRA 346

Annexation L4-V



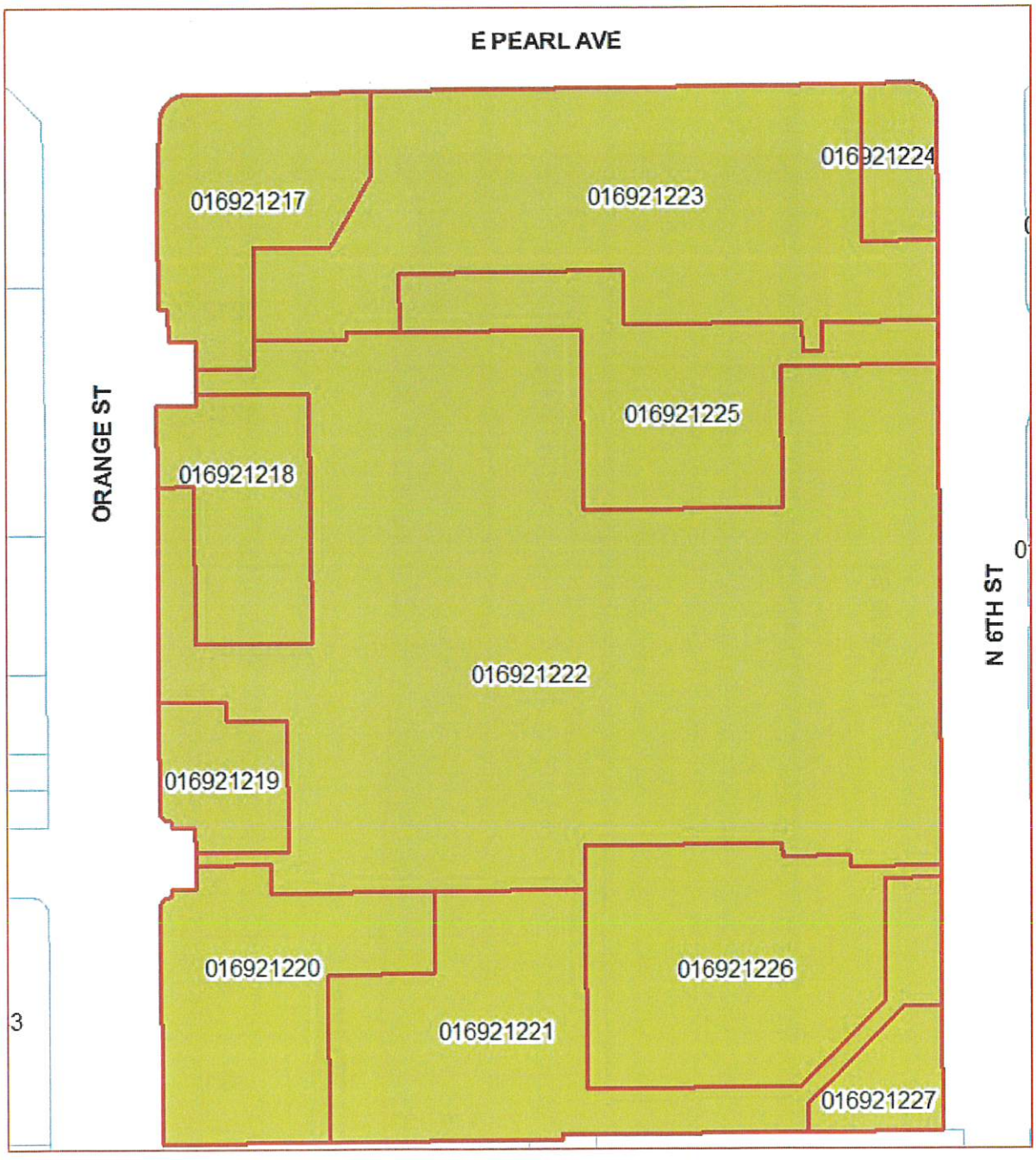
CRA 607

Annexation L4-W



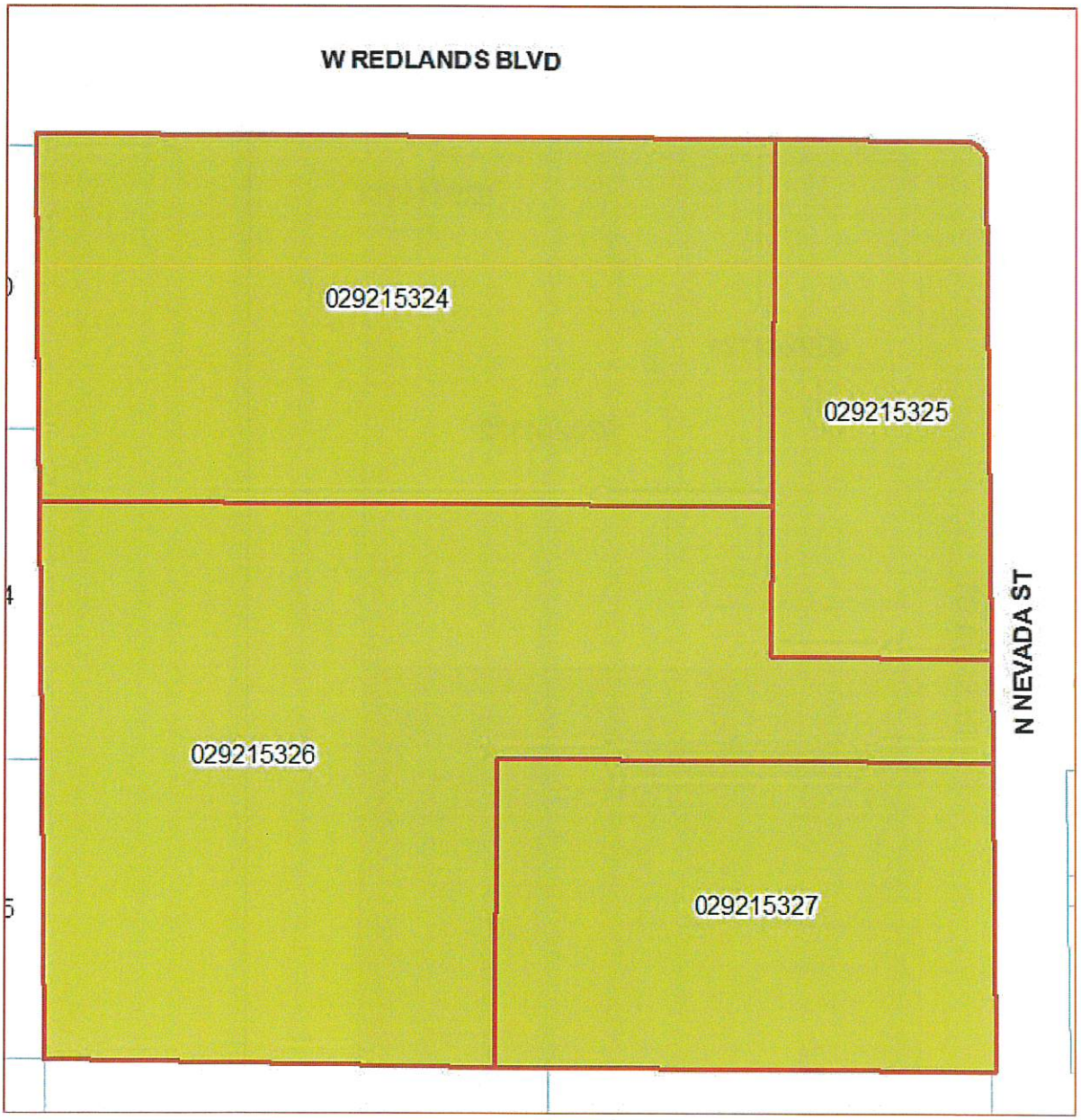
Tract Map 12461

Annexation L4-X



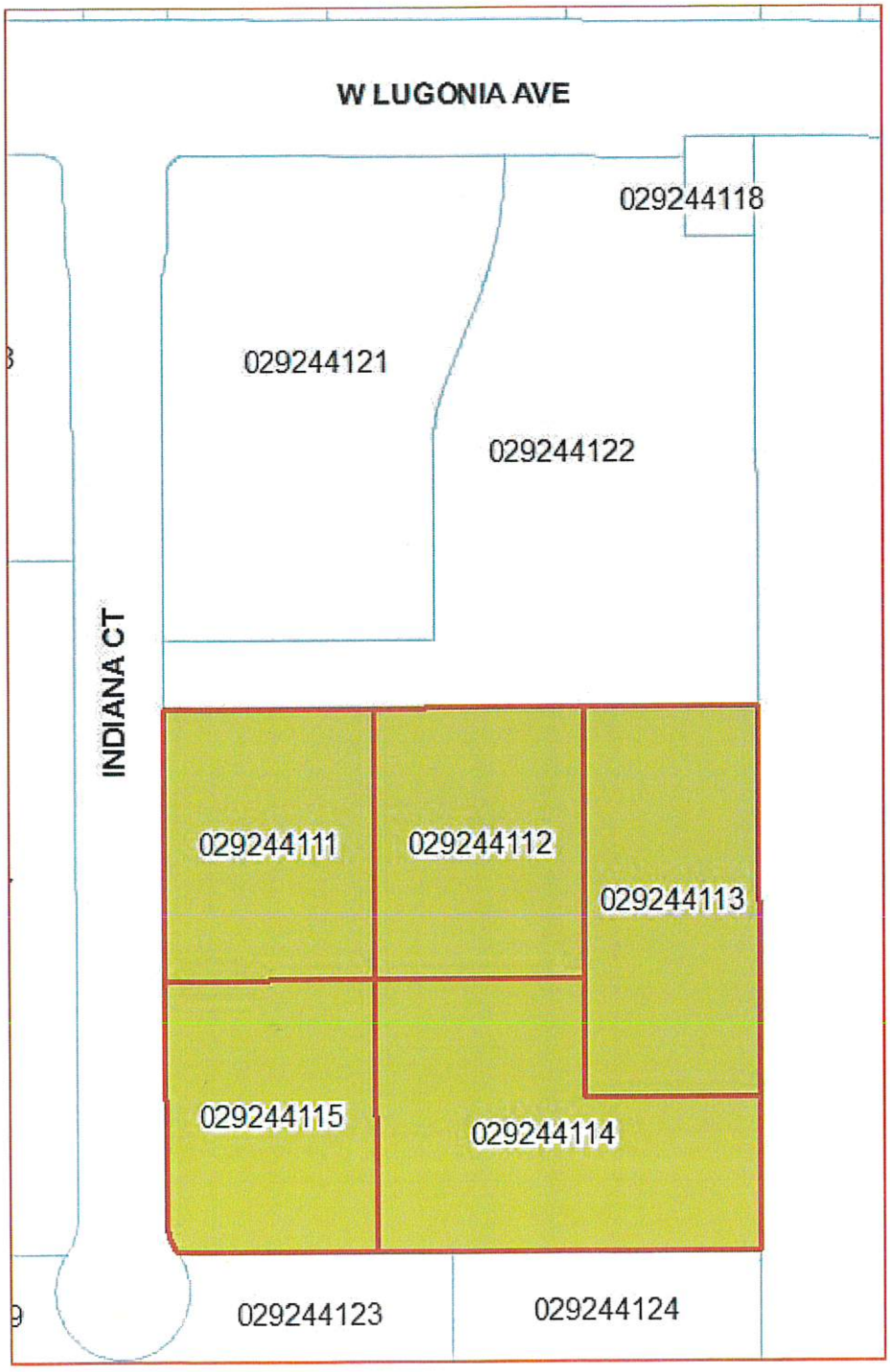
Parcel Map 12022

Annexation L5-A



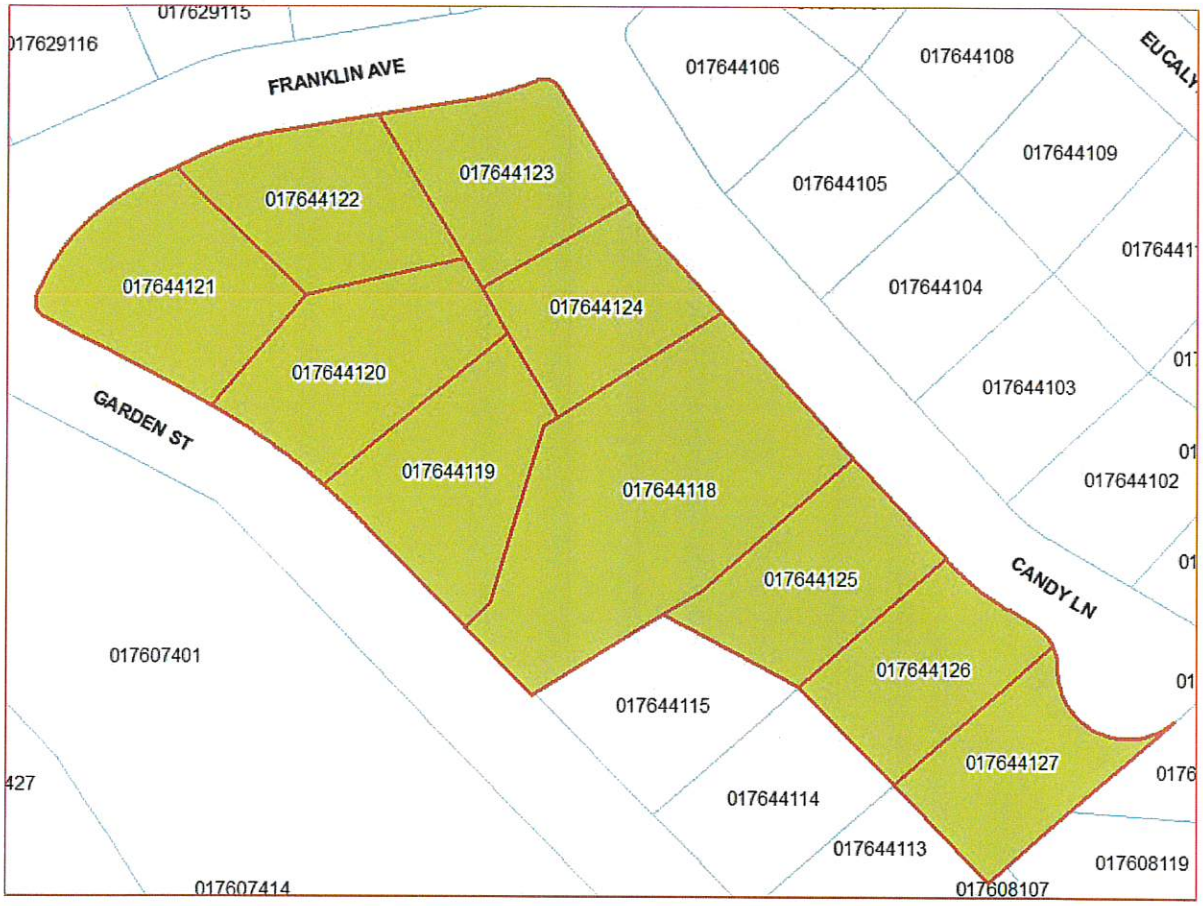
Parcel Map 12330

Annexation L5-B



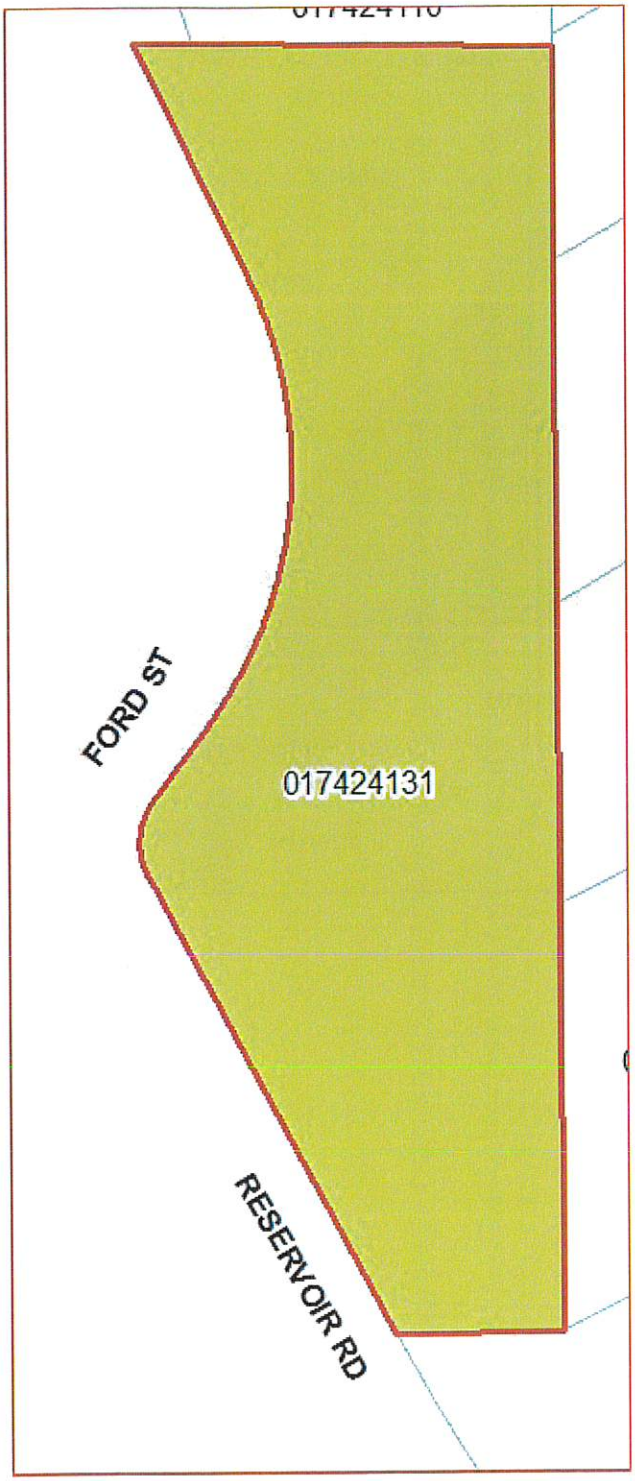
Parcel Map 12940

Annexation L5-C



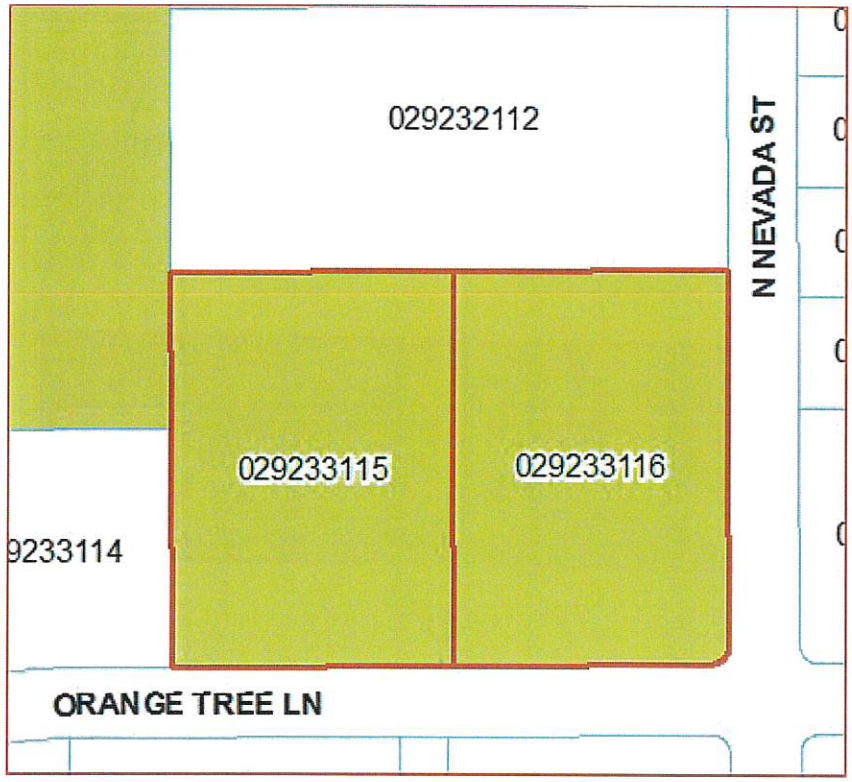
Tract 14556

Annexation L5-D



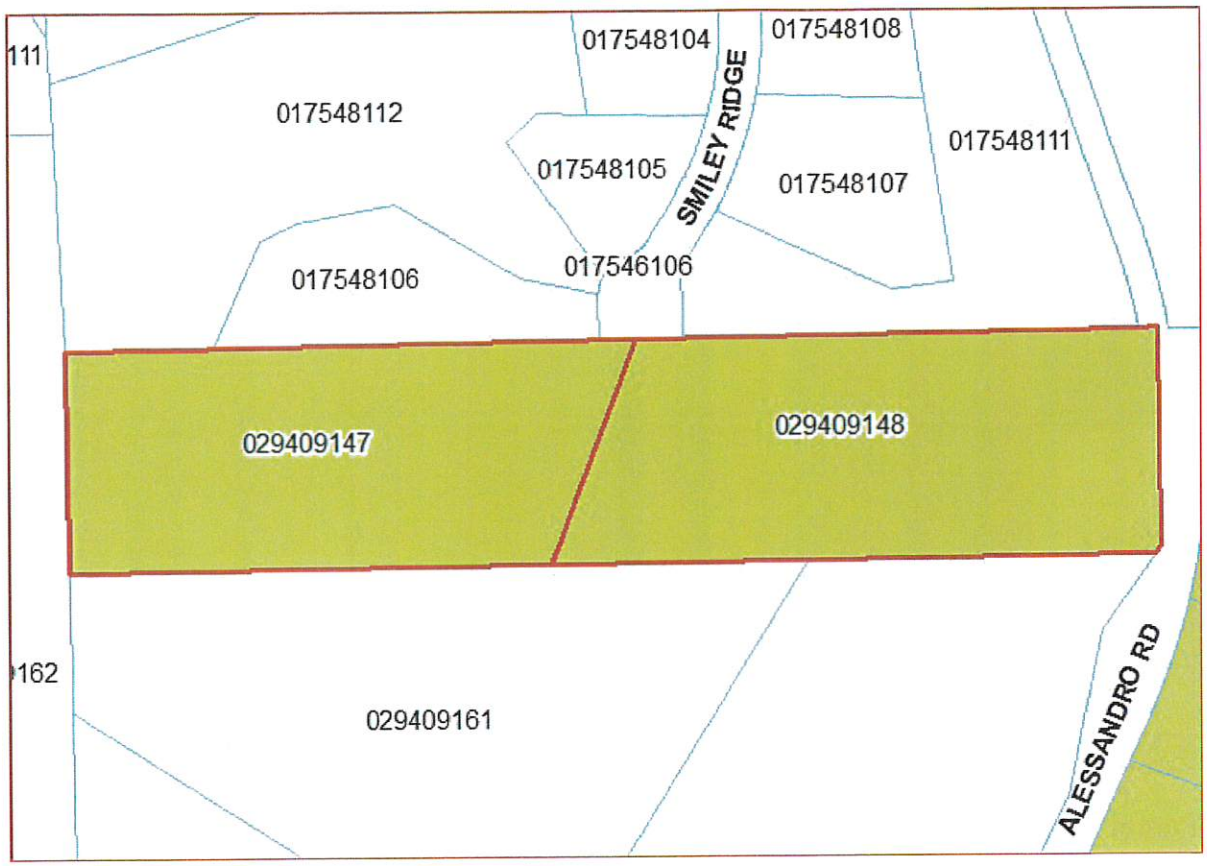
CRA 611

Annexation L5-E



Parcel Map 13261

Annexation L5-F



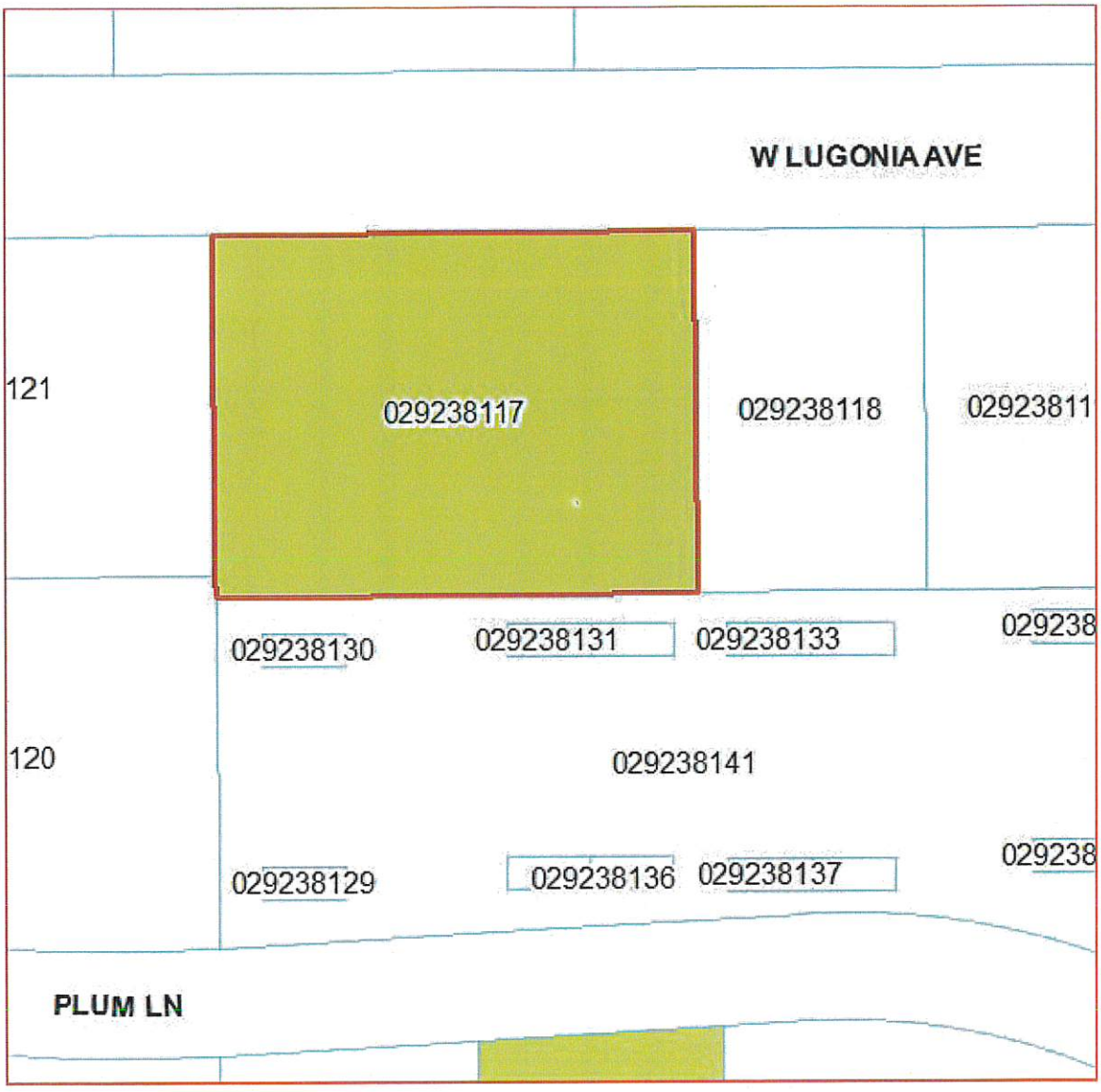
Parcel Map 11189

Annexation L5-G



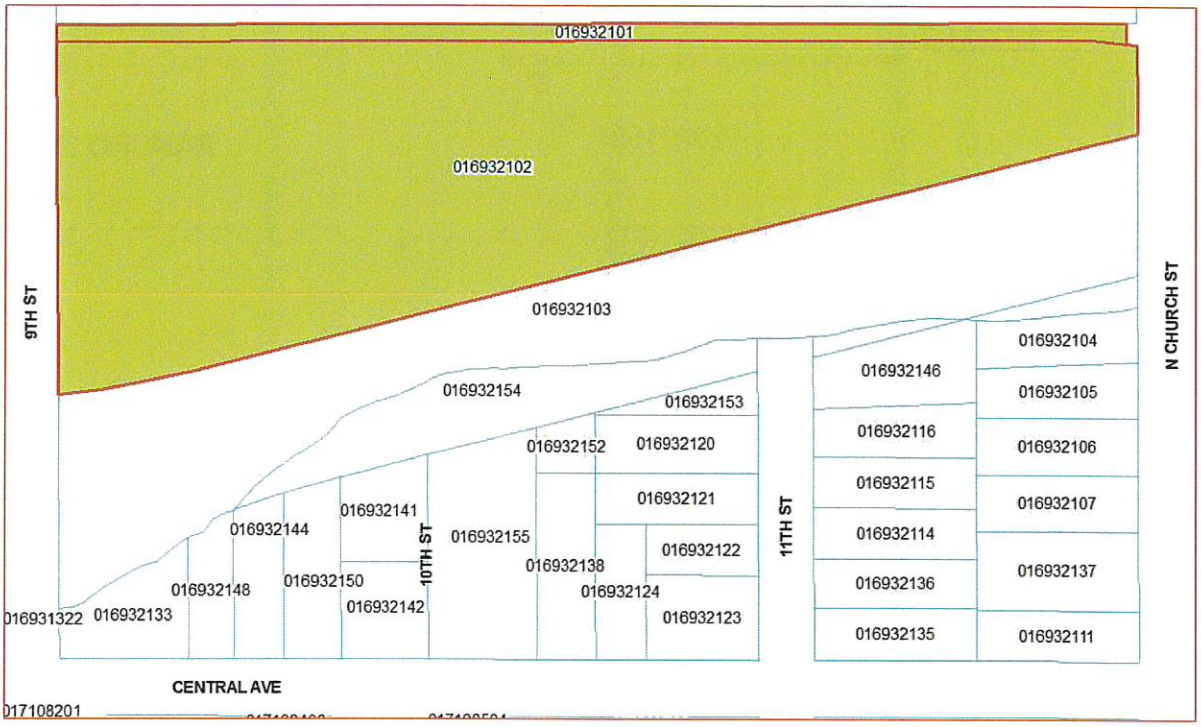
CRA 615

Annexation L5-H



CRA 536

Annexation L6-A



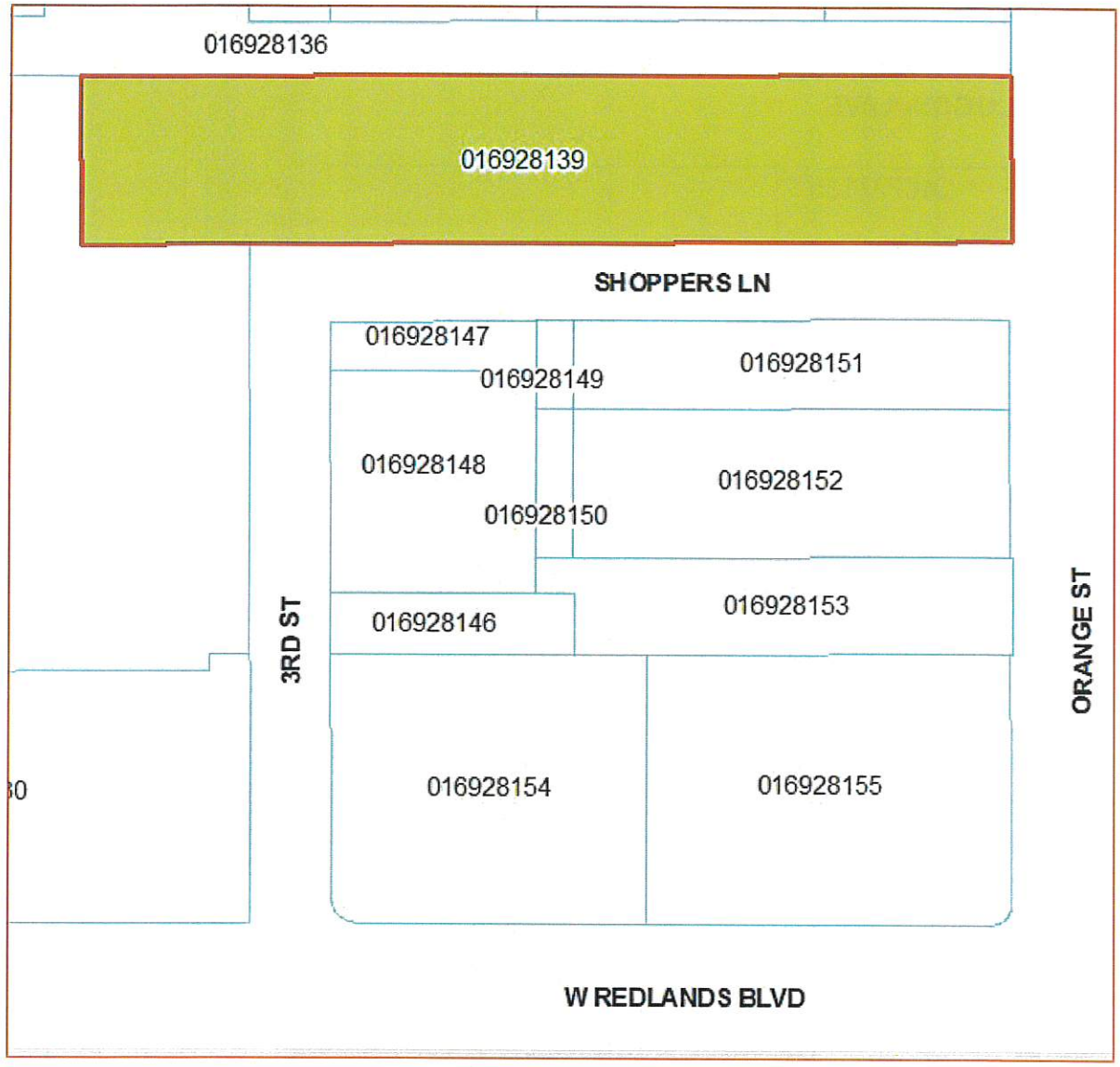
CRA 517

Annexation L6-B



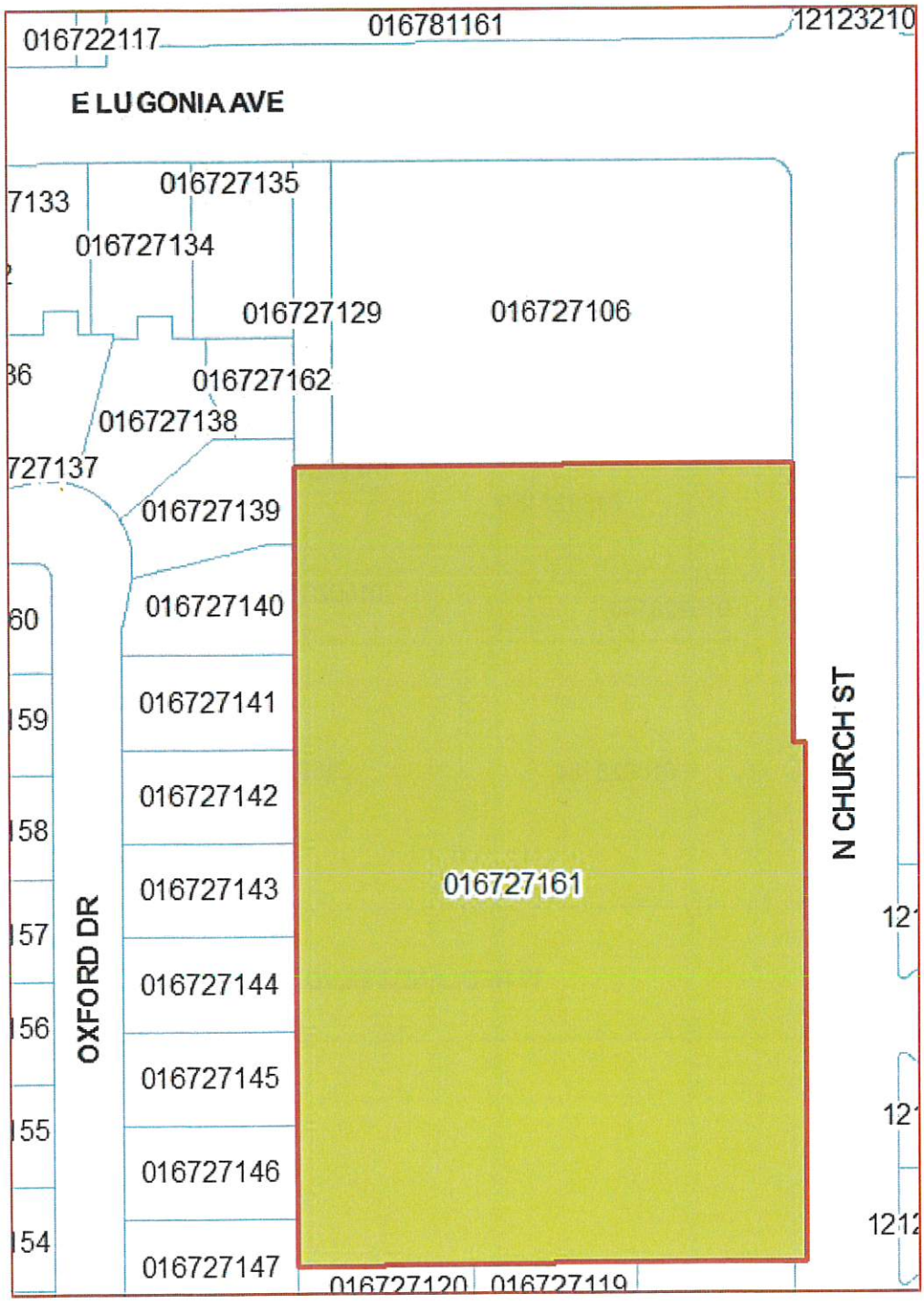
CRA 628

Annexation L6-C



CRA 624

Annexation L6-D



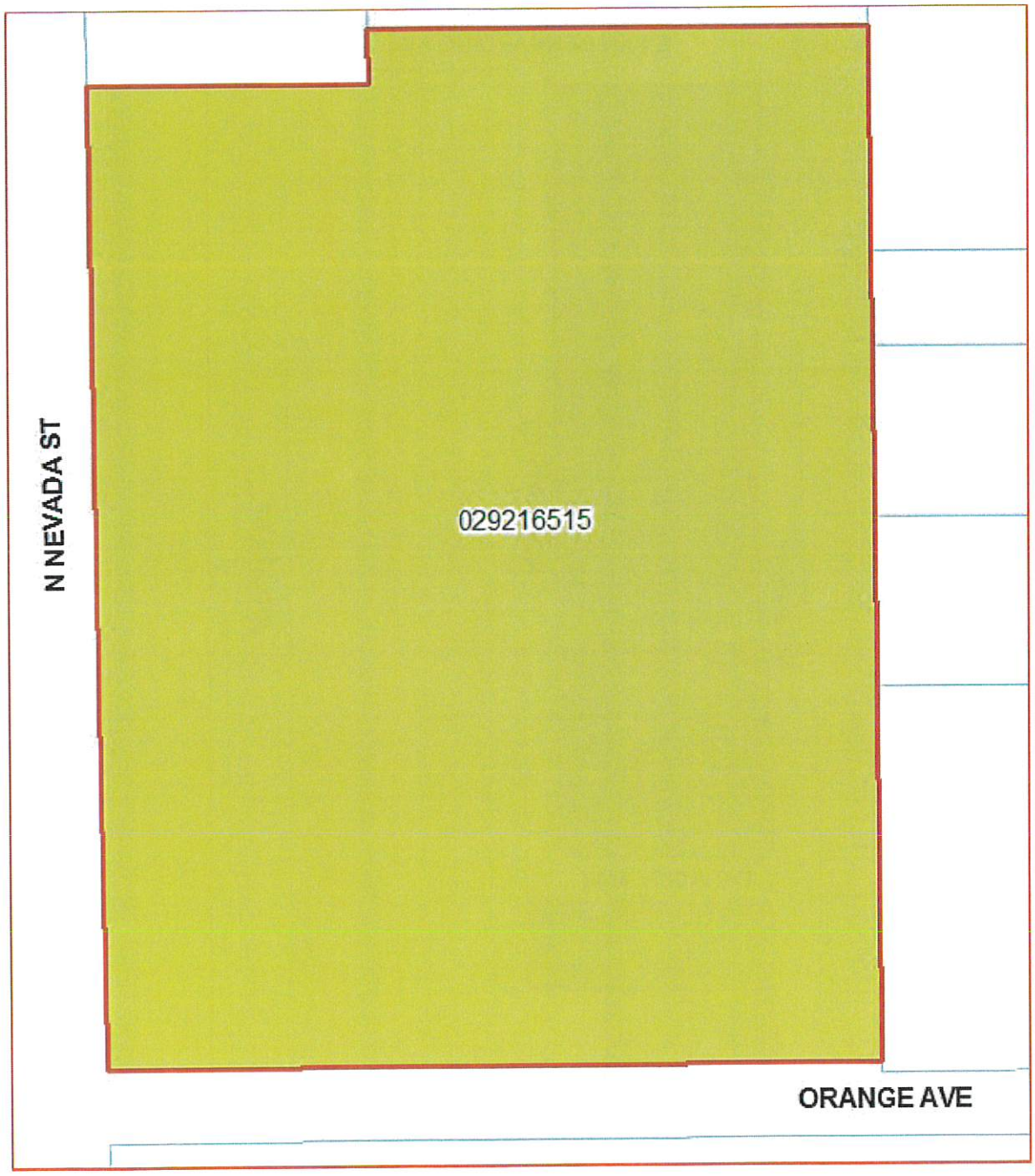
CRA 305

Annexation L6-E



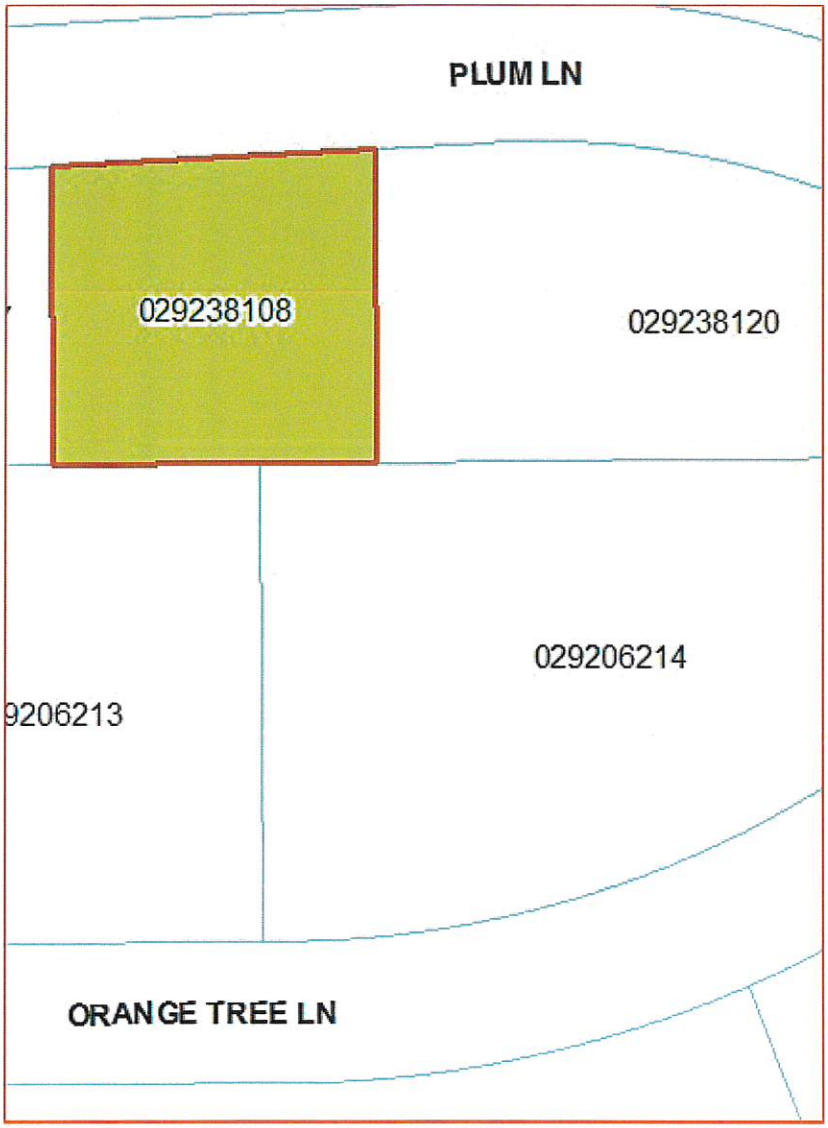
Tract Map 13575

Annexation L6-F



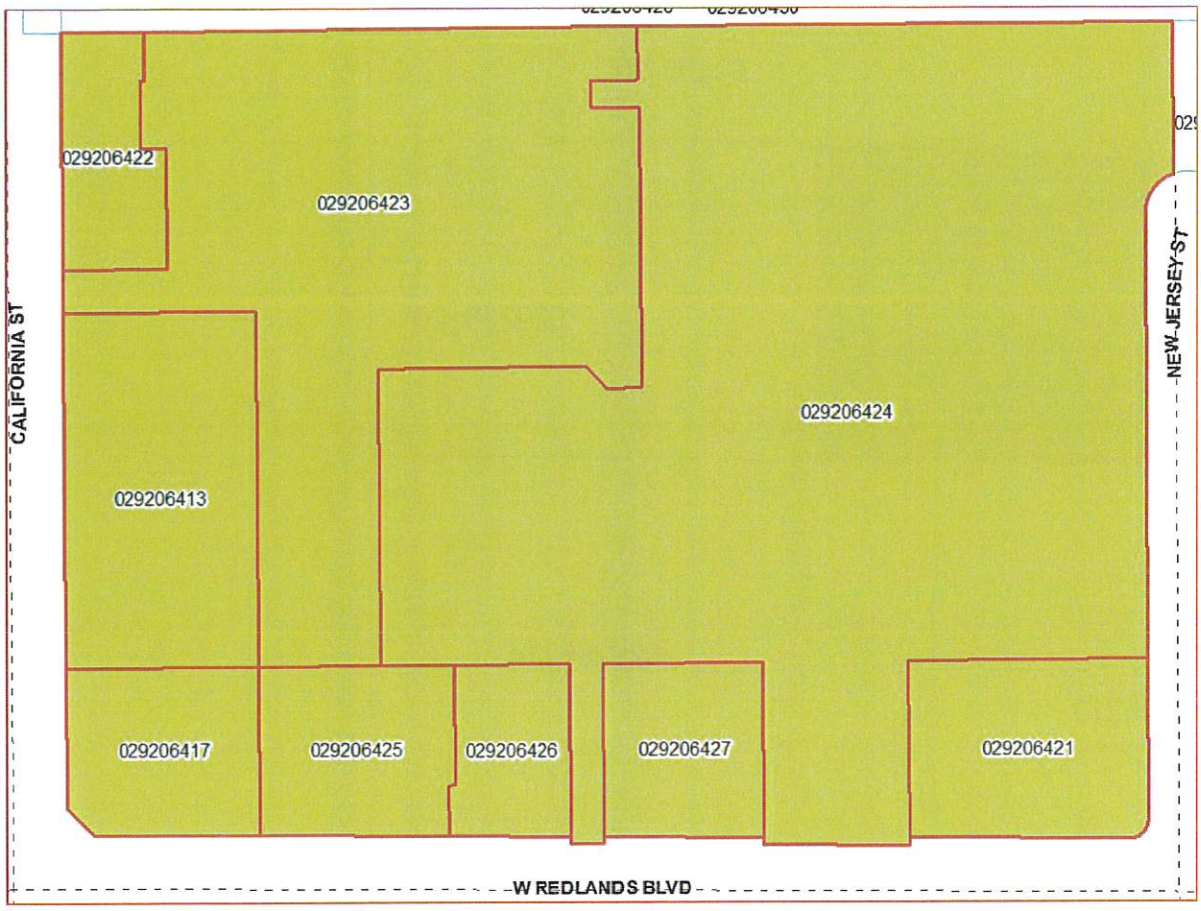
CUP 550

Annexation L6-G



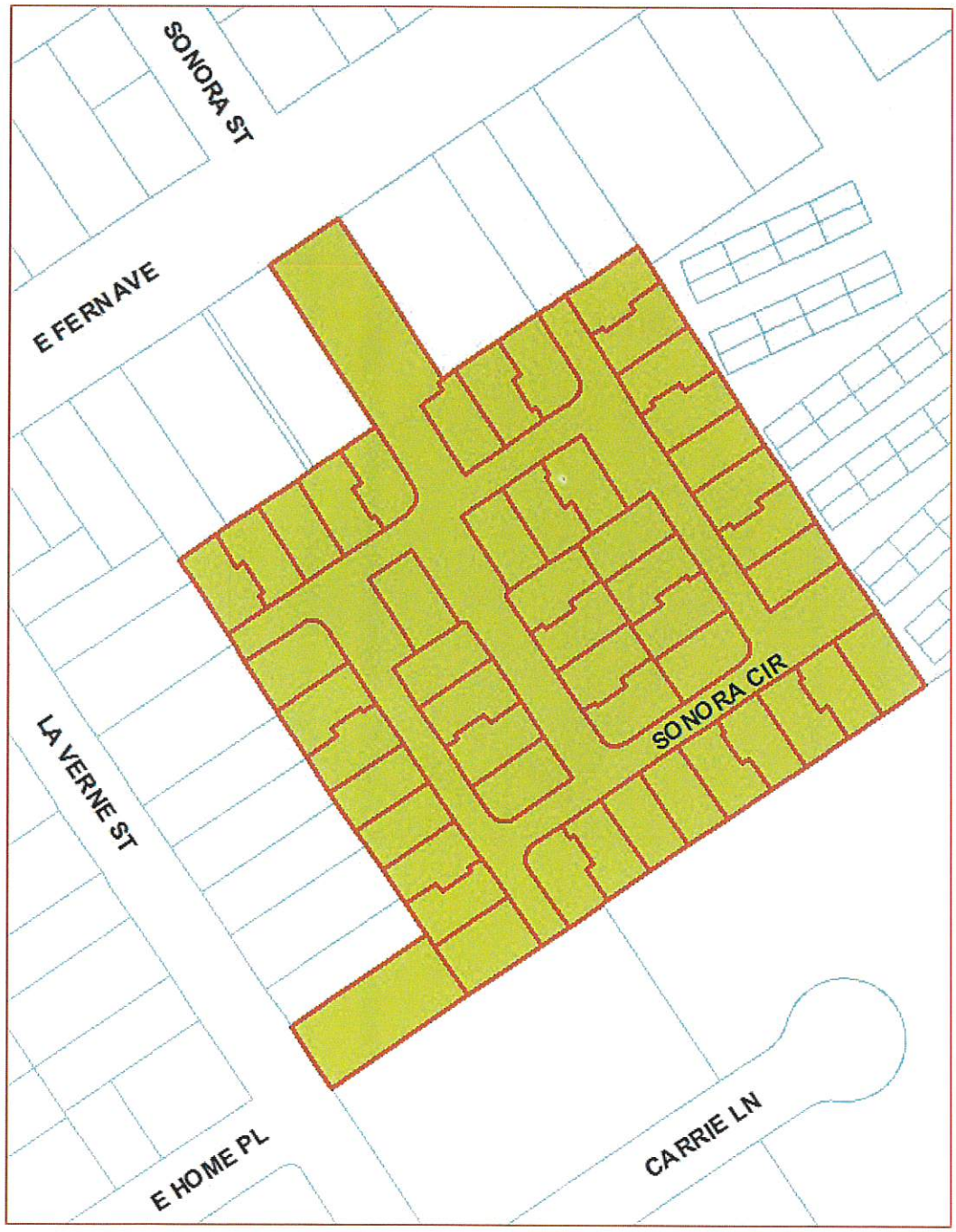
CRA 623

Annexation L6-H



Parcel Map 13542

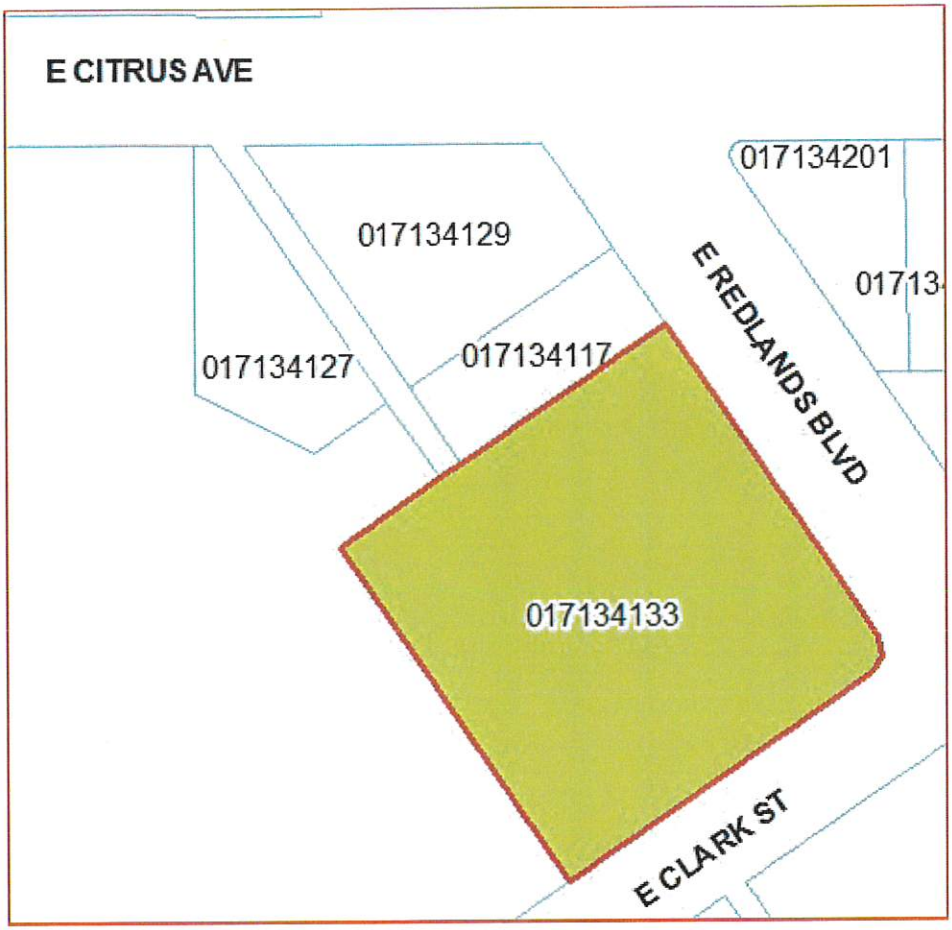
Annexation L6-I



Parcel Map 10749

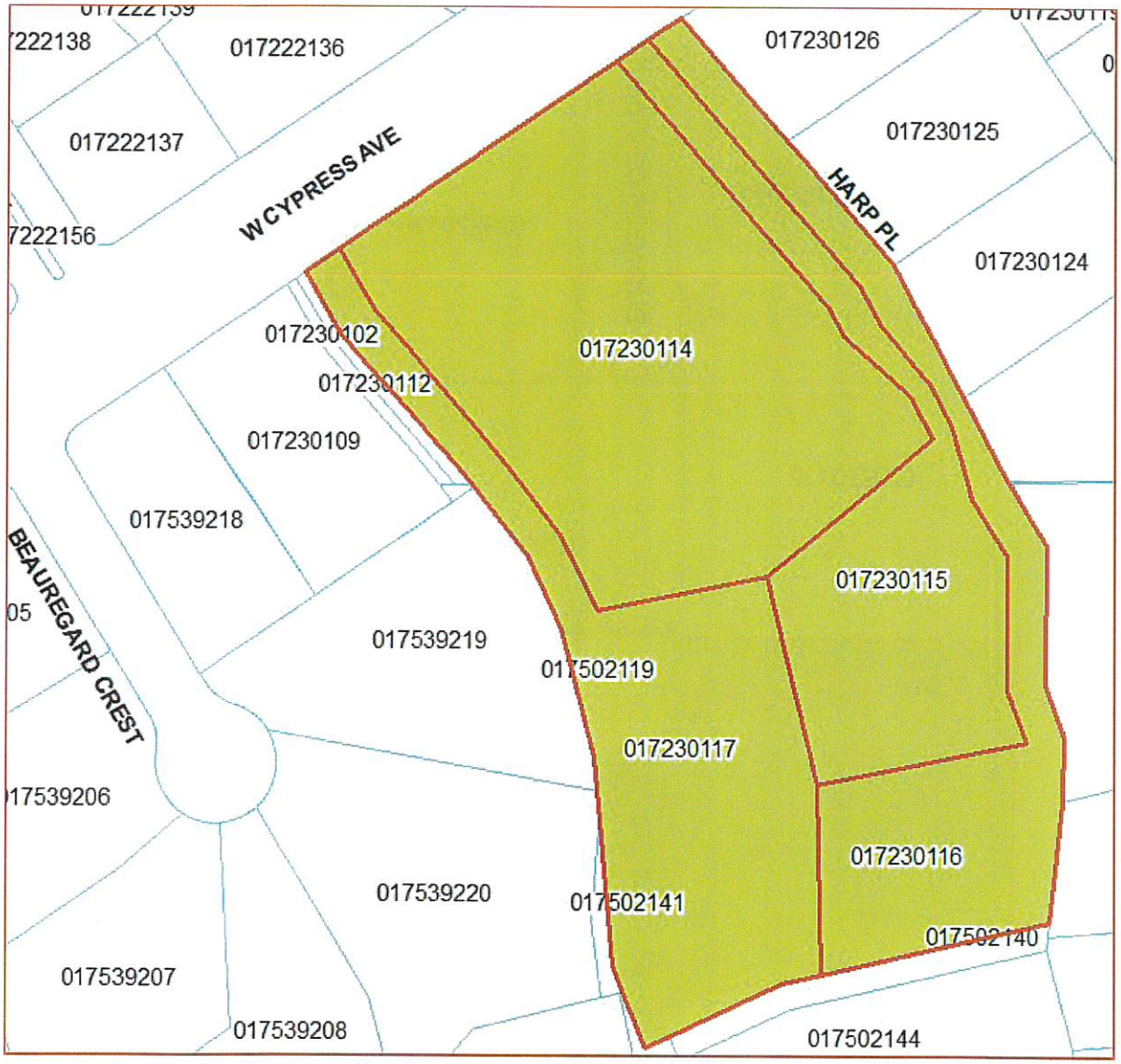
APN 0173-052-31 thru 42, APN 0173-062-01 thru 38, 39 (road)

Annexation L6-J



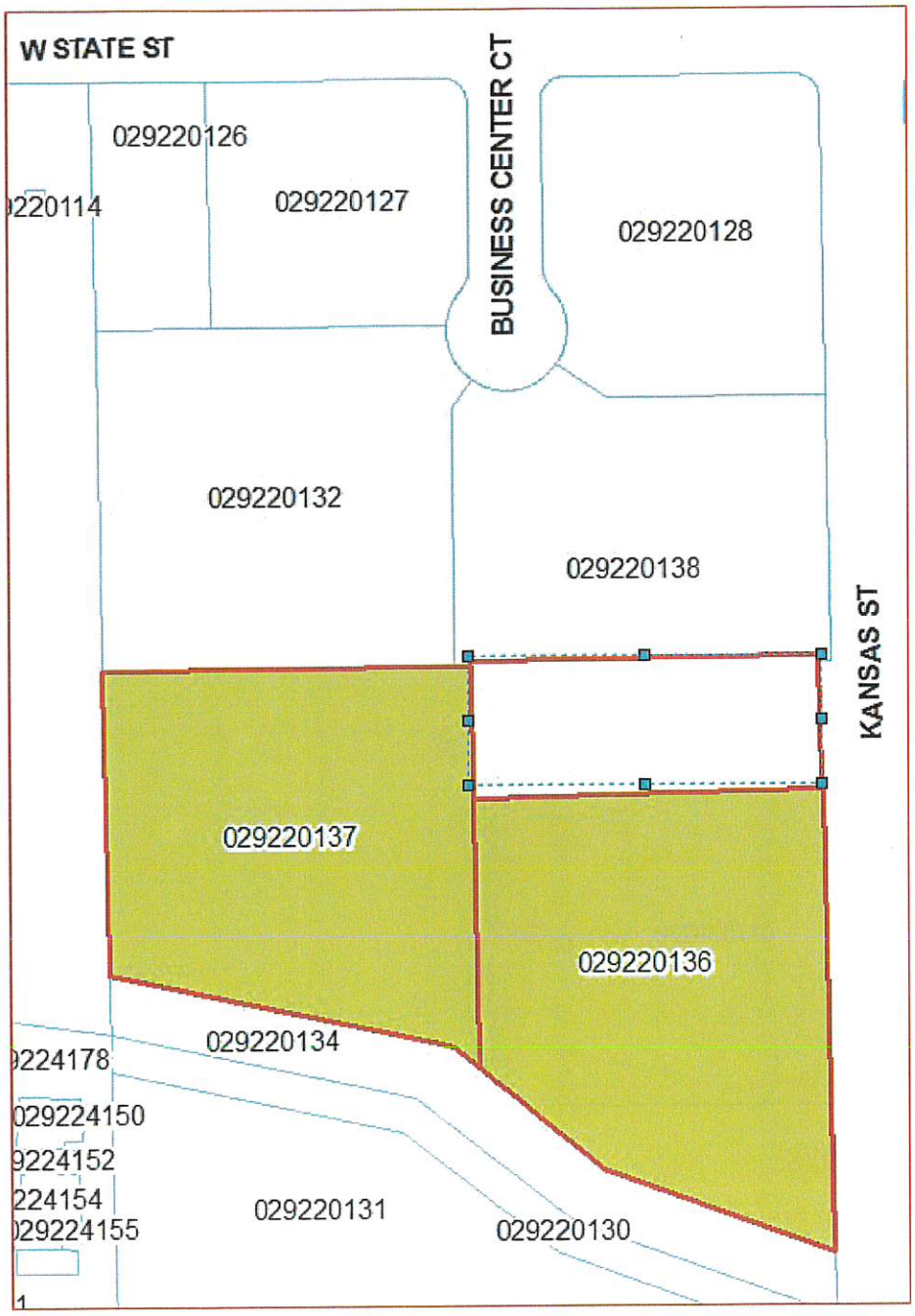
MS 201

Annexation L7-A



MS 213, Parcel Map 13978

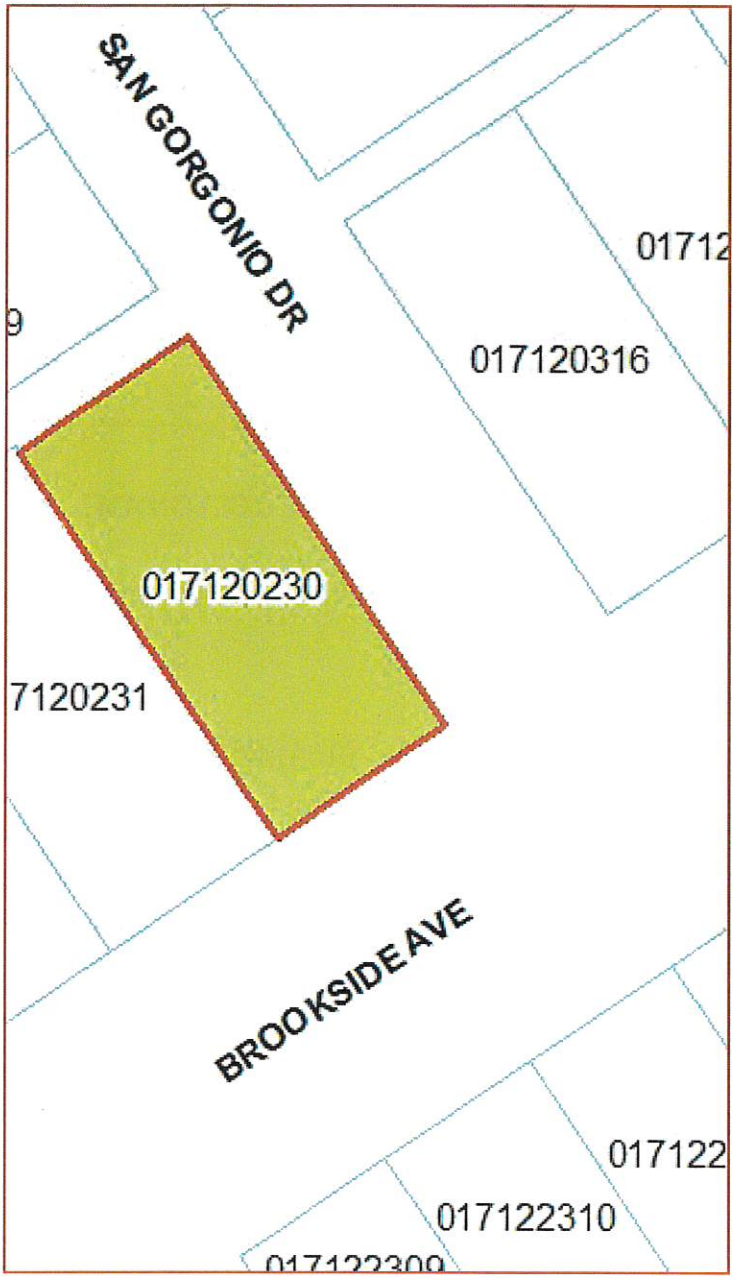
Annexation L7-B



MS 211

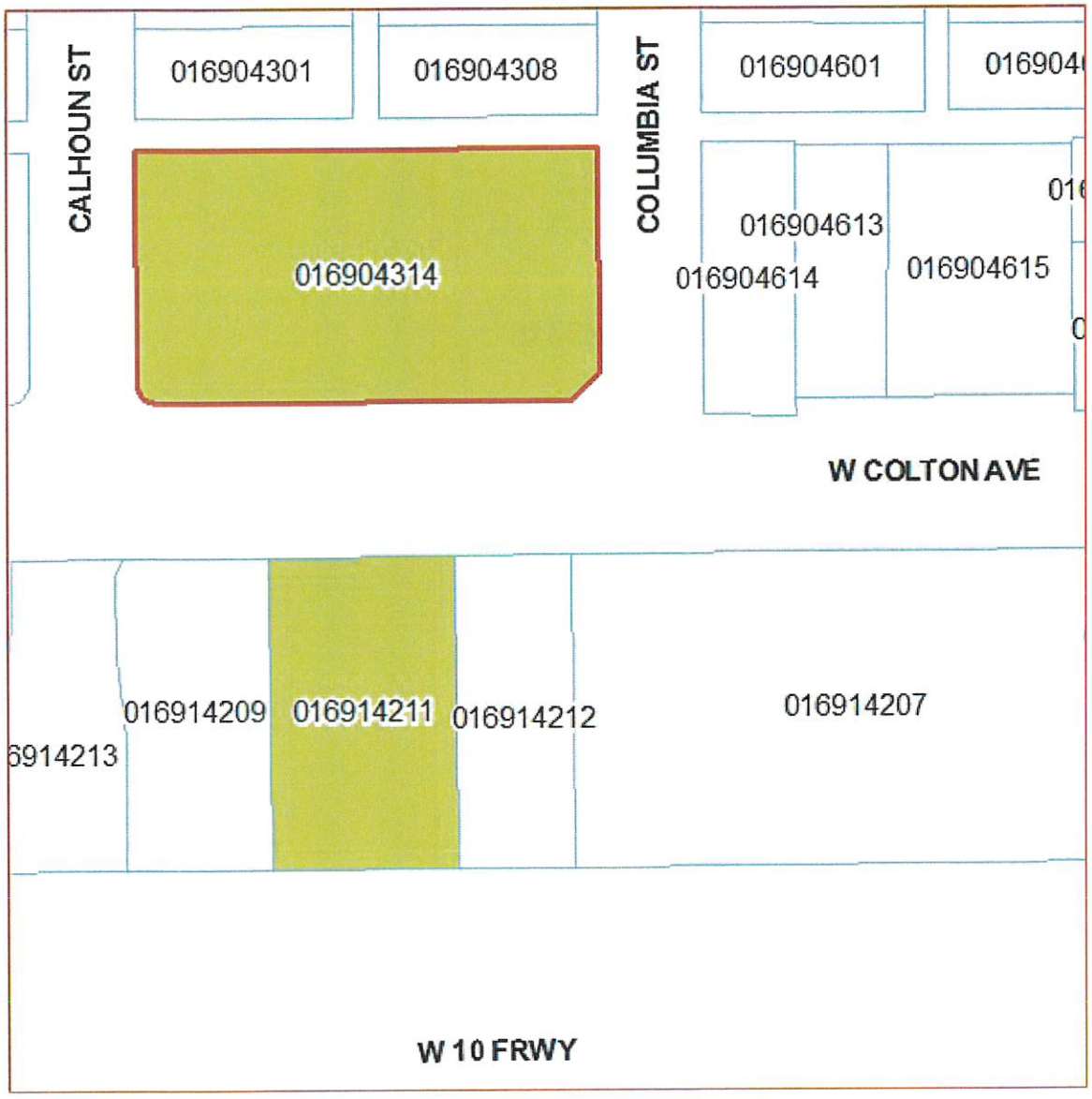
Lot line adjustment shifted the boundary between 0292-201-36 and -38 northerly. New APNs were assigned by the Assessor. APN 0292-201-36 became -39 and APN 0292-201-38 became -40.

Annexation L7-C



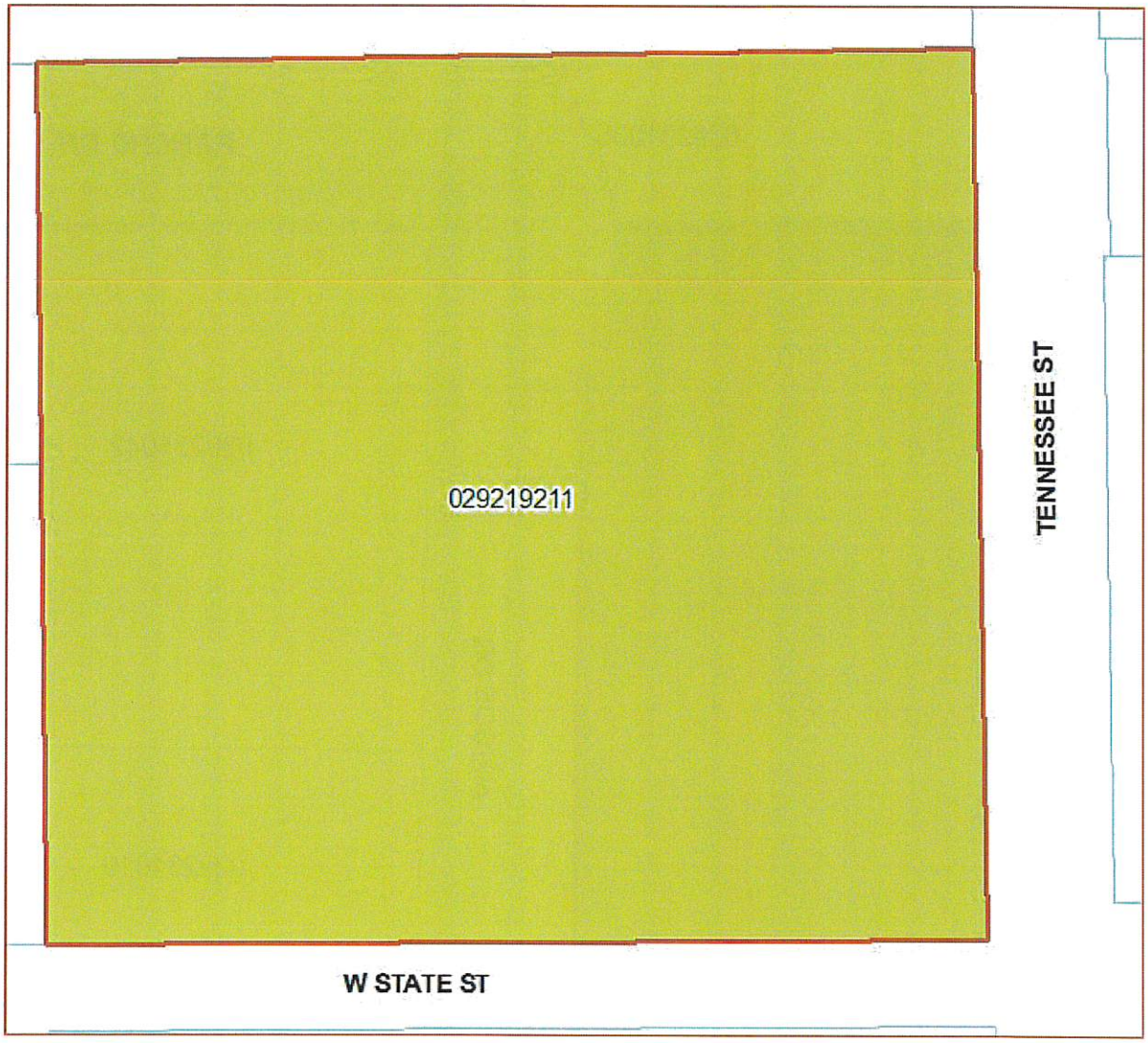
CUP 559

Annexation L7-D



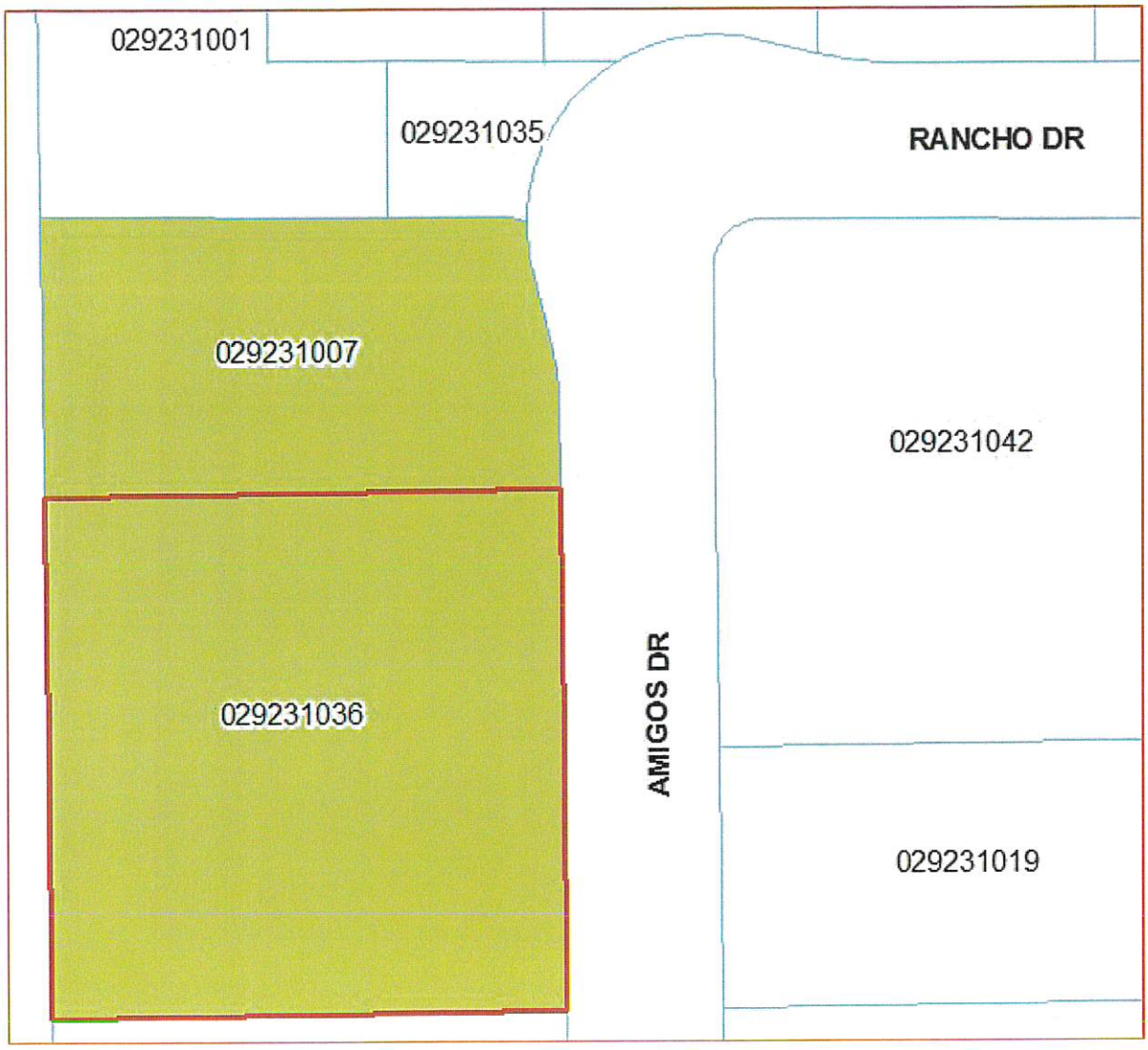
CRA 696

Annexation L7-E



CRA 543

Annexation L7-F



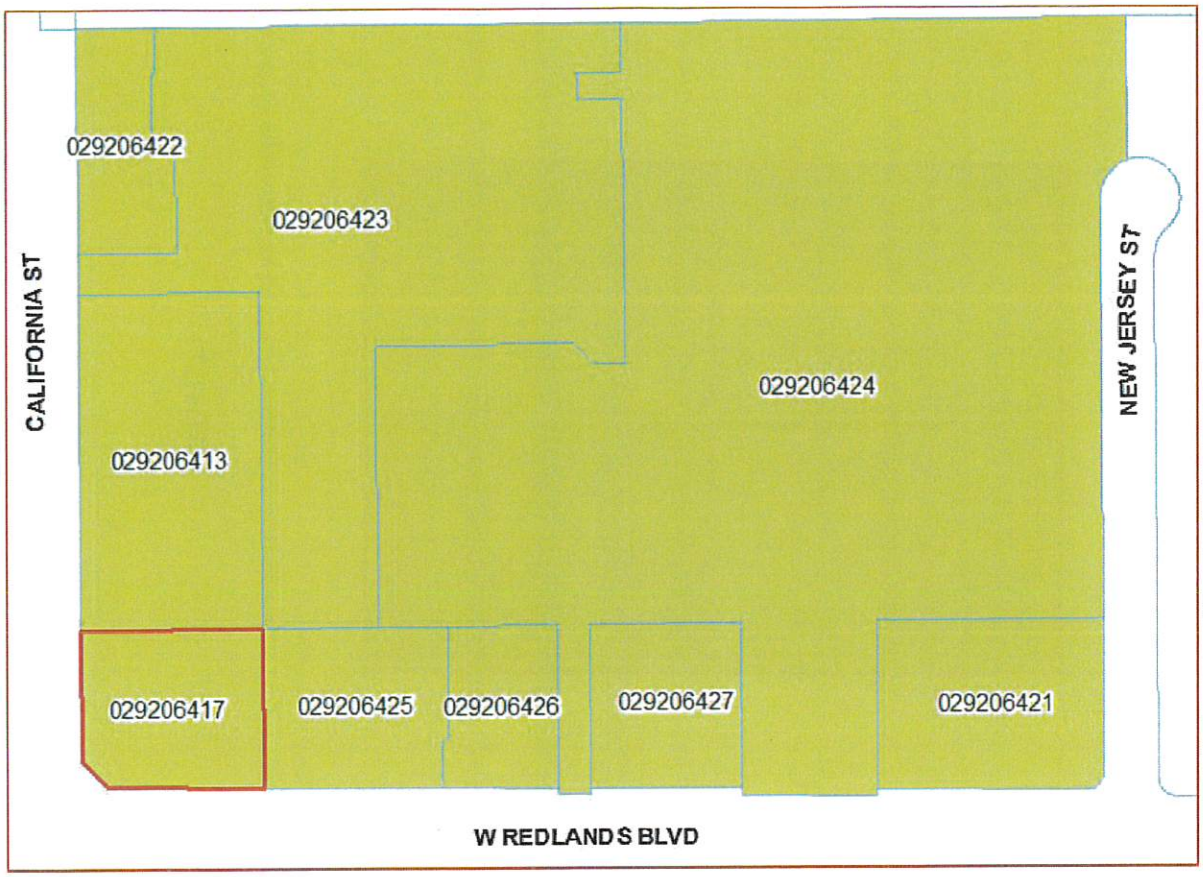
CRA 641

Annexation L7-G



CRA 640

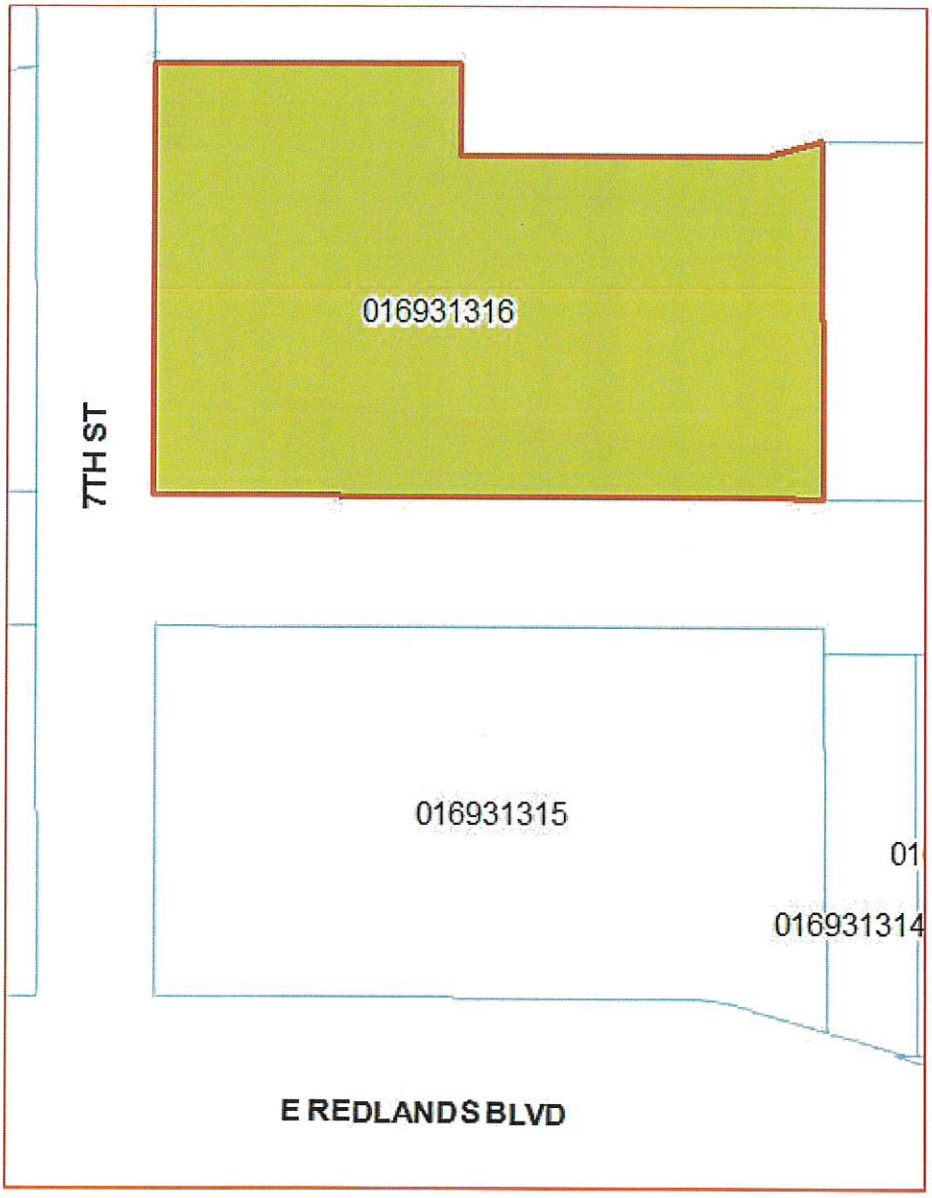
Annexation L7-H



CUP 562

Already included in Annexation L6-N

Annexation L7-I



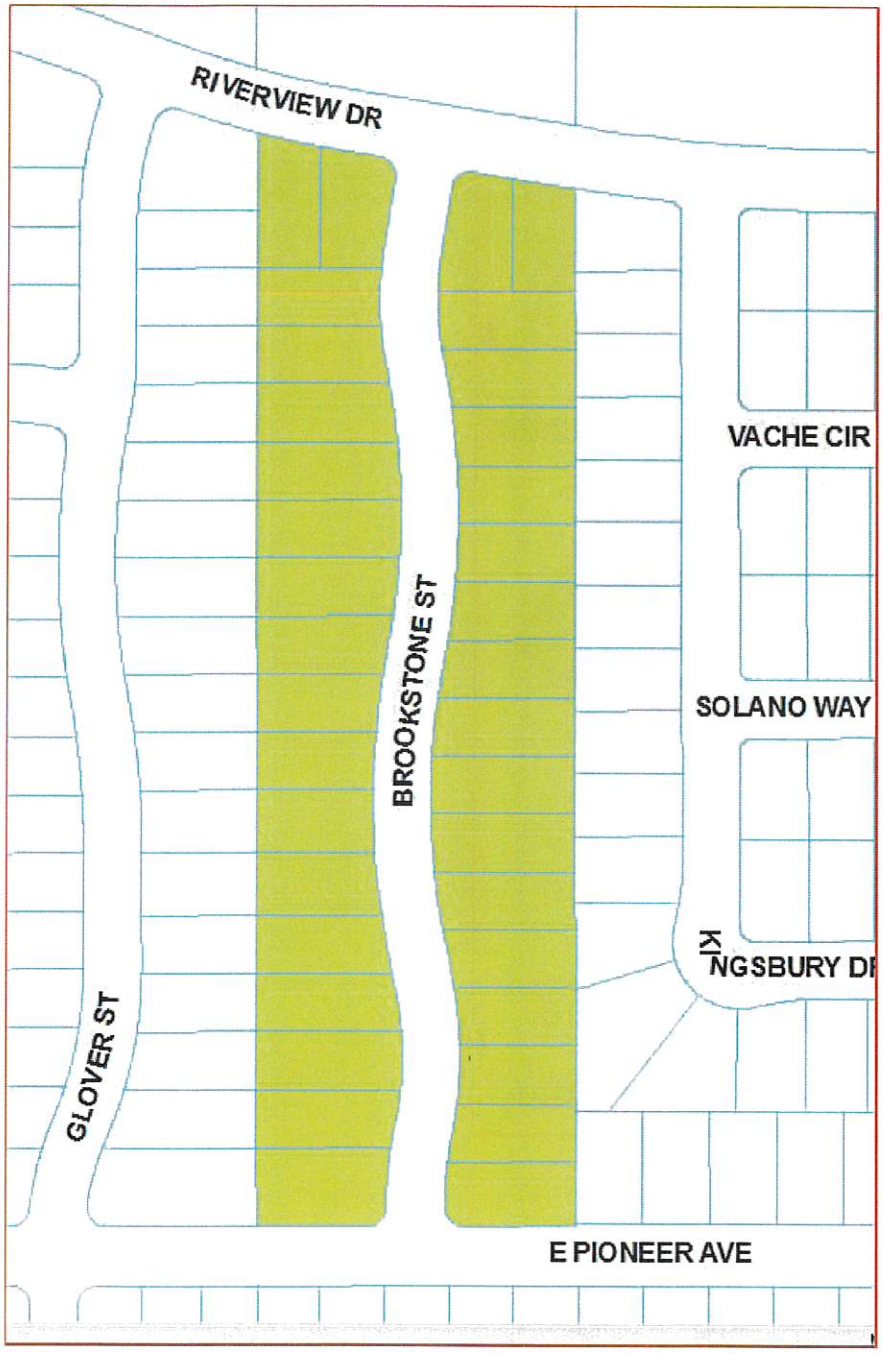
CUP 548

Annexation L8-A



CRA 637

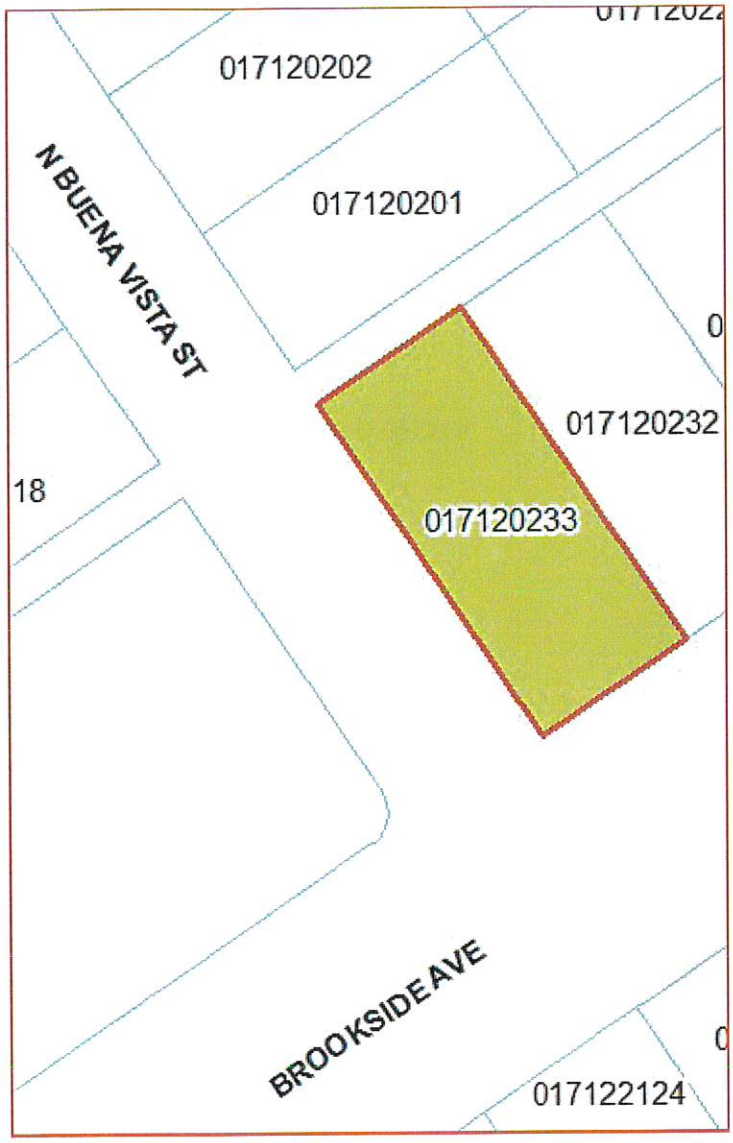
Annexation L8-B



Tract Map 10179

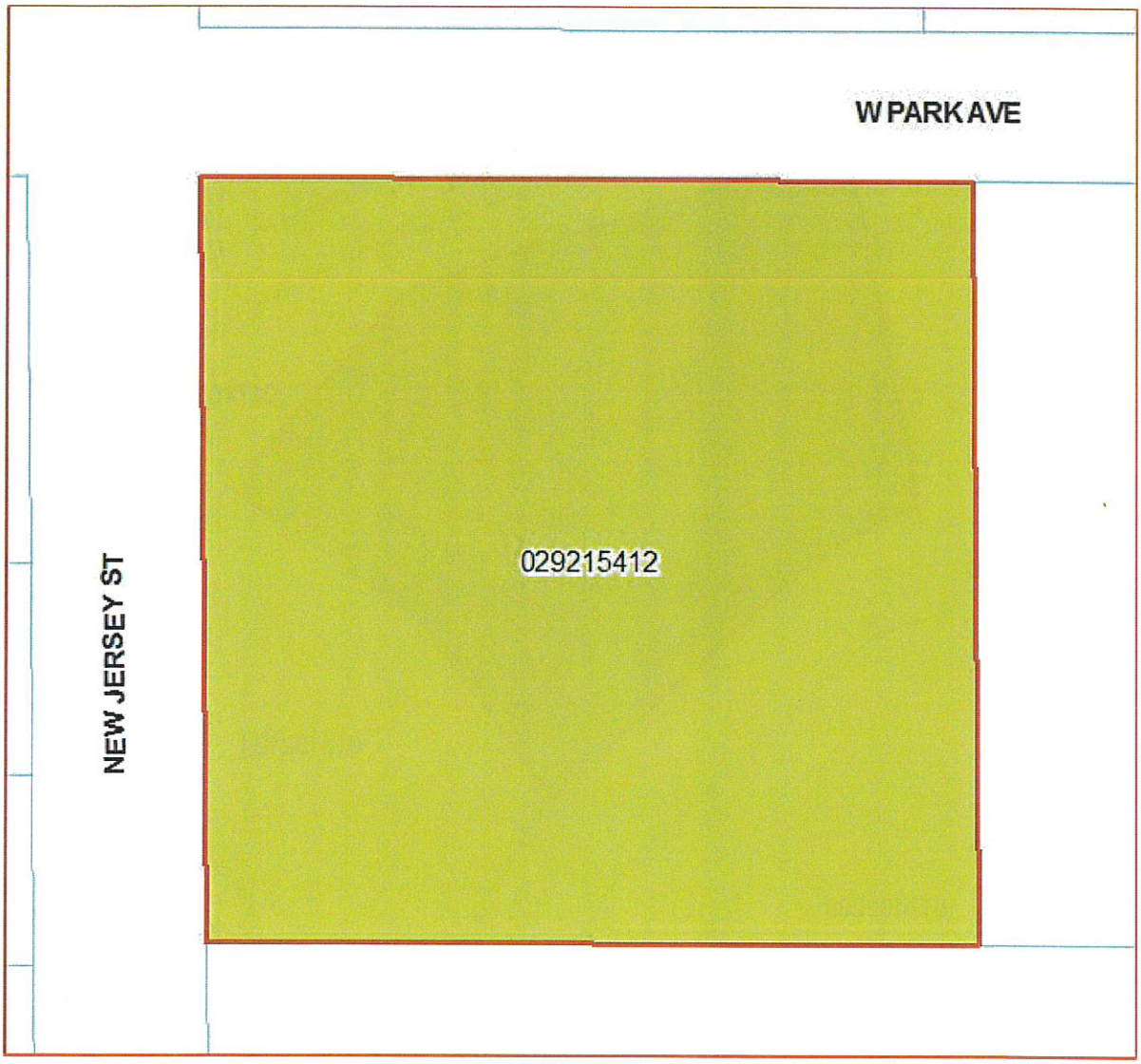
APN 0167-851-39 thru 56 and APN 0167-861-37 thru 54

Annexation L8-C



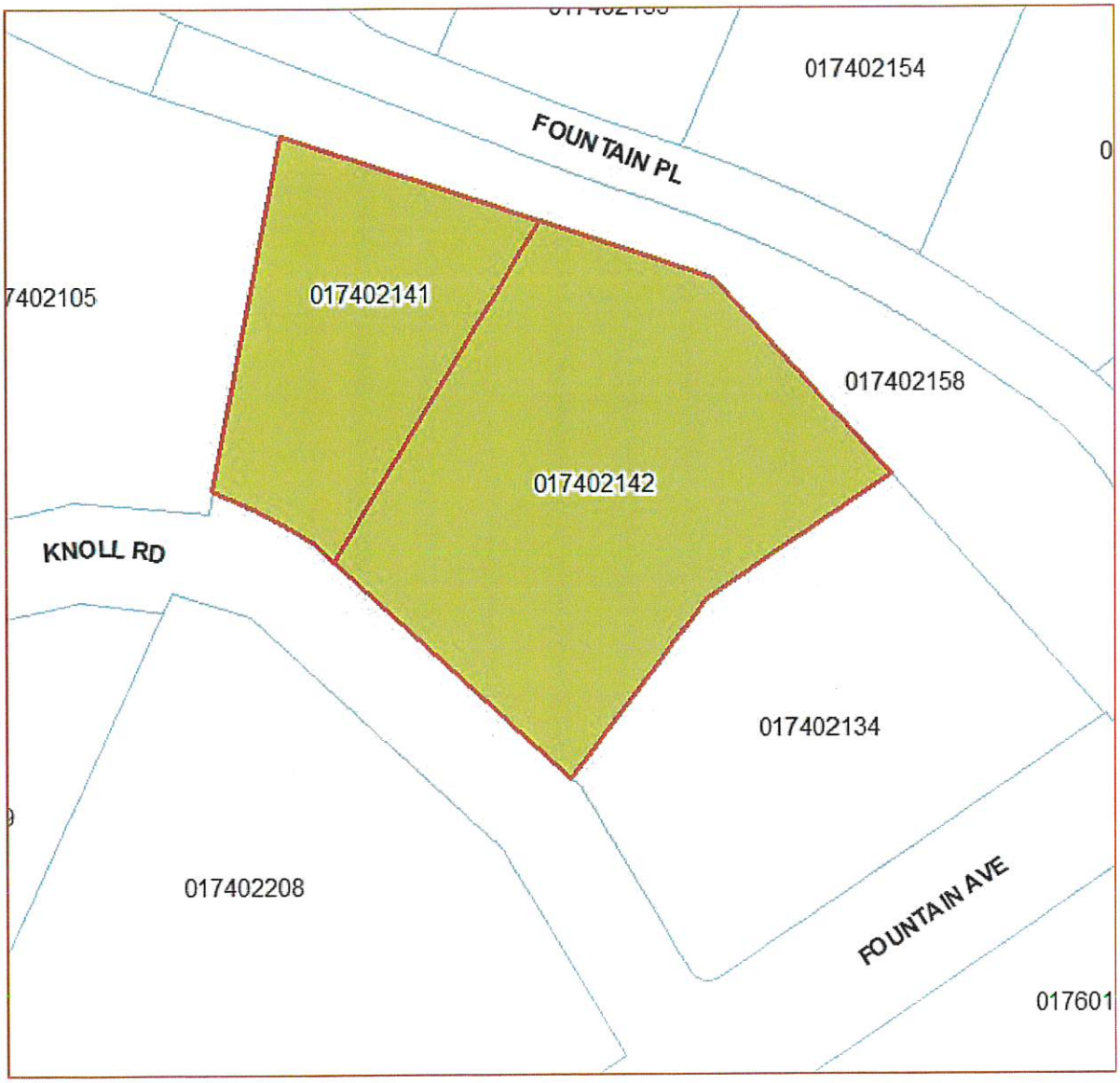
CUP 574

Annexation L8-D



CUP 642

Annexation L8-E



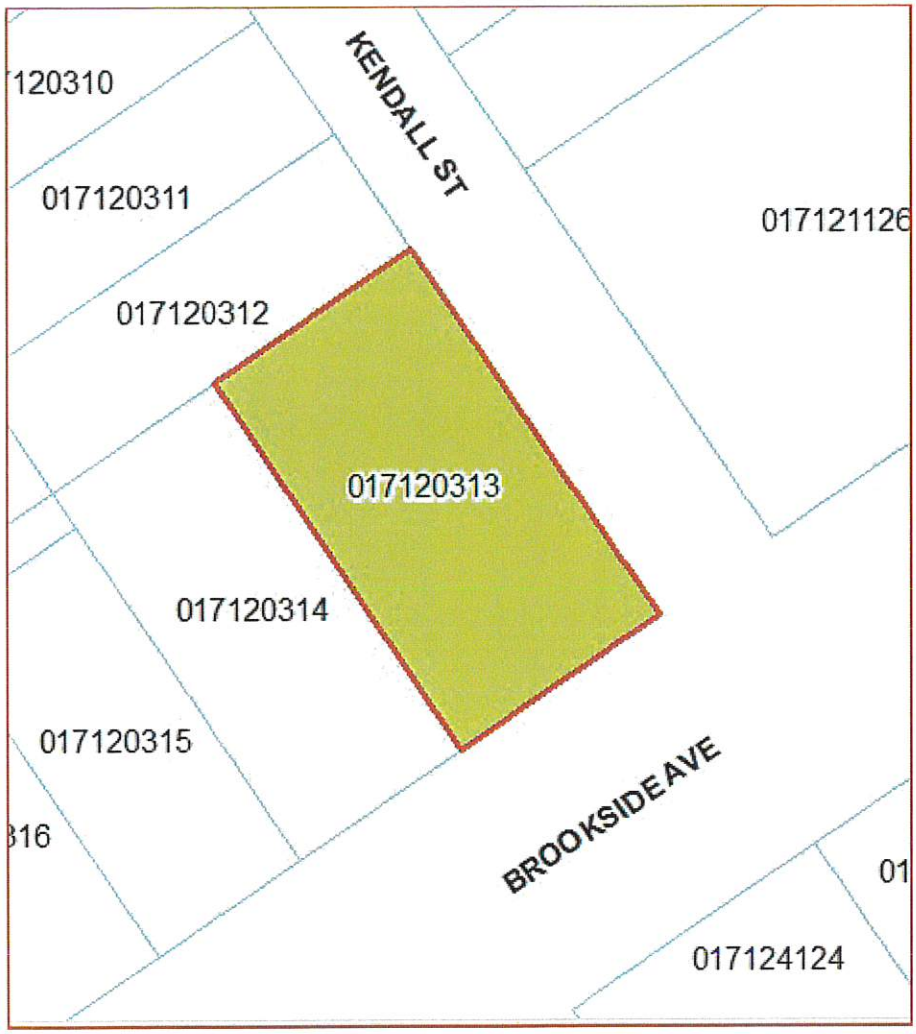
Parcel Map 14090

Annexation L9-A



CRA 648

Annexation L9-B



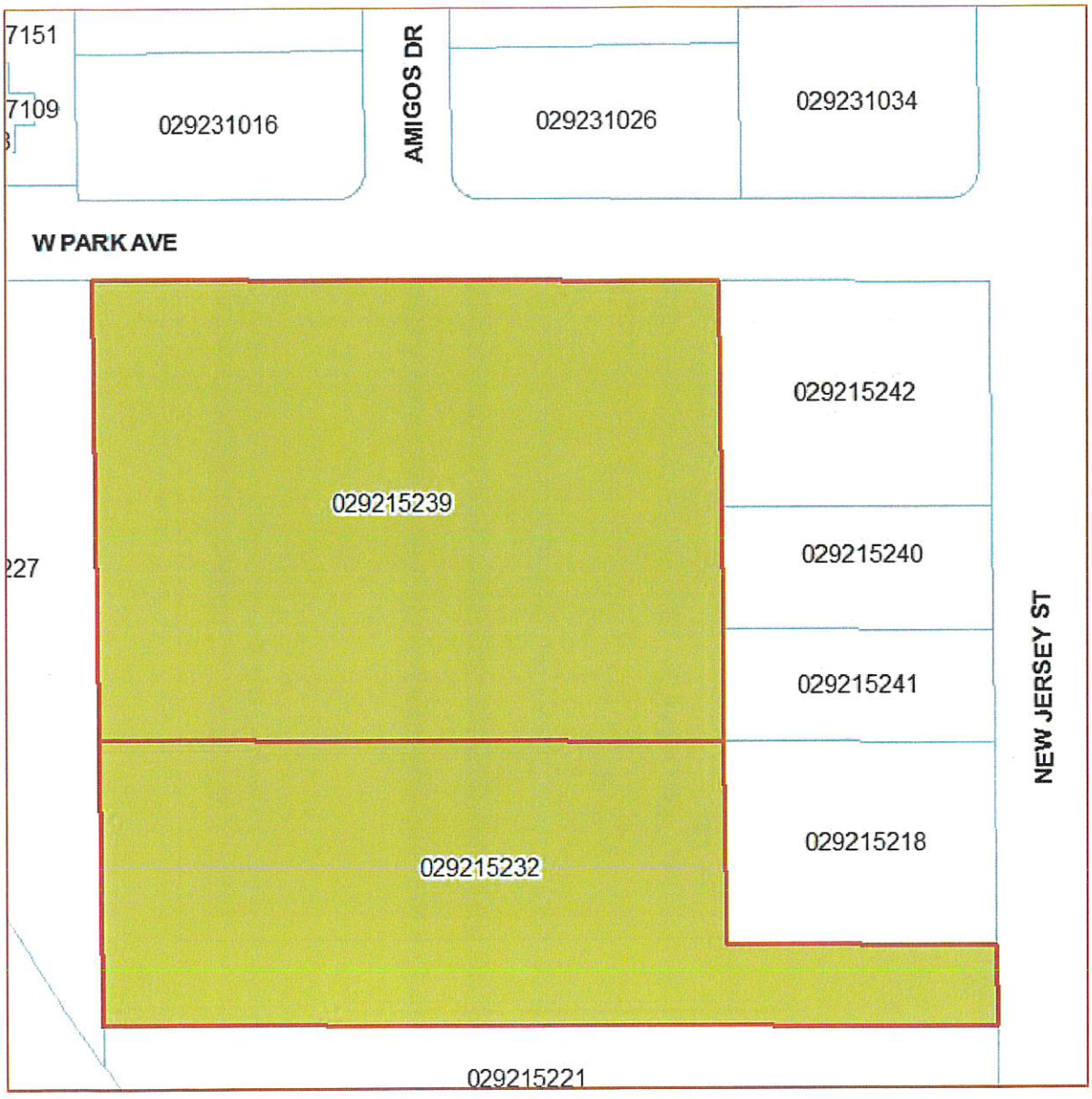
CUP 581

Annexation L10-A



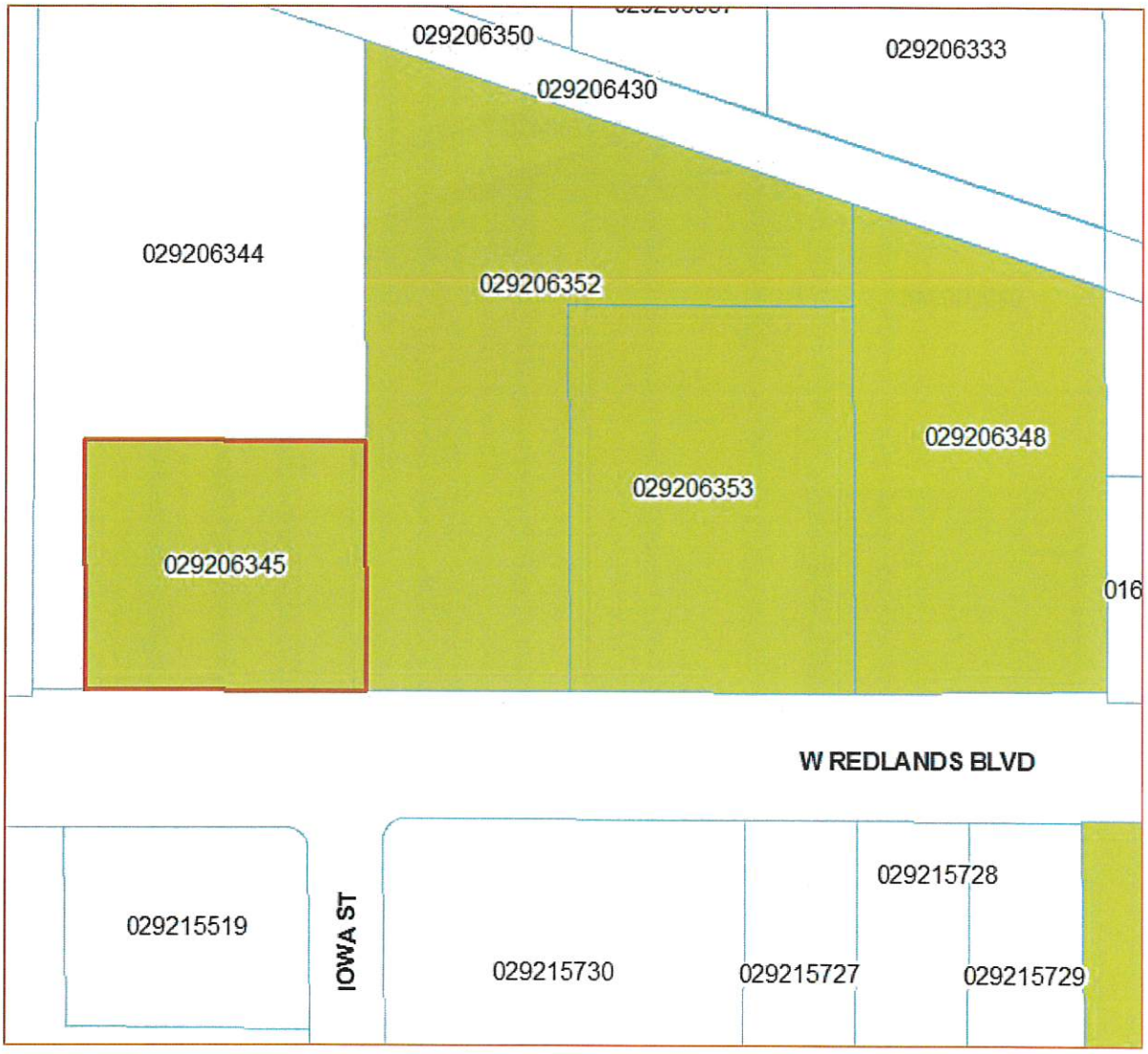
CRA 658

Annexation L10-B



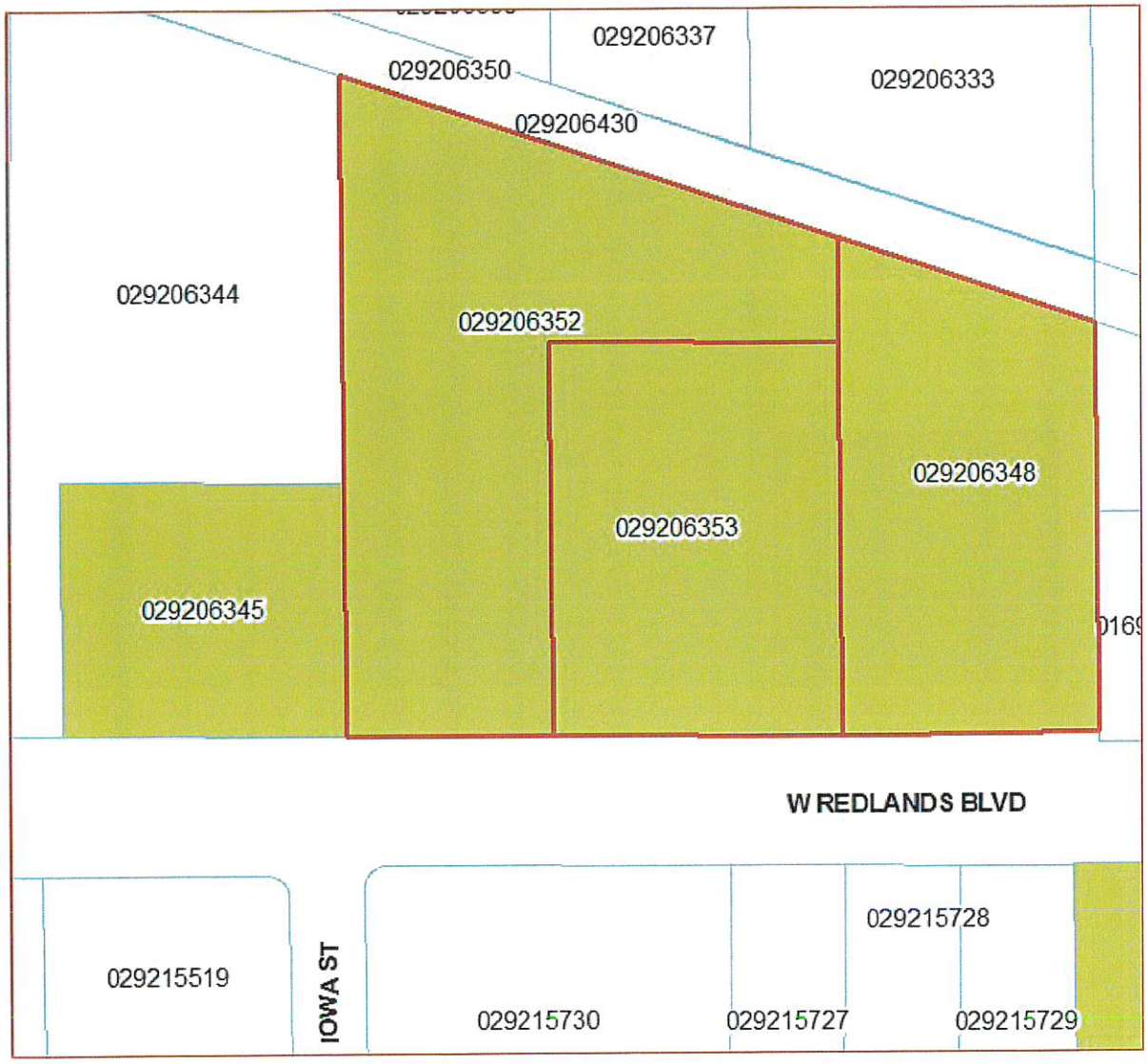
CRA 639

Annexation L10-C



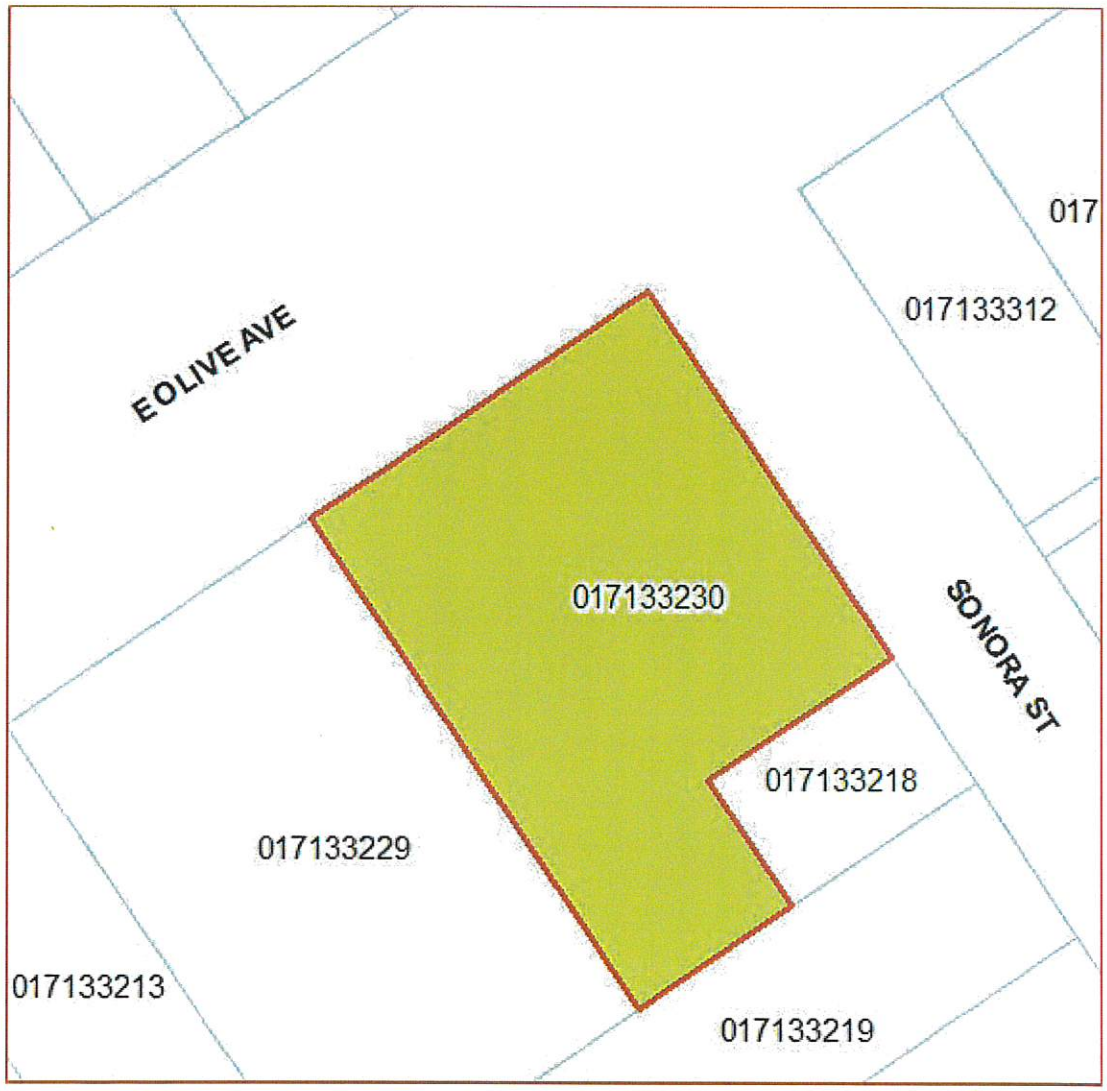
CRA 652

Annexation L10-D



CUP 602

Annexation L10-E



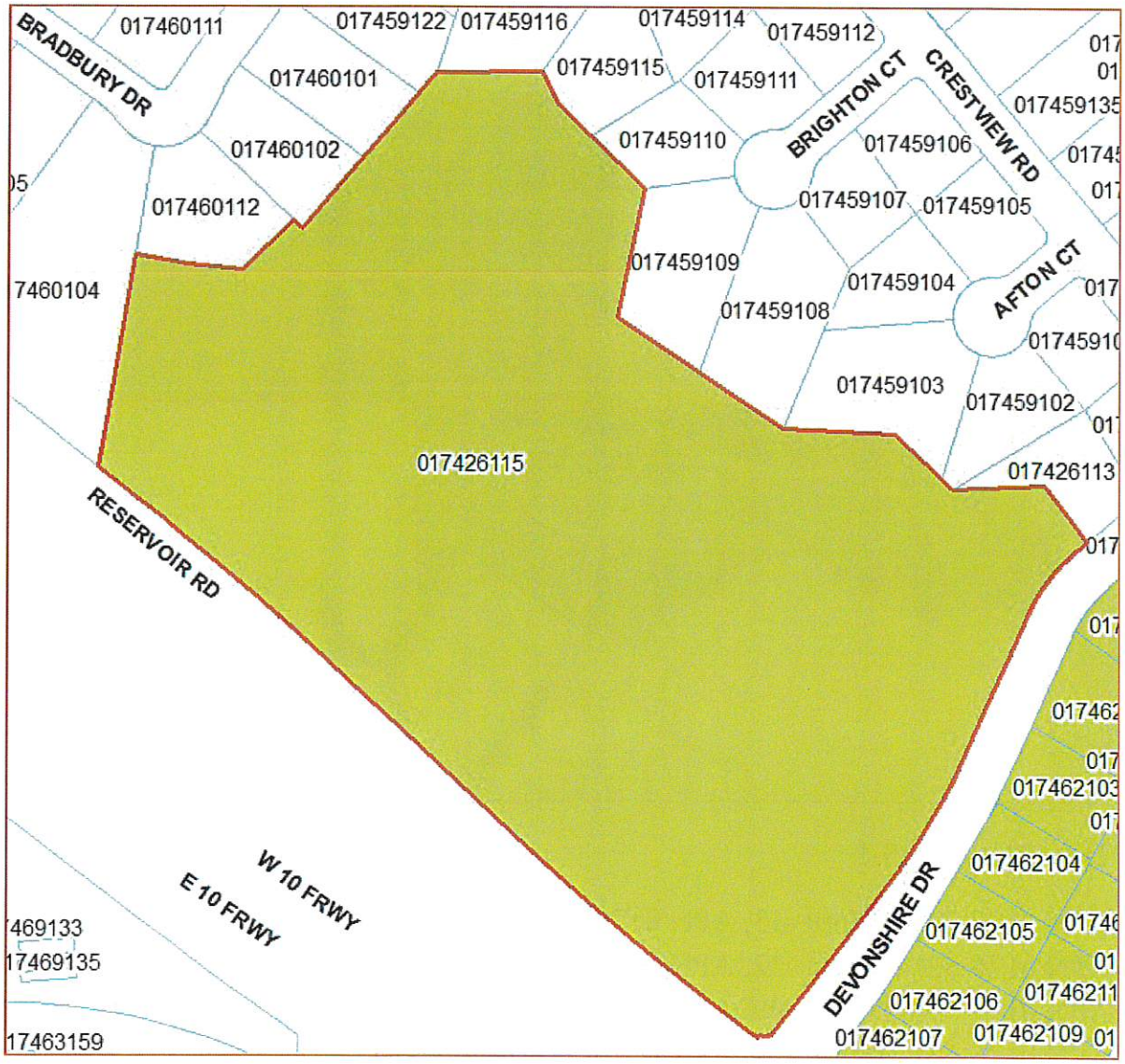
CUP 590

Annexation L10-F



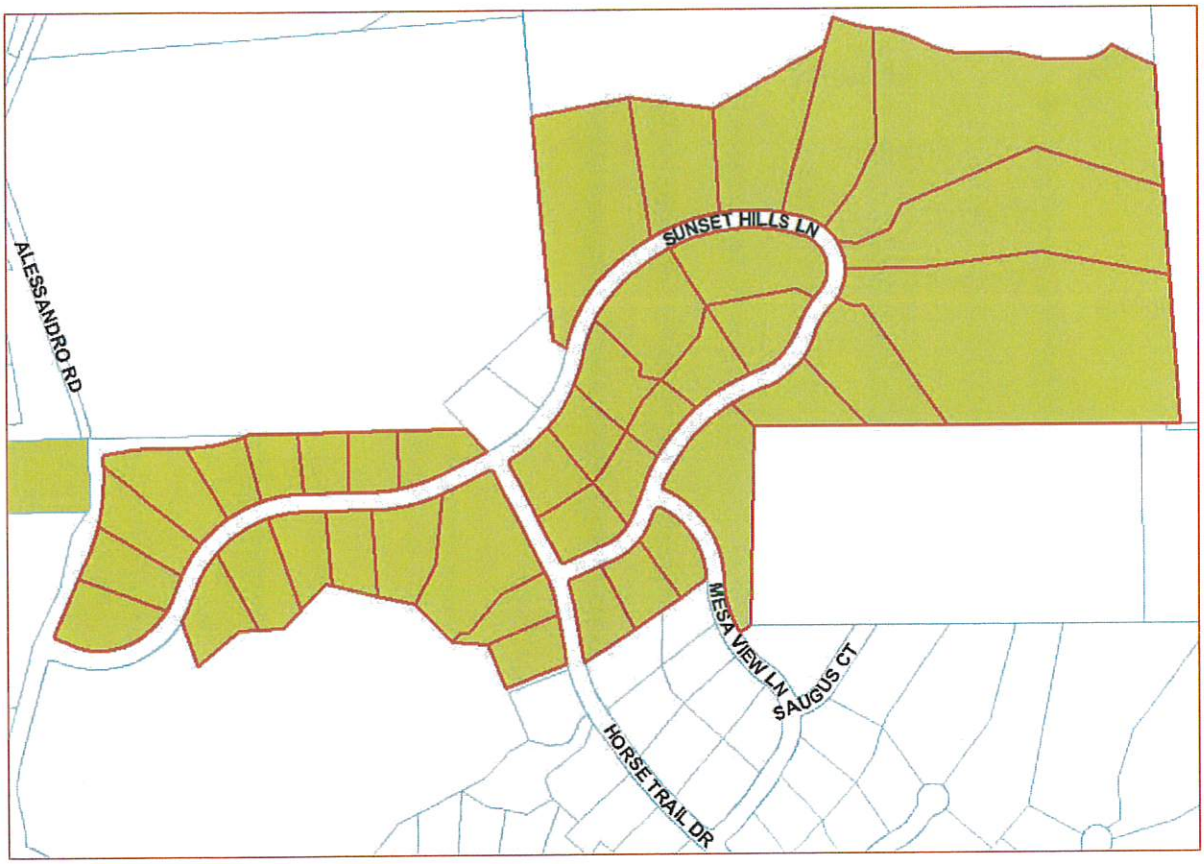
CUP 577

Annexation L10-G



CUP 541

Annexation L10-H



Tract Map 14790-1

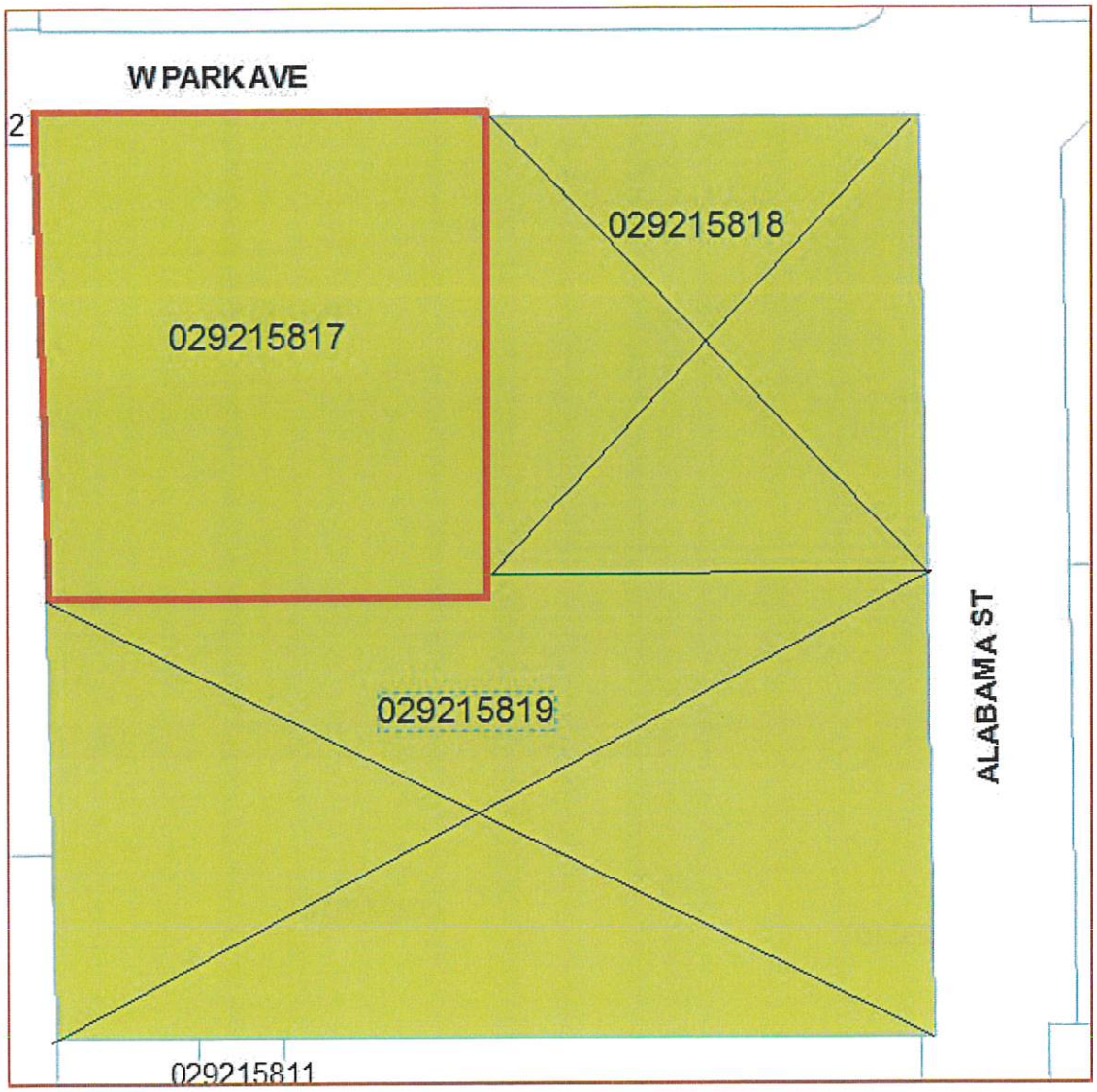
APN 0176-521-01 thru -13, APN 0176-521-18 thru -23
APN 0176-521-27 thru -32, APN 0176-531-01 thru -03
APN 0176-531-07 thru -09, APN 0176-531-12, -13, and -18
APN 0176-531-20 thru -22, APN 0176-531-24 thru -26

Annexation L11-A



CRA 664

Annexation L11-B



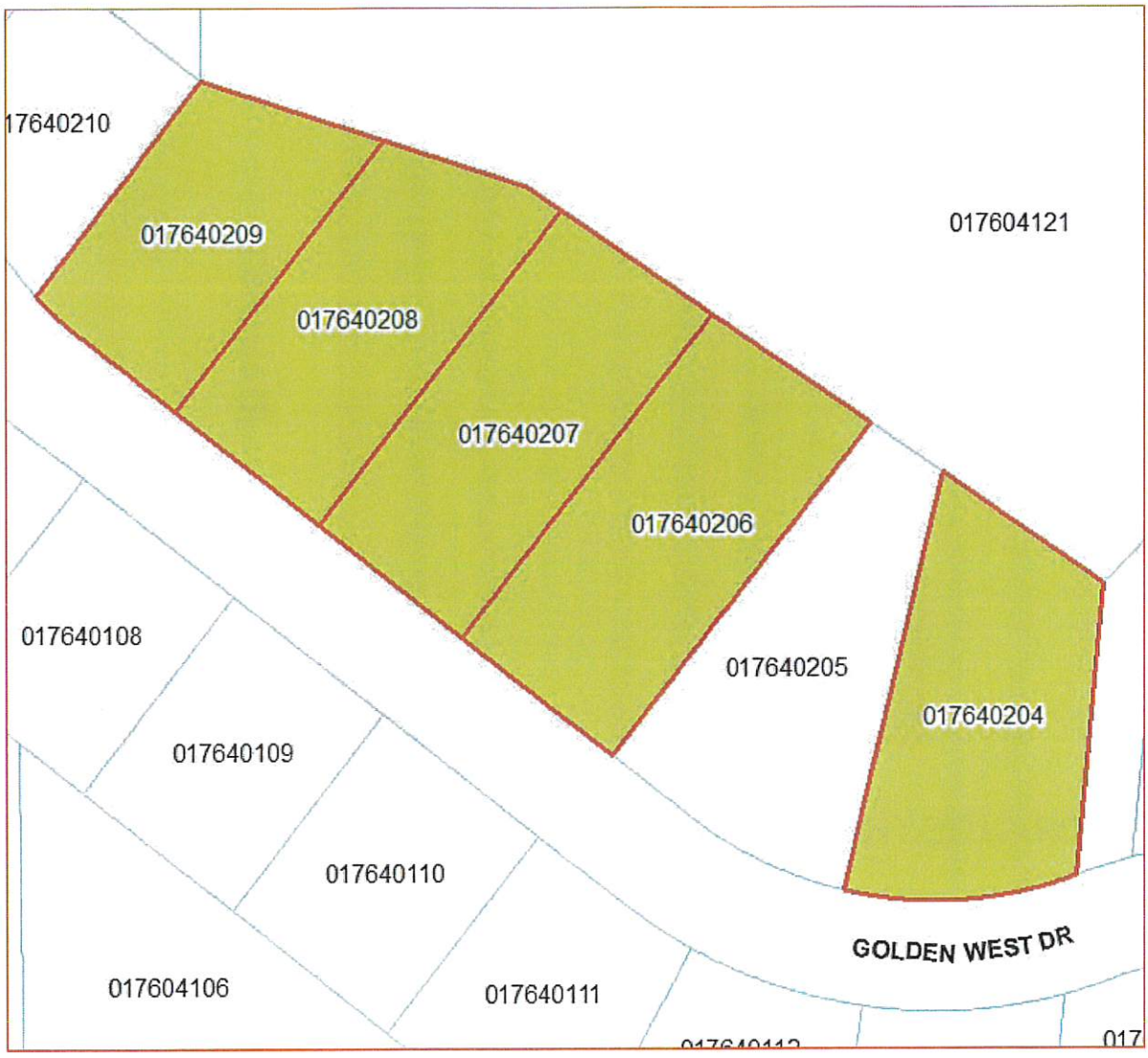
CRA 666

Annexation L11-C



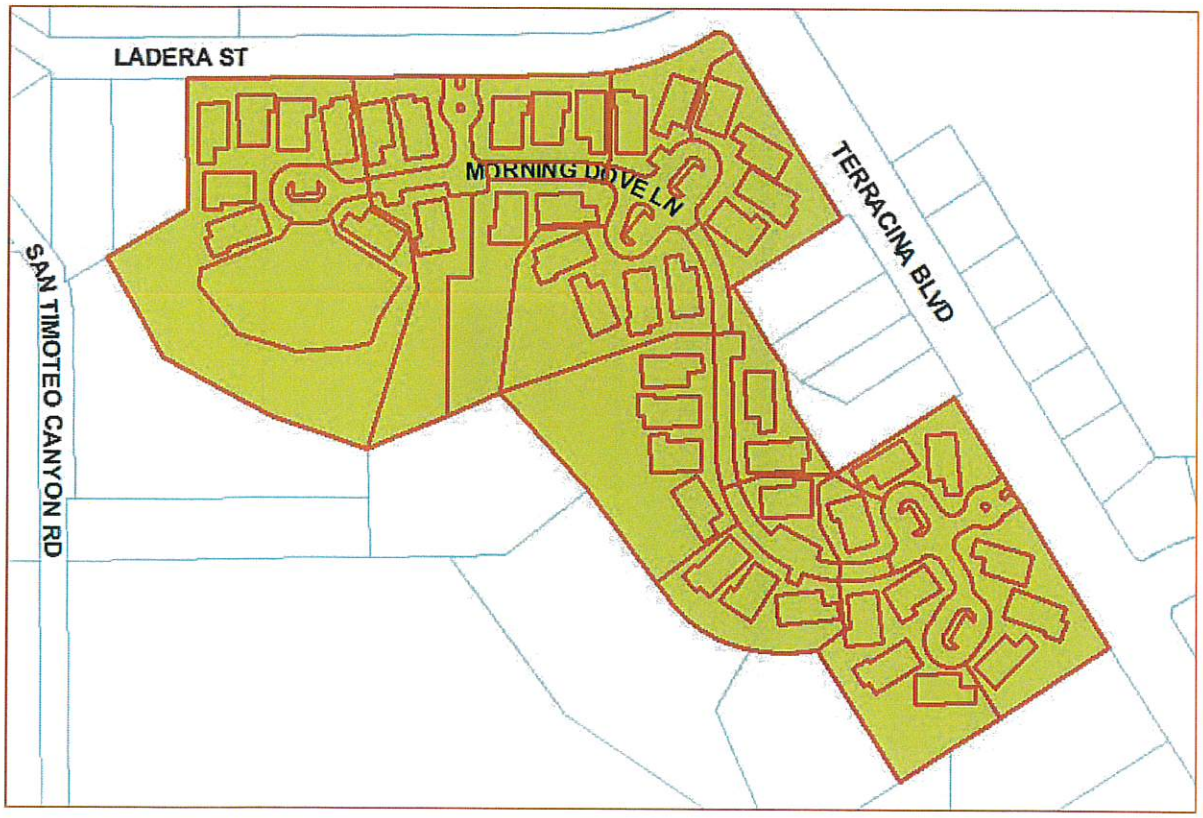
Tract 11535, Lot 36

Annexation L12-A, L12-B, L12-C, L12-D and L12-E



Annexation L12-A, APN 0176-402-09
Annexation L12-B, APN 0176-402-08
Annexation L12-C, APN 0176-402-07
Annexation L12-D, APN 0176-402-06
Annexation L12-E, APN 0176-402-04

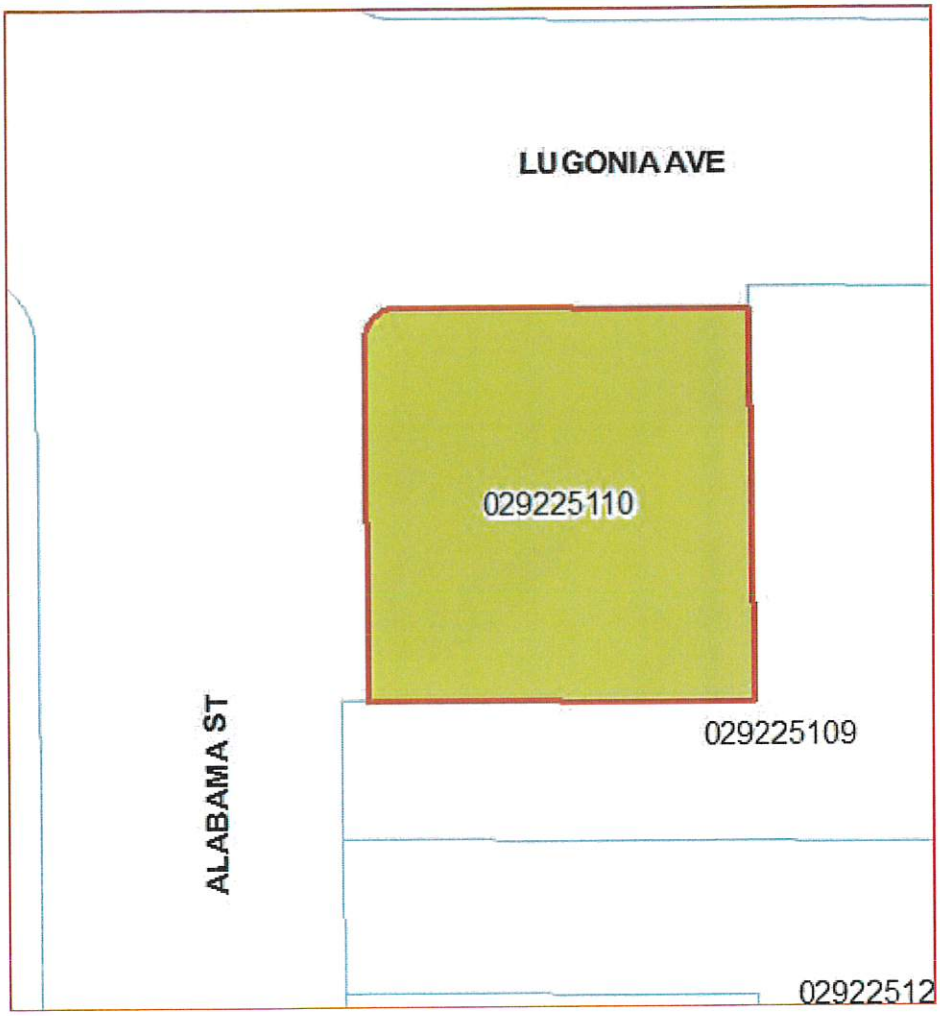
Annexation L12-F



Tract 15589

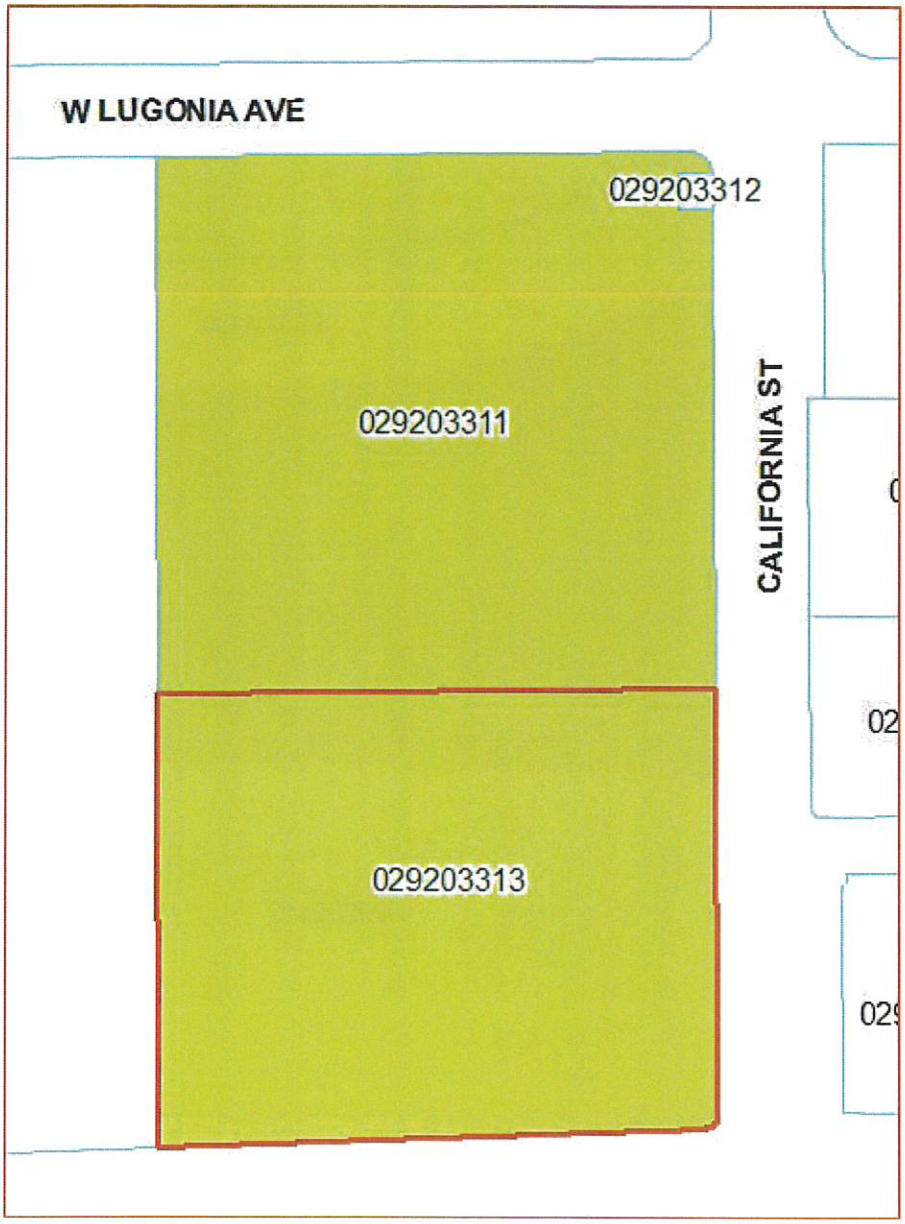
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Annexation L12-G



CUP 620

Annexation L12-H



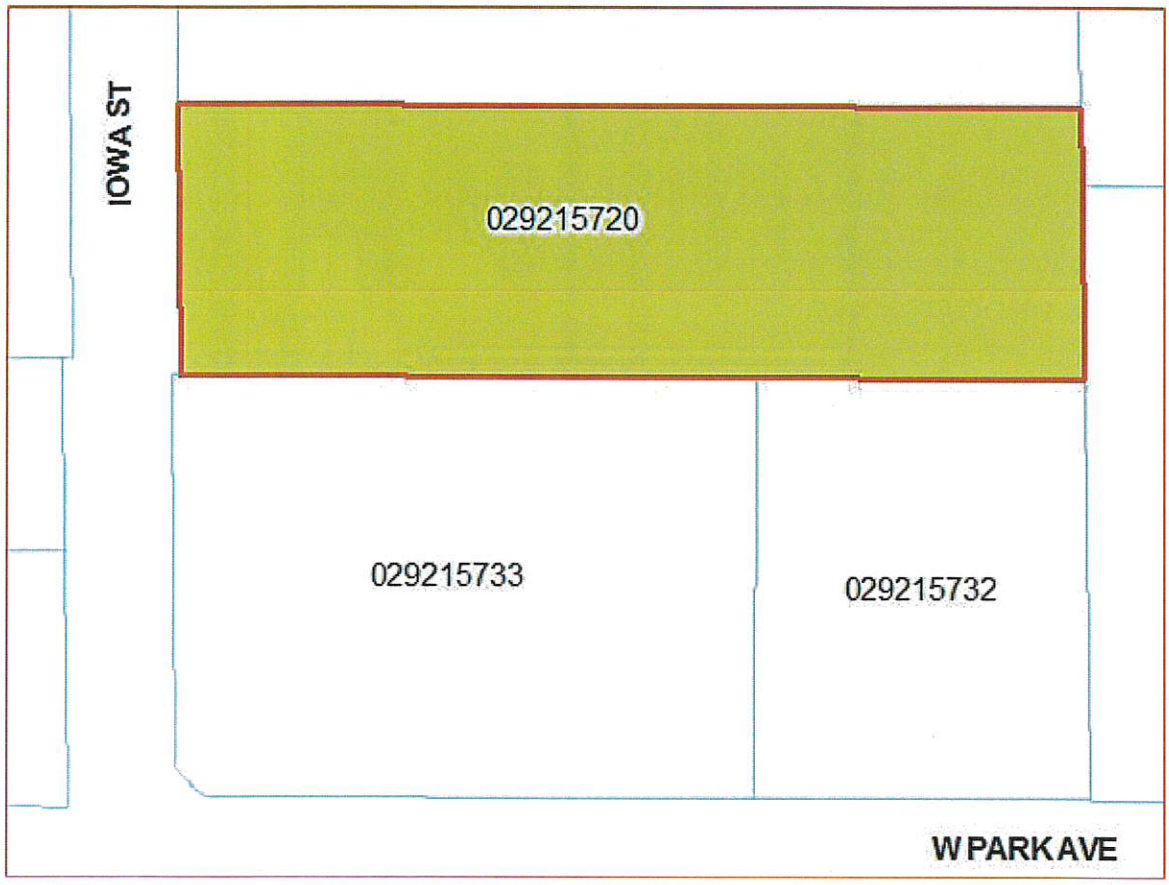
CUP 617

Annexation L12-I



CRA 668

Annexation L12-J



CUP 670

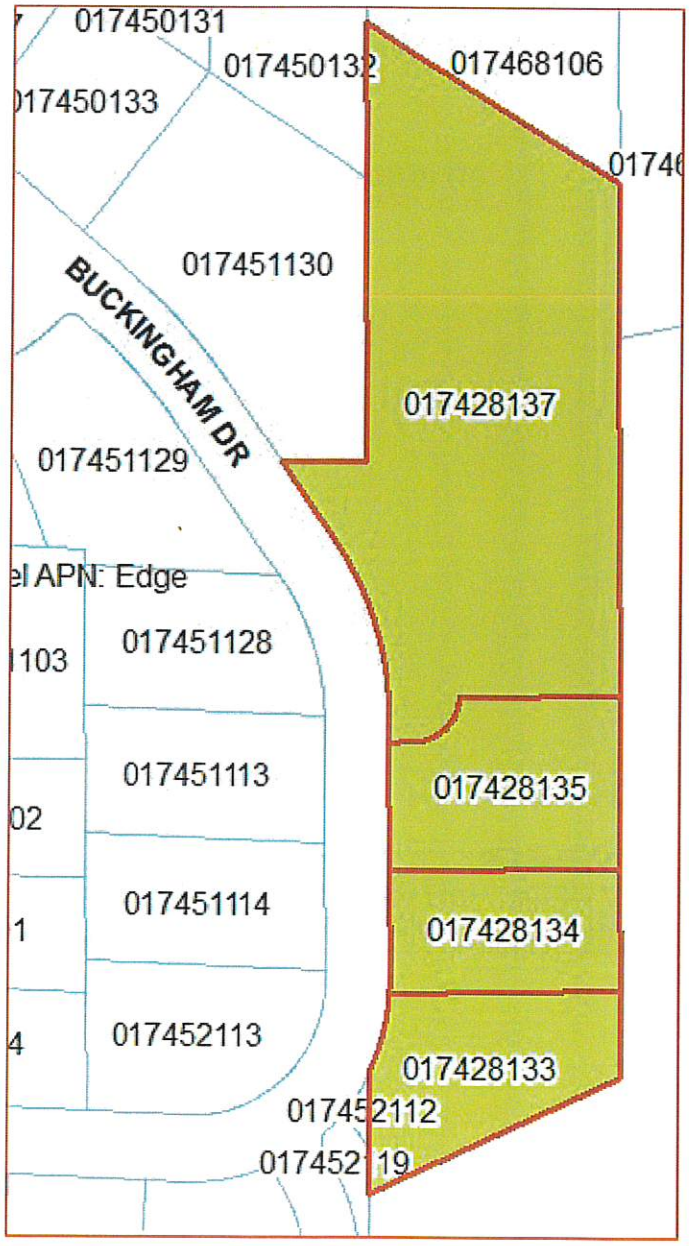
Annexation L12-K



MS 235

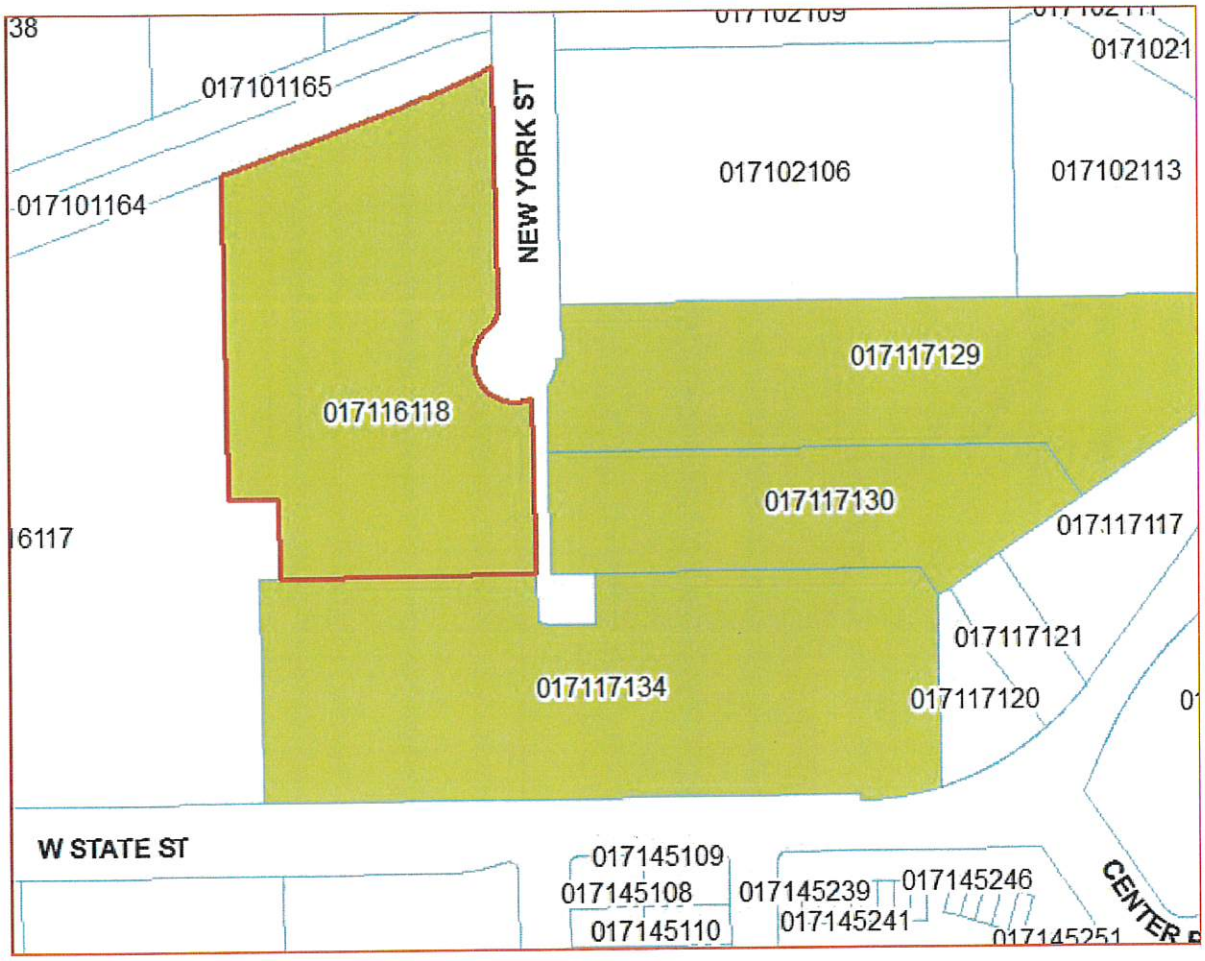
APN 0170-041-05, 0170-151-28, 0170-161-02, and 1212-431-02

Annexation L12-L



MS 221

Annexation L12-M



CRA 661

APPENDIX C

RESOLUTIONS & ORDINANCES

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CITY OF REDLANDS
LANDSCAPE MAINTENANCE DISTRICT NO. 1

APPENDIX C – RESOLUTIONS

Resolution No. 8651 – Institute proceedings and appointment of engineer

Resolution No. 8652 – Preliminary approval of engineer's report

Resolution No. 8653 – Declaring intention to levy assessments

Ordinance No. 2976 – Confirming a diagram and assessments

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RESOLUTION NO. 8651

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS INSTITUTING PROCEEDINGS FOR THE CONTINUED LEVY OF ASSESSMENTS, APPOINTING AN ASSESSMENT ENGINEER, AND ORDERING THE PREPARATION OF AN ENGINEER'S REPORT IN THE MATTER OF STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (this "City Council") has determined that the public interest, convenience and necessity requires the installation, operation and maintenance of a street lighting system and other facilities as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, it has been determined by the City Council of the City of Redlands (this "City Council"), that the public interest, convenience and necessity requires the maintenance of landscaping as set forth in Section 22525 of the California Streets and Highways Code; and

WHEREAS, this City Council has formed Redlands' Street Lighting District No. 1 to pay the costs associated with the installation, operation and maintenance of such street lighting system and other facilities; and

WHEREAS, this City Council has formed Redlands' Landscape Maintenance District No. 1 to pay the costs for the maintenance such landscaping; and

WHEREAS, it is the desire of this City Council to initiate proceedings and order the preparation of an engineer's report to levy assessments for fiscal year 2025-2026 upon properties located within Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, this City Council further desires to appoint Redlands' City Engineer, Donald Young, RCE No. 49918, as the "Assessment Engineer" for Street Lighting District No. 1 and Landscape Maintenance District No. 1;

NOW, THEREFORE, the City Council of the City of Redlands does hereby find, determine and resolve as follows:

Section 1. That the public interest, convenience and necessity requires the continued levy of assessments within Street Lighting District No. 1 for the purpose of installing, operating and maintaining street lights and associated facilities as authorized by Section 22620 of the California Streets and Highways Code and in compliance with Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 2. That the public interest, convenience and necessity requires the continued levy of assessments within Landscape Maintenance District No. 1 for the purpose of maintaining landscaping and improvements as authorized by Section 22620 of the California Streets and

Highways Code and in compliance with the requirements of Article XIIID and Section 19 of Article XVI of the California Constitution.

Section 3. That the properties to be assessed for the installation, operation and maintenance of the street lighting facilities shall be those properties located within the boundaries of Street Lighting District No. 1.

Section 4. That the properties to be assessed for the maintenance and operation of the landscaping and improvements shall be those properties located within the boundaries of Landscape Maintenance District No. 1.

Section 5. That the proceedings for the continued levy of assessments within Street Lighting District No. 1 and Landscape Maintenance District No. 1 shall be conducted in accordance the with provisions of Division 15 of the California Streets and Highways Code (the Landscaping and Lighting Act of 1972) and in compliance with the requirements of Article XIIID, and Section 19 of Article XVI, of the California Constitution.

Section 6. That Redlands' City Engineer, Goutam Dobey, RCE No. 75646, having an office located at 35 Cajon Street, Suite 15A, Redlands, California, is hereby appointed "Assessment Engineer" and shall have the authority conferred upon the Assessment Engineer by the Landscaping and Lighting Act of 1972.

Section 7. That the Assessment Engineer is hereby ordered to prepare a report in accordance with the Landscaping and Lighting Act of 1972.

ADOPTED, SIGNED AND APPROVED this 6th day of May, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof, held on the 6th day of May, 2025 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8652

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS GIVING PRELIMINARY APPROVAL OF THE ENGINEER'S REPORTS FOR FISCAL YEAR 2025-2026 FOR STREET LIGHTING DISTRICT NO. 1 AND LANDSCAPE MAINTENANCE DISTRICT NO. 1

WHEREAS, the City Council of the City of Redlands (the "City Council") has heretofore determined that the public interest, convenience and necessity require the maintenance and operation of street lighting and appurtenant facilities, as set forth in Section 22525 of the Streets and Highways Code, within the incorporated boundaries of the City of Redlands; and

WHEREAS, the City Council has heretofore determined that the public interest, convenience and necessity require the maintenance of landscape and irrigation facilities set forth in Section 22525 of the Streets and Highways Code, State of California, within the incorporated boundaries of the City of Redlands; and

WHEREAS, Donald Young, One Stop Permit Center Manager, 35 Cajon Street, Suite 15A, Redlands, California, has been appointed "Assessment Engineer" with all provisions of Part 2 of Division 15 of the Streets and Highways Code applicable to the Engineer being applied to the "Assessment Engineer;" and

WHEREAS, Sections 22622 and 22623 of the Streets and Highways Code require that an Engineer's Report be prepared and filed annually, specifying the assessments to be levied against the benefitting properties within the City's Street Lighting District No. 1 and Landscape Maintenance District No. 1; and

WHEREAS, the City of Redlands City Engineer, as the Assessment Engineer, has prepared and filed with the City Clerk reports in writing as required by the Landscaping and Lighting Act of 1972 and in compliance with Article XIIID of the California Constitution; and

WHEREAS, the City Council has duly considered said reports and each and every part thereof; and finds that each and every part of said reports is sufficient, and that no part of said reports requires modification in any respect;

NOW, THEREFORE, be it resolved by the City Council of the City of Redlands as follows:

Section 1. That the Engineer's estimate of the itemized costs and expenses of said work and of the incidental expenses in connection therewith, contained in said reports be, and each of them are hereby, preliminarily approved and confirmed.

Section 2. That the diagram showing the Street Lighting District No. 1 and Landscape Maintenance District No. 1 referred to and described in said reports, and the boundaries of the lots and parcels of land within such assessment district as the same existed at the time of passage of this resolution, are hereby preliminarily approved and confirmed.

Section 3. That the proposed assessment upon the properties in Street Lighting District No. 1 and Landscape Maintenance District No. 1, in proportion to the estimated benefit to be received by such properties, respectively, from said work and of the incidental expenses thereof, as contained in said report is hereby preliminarily approved and confirmed.

Section 4. That said reports shall stand as the Engineer's Report for the purposes of all subsequent proceedings for Street Lighting District No. 1 and Landscape Maintenance District No. 1.

APPROVED AND ADOPTED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____

Jeanne Donaldson, City Clerk

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RESOLUTION NO. 8653

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS WITHIN REDLANDS' STREET LIGHTING ASSESSMENT DISTRICT NO. 1 AND LANDSCAPE ASSESSMENT DISTRICT NO. 1 FOR FISCAL YEAR 2025-2026 PURSUANT TO THE LANDSCAPING AND LIGHTING ACT OF 1972, AND ESTABLISHING A TIME AND PLACE FOR PUBLIC HEARINGS FOR THE TWO DISTRICTS TO CONSIDER PROTESTS

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The City Council of the City of Redlands hereby (1) finds that the public interest and convenience requires, and (2) declares its intention to levy and collect, assessments against the lots and parcels of property within an existing assessment districts designated "Redlands' Street Lighting Assessment District No. 1 and Landscape Assessment District No. 1" (the "Districts") pursuant to the provisions of the Landscaping and Lighting Act of 1972, Part 2 of Division 15 of the Streets and Highways Code (commencing with Section 22500) (the "Act") for fiscal year 2025-2026, commencing July 1, 2025, and ending June 30, 2026, to pay for the costs and expenses of the improvements described in Section 3 hereof.

Section 2. Reference is hereby made to a map on file in the office of the City Clerk and open for public inspection for a description of the exterior boundaries of the Districts.

Section 3. The proposed improvements are briefly described as follows: The operation, maintenance and servicing of public within the District, including the operation, maintenance and servicing of public lighting facilities and landscaping, including safety lighting, traffic signals, trees, shrubs, grass and other ornamental vegetation, and appurtenant facilities, located along public roadways, streets and rights-of-way within the boundaries of the Districts. "Maintenance" means the furnishing of services and materials for the ordinary and usual maintenance, operation and servicing of the public lighting and landscaping facilities, and appurtenant facilities, including repair, removal or replacement of all or part of any of the public lighting and landscaping facilities, or appurtenant facilities. "Servicing" means the maintenance of any of the public lighting and landscaping facilities or appurtenant facilities, including the furnishing of electric current, energy or gas for the operation of any of the lighting facilities and the furnishing of water for the irrigation of any of the landscaping facilities.

Section 4. The assessments to be levied and collected against the assessable lots and parcels of property within the Districts for fiscal year 2025-2026 are not proposed to increase from the assessments levied and collected for fiscal year 1997-1998.

Section 5. Public property owned by any public agency and in use in the performance of a public function which is included within the boundaries of the Districts shall not be subject to assessment to be made under these proceedings to cover any of the costs and expenses of the improvements.

Section 6. All railroad, gas, water and electric utility rights-of-way are included within the Districts and shall be assessed in accordance with the benefits received from the improvements.

Section 7. Reference is hereby made to the Reports of the Engineer entitled "City of Redlands Street Lighting District No. 1 Engineer's Report for Fiscal Year 2025-2026" and "City of Redlands Landscape Maintenance District No. 1 Engineer's Report for Fiscal Year 2025-2026" on file in the office of the City Clerk for a full and detailed description of the improvements, the boundaries of the District and any zones therein and the proposed assessments upon assessable lots and parcels of land within the District.

Section 8. NOTICE IS HEREBY GIVEN THAT THE CITY COUNCIL APPOINTS TUESDAY, THE 17TH DAY OF JUNE, 2025, AT THE HOUR OF 6:00 P.M., OR AS SOON THEREAFTER AS THE MATTER MAY BE HEARD, IN THE COUNCIL CHAMBERS AT CITY HALL, CITY OF REDLANDS, 35 CAJON STREET, SUITE 2, REDLANDS, CALIFORNIA 92373, AS THE TIME AND PLACE FOR TWO PUBLIC HEARINGS TO CONSIDER PROTESTS OR OBJECTIONS TO THE LEVY OF THE PROPOSED ASSESSMENTS IN CONNECTION WITH THE DISTRICTS. All interested persons shall be afforded the opportunity to hear and be heard. Any interested person may file a written protest with the City Clerk prior to the conclusion of the hearing. A written protest shall state all grounds of objection. A protest by a property owner shall contain a description sufficient to identify the property owned by the signer thereof. The City Council shall consider all oral statements and all written protests made or filed by any interested person.

Section 9. The City Clerk is hereby authorized and directed to give notice of such hearing in accordance with law.

Section 10. The City Council hereby determines and declares that the proposed assessments constitute a continuation of assessments existing on the effective date of Article XIIID, that the assessments are imposed exclusively to finance the maintenance and operation expenses for streets and that the assessments are exempt from the requirements of Article XIIID, Section 4 of the California Constitution.

Section 11. The City Council hereby designates Donald Young, One Stop Permit Center Manager, telephone number (909) 798-7585 x6, to answer inquiries regarding the hearing, protest proceedings and procedural or technical matters.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was duly adopted by the City Council, at a regular meeting thereof, held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

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ORDINANCE NO. 2976

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF REDLANDS ESTABLISHING FISCAL YEAR 2025/26 ANNUAL ASSESSMENTS FOR LANDSCAPE MAINTENANCE DISTRICT NO. 1 IN ACCORDANCE WITH THE LIGHTING AND LANDSCAPING ACT OF 1972

WHEREAS, on July 7, 1987, the City Council ordered the formation of Landscape Maintenance District No. 1 (the “District”), pursuant to Chapter 2.5 of Part 1 of Division 2 of Title 5 (commencing with Section 53311) of the California Government Code, commonly known as the "Mello-Roos Community Facilities Act of 1982" (the "Act"); and

WHEREAS, the purpose of the District is to ensure satisfactory levels of funding for landscape maintenance are provided. District assessments provide funding for labor, material, and equipment associated with landscape services provided by the City within the District. These services include turf and ground cover maintenance, irrigation, and tree and bush trimming, adjacent properties annexed into the district, and to provide administrative management of the District; and,

WHEREAS, on May 6, 2025, City Council approved Donald Young, One Stop Permit Center Manager, as the Assessment Engineer for the District and the Assessment Engineer, Mr. Young is responsible for the preparation of the Engineer’s Report required to levy the annual assessment in accordance with the California Government Code; and,

WHEREAS, on June 3, 2025 City Council adopted Resolution No. 8652, preliminarily approving the Engineer's Report for the District; and,

WHEREAS, on June 3, 2025, City Council adopted Resolution No. 8653, setting June 17, 2025 as the Public Hearing date for consideration of levying Fiscal Year 2025/2026 assessments in accordance with the Lighting and Landscaping Act of 1972.

NOW, THEREFORE, the City Council of the City of Redlands, acting in its capacity as the legislative body of Landscape Maintenance District No. 1, ORDAINS as follows:

Section 1. The above recitals are all true and correct.

Section 2. By the passage of this Ordinance, the Council authorizes the levy of a special tax at a rate in accordance with the rate and method of apportionment set forth in the Engineer’s Report for the District on file with City Clerk of the City of Redlands, incorporated by reference herein, being the rate and method of apportionment specified in the Resolution of Intention to Establish the District.

Section 3. Properties or entities of the state, federal or other local governments shall, except as otherwise provided in Sections 53317.3 and 53317.5 of the Act, be exempt from the special tax.

Section 4. Only those properties identified in the Engineer's Report are subject to assessments of the District with assessment amounts as listed in Exhibit "A" attached hereto and incorporated by reference herein.

Section 5. All of the collections of the special tax shall be used as provided for in the Act and the Resolution of Formation.

Section 6. The special tax shall be collected in the same manner as ordinary ad valorem property taxes are collected and shall be subject to the same penalties and the same procedure, sale and lien priority in case of delinquency as is provided for ad valorem taxes, as such procedure may be modified by law from time to time.

Section 7. The City Council hereby determines that the adoption of this ordinance is exempt from review under the California Environmental Quality Act ("CEQA") pursuant to State CEQA Guidelines section 15061(b)(3) because this City Council determines that it can be seen with certainty that approval of this ordinance will have no direct or indirect impact on the physical environment, and that approval of this ordinance is not a "project" under CEQA as that term is defined in Public Resources Code section 21065.

Section 8. Severability. If any section, sentence, clause or phrase of this ordinance or the application thereof to any entity, person or circumstance is held for any reason to be invalid or unconstitutional, such invalidity or unconstitutionality shall not affect other provisions or applications of this ordinance which can be given effect without the invalid provisions or application, and to this end the provisions of this ordinance are severable. The City Council of the City of Redlands hereby declares that it would have adopted this ordinance and each section, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsections, sentences, clauses or phrases be declared invalid or unconstitutional.

Section 9. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect as provided by law.

Section 10. The District Assessment Engineer is hereby authorized to transmit a certified copy of this ordinance and necessary documents to the San Bernardino County Assessor and Treasurer-Tax Collector, and to perform all other acts which are required by the Act, this ordinance, or by law in order to accomplish the purpose of this ordinance.

ADOPTED, SIGNED AND APPROVED this 17th day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certifies that the foregoing resolution was adopted by the City Council, at a regular meeting thereof, held on the 17th day of June, 2025 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

APPENDIX D

ASSESSMENT ROLL

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City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0167-231-19-0000	709 LUGONIA AVE	Annexation L4-D	$ 6.00
0167-231-20-0000	705 LUGONIA AVE	Annexation L4-D	$ 6.00
0167-231-21-0000	1237 LAWTON ST	Annexation L4-D	$ 6.00
0167-271-61-0000	1135 CHURCH ST	Annexation L6-D	$ 6.00
0167-802-01-0000	1575 N COLUMBIA ST	Original 1-B	$ 39.65
0167-802-02-0000	1571 N COLUMBIA ST	Original 1-B	$ 36.05
0167-802-03-0000	1567 COLUMBIA ST	Original 1-B	$ 36.05
0167-802-04-0000	1563 COLUMBIA ST	Original 1-B	$ 36.05
0167-802-05-0000	1558 WOODBURY ST	Original 1-B	$ 36.05
0167-802-06-0000	1562 WOODBURY	Original 1-B	$ 36.05
0167-802-07-0000	1566 WOODBURY	Original 1-B	$ 36.05
0167-802-08-0000	1570 WOODBURY	Original 1-B	$ 39.65
0167-803-01-0000	1569 WOODBURY	Original 1-B	$ 39.65
0167-803-02-0000	1565 WOODBURY	Original 1-B	$ 36.05
0167-803-03-0000	1561 WOODBURY	Original 1-B	$ 36.05
0167-803-04-0000	610 ELISE	Original 1-B	$ 36.05
0167-803-05-0000	618 ELISE	Original 1-B	$ 36.05
0167-803-06-0000	626 ELISE	Original 1-B	$ 36.05
0167-803-07-0000	634 ELISE ST	Original 1-B	$ 36.05
0167-803-08-0000	1568 VERMONT	Original 1-B	$ 36.05
0167-803-09-0000	1574 VERMONT	Original 1-B	$ 39.65
0167-804-01-0000	633 ELISE	Original 1-B	$ 36.05
0167-804-02-0000	625 ELISE	Original 1-B	$ 36.05
0167-804-03-0000	617 ELISE	Original 1-B	$ 36.05
0167-804-04-0000	609 ELISE	Original 1-B	$ 36.05
0167-804-05-0000	601 ELISE	Original 1-B	$ 36.05
0167-804-06-0000	525 ELISE	Original 1-B	$ 36.05
0167-804-07-0000	517 ELISE	Original 1-B	$ 36.05
0167-804-08-0000	509 ELISE	Original 1-B	$ 36.05
0167-804-09-0000	1555 COLUMBIA ST	Original 1-B	$ 36.05
0167-804-10-0000	1551 COLUMBIA ST	Original 1-B	$ 36.05
0167-804-11-0000	1547 COLUMBIA ST	Original 1-B	$ 36.05
0167-804-12-0000	1543 N COLUMBIA ST	Original 1-B	$ 36.05
0167-804-13-0000	1528 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-14-0000	1530 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-15-0000	1532 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-16-0000	1534 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-17-0000	1536 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-18-0000	1538 CANTERBURY CIR	Original 1-B	$ 36.05
0167-804-19-0000	1540 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-01-0000	1539 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-02-0000	1537 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-03-0000	1535 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-04-0000	1533 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-05-0000	1531 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-06-0000	1509 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-07-0000	1507 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-08-0000	1505 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-09-0000	1503 CANTERBURY CIR	Original 1-B	$ 36.05
0167-823-10-0000	1501 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-01-0000	1539 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-02-0000	1535 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-03-0000	1531 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-04-0000	1527 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-05-0000	1523 COLUMBIA ST	Original 1-B	$ 36.05

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0167-824-06-0000	1519 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-07-0000	1515 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-08-0000	1511 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-09-0000	1507 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-10-0000	1503 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-11-0000	1501 COLUMBIA ST	Original 1-B	$ 36.05
0167-824-12-0000	508 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-13-0000	512 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-14-0000	516 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-15-0000	520 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-16-0000	600 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-17-0000	602 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-18-0000	606 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-19-0000	610 PENNSYLVANIA AVE	Original 1-B	$ 36.05
0167-824-20-0000	1500 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-21-0000	1502 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-22-0000	1504 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-23-0000	1506 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-24-0000	1508 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-25-0000	1510 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-26-0000	1512 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-27-0000	1514 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-28-0000	1516 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-29-0000	1518 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-30-0000	1520 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-31-0000	1522 CANTERBURY CIR	Original 1-B	$ 36.05
0167-824-32-0000	1524 CANTERBURY CIR	Original 1-B	$ 36.05
0167-851-39-0000	1832 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-40-0000	1828 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-41-0000	1824 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-42-0000	1820 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-43-0000	1816 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-44-0000	1812 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-45-0000	1808 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-46-0000	1804 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-47-0000	1800 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-48-0000	1835 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-49-0000	1831 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-50-0000	1827 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-51-0000	1823 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-52-0000	1819 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-53-0000	1815 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-54-0000	1811 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-55-0000	1807 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-851-56-0000	1803 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-37-0000	450 RIVERVIEW DR	Annexation L8-B	$ 6.00
0167-861-38-0000	1928 BROOKSTONE DR	Annexation L8-B	$ 6.00
0167-861-39-0000	1924 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-40-0000	1920 BROOKSTONE	Annexation L8-B	$ 6.00
0167-861-41-0000	1916 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-42-0000	1912 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-43-0000	1908 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-44-0000	1840 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-45-0000	1836 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-46-0000	1839 BROOKSTONE ST	Annexation L8-B	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0167-861-47-0000	1907 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-48-0000	1911 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-49-0000	1915 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-50-0000	1919 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-51-0000	1923 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-52-0000	1927 BROOKSTONE ST	Annexation L8-B	$ 6.00
0167-861-53-0000	410 RIVERVIEW DR	Annexation L8-B	$ 6.00
0167-861-54-0000	420 RIVERVIEW DR	Annexation L8-B	$ 6.00
0168-681-01-0000	1067 MENDICINO WY	Original 1-A	$ 62.09
0168-681-02-0000	1063 MENDICINO WY	Original 1-A	$ 62.09
0168-681-03-0000	1059 MENDICINO WY	Original 1-A	$ 62.09
0168-681-04-0000	1055 MENDICINO	Original 1-A	$ 62.09
0168-681-05-0000	1051 MENDICINO WY	Original 1-A	$ 62.09
0168-681-06-0000	1047 MENDOCINO	Original 1-A	$ 62.09
0168-681-07-0000	1043 MENDICINO WY	Original 1-A	$ 62.09
0168-681-08-0000	1039 MENDICINO	Original 1-A	$ 62.09
0168-681-09-0000	1035 MENDICINO	Original 1-A	$ 62.09
0168-681-10-0000	1756 MENDOCINO WY	Original 1-A	$ 62.09
0168-681-11-0000	1762 MENDOCINO WY	Original 1-A	$ 62.09
0168-681-12-0000	1768 MENDOCINO	Original 1-A	$ 62.09
0168-681-13-0000	1774 MENDICINO	Original 1-A	$ 62.09
0168-681-14-0000	1780 MENDICINO WY	Original 1-A	$ 62.09
0168-681-15-0000	1786 MENDICINO	Original 1-A	$ 62.09
0168-681-16-0000	1792 MENDOCINO	Original 1-A	$ 62.09
0168-681-17-0000	1798 MENDICINO	Original 1-A	$ 68.30
0168-681-18-0000	1008 ALPINE CT	Original 1-A	$ 68.30
0168-681-19-0000	1012 ALPINE	Original 1-A	$ 68.30
0168-681-20-0000	1016 ALPINE CT	Original 1-A	$ 68.30
0168-681-21-0000	1020 ALPINE	Original 1-A	$ 68.30
0168-681-22-0000	1024 ALPINE	Original 1-A	$ 68.30
0168-681-23-0000	1028 ALPINE CT	Original 1-A	$ 68.30
0168-681-24-0000	1032 ALPINE CT	Original 1-A	$ 68.30
0168-681-25-0000	1029 ALPINE CT	Original 1-A	$ 62.09
0168-681-26-0000	1025 ALPINE CT	Original 1-A	$ 62.09
0168-681-27-0000	1021 ALPINE ST	Original 1-A	$ 62.09
0168-681-28-0000	1017 ALPINE ST	Original 1-A	$ 62.09
0168-681-29-0000	1013 ALPINE	Original 1-A	$ 62.09
0168-681-30-0000	1009 ALPINE CT	Original 1-A	$ 62.09
0168-681-31-0000	1005 ALPINE CT	Original 1-A	$ 62.09
0168-681-32-0000	1042 MENDICINO WY	Original 1-A	$ 62.09
0168-681-33-0000	1046 MENDICINO	Original 1-A	$ 62.09
0168-681-34-0000	1050 MENDOCINO	Original 1-A	$ 62.09
0168-681-35-0000	1054 MENDICINO BLVD	Original 1-A	$ 62.09
0168-681-36-0000	1058 MENDICINO	Original 1-A	$ 62.09
0168-681-37-0000	1062 MENDICINO	Original 1-A	$ 62.09
0168-681-38-0000	1066 MENDICINO WY	Original 1-A	$ 62.09
0169-043-14-0000	506 W COLTON AVE	Annexation L7-D	$ 6.00
0169-053-12-0000	306 W COLTON AVE	Annexation L4-L	$ 6.00
0169-131-33-0000	507 LAWTON ST	Annexation L4-F	$ 6.00
0169-142-11-0000	511 W COLTON AVE	Annexation L4-I	$ 6.00
0169-182-02-0000		Annexation L4-O	$ 6.00
0169-182-03-0000	316 THE TERRACE	Annexation L4-O	$ 6.00
0169-182-04-0000		Annexation L4-O	$ 6.00
0169-212-17-0000	640 ORANGE ST	Annexation L4-X	$ 6.00
0169-212-18-0000	526 N ORANGE ST	Annexation L4-X	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0169-212-19-0000	500 N ORANGE ST	Annexation L4-X	$ 6.00
0169-212-20-0000	402-414 N ORANGE ST	Annexation L4-X	$ 6.00
0169-212-21-0000	418-450 N ORANGE ST	Annexation L4-X	$ 6.00
0169-212-22-0000	522 ORANGE ST	Annexation L4-X	$ 6.00
0169-212-23-0000	602 ORANGE ST	Annexation L4-X	$ 6.00
0169-212-24-0000	683 N 6TH ST	Annexation L4-X	$ 6.00
0169-212-25-0000	552 ORANGE ST	Annexation L4-X	$ 6.00
0169-212-26-0000	454-482 N ORANGE ST	Annexation L4-X	$ 6.00
0169-212-27-0000	411 N 6TH ST	Annexation L4-X	$ 6.00
0169-281-39-0000	347 ORANGE ST	Annexation L6-C	$ 6.00
0169-301-08-0000	E REDLANDS BLVD	Annexation L7-G	$ 6.00
0169-301-10-0000	21 E REDLANDS BLVD	Annexation L7-G	$ 6.00
0169-301-11-0000	170 E REDLANDS BLVD	Annexation L7-G	$ 6.00
0169-313-16-0000	304 7TH ST	Annexation L7-I	$ 6.00
0169-321-01-0000		Annexation L6-A	$ 6.00
0169-321-02-0000	304 N 9TH ST	Annexation L6-A	$ 6.00
0169-343-07-0000	1210 W COLTON AVE	Annexation L4-S	$ 6.00
0169-411-07-0000	1205 W COLTON AVE	Annexation L4-H	$ 6.00
0171-161-18-0000	371 NEW YORK	Annexation L12-M	$ 6.00
0171-171-34-0000	380 N NEW YORK ST	Annexation L4-R	$ 18.00
0171-202-30-0000	404 BROOKSIDE AVE	Annexation L7-C	$ 6.00
0171-202-33-0000	420 BROOKSIDE AVE	Annexation L8-C	$ 6.00
0171-203-13-0000	302 BROOKSIDE AVE	Annexation L9-B	$ 6.00
0171-331-04-0000	243 CAJON ST	Annexation L4-J	$ 6.00
0171-332-30-0000	124 E OLIVE AVE	Annexation L10-E	$ 6.00
0171-341-33-0000	612 REDLANDS BLVD	Annexation L6-J	$ 6.00
0171-383-19-0000	680 E REDLANDS BLVD	Annexation L4-E	$ 6.00
0171-383-20-0000	680 E REDLANDS BLVD	Annexation L4-E	$ 6.00
0172-031-49-0000	30 S CENTER ST	Annexation L4-M	$ 6.00
0172-301-14-0000	1515 W CYPRESS AVE	Annexation L7-A	$ 6.00
0172-301-15-0000	1513 W CYPRESS AVE	Annexation L7-A	$ 6.00
0172-301-16-0000	1511 W CYPRESS AVE	Annexation L7-A	$ 6.00
0172-301-17-0000	1517 W CYPRESS AVE	Annexation L7-A	$ 6.00
0173-052-31-0000	432 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-32-0000	430 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-33-0000	428 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-34-0000	426 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-35-0000	424 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-36-0000	422 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-37-0000	420 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-38-0000	418 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-39-0000	416 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-40-0000	412 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-41-0000	410 SONORA CIR	Annexation L6-I	$ 6.00
0173-052-42-0000	457 LA VERNE	Annexation L6-I	$ 6.00
0173-062-01-0000	472 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-02-0000	470 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-03-0000	468 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-04-0000	466 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-05-0000	464 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-06-0000	462 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-07-0000	460 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-08-0000	458 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-09-0000	456 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-10-0000	454 SONORA CIR	Annexation L6-I	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0173-062-11-0000	452 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-12-0000	450 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-13-0000	448 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-14-0000	446 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-15-0000	444 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-16-0000	442 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-17-0000	440 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-18-0000	438 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-19-0000	436 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-20-0000	434 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-21-0000	408 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-22-0000	406 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-23-0000	407 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-24-0000	473 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-25-0000	471 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-26-0000	469 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-27-0000	457 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-28-0000	455 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-29-0000	453 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-30-0000	451 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-31-0000	439 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-32-0000	437 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-33-0000	435 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-34-0000	431 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-35-0000	421 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-36-0000	423 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-37-0000	425 SONORA CIR	Annexation L6-I	$ 6.00
0173-062-38-0000	427 SONORA CIR	Annexation L6-I	$ 6.00
0174-021-41-0000	1377 KNOLL RD	Annexation L8-E	$ 6.00
0174-021-42-0000	1379 KNOLL RD	Annexation L8-E	$ 6.00
0174-241-31-0000	1475 FORD ST	Annexation L5-D	$ 12.00
0174-261-15-0000	1551 RESERVOIR RD	Annexation L10-G	$ 6.00
0174-281-33-0000	BUCKINGHAM	Annexation L12-L	$ 6.00
0174-281-34-0000	BUCKINGHAM	Annexation L12-L	$ 6.00
0174-281-35-0000	BUCKINGHAM	Annexation L12-L	$ 6.00
0174-281-37-0000	731 BUCKINGHAM DR	Annexation L12-L	$ 6.00
0174-621-01-0000	751 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-02-0000	755 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-03-0000	759 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-04-0000	763 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-05-0000	767 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-06-0000	771 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-07-0000	775 DEVONSHIRE DR	Annexation L2-A	$ 44.55
0174-621-08-0000	816 CONCORD	Annexation L2-A	$ 53.46
0174-621-09-0000	812 CONCORD	Annexation L2-A	$ 44.55
0174-621-10-0000	770 CONCORD	Annexation L2-A	$ 44.55
0174-621-11-0000	766 CONCORD	Annexation L2-A	$ 44.55
0174-621-12-0000	762 CONCORD	Annexation L2-A	$ 44.55
0174-621-13-0000	1609 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-14-0000	1613 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-15-0000	1617 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-16-0000	1621 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-17-0000	1625 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-18-0000	1629 SHEFFIELD	Annexation L2-A	$ 44.55
0174-621-19-0000	1633 SHEFFIELD	Annexation L2-A	$ 44.55

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0174-621-20-0000	1636 SHEFFIELD LN	Annexation L2-A	$ 44.55
0174-621-21-0000	1632 SHEFFIELD LN	Annexation L2-A	$ 44.55
0174-621-22-0000	1628 SHEFFIELD LN	Annexation L2-A	$ 44.55
0174-621-23-0000	801 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-24-0000	805 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-25-0000	809 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-26-0000	813 LEXINGTON LN	Annexation L2-A	$ 53.46
0174-621-27-0000	812 LEXINGTON LN	Annexation L2-A	$ 53.46
0174-621-28-0000	808 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-29-0000	804 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-30-0000	800 LEXINGTON LN	Annexation L2-A	$ 44.55
0174-621-31-0000	1620 SHEFFIELD LN	Annexation L2-A	$ 44.55
0174-621-32-0000	1616 SHEFFIELD LN	Annexation L2-A	$ 44.55
0174-621-33-0000	769 CONCORD LN	Annexation L2-A	$ 44.55
0174-621-34-0000	811 CONCORD LN	Annexation L2-A	$ 44.55
0174-621-35-0000	815 CONCORD LN	Annexation L2-A	$ 53.46
0175-491-01-0000	1521 REBECCA CREST	Original 1-C	$ 1,572.77
0175-491-02-0000	REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-03-0000	REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-04-0000	1527 REBELLA CREST	Original 1-C	$ 1,310.64
0175-491-05-0000	1531 REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-06-0000	1533 REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-07-0000	1535 REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-08-0000	1537 REBECCA CREST	Original 1-C	$ 1,310.64
0175-491-09-0000	1541 REBECCA CREST	Original 1-C	$ 1,572.77
0176-044-15-0000	605 VALLEY VIEW DR	Annexation L4-Q	$ 6.00
0176-402-04-0000	633 GOLDEN WEST DR	Annexation L12-E	$ 6.00
0176-402-06-0000	629 GOLDENWEST DR	Annexation L12-D	$ 6.00
0176-402-07-0000	627 GOLDEN WEST DR	Annexation L12-C	$ 6.00
0176-402-08-0000	GOLDEN WEST DR	Annexation L12-B	$ 6.00
0176-402-09-0000	623 GOLDEN WEST DR	Annexation L12-A	$ 6.00
0176-441-18-0000	1581 FRANKLIN AVE	Annexation L5-C	$ 78.37
0176-441-19-0000	1617 GARDEN ST	Annexation L5-C	$ 86.20
0176-441-20-0000	1613 GARDEN ST	Annexation L5-C	$ 86.20
0176-441-21-0000	1609 GARDEN ST	Annexation L5-C	$ 86.20
0176-441-22-0000	1583 FRANKLIN AVE	Annexation L5-C	$ 86.20
0176-441-23-0000	210 CANDY LN	Annexation L5-C	$ 78.37
0176-441-24-0000	226 CANDY LN	Annexation L5-C	$ 78.37
0176-441-25-0000	242 CANDY LN	Annexation L5-C	$ 78.37
0176-441-26-0000	250 CANDY LN	Annexation L5-C	$ 78.37
0176-441-27-0000	258 CANDY LN	Annexation L5-C	$ 78.37
0176-521-01-0000	1080 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-02-0000	1070 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-03-0000	1060 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-04-0000	1050 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-05-0000	1040 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-06-0000	1030 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-07-0000	1020 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-08-0000	1010 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-09-0000	1000 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-10-0000	912 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-11-0000	908 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-12-0000	904 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-13-0000	900 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-18-0000	1920 HORSE TRAIL DR	Annexation L10-H	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0176-521-19-0000	1910 HORSE TRAIL DR	Annexation L10-H	$ 6.00
0176-521-20-0000	1900 HORSE TRAIL DR	Annexation L10-H	$ 6.00
0176-521-21-0000	1011 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-22-0000	1021 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-23-0000	1031 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-27-0000	1061 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-28-0000	1041 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-29-0000	907 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-30-0000	949 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-31-0000	901 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-521-32-0000	951 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-01-0000	948 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-02-0000	944 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-03-0000	940 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-07-0000	924 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-08-0000	920 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-09-0000	916 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-12-0000	921 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-13-0000	931 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-18-0000	911 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-20-0000	936 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-21-0000	928 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-22-0000	932 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-24-0000	915 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-25-0000	947 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0176-531-26-0000	945 SUNSET HILLS LN	Annexation L10-H	$ 6.00
0292-032-39-0000	1251 RESEARCH DR	Annexation L3-A	$ 195.55
0292-032-40-0000	1115 RESEARCH DR	Annexation L3-A	$ 39.88
0292-032-41-0000	1110 RESEARCH DR	Annexation L3-A	$ 62.73
0292-032-42-0000	2351 LUGONIA AVE	Annexation L3-A	$ 301.84
0292-033-11-0000	1101 N CALIFORNIA ST	Annexation L4-C	$ 6.00
0292-033-13-0000	1101 N CALIFORNIA ST	Annexation L12-H	$ 6.00
0292-034-16-0000	941 CALIFORNIA ST	Annexation L4-N	$ 6.00
0292-063-45-0000	1720 W REDLANDS BLVD	Annexation L10-C	$ 6.00
0292-064-13-0000	2094 W REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-17-0000	2098 W REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-21-0000	2046 REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-22-0000	2072 W REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-23-0000	2070 W REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-24-0000	2050 REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-25-0000	2068 W REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-26-0000	2062 REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-064-27-0000	2052 REDLANDS BLVD	Annexation L6-H	$ 6.00
0292-152-39-0000	2015 PARK AVE	Annexation L10-B	$ 6.00
0292-153-24-0000	1915 REDLANDS BLVD	Annexation L5-A	$ 6.00
0292-153-25-0000	1911 REDLANDS BLVD	Annexation L5-A	$ 6.00
0292-153-26-0000	721 NEVADA ST	Annexation L5-A	$ 6.00
0292-153-27-0000	721 NEVADA ST	Annexation L5-A	$ 6.00
0292-154-12-0000	1991 PARK AVE	Annexation L8-D	$ 6.00
0292-156-21-0000	1717 PARK AVE	Annexation L4-V	$ 6.00
0292-157-16-0000	1625 W REDLANDS BLVD	Annexation L9-A	$ 6.00
0292-157-20-0000	560 IOWA ST	Annexation L12-J	$ 6.00
0292-157-31-0000	1615 REDLANDS BLVD	Annexation L5-G	$ 6.00
0292-158-15-0000	ALABAMA ST	Annexation L11-B	$ 6.00
0292-165-15-0000	1890 ORANGE AVE	Annexation L6-F	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0292-166-11-0000	1710 BARTON RD	Annexation L4-K	$ 6.00
0292-182-30-0000	614 ALABAMA ST	Annexation L4-T	$ 6.00
0292-182-31-0000	614 ALABAMA ST	Annexation L4-T	$ 6.00
0292-192-11-0000	301 TENNESSEE ST	Annexation L7-E	$ 6.00
0292-201-37-0000	141 KANSAS ST	Annexation L7-B	$ 6.00
0292-201-39-0000	125 KANSAS ST	Annexation L7-B	$ 6.00
0292-201-40-0000	210 BUSINESS CENTER CT	Annexation L7-B	$ 6.00
0292-202-17-0000	298 KANSAS ST	Annexation L10-A	$ 6.00
0292-202-18-0000	KANSAS ST	Annexation L10-A	$ 6.00
0292-251-10-0000	1280 ALABAMA ST	Annexation L12-G	$ 6.00
0292-310-07-0000	633 AMIGOS DR	Annexation L6-B	$ 6.00
0292-310-36-0000	617 AMIGOS DR	Annexation L7-F	$ 6.00
0292-321-10-0000	1981 W LUGONIA AVE	Annexation L4-G	$ 6.00
0292-331-15-0000	1910 ORANGE TREE LN	Annexation L5-E	$ 6.00
0292-331-16-0000	1902 ORANGE TREE LN	Annexation L5-E	$ 6.00
0292-341-17-0000	1751 PLUM LN	Annexation L12-I	$ 6.00
0292-341-24-0000	1711 PLUM LN	Annexation L11-A	$ 6.00
0292-341-25-0000	1741 PLUM LN	Annexation L11-A	$ 6.00
0292-351-08-0000	1806 ORANGE TREE LN	Annexation L11-C	$ 6.00
0292-381-08-0000	1653 PLUM LN	Annexation L6-G	$ 6.00
0292-441-11-0000	1230 INDIANA CT	Annexation L5-B	$ 6.00
0292-441-12-0000	1226 INDIANA CT	Annexation L5-B	$ 6.00
0292-441-13-0000	1222 INDIANA CT	Annexation L5-B	$ 6.00
0292-441-14-0000	1214 INDIANA CT	Annexation L5-B	$ 6.00
0292-441-15-0000	1210 INDIANA CT	Annexation L5-B	$ 6.00
0293-172-16-0000	1500 BARTON RD	Annexation L4-B	$ 27.00
0293-172-17-0000	1536 BARTON RD	Annexation L4-B	$ 27.00
0293-172-18-0000	1500 BARTON RD	Annexation L4-B	$ 6.00
0293-421-01-0000	1809 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-02-0000	1812 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-03-0000	1810 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-04-0000	1808 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-05-0000	1806 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-06-0000	1804 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-07-0000	1802 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-08-0000	1800 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-09-0000	1746 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-10-0000	1744 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-11-0000	1742 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-12-0000	1740 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-13-0000	1738 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-14-0000	1736 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-15-0000	1734 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-16-0000	1732 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-17-0000	1730 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-18-0000	1726 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-19-0000	1724 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-20-0000	1720 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-21-0000	1716 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-22-0000	1706 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-23-0000	1700 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-24-0000	1701 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-25-0000	1703 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-26-0000	1705 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-27-0000	1707 MORNING DOVE LN	Annexation L12-F	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
0293-421-28-0000	1709 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-29-0000	1711 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-30-0000	1715 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-31-0000	1717 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-32-0000	1719 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-33-0000	1721 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-34-0000	1723 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-35-0000	1725 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-36-0000	1727 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-37-0000	1729 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-38-0000	1731 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-39-0000	1733 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-40-0000	1735 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-41-0000	1737 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-42-0000	1743 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-43-0000	1747 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-44-0000	1803 MORNING DOVE LN	Annexation L12-F	$ 6.00
0293-421-45-0000	1805 MORNING DOVE LN	Annexation L12-F	$ 6.00
0294-091-47-0000	SMILEY RIDGE	Annexation L5-F	$ 6.00
0294-091-48-0000	1821 SMILEY RIDGE	Annexation L5-F	$ 6.00
1212-041-01-0000	1021 E PIONEER AVE	Annexation L10-F	$ 6.00
1212-081-54-0000	1709 DEANNA	Annexation L1-B	$ 101.35
1212-081-55-0000	1711 DEANNA	Annexation L1-B	$ 101.35
1212-081-56-0000	1715 DEANNA	Annexation L1-B	$ 101.35
1212-081-57-0000	1719 DEANNA	Annexation L1-B	$ 101.35
1212-081-58-0000	1723 DEANNA	Annexation L1-B	$ 101.35
1212-081-59-0000	1727 DEANNA WY	Annexation L1-B	$ 101.35
1212-081-60-0000	1731 DEANNA	Annexation L1-B	$ 101.35
1212-081-61-0000	1712 DEANNA	Annexation L1-B	$ 101.35
1212-081-62-0000	1708 DEANNA	Annexation L1-B	$ 101.35
1212-141-01-0000	1009 DOYLE	Annexation L1-A	$ 92.57
1212-141-02-0000	1013 DOYLE	Annexation L1-A	$ 92.57
1212-141-03-0000	1017 DOYLE	Annexation L1-A	$ 92.57
1212-141-04-0000	1021 DOYLE	Annexation L1-A	$ 92.57
1212-141-05-0000	1025 DOYLE ST	Annexation L1-A	$ 92.57
1212-141-06-0000	1029 DOYLE	Annexation L1-A	$ 92.57
1212-141-07-0000	1033 DOYLE	Annexation L1-A	$ 92.57
1212-141-08-0000	1037 DOYLE AVE	Annexation L1-A	$ 92.57
1212-141-09-0000	1041 DOYLE	Annexation L1-A	$ 92.57
1212-141-10-0000	1045 DOYLE	Annexation L1-A	$ 92.57
1212-141-11-0000	1058 STICKNEY	Annexation L1-A	$ 92.57
1212-141-12-0000	1054 STICKNEY	Annexation L1-A	$ 92.57
1212-141-13-0000	1050 STICKNEY	Annexation L1-A	$ 92.57
1212-141-14-0000	1046 STICKNEY	Annexation L1-A	$ 92.57
1212-141-15-0000	1042 STICKNEY	Annexation L1-A	$ 92.57
1212-141-16-0000	1038 STICKNEY CIR	Annexation L1-A	$ 101.83
1212-141-17-0000	1034 STICKNEY	Annexation L1-A	$ 101.83
1212-141-18-0000	1030 STICKNEY DR	Annexation L1-A	$ 101.83
1212-141-19-0000	1026 STICKNEY CIR	Annexation L1-A	$ 101.83
1212-141-20-0000	1022 STICKNEY AVE	Annexation L1-A	$ 101.83
1212-141-21-0000	1018 STICKNEY	Annexation L1-A	$ 101.83
1212-141-22-0000	1014 STICKNEY	Annexation L1-A	$ 101.83
1212-141-23-0000	1010 STICKNEY	Annexation L1-A	$ 101.83
1212-141-24-0000	1006 STICKNEY	Annexation L1-A	$ 101.83
1212-141-25-0000	1007 STICKNEY	Annexation L1-A	$ 92.57

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
1212-141-26-0000	1011 STICKNEY	Annexation L1-A	$ 92.57
1212-141-27-0000	1015 STICKNEY	Annexation L1-A	$ 92.57
1212-141-28-0000	1019 STICKNEY	Annexation L1-A	$ 92.57
1212-141-29-0000	1023 STICKNEY	Annexation L1-A	$ 92.57
1212-141-30-0000	1027 STICKNEY	Annexation L1-A	$ 92.57
1212-141-31-0000	1031 STICKNEY	Annexation L1-A	$ 92.57
1212-141-32-0000	1032 DOYLE	Annexation L1-A	$ 92.57
1212-141-33-0000	1028 DOYLE	Annexation L1-A	$ 92.57
1212-141-34-0000	1024 DOYLE AVE	Annexation L1-A	$ 92.57
1212-141-35-0000	1020 DOYLE	Annexation L1-A	$ 92.57
1212-141-36-0000	1016 DOYLE	Annexation L1-A	$ 92.57
1212-141-37-0000	1012 DOYLE	Annexation L1-A	$ 92.57
1212-141-38-0000	1008 DOYLE	Annexation L1-A	$ 92.57
1212-141-39-0000	1601 DEANNA	Annexation L1-B	$ 111.48
1212-141-40-0000	1605 DEANNA	Annexation L1-B	$ 101.35
1212-141-41-0000	1609 DEANNA	Annexation L1-B	$ 101.35
1212-141-42-0000	1613 DEANNA	Annexation L1-B	$ 101.35
1212-141-43-0000	1617 DEANNA	Annexation L1-B	$ 101.35
1212-141-44-0000	1621 DEANNA	Annexation L1-B	$ 101.35
1212-141-45-0000	1625 DEANNA	Annexation L1-B	$ 101.35
1212-141-46-0000	1701 DEANNA	Annexation L1-B	$ 101.35
1212-141-47-0000	1705 DEANNA	Annexation L1-B	$ 101.35
1212-141-48-0000	1704 DEANNA WY	Annexation L1-B	$ 101.35
1212-141-49-0000	1700 DEANNA	Annexation L1-B	$ 101.35
1212-141-50-0000	1622 DEANNA	Annexation L1-B	$ 101.35
1212-141-51-0000	1618 DEANNA	Annexation L1-B	$ 101.35
1212-141-52-0000	1614 DEANNA	Annexation L1-B	$ 101.35
1212-141-53-0000	1606 DEANNA	Annexation L1-B	$ 101.35
1212-141-54-0000	1602 DEANNA	Annexation L1-B	$ 111.48
1212-191-60-0000	1572 GROVE ST	Annexation L4-W	$ 6.00
1212-191-61-0000	1588 GROVE ST	Annexation L4-W	$ 6.00
1212-191-62-0000	1564 GROVE ST	Annexation L4-W	$ 6.00
1212-191-63-0000	1560 GROVE ST	Annexation L4-W	$ 6.00
1212-191-64-0000	1556 GROVE ST	Annexation L4-W	$ 6.00
1212-191-65-0000	1552 GROVE ST	Annexation L4-W	$ 6.00
1212-191-66-0000	1548 GROVE ST	Annexation L4-W	$ 6.00
1212-191-67-0000	1544 GROVE ST	Annexation L4-W	$ 6.00
1212-191-68-0000	1540 GROVE ST	Annexation L4-W	$ 6.00
1212-191-69-0000	1536 GROVE ST	Annexation L4-W	$ 6.00
1212-191-70-0000	1541 KELLY AVE	Annexation L4-W	$ 6.00
1212-191-71-0000	1545 KELLY AVE	Annexation L4-W	$ 6.00
1212-191-72-0000	1549 KELLY AVE	Annexation L4-W	$ 6.00
1212-191-73-0000	1553 KELLY AVE	Annexation L4-W	$ 6.00
1212-191-74-0000	1557 KELLY AVE	Annexation L4-W	$ 6.00
1212-191-75-0000	1561 KELLY ST	Annexation L4-W	$ 6.00
1212-191-76-0000	1565 KELLY ST	Annexation L4-W	$ 6.00
1212-191-77-0000	1569 KELLY ST	Annexation L4-W	$ 6.00
1212-191-78-0000	1573 KELLY ST	Annexation L4-W	$ 6.00
1212-191-79-0000	1577 KELLY ST	Annexation L4-W	$ 6.00
1212-201-01-0000	1572 NELSON ST	Annexation L6-E	$ 6.00
1212-201-02-0000	1568 NELSON ST	Annexation L6-E	$ 6.00
1212-201-03-0000	1560 NELSON ST	Annexation L6-E	$ 6.00
1212-201-04-0000	1556 NELSON ST	Annexation L6-E	$ 6.00
1212-201-05-0000	1552 NELSON ST	Annexation L6-E	$ 6.00
1212-201-06-0000	1548 NELSON ST	Annexation L6-E	$ 6.00

City of Redlands
Landscape Maintenance District No. 1 - Appendix D
Fiscal Year 2025/26
Assessment Roll (Sorted by APN)

APN	SITUS ADDRESS	ANNEXATION	CHARGE
1212-201-07-0000	1540 NELSON ST	Annexation L6-E	$ 6.00
1212-201-08-0000	1536 NELSON ST	Annexation L6-E	$ 6.00
1212-201-09-0000	1528 NELSON ST	Annexation L6-E	$ 6.00
1212-201-10-0000	1524 NELSON ST	Annexation L6-E	$ 6.00
1212-201-11-0000	1520 NELSON ST	Annexation L6-E	$ 6.00
1212-201-12-0000	1346 PARADISE WY	Annexation L6-E	$ 6.00
1212-201-13-0000	1343 PENNSYLVANIA AVE	Annexation L6-E	$ 6.00
1212-201-14-0000	1349 PENNSYLVANIA AVE	Annexation L6-E	$ 6.00
1212-201-15-0000	1350 PARADISE WY	Annexation L6-E	$ 6.00
1212-201-16-0000	1354 PARADISE WY	Annexation L6-E	$ 6.00
1212-201-17-0000	1521 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-18-0000	1525 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-19-0000	1529 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-20-0000	1533 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-21-0000	1537 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-22-0000	1541 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-23-0000	1545 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-24-0000	1549 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-25-0000	1553 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-26-0000	1557 MORIARTY ST	Annexation L6-E	$ 6.00
1212-201-27-0000	1561 MORIARTY ST	Annexation L6-E	$ 6.00

Summary Fields	Value
APN total count:	571
CHARGE total sum:	$ 28,784.34

City Council Meeting **I. 7.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Approve a request for in-kind support in the amount of $42,275.78, related to the 2025 Summer Music Festival event hosted from June 20, 2025, through August 15, 2025 by the Redlands Bowl Performing Arts, temporary street closures related to the event, and determine that the event is categorically exempt from environmental review pursuant to Section 15311(c) of the state's guidelines implementing the California Environmental Quality Act (Facilities and Community Services Director Crocker)

MOTION(S):

If the City Council determines that staff's recommendations are appropriate, the following motions are provided:

1. I move that the City Council determine that authorization for the items associated with the 2025 Summer Music Festival are exempt from environmental review pursuant to Section 15311(c) of the State's guidelines implementing the California Environmental Quality Act;
2. I move to authorize and approve the expenditure of city resources and in-kind support in the amount of $42,275.78 for the 2025 Summer Music Festival, which will be held from June 20th to August 15th, 2025.
3. I move to authorize and approve the temporary street closures detailed in the staff report for the 2025 Summer Music Festival, which will be held from June 20th to August 15th 2025.

RECOMMENDATION:

Staff recommends that the City Council determine that authorization for the items associated with the 2025 Summer Music Festival, scheduled from June 20, 2025, through August 15, 2025, is exempt from environmental review pursuant to Section 15311(c) of the State's guidelines implementing the California Environmental Quality Act (CEQA). Staff further recommends that the City Council direct staff accordingly regarding the temporary street closures outlined in the staff report and the expenditure of city resources and in-kind

support in the amount of $42,275.78, including costs for personnel, equipment, and related services.

DISCUSSION:

The Facilities and Community Services Department manages the administration and issuance of permits for special events held in public areas of the city. Upon the issuance of a special event permit, the event may take place contingent on the event organizer paying the required fees. The City recognizes the value of partnering with non-profit agencies and organizations to provide services beneficial to the community. In an effort to support programs that provide a community benefit, the City Council will, from time to time, consider the authorization of in-kind support, including the use of city equipment, staff, and facilities for special events.

The Redlands Bowl Performing Arts (RBPA) is planning its 2025 season of the Redlands Bowl Summer Music Festival. The concerts are scheduled to take place between June 20, 2025, and August 15th, 2025, from 6:30 p.m. to 10:30 p.m., with the show starting at 8:00 pm. The anticipated attendance for the 2025 Summer Music Festival season is approximately 100,000 total visitors from Redlands and surrounding areas. On January 16, 2007, the City Council approved a lease agreement with RCMA, now RBPA, to use the Redlands Bowl for their summer performances exclusively. RBPA is requesting in-kind support from two sworn police officers during each of their 20 concerts, as well as the cost of the fireworks permit and RFD engine on standby. The RBPA is a registered 501(c) non-profit organization operating out of the City of Redlands. The City Council has approved similar requests for past events.

The Redlands Bowl Performing Arts (RBPA) is requesting street closures of Eureka Street, between W. Vine Street and W. Olive Avenue; and Grant Street between the Joselyn Sr. Center parking lot driveway and W. Olive Street. The Redlands Bowl Summer Music Festival will be hosted on Tuesdays and Fridays beginning June 20, 2025, through August 15th, with four additional days being Thursdays on July 3rd, Thursday, July 24th, Saturday, July 26th, and Sunday, July 27th. All street closures will be in place between 4:00 p.m. and 10:00 p.m. The Redlands Bowl Performing Arts has requested in-kind support for two nights of fireworks on July 3rd and for the final show night of August 15th. The scheduled list of events is included in the staff report attachments.

The City Council has a history of supporting this event through in-kind contributions. In 2023, for example, the City provided an estimated $33,381 in in-kind support for the 101st season. For the 2025 season, the estimated total in-kind support requested is $42,275.78, which reflects expanded programming and rising operational costs. The festival is expected to host 20 concerts featuring approximately 300 musicians.

The event is exempt from the requirements of the California Environmental Quality Act's guidelines pursuant to Section 15311(c). Section 15311(c), accessory structures Class 11 facilities, consists of the construction or replacement of minor structure accessory to existing commercial, industrial, or institutional facilities, including placement of seasonal or temporary use items such as mobile food units, portable restrooms or similar items in generally the same locations from time to time in publicly owned parks or other facilities designed for public use.

ALTERNATIVES:

The City Council may elect to deny the request for in-kind support, deny the request for temporary street closure and direct staff accordingly.

STRATEGIC PLAN:

Priority A - Quality of Life, Beautification, Arts and Culture.

SUBMITTED BY:
Tabitha Crocker, Facilities and Community Services Department Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Janice McConnell, Assistant City Manager
Christopher Boatman, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Jaclyn Ramirez, Administrative Assistant II

Fiscal Impact

Fiscal Year:	FY 2024/25
Revenue Generating:	Y
Appropriation Required Y/N:	N
Amount:	$42,275.78
Budgeted Y/N:	N
Discussion:	

Please see the "Fiscal Impact" attachment for reference.

Attachments

In-Kind Re
Event Flyer
Verification of Non-Profit
Street Closure Permit
Fiscal Impact

City of Redlands

In-Kind Support Request

Event Name: Redlands Bowl Summer Music Festival

Event Date(s): 06/20/2025 - 08/15/2025 **Location(s):** Redlands Bowl

Rain Out Date: **Beginning Time:** 6:30pm **End Time:** 10:30pm

Describe Your Request:

This completed form with all supporting documentation shall be submitted a minimum of 60 days prior to the scheduled event. Additional information may be attached to this application form, as needed.

We are requesting police presence for each of the nights of the summer music festivals. The dates are as follows: 6/20, 6/24, 6/27, 7/01, 7/03, 07/08, 7/11, 7/15, 7/18, 7/22, 7/24-27, 7/29, 8/01, 8/05, 8/08, 8/12, 8/15

Select and Describe All City Provided Services That May Apply to Your Request :

- [x] Traffic (*Personnel, equipment, cones, barricades, no-parking* — CVP to Help
- [x] Police (*Public Safety Personnel)* — 2 Officers Each Night
- [ ] Fire (*Paramedics, Inspectors)*
- [x] Parks *(Cleanup Personnel, Ball Field Lights)* — Maintaning Parks and Trash
- [x] Facility — Use of Joslyn Senior Center

Refuse/Recycling *(Event Receptacles, Roll-Off Service)* acquired by Event Organizers through Redlands Customer Service

Section 13.65 of the Redlands Municipal Code requires that events that serve more than 2,000 individuals per day will be required to submit for review and approval a Large Venue Recycling Plan. The Quality of Life Department may require smaller events to comply with City recycling practices as a condition of waiving fees.

- [ ] Other

Group/Organization Name: Redlands Community Music Association dba Redlands Bowl Performing Arts

Is your Group/Organization a Registered Non-Profit: [x] Yes [ ] No **Non-Profit Federal Tax ID Number:**

Does your Group/Organization Presently Have Liability Insurance? [x] Yes [ ] No

Please be advised that depending upon your request, you may be required to provide proof of insurance coverage in an amount determined by the City and naming the City as an additional insured.

Has your Group/Organization received fee waivers from the City in the past? Share Use with City of Redlands

Primary Contact Name & Title: Beverly Noerr, Executive Director

Mailing Address: 168 South Eureka St. Redlands, CA 92373

Phone Number: 909-793-7316 **E-Mail Address:** bnoerr@redlandsbowl.org

As a part of our commitment to fiscal responsibility, the City of Redlands gathers data associated with the economic and social benefits associated with in-kind support. Please provide estimates, as applicable, for your event.

Positive outcomes for your organization from this

Over 100,000 people attend the Festival each year. They shop and dine throughout the city before and after the programs. We continue to receive calls from patrons asking what steps we take to provide safety for guests at the Bowl.

Describe what economic benefit and impact this event will bring to the City:

By providing officers at all Festival concerts, the public will feel safer and thus continue to attend, as well as shop and dine in Redlands.

In April 2002, the City Council adopted Resolution No. 6038, which encourages groups or organizations requesting in-kind support from the City to use local businesses when procuring goods and services associated with the event. Receipts will need to be submitted through a follow up form. Failure to submit post event documentation (within 15 days) may affect future requests.

	Proposed Event	Previous Event Actuals	Vendors
Attendance: Redlands Residents	Festival - 60,000 per summer		
Attendance: Non-Residents	Festival - 40,000 per summer		
Food & Beverage Sales			
Merchandise Sales			
Ticket/Entrance Fees			
Other			
Total Revenue			

I certify that all statements on this application are true and complete to the best of my knowledge.

Signature: Beverly Noerr (Mar 12, 2025 10:23 PDT) Beverly Noerr (Mar 12, 2025 10:23 PDT)

Title: Executive Director

Please Print Your Name: Beverly Noerr

Date: 03/12/2025

To Be Completed by the City of Redlands

Date Received: 03/12/25

Received By: Jaclyn Ramirez

Notes:

City Manager Approval:

City Council Approval:

REDLANDS BOWL
PERFORMING ARTS

SUMMER MUSIC FESTIVAL
2025 SEASON SCHEDULE
PROGRAMS START AT 8:00PM
No admission charged

Friday, June 20
Celebrating the Legacy of Whitney Houston
and other Great Pop Divas
Featuring Nicole Henry

Tuesday, June 24
Grand Finals of the Young Artists
Concerto Competition
Featured Soloist - Miclen LaiPang, Violin

Friday, June 27
Adventures in Parrotdise
A Tribute to Jimmy Buffet

Tuesday, July 1
Bluegrass Under the Stars with Rebecca Frazier

Thursday, July 3
A Star Spangled Evening of Patriotic Pops
Conducted by Nolan Livesay

Tuesday, July 8
Mariachi Continental de San Diego

Friday, July 11
Catapult Shadow Dance

Tuesday, July 15
Navy Band Southwest

Friday, July 18
Naturally 7 (A capella)

Tues, July 22 & Thurs, July 24 - Sun, July 27
Joseph and the Amazing Technicolor Dreamcoat
Presented by Legendary Productions

Tuesday, July 29
The Pack Drumline

Friday, August 1
State Street Ballet of Santa Barbara
Presents *The Jungle Book*

Tuesday, August 5
Bee Gees Gold

Friday, August 8
Ireland with Michael Londra — Live!

Tuesday, August 12
Phat Cat Swinger

Friday, August 15
Fireworks Finale!
Pictures at an Exhibition:
Celebrating the Artistry of Bob Peak
Produced by Robert Townson
The Redlands Symphony
Ransom Wilson, Conductor

Add attachments to Regular Meeting o

U. S. TREASURY DEPARTMENT
INTERNAL REVENUE SERVICE
DISTRICT DIRECTOR
P. O. BOX 231, MAIN OFFICE
LOS ANGELES 53, CALIFORNIA

January 10, 1961

IN REPLY REFER TO
Code 434.TSS:FS
MA 5-8971-Ext 745
G-21 Federal Building

Redlands Community Music Association
Redlands Bowl
Post Office Box 466
Redlands, California

Attention: Robert E. Morse, Controller

Gentlemen:

This refers to your liability for Federal Insurance Contributions Act (social security) taxes which you have reported on Form 941 for the third calendar quarter of 1960.

The Internal Revenue Service has issued to your Association a ruling dated December 14, 1944, holding that your organization is exempt from Federal income tax as an educational organization described in section 101(6) of the 1939 Internal Revenue Code, (now section 501(c)(3) of the 1954 Code.)

The 1954 Code correspondingly exempts you from Federal Insurance Contributions Act (social security) taxes unless you file a Form SS-15 certifying that you waive such social security tax exemption.

Generally stated, claim Form 843 may be executed and filed within statute of limitations for the Federal Insurance Contributions Act taxes you may have paid for any period in which you do not have a Form SS-15 in effect. If you decide to extend social security coverage to your employees, it is necessary that your organization execute and file Form SS-15 accompanied by a Form SS-15a signed by any employee who concurs in the coverage. Information on Form SS-15 includes instructions on the date and extent of tax liability under the Act.

Your reply showing whether or not you intend to file a Form SS-15 will be appreciated.

Very truly yours,

R. A. Riddell
District Director

By S. J. Small

FS:ae

Event: Redlands Bowl Summer Music Festival Date: 3/26/25

PERMIT TO CLOSE STREET FOR SOCIAL EVENT(S)

Permission to close a street for an event is subject to the following requirements:

1.	**Street Closure Diagram MUST be attached. (Failure to submit diagram will result in non-issuance of permit).**
2.	**Event Flyer or Event Description MUST be attached. (Failure to submit flyer or event description will result in non-issuance of permit).**
3.	**Applicant MUST provide insurance coverage per City's requirements (see reverse)**
4.	Written permission from all residents of the effected portion of the street MUST be attached.
5.	No tables or other objects shall be placed on the street surface.
6.	No alcohol shall be consumed on the street or City right-of-way outside of a permitted area.
7.	Temporary No Parking Signs and barricades shall be supplied and posted by City Staff
8.	Affected street(s) shall remain accessible for emergency vehicles and local traffic at all times.
9.	This permit pertains only to the closing of the street(s). This permit does not relate to the type of activity, noise, or any other aspect of the event. All other applicable and appropriate ordinances and laws apply.

Permission is hereby granted to: Redlands Bowl Performing Arts

To close (street names) Eureka St.(Starting by the Smiley Library up to Olive) and Grant St. (Starting by Joslyn Center up to Olive St,)

Between (street names) _____

Day & date See Below **Event times -** from (time) 5:00 ☐ am ☑ pm to (time) 9:00 ☐ am ☑ pm

Address of Applicant: 168 SEureka St. Redlands CA 92373 Phone No: 909-793-7316

Signature of Applicant: [signature] Applicant Name (print): Beverly Noerr

Condition(s);**set up & clean up time required:** _____

Event Description: Redlands Bowl Summer Music Festival every Tuesday & Friday Starting June 20-August 15 also Thursday July 3, Thursday July 24, Saturday July 26 Sun. July 27

FOR OFFICE USE ONLY

This permit must be signed by the Chief of Police in order to be valid.

1. [signature] Chief of Police — Date 4/8/2025
2. [signature] Municipal Utilities & Engineering Department — Date
3. [signature] Facilities & Community Services Department — Date 3/27/25
4. [signature] Risk Management Division — Date 4/15/2025

Street Closure time: From 4:00 ☐ am ☒ pm To 10:00 ☐ am ☒ pm

Staff Notes:

In anticipation of the City Council's consideration of this request, staff has compiled the following table outlining costs related to fees established by Resolution of the City Council and departmental charges pertaining to personnel and equipment resources necessary for the support of the event. The departmental charges are costs outside of normal City operations that would not be incurred by the City if the special event was not taking place.

Departmental Charges (Personnel & Equipment)	**2024-2025 Amount**	**Type**	**2023-2024 Amount**
Police Personnel[1]	$30,000	Hard Cost	$30,000.00
Fire Personnel[1]	$335.78	Hard Cost	$0.00
Facilities & Community Services Personnel[1]	$7,200.00	Hard Cost	$0.00
Personnel & Equipment Subtotal	**$37,535.78**		$0.00
Fees Established by City Council Resolution			
Park Reservation	$0.00	Soft Cost	$0.00
FCS Equipment	$2,040.00	Soft Cost	$2,040.00
Fire Equipment	$2,700.00	Soft Cost	$1,341.00
Fees Subtotal	**$4,740.00**		**$0.00**
Total Departmental Charges and Fees	**$42,275.78**		$0.00
	$37,535.78 **$4,740.00** **$42,275.78**	Hard Cost Soft Cost Total	**$0.00** **$0.00** **$33,381.00**

[1]*Personnel costs are calculated conservatively assuming the highest staff cost scenario. Actual costs may vary on the day of the event based on the actual staff present. Actual costs will be confirmed following the event and will be included in a reconciliation report presented to the City Council.*

The following table summarizes the total estimated costs associated with the use of City resources and waiver of fees approved for events scheduled during Fiscal Year 2024-25 to date:

TABLE 2: FY 2024-25 Fee Waivers to date

Hard Costs	**Soft Costs**	**Deposits Refunded**	**Waiver Amount**	**Net Amount**
$400,250.30	$34,877.70	$0.00	$435,128.00	$435,128.00

City Council Meeting **I. 8.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Approve the First Amendment to the Agreement for property tax management, information, and audit services with HdL Coren & Cone to increase the total agreement amount from $99,875 to $105,470 (Management Services/Finance Director Garcia)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move that the City Council approve the First Amendment to the agreement with HdL Coren & Cone to increase the total agreement amount to $105,470.

RECOMMENDATION:

Staff recommends that the City Council approve the First Amendment to the agreement for property tax management, information and audit services with HdL Coren & Cone to increase the total agreement amount from $99,875 to $105,470.

DISCUSSION:

On June 21, 2022, the City Council approved an agreement with HdL Coren & Cone (hereafter "HdL") for the provision of property tax management, information, and audit services for the City. The agreement was for a period of three (3) years with two additional one-year terms (hereafter "Extended Terms"). HdL provides audit and information services related to property taxes and has an extensive database consisting of more than 20 years of historical county property tax information. HdL currently services 205 clients in California and offers a proprietary web-based software that provides access to monthly changes in ownership, deed recordings and other data affecting property tax levels.

Per Section 5.1 of the original agreement ("Payments to Consultant"), HdL and the City initially agreed to a Based Fixed Fee for the first term which amounted to $59,925 and cited in their Fee Schedule that their "Based Fix Fee shall be adjusted annually starting the calendar year 2023 by the percentage increase in the "California Consumer Price Index (CCPI)."

HdL did not raise their rates in 2023 or 2024. However, HdL provided notice that their rates will raise 3.1% to align with CCPI, on June 21, 2025. To allow HdL to continue their services and to account for this increase according to the CCPI, we suggest compensation be increased for both Extended Terms. This percentage increase will raise their fees for the first Extended Term from $19,975 to $22,425. HdL has also agreed to preemptively adjust their fees for the second Extended Term by an increase of 3.1% of the new cost for the first Extended Term on June 21, 2026. This increase will raise their fees for the second Extended Term from $19,975 to $23,120, bringing the new value of the agreement to $105,470.

Approval of this First Amendment to the agreement with HdL Coren & Cone will allow them to continue to provide crucial property tax management and audit services to the City.

ALTERNATIVES:

City Council may elect not to approve the First Amendment to the Agreement with HdL Coren & Cone.

STRATEGIC PLAN:

N/A

SUBMITTED BY:
Danielle Garcia, Management Services/Finance Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Valerie Abrego, Management Analyst

Fiscal Impact

Fiscal Year:	2025-2026
Revenue Generating:	Yes
Appropriation Required Y/N:	No
Amount:	N/A
Budgeted Y/N:	Yes
Account No.:	101501

Discussion:

Funding for Professional Services Agreement for Property Tax Management, Information, and Audit Services with HdL Coren & Cone is included in 2025-2026 Budget Request.

Attachments

HdL Coren & Cone 2022 Property Tax Agreement

1st Amendment to HdL Coren & Cone Agreement

AGREEMENT TO PERFORM PROFESSIONAL SERVICES

This agreement for the provision of property tax management, information and audit services ("Agreement") is made and entered in this 21st day of June, 2022 ("Effective Date"), by and between the City of Redlands, a municipal corporation ("City") and HdL Coren & Cone, a California corporation ("Consultant"). City and Consultant are sometimes individually referred to herein as a "Party" and, together, as the "Parties." In consideration of the mutual promises contained herein, City and Consultant agree as follows:

ARTICLE 1 – ENGAGEMENT OF CONSULTANT

1.1 City hereby engages Consultant to provide property tax management information and audit services for City (the "Services").

1.2 The Services shall be performed by Consultant in a professional manner, and Consultant represents that it has the skill and the professional expertise necessary to provide the Services to City at a level of competency presently maintained by other practicing professional consultants in the industry providing like and similar types of Services.

ARTICLE 2 – SERVICES OF CONSULTANT

2.1 The Services that Consultant shall perform are more particularly described in Exhibit "A," titled "Scope of Services," which is attached hereto and incorporated herein by this reference.

2.2 Consultant shall comply with applicable federal, state and local laws and regulations in the performance of this Agreement including, but not limited to, any applicable State prevailing wage laws.

ARTICLE 3 – RESPONSIBILITIES OF CITY

3.1 City designates Danielle Garcia, Director of Management Services, as City's representative with respect to performance of the Services, and such person shall have the authority to transmit instructions, receive information, interpret and define City's policies and decisions with respect to performance of the Services.

ARTICLE 4 – PERFORMANCE OF SERVICES

4.1 Consultant shall perform and complete the Services in a prompt and diligent manner.

4.2 The term of this Agreement shall be for a period of three (3) years from the Effective Date of this Agreement (the "Initial Term"). The City shall have the option to extend the Initial Term of this Agreement by two (2) additional one-year terms (each, an "Extended Term"), on the same terms and conditions, by providing written notice to Consultant at least thirty (30) days prior to the expiration of the Initial Term or any Extended Term.

4.3 If Consultant's Services include deliverable electronic visual presentation materials, such materials shall be delivered in a form, and made available to City, consistent with City Council-adopted policy for the same. It shall be the obligation of Consultant to obtain a copy of such policy from City staff.

ARTICLE 5 – PAYMENTS TO CONSULTANT

5.1 The compensation for the Consultant's performance of the Services will be the amount of fifty-nine thousand nine hundred twenty-five dollars ($59,925.00) for the Services provided during the Initial Term. Should this Agreement be extended, the compensation for Consultant's performance for the Services will be the amount of nineteen thousand nine hundred seventy-five dollars ($19,975.00) for the first Extended Term; and nineteen thousand nine hundred seventy-five dollars ($19,975.00) for the second Extended Term, bringing the total possible amount of compensation to ninety nine thousand eight hundred seventy-five dollars ($99,875.00). For the Initial Term and each Extended Term, City shall pay Consultant on a time and materials basis in accordance with the rates specified in Exhibit "B," titled "Fee Schedule," which is attached hereto and incorporated herein by this reference

Consultant may adjust its Based Fix Fee pursuant to the California Consumer Price Index as set forth in Exhibit "B". Fees for the identification and correction of errors are compensated on a contingent basis, Consultant shall receive 25 percent of general fund or tax increment property tax revenue or other revenues attributable to City recovered or reallocated as set forth in Exhibit "B".

5.2 Consultant shall submit quarterly invoices to City describing the Services performed during the preceding month. Consultant's invoices shall include a brief description of the Services performed, the dates the Services were performed, the number of hours spent and by whom, and a description of reimbursable expenses related to the Services. City shall pay Consultant no later than thirty (30) days after receipt and approval by City of Consultant's invoice.

5.3 Any notice or other communication required, or which may be given, pursuant to this Agreement, shall be in writing. Any such notice shall be deemed delivered (i) on the date of delivery in person; (ii) five (5) days after deposit in first class registered mail, with return receipt requested; (iii) on the actual delivery date if deposited with an overnight courier; or (iv) on the date sent by facsimile or electronic mail transmission (including PDF), if confirmed with a copy sent contemporaneously by first class, certified, registered or express mail; in each case properly posted and fully prepaid to the appropriate address set forth below, or such other address as a Party may provide notice in accordance with this section:

CITY:	CONSULTANT:
City Clerk	HDL Coren & Cone
City of Redlands	Paula Cone, President
35 Cajon Street	120 S. State College Boulevard

P.O. Box 3005 (mailing)
Redlands, CA 92373
jdonaldson@cityofredlands.org
Phone: (909) 798-7531

Brea, CA 92821
Phone: 714-879-5000

ARTICLE 6 – INSURANCE AND INDEMNIFICATION

6.1 The following insurance coverage required by this Agreement shall be maintained by Consultant for the duration of its performance of the Services. Consultant shall not perform any Services unless and until the required insurance listed below is obtained by Consultant. Consultant shall provide City with certificates of insurance and endorsements evidencing such insurance prior to commencement of the Services. Insurance policies shall include a provision prohibiting cancellation or modification of the policy except upon thirty (30) days prior written notice to City.

A. Workers' Compensation and Employer's Liability insurance in the amount that meets statutory requirements with an insurance carrier acceptable to City, or certification to City that Consultant is self-insured or exempt from the workers' compensation laws of the State of California. Consultant shall execute and provide City with Exhibit "C," titled "Workers' Compensation Insurance Certification," which is attached hereto and incorporated herein by this reference, prior to performance of the Services.

B. Comprehensive General Liability insurance with carriers acceptable to City in the minimum amount of One Million Dollars ($1,000,000) per occurrence and Two Million Dollars ($2,000,000) aggregate, for public liability, property damage and personal injury is required. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

C. Consultant shall secure and maintain professional liability insurance throughout the term of this Agreement in the amount of One Million Dollars ($1,000,000) per claim made.

D. Business Auto Liability coverage, with minimum limits of One Million Dollars ($1,000,000) per occurrence, combined single limit bodily injury liability and property damage liability. This coverage shall include all Consultant owned vehicles used in connection with Consultant's provision of the Services, hired and non-owned vehicles, and employee non-ownership vehicles. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

E. Consultant is expressly prohibited from assigning or subcontracting any of the Services without the prior written consent of City. In the event of mutual agreement by the Parties to assign or subcontract a portion of the Services, Consultant shall add such assignee or subcontractor as an additional insured to the insurance policies required hereby and provide City with the insurance endorsements prior to any

Services being performed by the assignee or subcontractor.

6.2 Consultant shall defend, indemnify and hold harmless City and its elected and appointed officials, employees and agents from and against any and all claims, losses or liability, including attorneys' fees, arising from injury or death to persons or damage to property occasioned by any negligent act or omission by, or the willful misconduct of, Consultant, or its officers, employees and agents in performing the Services.

ARTICLE 7 – CONFLICTS OF INTEREST

7.1 Consultant covenants and represents that it does not have any investment or interest in any real property that may be the subject of this Agreement or any other source of income, interest in real property or investment that would be affected in any manner or degree by the performance of Consultant's Services. Consultant further covenants and represents that in the performance of its duties hereunder, no person having any such interest shall perform any Services under this Agreement.

7.2 Consultant agrees it is not a designated employee within the meaning of the Political Reform Act because Consultant:

A. Does not make a governmental decision whether to:

(i) approve a rate, rule or regulation, or adopt or enforce a City law;
(ii) issue, deny, suspend or revoke any City permit, license, application, certification, approval, order or similar authorization or entitlement;
(iii) authorize City to enter into, modify or renew a contract;
(iv) grant City approval to a contract that requires City approval and to which City is a party, or to the specifications for such a contract;
(v) grant City approval to a plan, design, report, study or similar item;
(vi) adopt, or grant City approval of, policies, standards or guidelines for City or for any subdivision thereof.

B. Does not serve in a staff capacity with City and in that capacity, participate in making a governmental decision or otherwise perform the same or substantially the same duties for City that would otherwise be performed by an individual holding a position specified in City's Conflict of Interest Code under Government Code section 87302.

7.3 In the event City determines that Consultant must disclose its financial interests, Consultant shall complete and file a Fair Political Practices Commission Form 700, Statement of Economic Interests, with the City Clerk's office pursuant to the written instructions provided by the City Clerk.

ARTICLE 8 – GENERAL CONSIDERATIONS

8.1 In the event any action is commenced to enforce or interpret any of the terms or conditions of this Agreement the prevailing Party shall, in addition to any costs and other relief, be entitled to the recovery of its reasonable attorneys' fees, including fees for the use of in-house counsel by a Party.

8.2 Consultant shall not assign any of the Services, except with the prior written approval of City and in strict compliance with the terms and conditions of this Agreement. Any assignment or attempted assignment without such prior written consent may, in the sole discretion of City, result in City's immediate termination of this Agreement.

8.3 Consultant is for all purposes under this Agreement an independent contractor and shall perform the Services as an independent contractor. Neither City nor any its agents shall have control over the conduct of Consultant or Consultant's employees, except as herein set forth. Consultant shall supply all necessary tools and instrumentalities required to perform the Services. Assigned personnel employed by Consultant are for its account only, and in no event shall Consultant or personnel retained by it be deemed to have been employed by City or engaged by City for the account of, or on behalf of City. Consultant shall have no authority, express or implied, to act on behalf of City in any capacity whatsoever as an agent, nor shall Consultant have any authority, express or implied, to bind City to any obligation.

8.4 This Agreement may be terminated by City, in its sole discretion, by providing not less than five (5) days prior written notice to Consultant of City's intent to terminate. If this Agreement is terminated by City, an adjustment to Consultant's compensation shall be made, but (1) no amount shall be allowed for anticipated profit or unperformed Services, and (2) any payment due Consultant at the time of termination may be adjusted to the extent of any additional costs to City occasioned by any default by Consultant. Upon receipt of a termination notice, Consultant shall immediately discontinue its provision of the Services and, within five (5) days of the date of the termination notice, deliver or otherwise make available to City, copies (in both hard copy and electronic form, where applicable) of project related data, design calculations, drawings, specifications, reports, estimates, summaries and such other information and materials as may have been accumulated by Consultant in performing the Services. Consultant shall be compensated on a pro-rata basis for Services completed up to the date of termination.

8.5 Consultant shall maintain books, ledgers, invoices, accounts and other records and documents evidencing costs and expenses related to the Services for a period of three (3) years, or for any longer period required by law, from the date of final payment to Consultant pursuant to this Agreement. Such books shall be available at reasonable times for examination by City at the office of Consultant.

8.6 This Agreement, including the Exhibits incorporated herein by reference, represents the entire agreement and understanding between the Parties as to the matters contained herein, and any prior negotiations, written proposals or verbal agreements relating to such

matters are superseded by this Agreement. Except as otherwise provided for herein, any amendment to this Agreement shall be in writing, approved by City and signed by City and Consultant.

8.7 This Agreement shall be governed by and construed in accordance with the laws of the State of California, without regard to its conflicts of laws provisions. The Parties agree that all actions or proceedings arising in connection with this Agreement shall be tried and litigated only in the state courts located in San Bernardino County, California, and the federal courts located in Riverside County, California.

8.8 If one or more of the sentences, clauses, paragraphs or sections contained in this Agreement is declared invalid, void or unenforceable by a court of competent jurisdiction, the same shall be deemed severable from the remainder of this Agreement and shall not affect, impair or invalidate the remaining sentences, clauses, paragraphs or sections contained herein, unless to do so would deprive a Party of a material benefit of its bargain under this Agreement.

IN WITNESS WHEREOF, duly authorized representatives of City and Consultant have signed in confirmation of this Agreement.

CITY OF REDLANDS

By: _____
Paul T. Barich, Mayor

HDL COREN & CONE

By: Paula J Cone
Paula Cone, President

ATTEST:

_____
Jeanne Donaldson, City Clerk

EXHIBIT "A"
SCOPE OF SERVICES

Services provided include property tax management service, secured and unsecured parcel audits, assessment district processing, budget projections, Successor Agency support, and bond fiscal analysis.

Reports and Management Analyses (1)

Consultant will provide the following reports. Reports are also available from prior years if required.

• A five-year history of the values within the City, Successor Agency and custom (city defined) geographic area;
• A listing of the largest value changes, positive and negative between tax years;
• A listing of the major property owners, including the assessed value of their property and property use code designation;
• A listing of the major property tax payers, including an estimate of the property taxes;
• A listing of property tax transfers which occurred since the lien date ordered by month;
• A multiple year comparison of growth by use code designation over a 10-year period;
• Calculate an estimate of property tax revenue anticipated to be received for the fiscal year based upon the initial information provided by the County and subject to modification. This report is interactive for tax modeling. This estimate shall not be used to secure the indebtedness of the City.
• Property sales information, and Proposition 8 exposure and recapturing potential
• Budget forecasting model for 1 and 5-year projections for General Fund, Successor Agency and VLF In Lieu Revenues.

(1) Reports are based upon property tax information obtained from your county and supplemented by additional information from third parties. Some reports are dependent upon the availability of county data in electronic format.

Successor Agency Services including but not limited to:

• Tax increment projections by project area and for the Successor Agency

• Cash flows for the Successor Agency as requested

• Assistance with Redevelopment Obligation Payment Schedules as requested (additional charges may be required)

• Estimates of property tax revenues to be received by the City as requested

• Monitor the County distribution of tax-sharing revenues to the City and to taxing entities of the former redevelopment agency

• Coordinate as necessary with the Auditor-Controller the relationship between the tax-sharing, debt service and other obligations of former redevelopment agency

Monthly/Quarterly Reports and System Updates

• A listing of property tax appeals filed on properties in the City where data is available for purchase from the Clerk of the Board.

• A listing of property transfers that have occurred since the last report will be available through the software provided and updated on a monthly basis.

Web-Based Software

• Consultant provides a web-based software application to clients as a user-friendly tool to access the City's property tax data. Consultant provides updates to the data portion of the product on monthly basis to reflect changes in ownership, updated appeals filings, and deed recordings.

• As modifications and enhancements are made to the program, clients receive the enhanced version of the software at no additional cost. Training will be provided to city staff within the first two months after the execution of the agreement for property tax management and audit services and is available annually for new staff members or staff requiring a refresher course. If additional training sessions are required, the fees in the compensation section under hourly fees will be charged.

EXHIBIT "B"

FEE SCHEDULE

Fee for Services

Consultant shall provide the Base Services described above, for a fixed annual fee of $19,975 (invoiced quarterly)("Based Fixed Fee").

The Base Fixed Fee shall be adjusted annually starting in calendar year 2023 by the California Consumer Price Index (CCPI) for all items as determined by the California Department of Industrial Relations as measured February to February by the California All Urban Consumers index.

On-Going Consultation

During the term of the agreement, we serve as the resource staff to the County or agency on questions relating to property tax. This includes being "on-call" to assist with any property tax issues. On-going consultation would include, but not be limited to inquiries resolved through use of the City data base. All requests for information based upon the County's property tax data sets are provided without additional costs. Special reports, additional research, or requests requiring additional computer programming requested by City in writing may be charged additional costs. Attendance at City and/or Successor Agency meetings at the written request of City will be billed at our hourly rates.

Fees for Optional Services shall be billed at the following hourly rates:
Partner $250 per hour
Principal $225 per hour
Programmer $200 per hour
Associate $175 per hour
Senior Analyst $125 per hour
Analyst $ 90 per hour
Administrative $ 70 per hour

Hourly rates for optional services are exclusive of expenses and are subject to adjustment by Consultant annually. On July 1st of each year starting in calendar year 2023, Consultant shall provide City with an updated schedule of hourly rates. The rates will not be increased by more than five percent (5%) per year.

Identification and Correction of Errors

Fees for the identification and correction of errors are on a contingent basis, Consultant shall receive twenty-five percent (25%) of general fund or tax increment property tax revenue or other revenues attributable to City recovered or reallocated which are directly or indirectly the result of an audit, analysis or consultation performed by Consultant (including but not limited to base year value audits; administration of tax sharing agreements; tax increment allocation reviews; county allocation reviews). Consultant shall separate and support said reallocation and provide City with an itemized invoice showing all amounts due as a result of revenue recovery or reallocation. City shall pay audit fees after Consultant's submittal of evidence that corrections have been made by the appropriate agency. Payment to Consultant shall be made within thirty

(30) days after City receives its first remittance advice during the fiscal year for which the correction applies.

EXHIBIT "C"

WORKERS' COMPENSATION INSURANCE CERTIFICATION

Every employer, except the State, shall secure the payment of compensation in one or more of the following ways:

(a) By being insured against liability to pay compensation by one or more insurers duly authorized to write compensation insurance in this State.

(b) By securing from the Director of Industrial Relations, a certificate of consent to self-insure, either as an individual employer, or as one employer in a group of employers, which may be given upon furnishing proof satisfactory to the Director of Industrial Relations of ability to self-insure and to pay any compensation that may become due to his or her employees.

CHECK ONE

✓ I am aware of the provisions of Section 3700 of the Labor Code which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and I will comply with such provisions before commencing the performance of the work and activities required or permitted under this Agreement. (Labor Code §1861).

_____ I affirm that at all times, in performing the work and activities required or permitted under this Agreement, I shall not employ any person in any manner such that I become subject to the workers' compensation laws of California. However, at any time, if I employ any person such that I become subject to the workers' compensation laws of California, immediately I shall provide the City with a certificate of consent to self-insure, or a certification of workers' compensation insurance.

I certify under penalty of perjury under the laws of the State of California that the information and representations made in this certificate are true and correct.

HDL COREN & CONE

By: Paula J Cone
Paula Cone, President

Date: June 9, 2022

FIRST AMENDMENT TO AGREEMENT TO PERFORM PROFESSIONAL SERVICES

This first amendment ("First Amendment") to the agreement for the provision of property tax management, information and audit services ("Agreement"), dated June 21, 2022, by and between the City of Redlands, a municipal corporation and a general law city ("City"), and HdL Coren & Cone, a California corporation ("Consultant"), is made and entered into this 3rd day of June, 2025.

RECITALS

WHEREAS, it is the desire of the City and Consultant to amend their existing Agreement, specifically "Payments to Consultant."

NOW, THEREFORE, for good and valuable consideration in the receipt of which is hereby acknowledged City and Consultant agree as follows:

AGREEMENT

Section 1. Article 5.1 of the Agreement, entitled "Payments to Consultant," is hereby amended to read as follows:

"5.1. The compensation for the Consultant's performance of the Services will be the amount of Fifty-Nine Thousand Nine Hundred Twenty-Five Dollars ($59,925.00) for the Services provided during the Initial Term. Should this Agreement be extended, commencing June 21, 2025 of the first Extended term, the compensation for Consultant's performance for the Services will be the amount of Twenty-Two Thousand Four Hundred Twenty-Five Dollars ($22,425.00) which amount includes an increase pursuant to the Consumer Price Index as set forth in Exhibit "B". Commencing June 21, 2026 of the second Extended Term and Twenty-Three Thousand One Hundred Twenty Dollars ($23,120.00) which includes an increase pursuant to the Consumer Price Index as set forth in Exhibit "B", bringing the total possible amount of compensation to One Hundred Five Thousand Four Hundred seventy dollars ($105,470.00). For the Initial Term and each Extended Term, City shall pay Consultant on a time and materials basis in accordance with the rates specified in Exhibit "B," titled "Fee Schedule," which is attached hereto and incorporated herein by this reference

Consultant may adjust its Based Fix Fee pursuant to the California Consumer Price Index as set forth in Exhibit "B". Fees for the identification and correction of errors are compensated on a contingent basis, Consultant shall receive 25 percent of general fund or tax increment property tax revenue or other revenues attributable to City recovered or reallocated as set forth in Exhibit "B".

Section 2. The Fee Schedule set forth in Exhibit "B" of the Agreement is hereby amended as set forth in Attachment "1", which is attached hereto and incorporated herin by this reference.

Section 3. All other provisions of the Agreement shall remain unchanged by this First Amendment and in effect.

Section 4. This Amendment may be executed in counterpoarts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

IN WITNESS WHEREOF, the parties have executed this First Amendment, to be effective as of June 3, 2025.

CITY OF REDLANDS

By: _____
Mario Saucedo, Mayor

HDL COREN & CONE

By: _____
Paula Cone, President

ATTEST:

_____
Jeanne Donaldson, City Clerk

ATTACHMENT 1

EXHIBIT B
FEE SCHEDULE

A. Fee for Services

1.Consultant shall provide the Base Services described above, for a fixed annual fee of $19,975 (invoiced quarterly)("Based Fixed Fee").

2. The Base Fixed Fee shall increase annually starting June 21st, 2025 by the percentage increase in the California Consumer Price Index (CCPI) for all items as determined by the California Department of Industrial Relations as measured February to February by the California All Urban Consumers index for the preceding twelve-month period.

3. In no event shall the Based Fixed Fee be reduced by this calculation. For purposes of this Agreement, the "CPI"shall mean the Consumer Price Index - All Urban Consumers for the surrounding statistical metropolitan area nearest City, All Items (1982-84 = 100), as published by the U.S. Department of Labor, Bureau of Labor Statistics, or, if such index should cease to be published, any reasonably comparable index selected by Consultant.

On-Going Consultation

During the term of the agreement, we serve as the resource staff to the County or agency on questions relating to property tax. This includes being "on-call" to assist with any property tax issues. On-going consultation would include, but not be limited to inquiries resolved through use of the City data base. All requests for information based upon the County's property tax data sets are provided without additional costs. Special reports, additional research, or requests requiring additional computer programming requested by City in writing may be charged additional costs. Attendance at City and/or Successor Agency meetings at the written request of City will be billed at our hourly rates.

Fees for Optional Services shall be billed at the following hourly rates:

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Hourly rates for optional services are exclusive of expenses and are subject to adjustment by Consultant annually. On July 1st of each year starting in calendar year 2023, Consultant shall provide City with an updated schedule of hourly rates. The rates will not be increased by more than five percent (5%) per year.

Identification and Correction of Errors

Fees for the identification and correction of errors are on a contingent basis, Consultant shall receive twenty-five percent (25%) of general fund or tax increment property tax revenue or other revenues attributable to City recovered or reallocated which are directly or indirectly the result of an audit, analysis or consultation performed by Consultant (including but not limited to base year value audits; administration of tax sharing agreements; tax increment allocation reviews; county allocation reviews). Consultant shall separate and support said reallocation and provide City with an itemized invoice showing all amounts due as a result of revenue recovery or reallocation. City shall pay audit fees after Consultant's submittal of evidence that corrections have been made by the appropriate agency..Payment to Consultant shall be made within thirty (30) days after City receives its first remittance advice during the fiscal year for which the correction applies.

City Council Meeting **I. 9.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Adopt Resolution No. 8686 establishing the special tax levy within the City of Redlands Community Facilities District No. 2003-1 (Redlands Business Center) (Management Services/Finance Director Garcia)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to adopt Resolution No. 8686.

RECOMMENDATION:

Staff Recommends that City Council adopt Resolution No. 8686.

DISCUSSION:

In March 2004, the City issued $9,545,000 of Community Facilities District (CFD) Bonds for improvements within the District which is bounded by Mountain View Avenue on the west, San Bernardino Avenue on the north, California Street on the east and Lugonia Avenue on the south (CFD 2003-1). The bonds will be repaid by special taxes levied upon the benefiting property owners and are set to mature in September 2033.

Resolution No. 8686 set the 2025-2026 maximum tax rates and authorized the City Clerk to file all necessary information with the San Bernardino County Auditor/Controller no later than the levy deadline of August 10, 2025. (Preliminary Notice of Special Assessments will be provided to the County by DTA Public Finance, Inc. by July 1, 2025, as required).

Exhibit A of Resolution No. 8686 shows the calculation of the Fiscal Year 2025-2026 Special Tax Levy as prepared by DTA Public Finance, Inc. for CFD 2003-1.

It is noted that there is no levy for CFD 2001-1 for FY 2025-2026. CFD 2001-1 was established in August 2001, when the City issued $9,255,000 of Community Facilities District (CFD) Bonds for improvements in and around the San Bernardino Avenue/California Street area (CFD 2001-1). The bonds are set to mature in September 2026 and no additional special taxes need be levied as the CFD has sufficient funds to pay the remaining debt service to close out the CFD.

Detailed reports prepared by DTA Public Finance, Inc., showing updates of the development status, the financial obligations and the special tax requirements for Fiscal Year 2025-2026 for each CFD, are on file in the City Clerk's Office.

ALTERNATIVES:

The Council may choose to reject, modify, or table this item. Note that failure to file the required information with the San Bernardino County Auditor/Controller before the August 10, 2025 deadline will result in the inability to collect this levy and may impact the debt repayment schedule.

STRATEGIC PLAN:
Not Applicable.

SUBMITTED BY:
Danielle Garcia, Management Services/Finance Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager

PREPARED BY:
Valerie Abrego, Management Analyst

Fiscal Impact

Fiscal Year:	2025-2026
Revenue Generating:	Yes
Appropriation Required Y/N:	No
Amount:	Various
Budgeted Y/N:	Yes
Account No.:	Fund 810

Discussion:

There is no impact to the General Fund. These assessments are pass-through tax levies, wherein the City collects and remits funds on behalf of the Community Facilities Districts. Its indebtedness is not City debt in any way.

Attachments

Resolution No. 8686 CFD 2003-1 for FY 2025-2026

Exhibit A for CFD 2003-1

RESOLUTION NO. 8686

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS LEVYING SPECIAL TAXES WITHIN CITY OF REDLANDS COMMUNITY FACILITIES DISTRICT NO. 2003-1 (REDLANDS BUSINESS CENTER)

WHEREAS, the City Council (the "City Council") of the City of Redlands (the "City") has formed City of Redlands Community Facilities District No. 2003-1 (Redlands Business Center) (the "Community Facilities District"), under and pursuant to the Mello-Roos Community Facilities Act of 1982 (the "Act"); and

WHEREAS, the City Council, as the legislative body of the Community Facilities District, is authorized under the Act to levy special taxes (the "Special Taxes") to pay for the costs of certain facilities and to authorize the issuance of bonds secured by the Special Taxes under the Act; and

WHEREAS, the City Council, pursuant to Ordinance No. 2569, adopted by the City Council of the City on January 20, 2004, authorized and levied the Special Taxes within the Community Facilities District; and

WHEREAS, Section 53340 of the Act provides that the legislative body of a community facilities district may provide, by resolution, for the levy of the special tax in the current year or future tax years at the same rate or at a lower rate than the rate provided by ordinance, if the resolution is adopted and a certified list of all parcels subject to the special tax levy including the amount of the tax to be levied on each parcel for the applicable tax year, is filed by the clerk or other official designated by the legislative body with the county auditor on or before the 10th day of August of that tax year; and

WHEREAS, on February 3, 2004, the City Council adopted a resolution entitled "A Resolution of the City Council of the City of Redlands Authorizing the Issuance of not to Exceed $9,600,000 Aggregate Principal Amount of City of Redlands Community Facilities District No. 2003-1 (Redlands Business Center) Special Tax Bonds, Series 2004, Approving the Execution and Delivery of an Indenture, a Bond Purchase Contract and a Continuing Disclosure Certificate and the Preparation of an Official Statement and Other Matters Related Thereto" authorizing the issuance of City of Redlands Community Facilities District No. 2003-1 (Redlands Business Center) Special Tax Bonds, Series 2004 (the "Bonds"), in an aggregate principal amount of not to exceed $9,600,000;

WHEREAS, the City Council desires to levy the Special Taxes within the Community Facilities District for Fiscal Year 2025-2026;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. All of the above recitals are true and correct.

Section 2. The City Council hereby levies the Special Taxes for the Fiscal Year 2025-2026 at the maximum rates and with respect to the parcels as set forth in Exhibit "A" hereto; provided, however, that the City Manager of the Finance Director of the City is hereby authorized, prior to the submission to the San Bernardino County Auditor/Controller and upon consultation with the City 's

special tax consultant, DTA Public Finance, Inc. (a) to make any necessary modifications to such Special Taxes to correct any errors, omissions or inconsistencies in the listing or categorization of parcels to be taxed (provided that any such modifications shall not result in an increase in the Special Tax applicable to any category of parcels), or (b) to lower such Special Tax rates to the extent such officer deems necessary upon receipt of the final pricing information, and debt service requirements with respect to, the Bonds. The City Clerk of the City is hereby authorized and directed to file with the San Bernardino County Auditor/Controller no later than August 10th, 2025 a certified list of all parcels subject to the Special Tax levy including the amount of the Special Tax to be levied on each parcel for Fiscal Year 2025-2026.

Section 3. The officers and agents of the City are, and each of them hereby is, authorized and directed to execute and deliver any and all documents and instruments and to do and cause to be done any and all acts and things necessary or proper for carrying out the levy of the Special Taxes for Fiscal Year 2025-2026 as provided in this resolution.

Section 4. All actions heretofore taken by the officers and agents of the City with respect to the levy of the Special Taxes for Fiscal Year 2025-2026 are hereby approved, confirmed and ratified.

Section 5. This Resolution shall take effect immediately upon its adoption

APPROVED AND ADOPTED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

EXHIBIT “A”
CITY OF REDLANDS CFD No. 2003-1
FY 2025-2026 SPECIAL TAX LEVY

[Attached]

Exhibit A

City of Redlands CFD No. 2003-1
FY 2025-2026 Special Tax Levy

Assessor's Parcel Number	FY 2025-2026 Special Tax
Zone 1	
0167-441-07	$16,379.77
0167-481-16	$102,966.76
0167-501-11	$150,471.44
0167-511-24	$7,046.61
0167-511-25	$6,758.99
0167-511-26	$36,239.70
0167-511-27	$9,970.71
0167-511-28	$8,964.05
0167-511-29	$225,827.00
0167-541-09	$160,729.77
Subtotal	**$725,354.80**
Zone 2	
0167-511-09	$228,175.87
Subtotal	**$228,175.87**
Total FY 2025-2026 Special Tax Levy	**$953,530.67**
Total Number of Parcels Taxed	**11**

City Council Meeting **K. 1.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: A Public Hearing to consider the following matters concerning the 2021–2029 Housing Element Rezoning Project, implementing Housing Element Program 1.1-1:

1. Adoption of Resolution No. 8687 to certify the Final Subsequent Environmental Impact Report prepared for the proposed project, and adopt the associated Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring & Reporting Program in accordance with the California Environmental Quality Act.

2. Adoption of Resolution No. 8688 for General Plan Amendment No. 149 to amend the Land Use Map and change the designation of seven parcels to Medium Density Residential, change 14 parcels to High Density Residential, and change a portion of one parcel to Public/Institutional.

3. Adoption of Resolution No. 8689 for Amendment No. 1 to Concept Plan 4 to remove three parcels from the Concept Plan No. 4 boundaries.

4. Adoption of Resolution No. 8690 for Amendment No. 54 to the East Valley Corridor Specific Plan (Specific Plan No. 40) to remove 21 parcels from the Specific Plan's boundaries (and designate the zoning pursuant to RMC Title 18), change the land use designation of one parcel to Multiple Family Residential–2500 District (EV/2500RM), and change the land use designation of one parcel to Public/Institutional (EV/PI) District to accommodate the existing land use.

5. Introduction of Ordinance No. 2983 for Zone Change No. 479, a proposal to amend the Zoning Map amendment to change the zone of nine parcels to Multiple Family Residential (R-2) and change 16 parcels to Multiple Family Residential (R-3) district pursuant to Title 18 (Zoning Regulations) of the Redlands Municipal Code; and change the zone of one parcel

to Multifamily Residential (EV/2500RM) and a portion of one parcel to Public Institutional (EV/IP) within the East Valley Corridor Specific Plan (Specific Plan No. 40).

The subject properties are the following APNs:
0292-163-02-0000; 0292-163-03-0000; 0292-165-05-0000; 0292-165-06-0000; 0292-165-07-0000; 0292-165-08-0000; 0292-165-09-0000; 0292-165-10-0000; 0292-165-16-0000; 0292-165-17-0000; 0292-165-04-0000; 0292-167-02-0000; 0292-167-07-0000; 0292-167-28-0000; 0292-167-29-0000; 0292-167-30-0000; 0292-167-17-0000; 0292-201-20-0000; 0292-201-14-0000; 0167-141-04-0000; 0167-141-05-0000; 0167-141-06-0000; 0169-021-02-0000; 0169-021-11-0000; 0167-151-23-0000; 0167-161-10-0000; 0292-165-15-0000.

(Mayor to declare meeting open as a public hearing)

(Development Services Director Desatnik)

PROCEDURE FOR PUBLIC HEARING:

1. Mayor declares the meeting open as a public hearing.
2. Mayor calls upon Department Director for report.
3. Mayor calls for questions/comments from members of the City Council.
4. Mayor calls upon applicant, or his/her representative, for comments and testimony.
5. Mayor calls for comments/questions/testimony from members of the public
   (3 minutes per speaker).
6. Mayor calls upon City Clerk to note any written comments received.
7. Mayor calls upon the applicant, or representative, for rebuttal comments (5 minutes).
8. Mayor closes the public hearing.
9. City Council considers the motion and votes.

MOTION(S):

If the City Council deems it appropriate, the following three motions are provided:

1. I move to adopt Resolution No. 8687 to adopt and certify the Final Subsequent Environmental Impact Report prepared for the project, including the Findings of Fact and the Statement of Overriding

Considerations; and
2. I move to adopt Resolution Nos. 8688, 8689 and 8690 to approve the General Plan Amendment, Specific Plan Amendment, and Concept Plan Amendment; and
3. I move to introduce Ordinance 2983 to amend the Zoning Map.

RECOMMENDATION:

On April 22, 2025, the Planning Commission reviewed the proposed project and recommended that the City Council: (1) certify the Final Subsequent Environmental Impact Report and adopt the Findings of Fact, the Statement of Overriding Considerations, and the Mitigation Monitoring & Reporting Program; and, (2) adopt the proposed amendments to the General Plan Land Use Map, the East Valley Corridor Specific Plan, Concept Plan 4, and the Zoning Map.

BACKGROUND:

The City Council adopted the 2021-2029 (6th Cycle) Housing Element on February 1, 2022, and the final revised document on October 4, 2022. For more background information regarding the preparation and adoption process, please refer to the City Council staff report of February 1, 2022 (click here for link). The certified Housing Element is available on the City website at https://www.cityofredlands.org/post/housing-element.

A) Regional Housing Needs Allocation

In each cycle, the Regional Housing Needs Allocation (RHNA) process is conducted to determine local housing needs at various affordability levels. The California Department of Housing & Community Development (HCD) and the California Department of Finance ultimately determine overall regional housing needs based on factors including population forecasts, housing supply and demand, conditions like overcrowding rates, and jobs-housing balance. These allocations are goals, not production requirements, aimed at ensuring enough properly zoned land (i.e., supply) is available to meet the anticipated population (i.e., demand).

For the 2021-2029 Housing Element cycle, the RHNA allocation was a total of 3,516 new units to the City of Redlands. After receiving their RHNA assignment, local governments must adopt housing elements that plan accordingly for their RHNA allocation as well as identify any necessary actions or programs to meet its allocation. Table 1 summarizes the City's allocation of regional housing needs, by household income group, as determined by SCAG.

Table 1: City of Redlands' 2021–2029 RHNA Allocation, by Income Group

Household Income Group	Number	Percent
Very Low (<50% AMI)	967	28
Low (50-80% AMI)	615	17
Moderate (80-120% AMI)	652	19
Above Moderate (>120% AMI)	1,282	36
Total	**3,516**	**100**

RHNA Buffer: State law requires cities to maintain adequate capacity in their housing site inventories to meet their RHNA for all income levels. In the event that a site is developed below the project density specified in the Housing Element, or at a different household income level than projects, the City must have adequate sites available to accommodate the remaining balance of the RHNA. If the City does not have surplus capacity within the existing zoning plan, it must identify and rezone additional sites to accommodate the remaining housing need. Accordingly, the City included an additional buffer of 20 percent (or 703 units) above the RHNA in each category, as shown in Table 2.

Table 2: Redlands RHNA with Buffer

Income Group	Very Low	Low	Moderate	Above Moderate	Total
RHNA units	967	615	652	1,282	3,516
20% Buffer	193	123	130	256	703
Total	1,160	738	782	1,538	4,219

B) 6th Cycle Housing Element Site Inventory

Housing Elements must identify specific parcels available for residential development. The California Department of Housing & Community Development (HCD) provides guidelines which allows including sites that are being prepared for development, provided there is a program (such as a commitment to future rezoning) to complete any necessary actions early in the cycle. The Housing Element includes a site inventory that identifies sites to be rezoned to meet the minimum housing densities needed to meet the assigned housing allocation.

Program 1.1-1 of the Housing Element requires that the City rezone enough land to provide capacity for at least 4,218 units. All sites to be rezoned are identified for rezoning in the Housing Element site inventory list (except for Site 24 which is being rezoned from Commercial/Industrial to Public/Institutional to be consistent with the property's current use as a school).

The RHNA sites are dispersed throughout the City to prevent overconcentration of housing in a particular area and to ensure that housing is reasonably distributed based on availability and proximity to resources and public services.

C) Planning Commission Hearing and Recommendation

As the advisory body to the City Council concerning amendments to the General Plan, Specific Plans, and the Zoning Map, the Planning Commission held a public hearing and considered the proposal during its regular meeting on April 22, 2025. During the hearing, five individuals addressed the commission: four expressed support for the project, citing the benefits of increased residential density; and no speakers expressed opposition to the project. The Commission voted unanimously to recommend approval of the project.

SUMMARY

A) Project Description

The proposed project directly implements Program 1.1-1 of the Housing Element by changing the zoning designations of multiple parcels identified in the housing sites inventory of the Housing Element. The goal of this program is to increase residential zoning capacity by an estimated 2,436 housing units to meet the RHNA assigned to the City for the current housing element cycle. The program also involves updates to the land use maps of both the General Plan and East Valley Corridor Specific Plan, which are necessary to enable the proposed rezoning and maintain consistency between the land use plans and the zoning ordinance.

Table 3 (see Attachment A) summarizes the proposed changes to the zoning and land use classifications for each parcel. Attachments B, C and D include a vicinity map, aerials, and existing and proposed General Plan land use and zoning maps.

B) General Plan and Specific Plan Amendments

General Plan Amendment: According to the General Plan Land Use Map, most of the project parcels are currently designated for nonresidential land use ('Commercial/Industrial' and 'Commercial'), although five sites currently have residential designations ('Medium Density Residential' or 'High Density Residential'). The project would amend the General Plan land use map to reclassify the nonresidential parcels to Medium Density Residential or High Density Residential; however, the designations of residential parcels would not change. Table 4 summarizes the surrounding General Plan land use designations of the project sites.

Table 4: Surrounding Land Use Designations

Sites	North	East	West	South
1-16 24	Commercial / Industrial and Parks / Golf Courses	Commercial / Industrial	City of Loma Linda	Medium Density Residential and Parks / Golf Courses
17-19	Low Density Residential	Low Density Residential	Commercial	High Density Residential
20 21	Low Density Residential and Medium Density Residential	Medium Density Residential	Commercial	Commercial / Industrial and Low Density Residential
22 23	High Density Residential and Commercial	Low Density Residential	Low Density Residential	Low Density Residential and Public / Institutional

Specific Plan Amendment: The project would amend Specific Plan No. 40, also known as the East Valley Corridor Specific Plan (EVCSP), by removing 21 parcels from the EVCSP and rezoning them for multi-family residential use (either R-2 or R-3). Of the parcels to be removed, 18 are currently located in the 'Commercial/Industrial (EV/IC)' district, and three are located in the 'General Commercial (CG)' and 'Administrative Professional (AP)' areas within Concept Plan No. 4.

Furthermore, the project would also amend the EVCSP Land Use Map to change the land use designations of two parcels. First, the designation of the parcel on the northwest corner of Orange Avenue and Iowa Street would be changed from 'Multiple-Family Residential (EV/3000RM)' to 'Multiple-Family Residential (EV/2500RM)' and thereby increase the allowed maximum residential density on the site.

Second, the designation of the parcel currently owned and occupied by Montessori in Redlands, at the northeast corner of Orange Avenue and Nevada Street, would be modified. This parcel is currently split-zoned (i.e., features two specific plan designations), and the portion of the parcel north of the Morey Arroyo is designated 'Commercial/Industrial (EV/IC)' whereas the south portion is designated EV/3000RM. The EVCSP amendment would change the designation of the north portion to 'Public Institutional (EV/IP)' for compatibility with the proposed residential zoning, as well as align the site designation with its current use as a school which operates under a previously approved conditional use permit. While this parcel is not included in Housing Element Program 1.1-1 for rezoning, it is desirable to ensure its zoning designation will be consistent with adjacent multifamily residential zone changes described above (and the school's administrators were not opposed to the rezoning when they discussed the idea with staff).

C) Zone Change

Ultimately, the project would rezone a total of 26 parcels for multifamily residential uses (and one for public/quasi-public institutional use) in order to implement Program 1.1-1 of the Housing Element. All sites (except for Site No. 24) are identified in the Housing Element housing sites inventory and must be rezoned to maintain a compliant Housing Element and, by extension, an internally consistent and legally valid General Plan. Table 5 summarizes the surrounding zoning district designations of the sites.

Table 5: Surrounding Zoning Designations

Sites	North	East	West	South
1-16 24	Commercial / Industrial (EV/IC)	Commercial / Industrial (EV/IC)	City of Loma Linda	Multiple-Family Residential (EV2500RM, EV3000RM)
17-19	Special Development (EV/SD); Specific Plan No. 62 (Bergamot)	Suburban Residential (R-S); Agricultural (A-1)	Concept Plan No. 4	Suburban Residential (R-S); Single Family Residential (R-1); Multiple Family Residential (R-3)
20 21	Single Family Residential (R-1)	Multiple Family Residential (R-2)	Agricultural (A-1)	Light Industrial (M-1); Single Family Residential (R-1)
22 23	Multiple Family Residential (R-2); Neighborhood Convenience (C-2)	Single Family Residential (R-1)	Multiple Family Residential (R-2)	Multi-Family Residential (R-2); Educational (E)

D) Measure 'U'

Measure 'U' is a growth management initiative approved by Redlands voters in 1997, and establishes several principles of managed development. Measure U amended the Redlands General Plan by adding a policy that requires the City Council to make mandatory findings and approve by a four-fifths vote for any re-designation of land that would permit residential densities greater than the R-E classification if the land meets one or both of the following conditions:

- Land that is undeveloped as of March 1, 1997 and designated in whole or in part as "Urban Reserve" or "Urban Reserve (Agricultural)" in the Redlands general plan in effect as of June 1, 1987; or

- Any land parcel that was in active agricultural production on November 3, 1986 regardless of zoning

None of the sites meet the first condition of having been designated "Urban

Reserve" or "Urban Reserve (Agricultural)" in the 1987 General Plan. However, staff reviewed past aerial photographs and determined that the following sites were presumably in active agricultural production on or after November 1986 and therefore meet the second condition: Sites 1, 2, 3, 6, 7, 8, 13, 14, 15, 16, 18, 19 and 21. Staff has reviewed the findings and has included recommended determinations for each finding in the draft resolution (see Attachment F).

E) Land Use and Circulation

Staff has reviewed the location of the redesignated sites in relation to the General Plan Roadway Circulation Map (see Attachment E) and determined that the planned roadway network design can accommodate the planned land uses. Therefore, staff determined that the planned roadways are aligned with the existing circulation plan, and that no changes to the general plan circulation policies or roadway classifications are necessary. As infill sites, the project sites abut existing roadways including major arterials (San Bernardino Avenue, Lugonia Avenue), minor arterials (Nevada Street, Texas Street, Orange Street) and collectors (Citrus Avenue and Iowa Street) which can effectively serve future residential development on adjacent parcels and adequately convey traffic to and from the project sites. Development of any substandard roadways would occur incrementally as new development occurs (e.g., frontage improvements), or upon construction of public works projects identified in the City's capital improvement program.

F) Water Supply, Infrastructure and Public Services

Impacts of the proposed rezoning and future allowed residential uses on water supply, infrastructure and public services such as police and fire response have been evaluated through the environmental review process, the proposed changes to the land use designations and rezoning would not adversely affect public infrastructure or resources. According to the Water Supply Assessment prepared for the project, it is expected that local water supplies will continue to be sufficient to serve new development at buildout under the new zoning. Furthermore, the cost of serving new residential development (e.g., police, fire, library, schools, parks, and new infrastructure) would be sufficiently offset by the payment of applicable Development Impact Fees (to the City) and school impact fees (to RUSD) at the time of construction, or possibly by imposing conditions of approval on new development.

ENVIRONMENTAL REVIEW:

A Subsequent Environmental Impact Report ("SEIR") to the 2035 General Plan Environmental Impact Report has been prepared for this project.

An environmental impact report ("EIR") is an informational document which must be considered by public agencies prior to its approval or disapproval of a project,

including the adoption or amendment of both general plans and zoning ordinances. The purpose of an EIR is to provide public agencies and the public in general with detailed information about the effects which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project. The basis for preparing the SEIR and an overview of the project environmental review process are discussed below.

A) Background

In July 2017, the City Council certified the General Plan EIR pursuant to section 15168 of the CEQA Guidelines. The General Plan EIR is a programmatic EIR that examines the potential effects resulting from implementing designated land uses and policies in the General Plan. The impact assessment evaluates the project as a whole and identifies the broad, regional effects that may occur with its implementation. As a programmatic document, the General Plan EIR does not assess site-specific impacts. Depending on the circumstances, future development proposals may be subject to individual, site-specific environmental review.

According to section 15162(a)(1) of the CEQA Guidelines, a subsequent EIR must be prepared if substantial changes are proposed in a project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Because this project would rezone and redesignate parcels to provide for future housing development as required by the RHNA, the scope of the changes warranted the preparation of a subsequent EIR.

Topics Analyzed: The SEIR evaluates the following environmental topics deemed potentially affected by the project:

- Agricultural Resources
- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

Determining Levels of Significance: The SEIR utilizes 36 criteria to assess the potential impacts of the project on the environment. For each criterion identified

in the SEIR, a corresponding statement of the level of significance of the impact is provided. Impacts are classified as one of the following categories:

- **"No Impact"** means no adverse effect on the environment would occur, and mitigation measures are not required.

- **"Less than Significant Impact"** means the impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.

- **"Less than Significant Impact with Mitigation Incorporated"** means the impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval and applicable plans, programs, and policies, when implemented, will reduce the significant impact to a less-than-significant level.

- **"Significant and Unavoidable Impact"** means the impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures, standard conditions of approval, and applicable plans, programs, and policies would not reduce the impact to a less-than-significant level, and a significant and unavoidable would remain.

The results of the analysis are summarized in the 'Summary of Environmental Impacts' section below.

B) Notice of Preparation

The first step of the EIR process is the circulation of a Notice of Preparation ("NOP"). An Initial Study was also prepared to accompany the NOP and to provide preliminary analysis of the environmental topics to be included in the EIR analysis. The NOP process provides a 30-day public comment period to allow members of the public and other agencies the opportunity to provide early comments on the scope of the environmental analysis. During the comment period, a total of six written comments were received.

During the NOP process, several environmental topics including Aesthetics, Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Recreation and Wildfire were "scoped out" of the EIR analysis as it could be seen with certainty that the project would not have effects concerning those environmental aspects; therefore, the SEIR does not further analyze these topics.

Public Scoping Meeting: A public scoping meeting was held on July 18, 2024, at 4:30 p.m. as a virtual meeting on Zoom. During the meeting, two comments were received.

Project Description: The environmental analysis employed a buildout comparison methodology, analyzing the differences in buildout potential between the existing (*status quo*) and proposed land use and zoning scenarios to estimate the project's incremental impacts. The buildout assumptions used for preparation of the technical studies and SEIR are summarized in the table below.

Table 5: Project Description

Project buildout assumptions	Dwelling units	Non-residential floor area (sq. ft.)
Existing (status quo)	111	2,209,040
Proposed	2,436	151,048 *
Net change	+2,325	-2,057,992
* Public/Institutional use		

C) Notice of Availability

The Draft SEIR was finalized in December 2024, and the Notice of Completion ("NOC") and Notice of Availability ("NOA") were circulated for public review on January 21, 2025.

The 45-day public review and comment period began on January 22, 2025 and ended on March 7, 2025. Printed copies of the Draft SEIR and appendices (technical studies) were posted for public viewing at the A.K. Smiley Public Library and the Planning Division public counter. The Draft EIR and appendices were also made available on the City's Planning Division website (https://www.cityofredlands.org/post/environmental-documents) and the State Clearinghouse website (https://ceqanet.opr.ca.gov/2016081041/7).

D) Summary of Environmental Impacts

The Draft SEIR found that there were No Impacts to one criterion; Less than Significant Impacts to 24 criteria (including those Less than Significant Upon Mitigation); and Significant and Unavoidable Impacts to 11 criteria. The following table summarizes the number and scope of the project's environmental impacts. Those topics for which a Significant & Unavoidable Impact were found applied to Agricultural Resources, Air Quality and Greenhouse Gas, and Transportation. The significant transportation impact (with respect to vehicle miles traveled as a metric) applied only to a subset of the project parcels (Sites 20, 21 and 23); however, the significant impact would only occur on a cumulative basis (i.e., under the unlikely scenario in which these sites are developed in conjunction simultaneously as part of one project), and development of each site occurring independently is not expected to result in any significant impacts.

Table 6: Summary of Environmental Impacts

Environmental Factor	Number of Criteria Evaluated	No Impact	Less than Significant Impact	Significant and Unavoidable Impact
Agricultural Resources	3	--	--	3
Air Quality	4	--	--	4
Cultural Resources	2	--	2	--
Energy	3	1	2	--
Greenhouse Gases	3	--	--	3
Land Use and Planning	2	--	2	--
Noise	3	--	3	--
Population and Housing	2	--	2	--
Public Services	4	--	4	--
Transportation	3	--	2	1
Tribal Cultural Resources	3	--	3	--
Utilities and Service Systems	4	--	4	--
TOTAL:	36	1	24	11

E) Alternatives Analyzed

CEQA mandates that public agencies consider and analyze alternatives to projects. According to section 15126.6(d)(2) of the CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts." The discussion must also include an evaluation of the 'No Project Alternative' to allow decision-makers to compare the impacts of approving a project in relation to not approving it.

The feasibility of project alternatives is constrained by the mandatory nature of the proposed project, which involves rezoning specific sites across the jurisdiction to accommodate the City's assigned regional housing allocation; that is, the City is legally obligated to carry out the rezoning. Furthermore, implementing the project is essential to ensure internal consistency between the General Plan's land use policies and the Housing Element, making approval of the project necessary for the city to maintain a legally valid general plan.

Chapter 6 of the Draft SEIR provides a comparative analysis of the environmental impacts among three project alternatives as shown in the table below.

Table 7: Summary of Alternatives

Alternative Scenario	**Description**
No Project / No New Development	Existing zoning and specific plan would remain as they are today (i.e., *status quo*), and the project is not approved. No changes to the existing zoning would occur, and future development projects would be built in compliance with the current zoning regulations.
Reduced Project Site	Under this alternative, the parcels which are located on the Morrey Arroyo Creek (Sites 2, 7, 8, 11,12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9,10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned to the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.
Reduced Project Development	The Reduced Project Development Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, Project buildout would be reduced by 55 percent; thereby limiting the overall future buildout to a maximum of 1,096 residential units and abuildout of 67,971.81 SF nonresidential uses. This alternative would still require approval of the GPA,adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only1,948 dwelling units would be allowed to be constructed and the City would have a 1,315-dwelling-unit deficit in meeting their State mandated RHNA fair share.

F) Final SEIR

The Final SEIR (see Attachment F-1) comprises the Draft SEIR, comments received on the Draft SEIR, and the responses to those comments. The primary purpose of the Final SEIR is to respond to comments received during the 45-day public review period of the Draft SEIR. As mentioned previously, the review period for the Draft SEIR (State Clearinghouse No. 2016081041) was January 22, 2025 through March 7, 2025. There are no revisions to the Draft SEIR as a result of the comments.

Public Comments Received: Two agencies (the California Department of Conservation and the County of San Bernardino Public Works Department) commented on the Draft SEIR. No comments from individuals or organizations were received on the Draft SEIR. Responses to the agency comments were prepared and included in the Final SEIR.

Mitigation Monitoring & Reporting Program: A Mitigation Monitoring and Reporting Program ("MMRP"), which summarizes all mitigation measures and

outlines the program for monitoring the implementation of each measure, has been prepared and is included in the Final SEIR.

G) Findings of Fact and Statement of Overriding Considerations

Sections 15091 and 15093 of the CEQA Guidelines state that no public agency shall approve a project for which a certified EIR identifies one or more significant environmental effects unless the agency makes findings regarding each effect. These findings can show that significant environmental effects can be avoided or substantially lessened by changes required in the project or by changes that are within the responsibility of jurisdiction of another public agency that can or should be adopted.

Findings can also be made concerning specific economic, legal, social, technological or other considerations, such as state mandates or regional housing shortages, that make the mitigation measures or project alternatives infeasible. In addition, findings are required if specific economic, legal, social, technological or other benefits of a project outweigh the unavoidable adverse environmental effects. In such a situation, the adverse environmental effects may be considered "acceptable" and the project approved. The proposed Findings of Fact and Statement of Overriding Considerations are included in Attachment G-2 (the 'Significant and Unavoidable Impacts' relate to the topics of Agriculture, Air Quality, Greenhouse Gas Emissions and Transportation).

Overriding Considerations: The list of overriding considerations (to allow the rezoning to move forward in light of the environmental impacts) include the following, as identified in the Final Subsequent EIR. The Project would:

- Allow the City to meet the State mandated RHNA fair share and ensure the City remains consistent with State Housing Element law.
- Implement and be consistent with the City's adopted and certified Housing Element.
- Provides additional housing and the necessary residential capacity in accordance with the City's certified Housing Element Update.
- Provide housing that would result in a better jobs-housing balance in Redlands, which is currently considered jobs rich.
- Promote a diverse housing stock with a wide range of sizes and affordability within the City of Redlands.
- Increase the development potential of underutilized parcels of the City of Redlands, allowing for increased residential development and development impact fees within the City.
- Locate new higher-density housing developments close to nearby retail stores, personal service uses, medical and dental offices, schools, parks, transportation corridors, and employment centers in Redlands.

These overriding considerations, particularly those pertaining to the increase in regional housing demand and the City's jobs/housing balance, are very similar to

those contained in the Statement of Overriding Considerations previously adopted with the General Plan EIR (certified in December 2017). Like this Subsequent EIR, the General Plan EIR identifies the long-term increase in regional housing demand as a justification for accepting the probable significant environmental impacts (i.e., an increase of about 6,400 new dwelling units by the year 2035). The General Plan EIR also identified a better jobs/housing ratio as a justification for accepting the likely significant environmental impacts, which means that more housing units in Redlands would help offset the high number of jobs in Redlands (thus achieving a desirable jobs/housing ratio of about 1.0 citywide).

ALTERNATIVES:

The City Council may continue the public hearing and direct staff to address any issues and/or bring back additional information. However, since the rezoning is required to implement the 2021–2029 Housing Element, no alternatives are recommended.

SUBMITTED BY:
Brian Desatnik, Development Services Director

RECOMMENDED BY:
Charles M. Duggan, Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Christopher Boatman, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Kevin Beery, Senior Planner

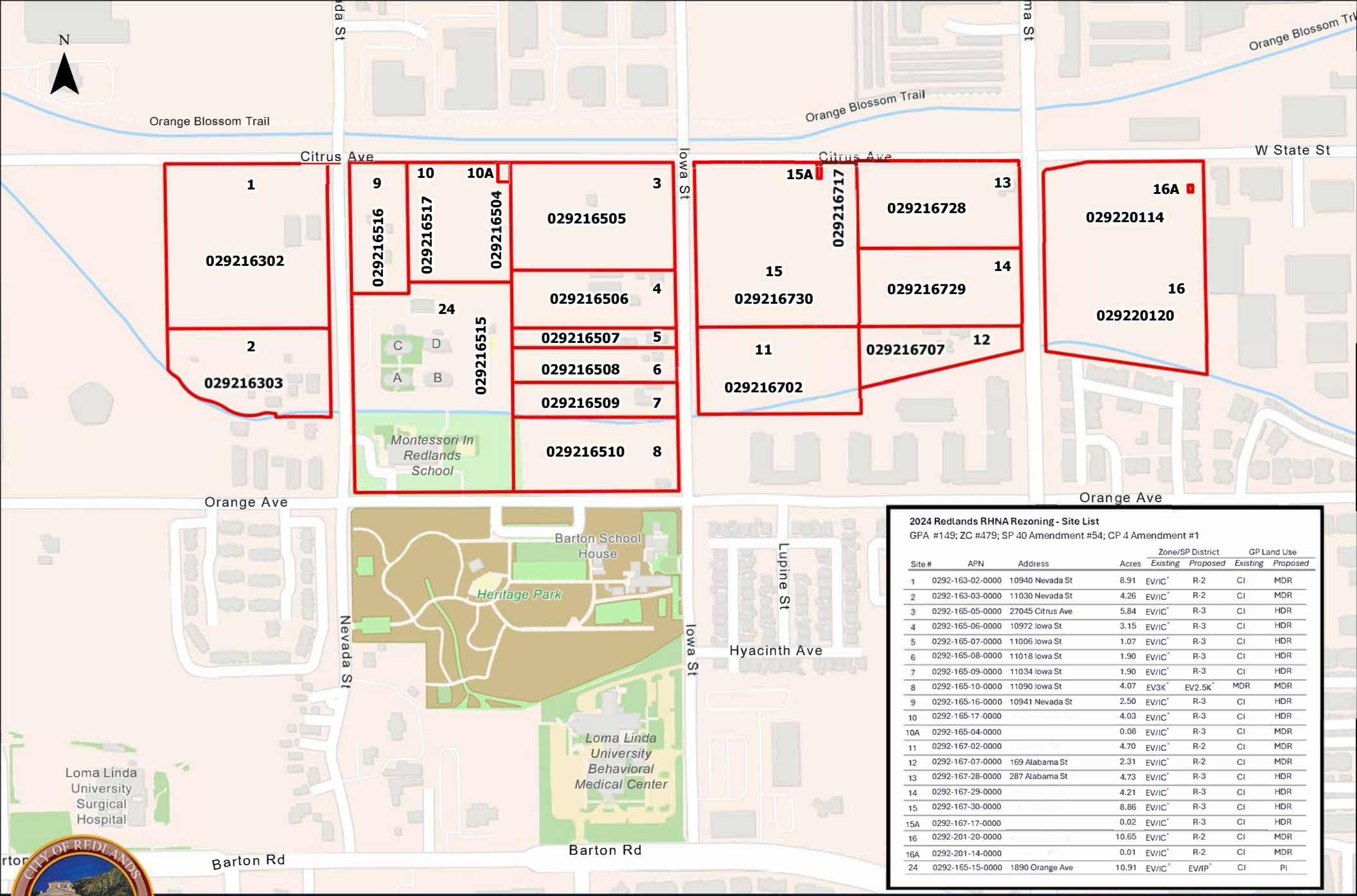
Attachments

Attachment A: Project Parcel List
Attachment B: Vicinity Maps and Aerials
Attachment C: General Plan Land Use Map (Existing & Proposed)
Attachment D: Zoning Map (Existing & Proposed)
Attachment E: General Plan Roadway Classification Map
Attachment F-1: Final Subsequent EIR
Attachment F-2: Draft Subsequent EIR
Attachment G-1: Resolution 8687 (CEQA)
Attachment G-2: Findings of Fact and Statement of Overriding Considerations
Attachment G-3: Mitigation Monitoring & Reporting Program

Attachment H: Resolution 8688 (GPA 149)
Attachment I: Resolution 8689 (CP4 A1)
Attachment J: Resolution 8690 (SP40 A54)
Attachment K: Ordinance 2983 (ZC 479)

Table 3 – Summary of Land Use and Zoning Map Changes by Parcel (APN)

Site ID	APN	Current Zoning	Proposed Zoning	Current General Plan Land Use Designation	Proposed General Plan Land Use Designation
1	0292-163-02-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
2	0292-163-03-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
3	0292-165-05-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
4	0292-165-06-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
5	0292-165-07-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
6	0292-165-08-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
7	0292-165-09-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
8	0292-165-10-0000	EV3000RM	EV2500RM	Medium Density Residential	Medium Density Residential
9	0292-165-16-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
10	0292-165-17-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
10A	0292-165-04-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
11	0292-167-02-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
12	0292-167-07-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
13	0292-167-28-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
14	0292-167-29-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
15	0292-167-30-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
15A	0292-167-17-0000	EV/IC	R-3	Commercial/Industrial	High Density Residential
16	0292-201-20-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
16A	0292-201-14-0000	EV/IC	R-2	Commercial/Industrial	Medium Density Residential
17	0167-141-04-0000	CG/AP	R-2	Commercial	Medium Density Residential
18	0167-141-05-0000	CG/AP	R-3	Commercial	High Density Residential
19	0167-141-06-0000	CG/AP	R-3	Commercial	High Density Residential
20	0169-021-02-0000	A-1	R-2	Medium Density Residential	Medium Density Residential
21	0169-021-11-0000	R-1	R-2	Medium Density Residential	Medium Density Residential
22	0167-151-23-0000	R-2	R-3	High Density Residential	High Density Residential
23	0167-161-10-0000	R-2	R-3	High Density Residential	High Density Residential
24	0292-165-15-0000	EV/IC	EV/IP	Commercial/Industrial	Public/Institutional



2024 Redlands RHNA Rezoning - Site List

GPA #149; ZC #479; SP 40 Amendment #54; CP 4 Amendment #1

Site #	APN	Address	Acres	Zone/SP District Existing	Zone/SP District Proposed	GP Land Use Existing	GP Land Use Proposed
1	0292-163-02-0000	10940 Nevada St	8.91	EV/IC*	R-2	CI	MDR
2	0292-163-03-0000	11030 Nevada St	4.26	EV/IC*	R-2	CI	MDR
3	0292-165-05-0000	27045 Citrus Ave	5.84	EV/IC*	R-3	CI	HDR
4	0292-165-06-0000	10972 Iowa St	3.15	EV/IC*	R-3	CI	HDR
5	0292-165-07-0000	11006 Iowa St	1.07	EV/IC*	R-3	CI	HDR
6	0292-165-08-0000	11018 Iowa St	1.90	EV/IC*	R-3	CI	HDR
7	0292-165-09-0000	11034 Iowa St	1.90	EV/IC*	R-3	CI	HDR
8	0292-165-10-0000	11090 Iowa St	4.07	EV3K*	EV2.5K*	MDR	MDR
9	0292-165-16-0000	10941 Nevada St	2.50	EV/IC*	R-3	CI	HDR
10	0292-165-17-0000		4.03	EV/IC*	R-3	CI	HDR
10A	0292-165-04-0000		0.08	EV/IC*	R-3	CI	MDR
11	0292-167-02-0000		4.70	EV/IC*	R-2	CI	MDR
12	0292-167-07-0000	169 Alabama St	2.31	EV/IC*	R-2	CI	MDR
13	0292-167-28-0000	287 Alabama St	4.73	EV/IC*	R-3	CI	HDR
14	0292-167-29-0000		4.21	EV/IC*	R-3	CI	HDR
15	0292-167-30-0000		8.86	EV/IC*	R-3	CI	HDR
15A	0292-167-17-0000		0.02	EV/IC*	R-3	CI	HDR
16	0292-201-20-0000		10.65	EV/IC*	R-2	CI	MDR
16A	0292-201-14-0000		0.01	EV/IC*	R-2	CI	MDR
24	0292-165-15-0000	1890 Orange Ave	10.91	EV/IC*	EV/IP*	CI	PI

2024 RHNA Rezoning Sites (West)

Nevada St, Citrus Ave, Iowa St, Alabama St

0 500 1,000 US Feet

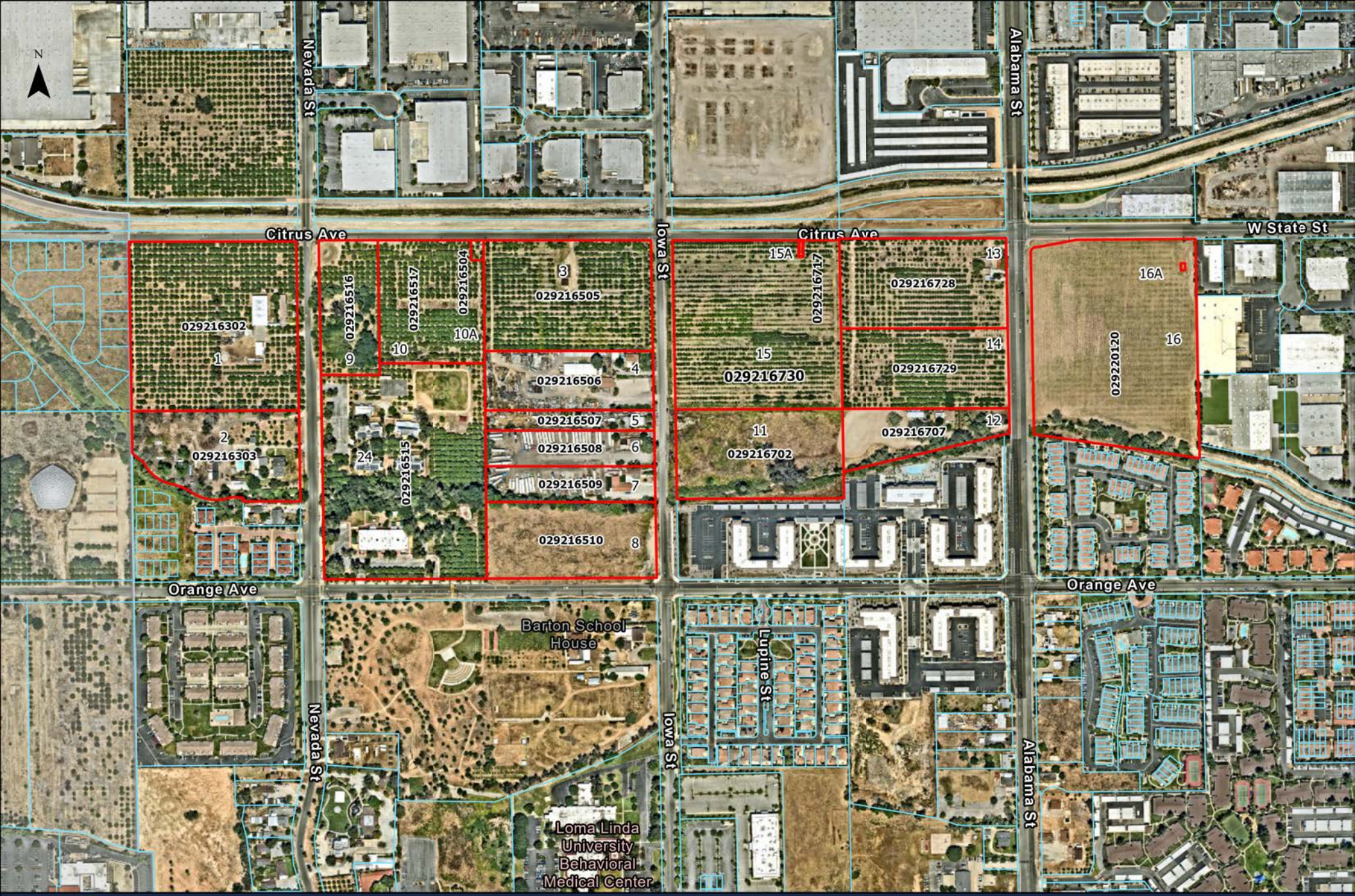
Legend

Rezoning Sites

City of Redlands - Development Services

Author: Redlands GIS

Date: Aug 2024



2024 RHNA Rezoning

Aerial (West)

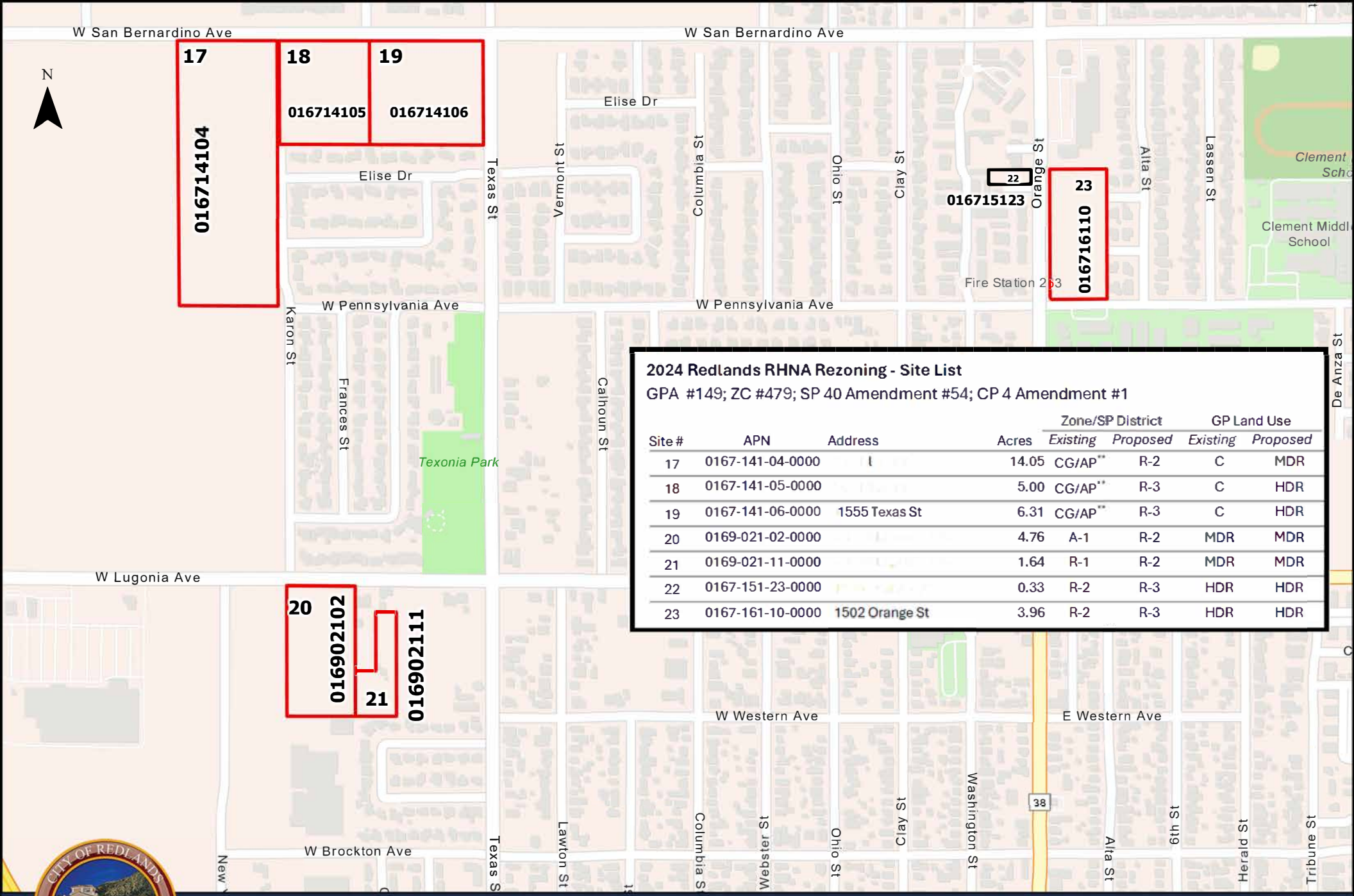
Legend

- Parcels
- Proposed Rezoning Parcels

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



2024 Redlands RHNA Rezoning - Site List

GPA #149; ZC #479; SP 40 Amendment #54; CP 4 Amendment #1

Site #	APN	Address	Acres	Zone/SP District		GP Land Use	
				Existing	*Proposed*	*Existing*	*Proposed*
17	0167-141-04-0000		14.05	CG/AP**	R-2	C	MDR
18	0167-141-05-0000		5.00	CG/AP**	R-3	C	HDR
19	0167-141-06-0000	1555 Texas St	6.31	CG/AP**	R-3	C	HDR
20	0169-021-02-0000		4.76	A-1	R-2	MDR	MDR
21	0169-021-11-0000		1.64	R-1	R-2	MDR	MDR
22	0167-151-23-0000		0.33	R-2	R-3	HDR	HDR
23	0167-161-10-0000	1502 Orange St	3.96	R-2	R-3	HDR	HDR

2024 RHNA Rezoning Sites (East)

Elise Dr, Texas St, Lugonia Ave,Orange St

0 500 1,000 US Feet

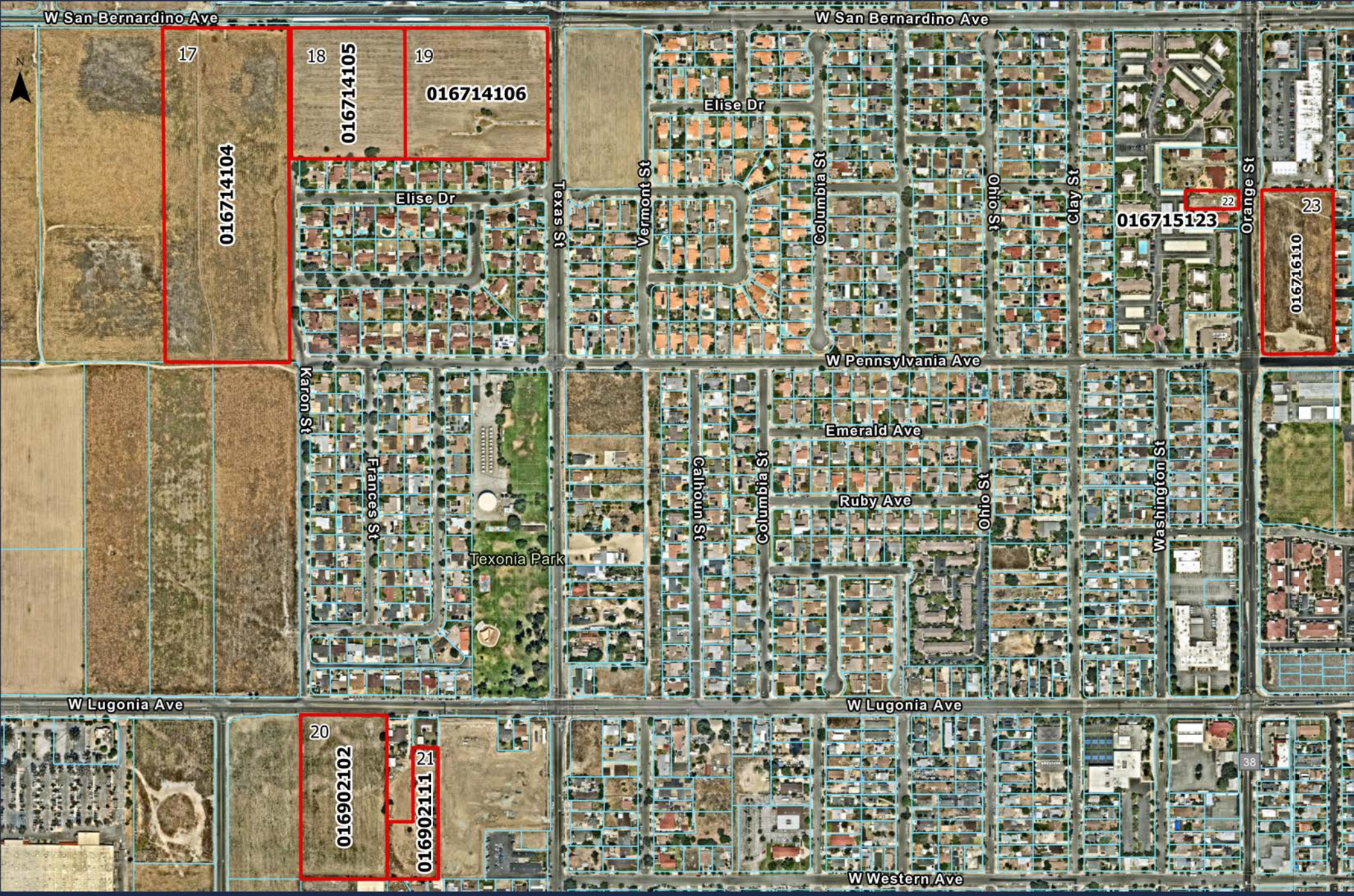
Legend

Rezoning Sites

City of Redlands - Development Services

Author: *Redlands GIS*

Date: *Aug 2024*



2024 RHNA Rezoning

Aerial (East)

0 500 1,000 US Feet

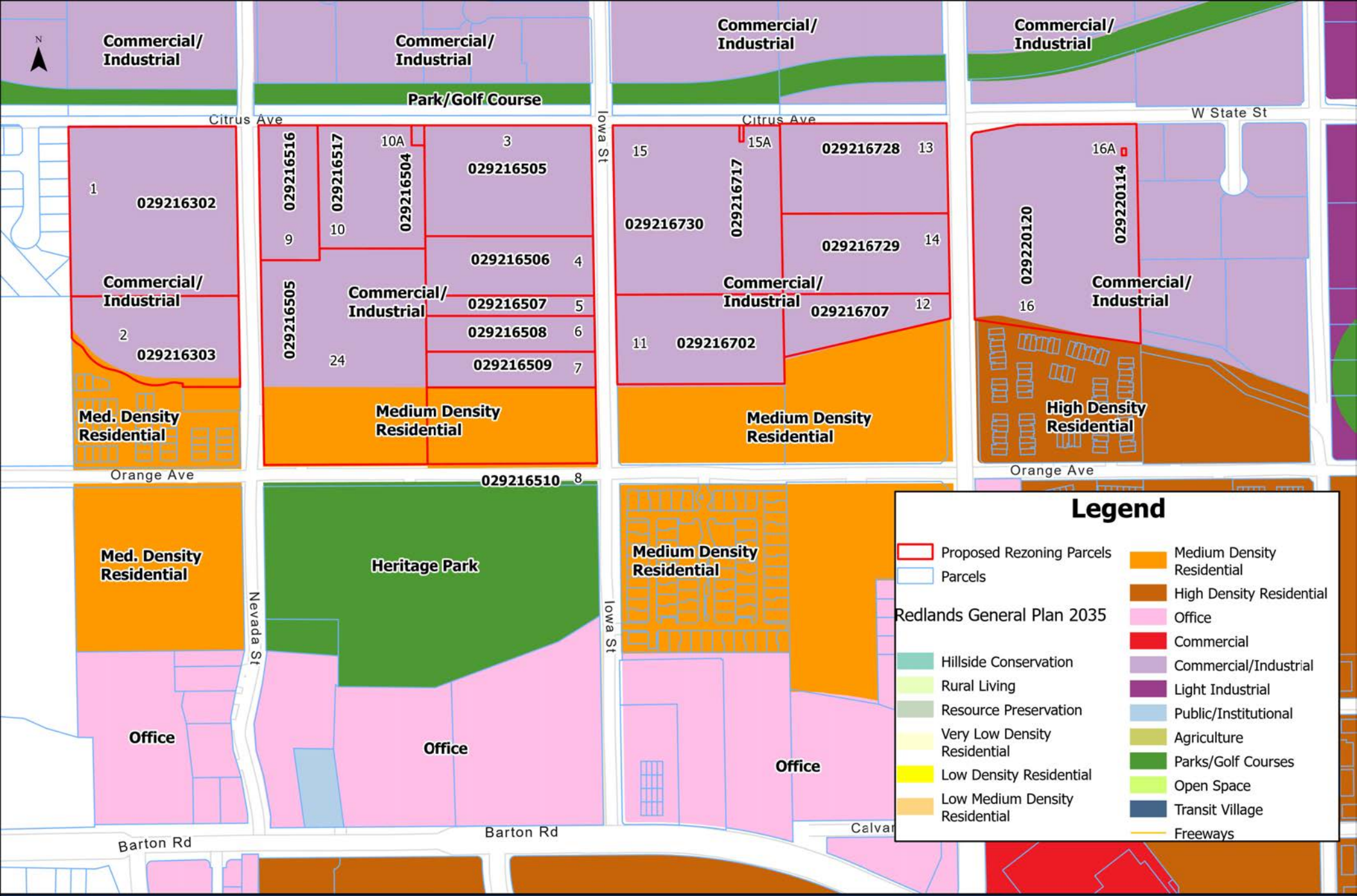
Legend

- Parcels
- Proposed Rezoning Parcels

City of Redlands - Development Services

Author: *Redlands GIS*

Date: *July 2024*



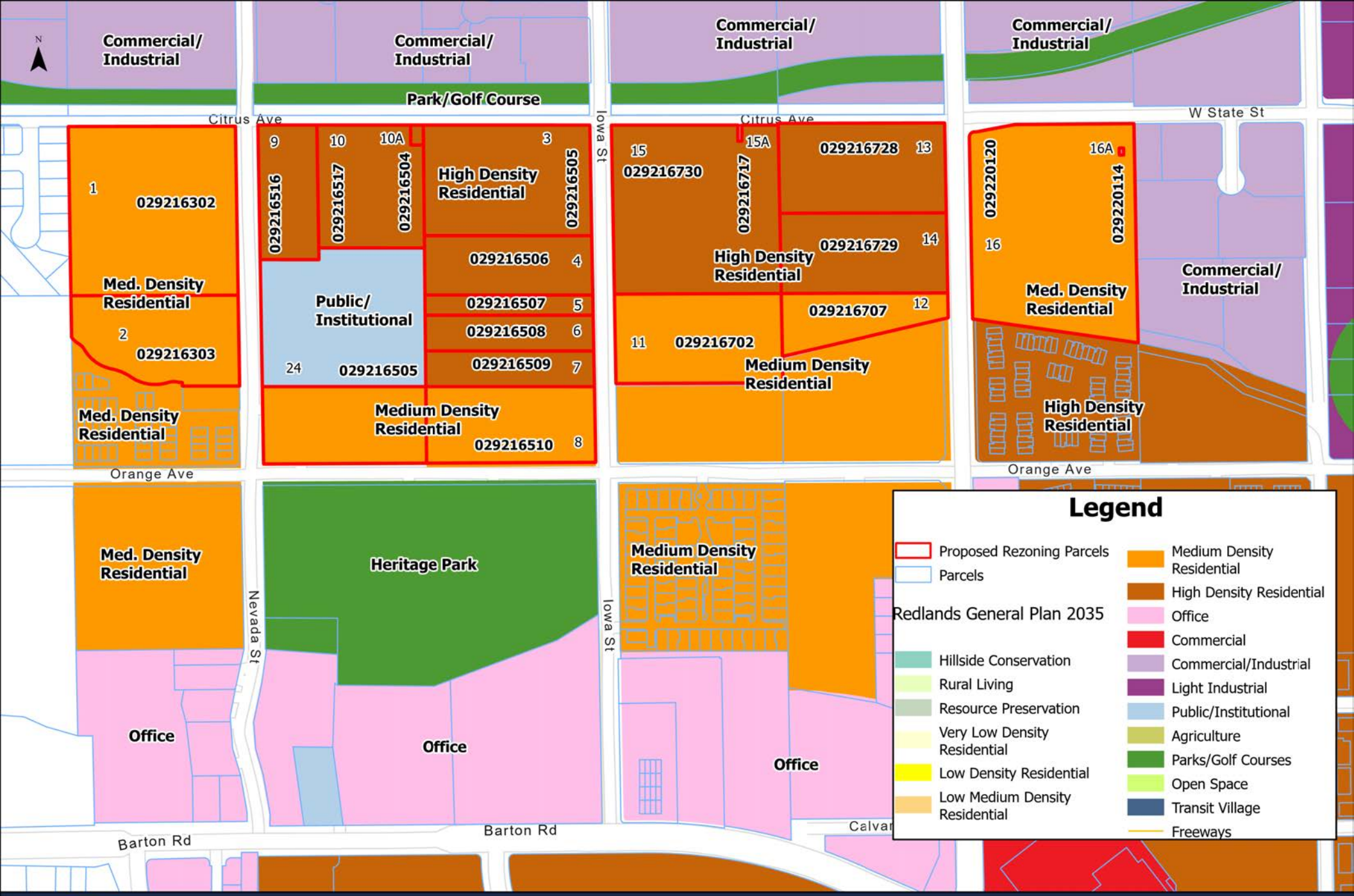
2024 RHNA Rezoning

Existing GP Land use (West)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



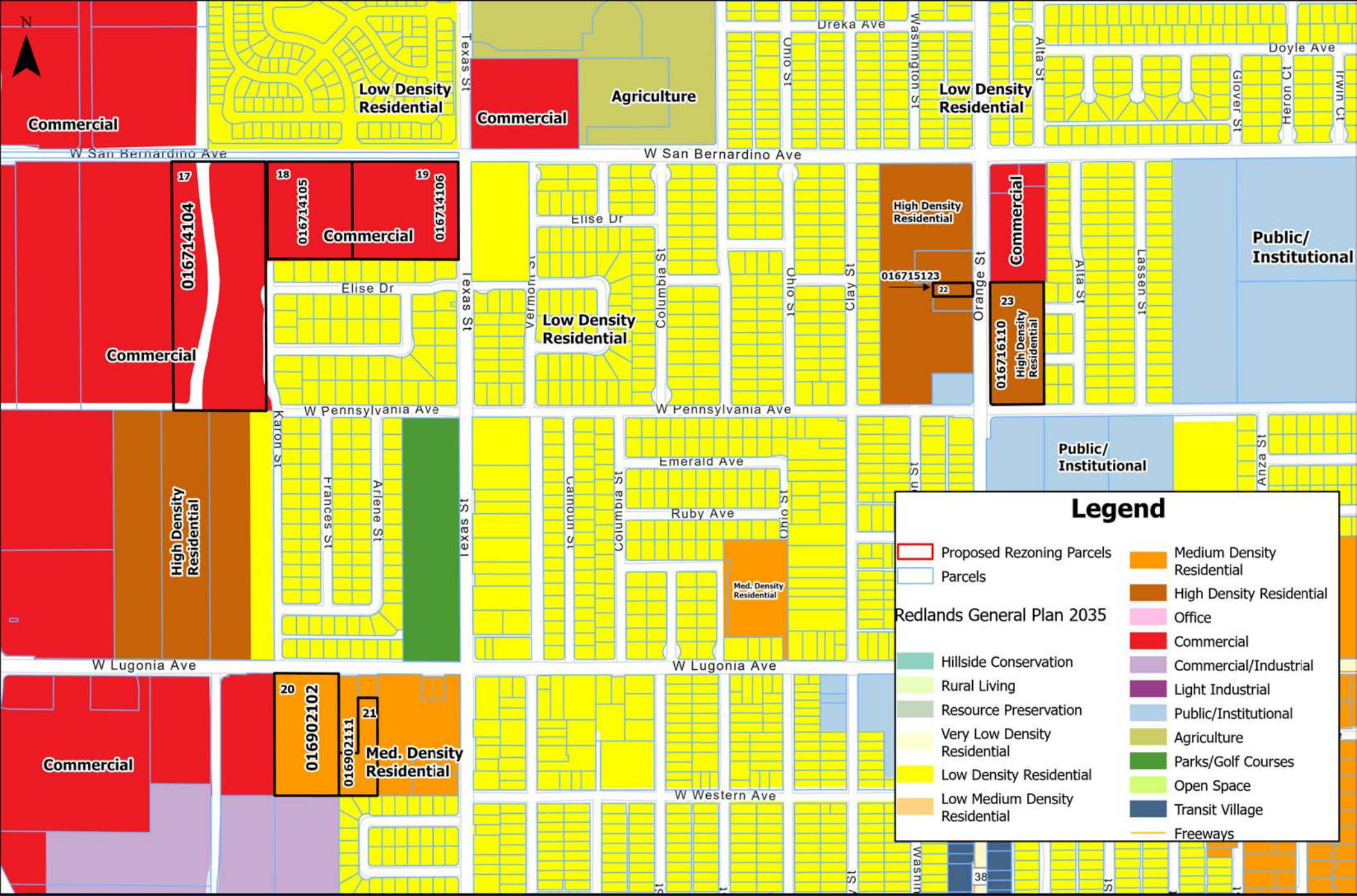
2024 RHNA Rezoning

Proposed GP Land use (West)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



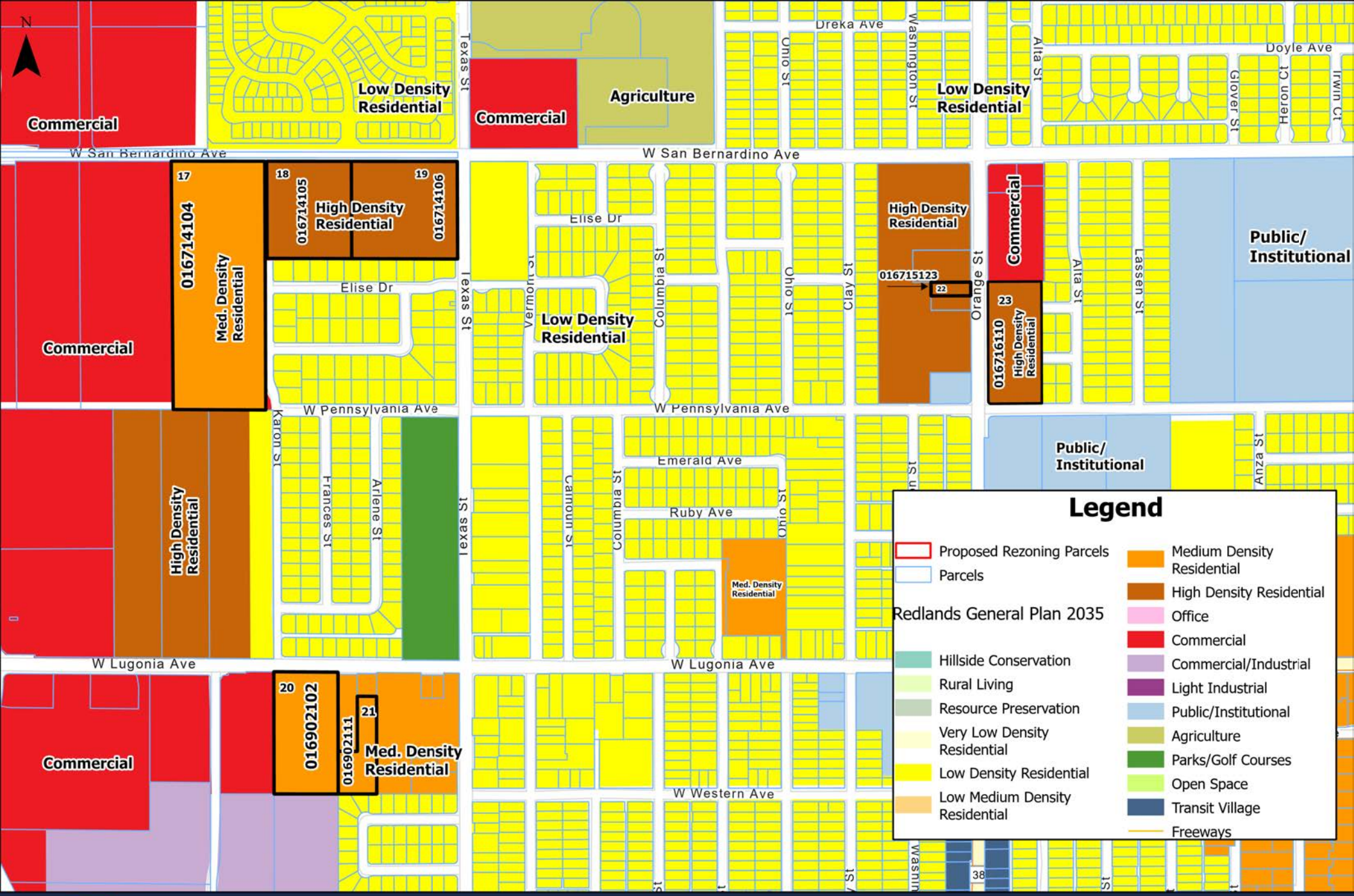
2024 RHNA Rezoning

Existing Land Use (EAST)

0 500 1,000 US Feet

City of Redlands - Development Services

***Author:** Redlands GIS*
***Date:** July 2024*



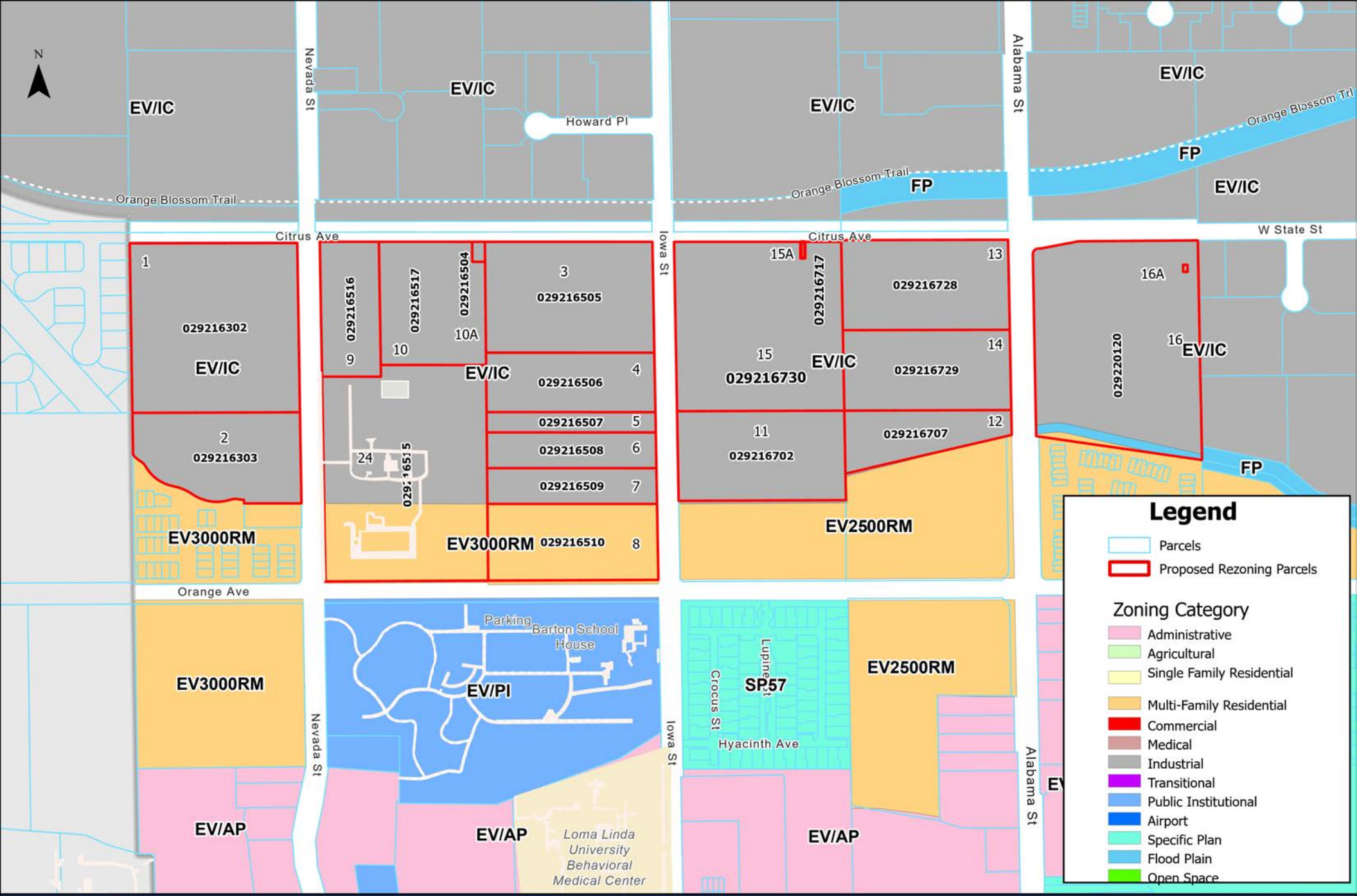
2024 RHNA Rezoning

Proposed Land Use (EAST)

0 500 1,000 US Feet

City of Redlands - Development Services

***Author:** Redlands GIS*
***Date:** July 2024*



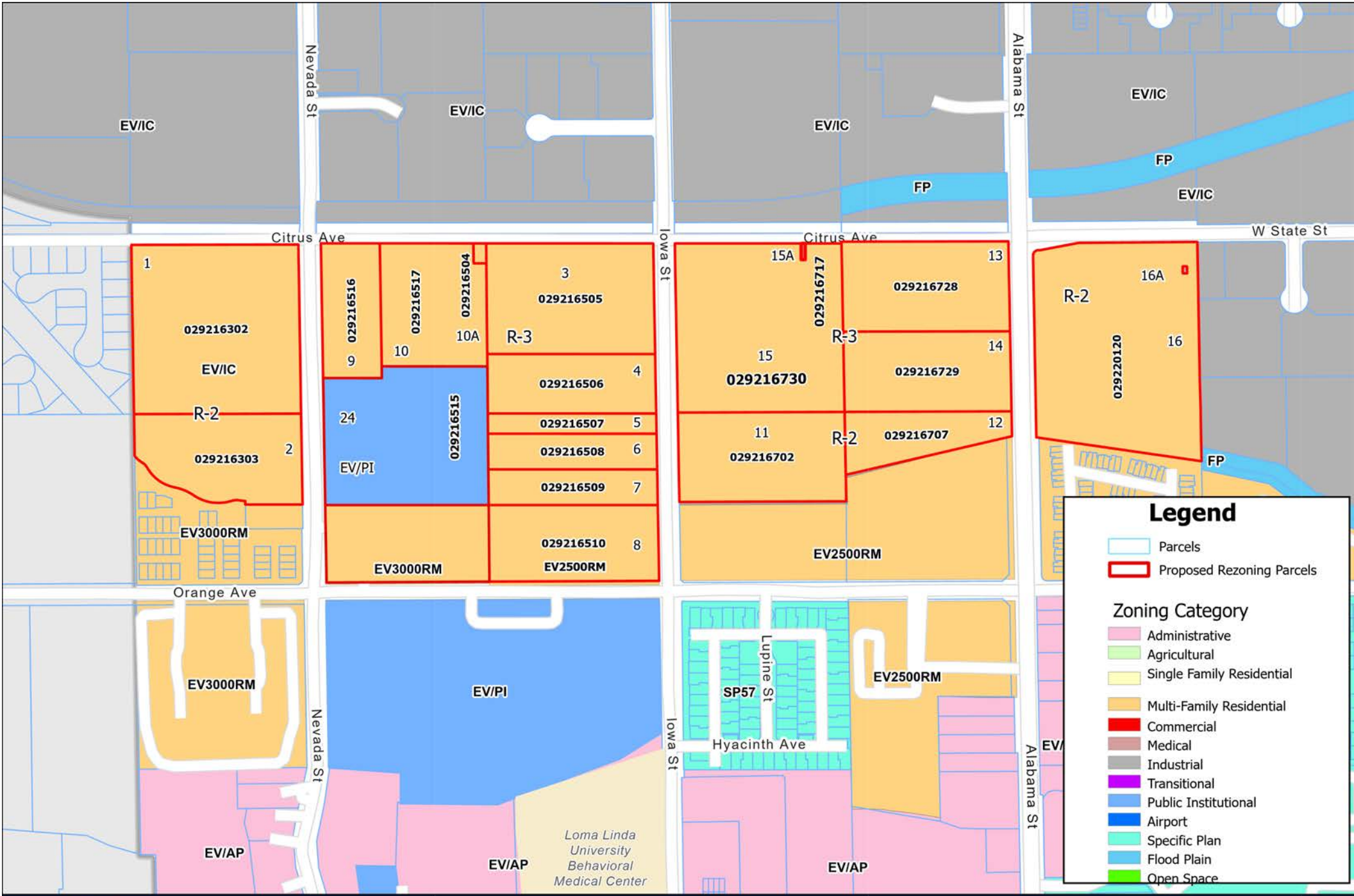
2024 RHNA Rezoning

Existing Zones / SP District (West)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



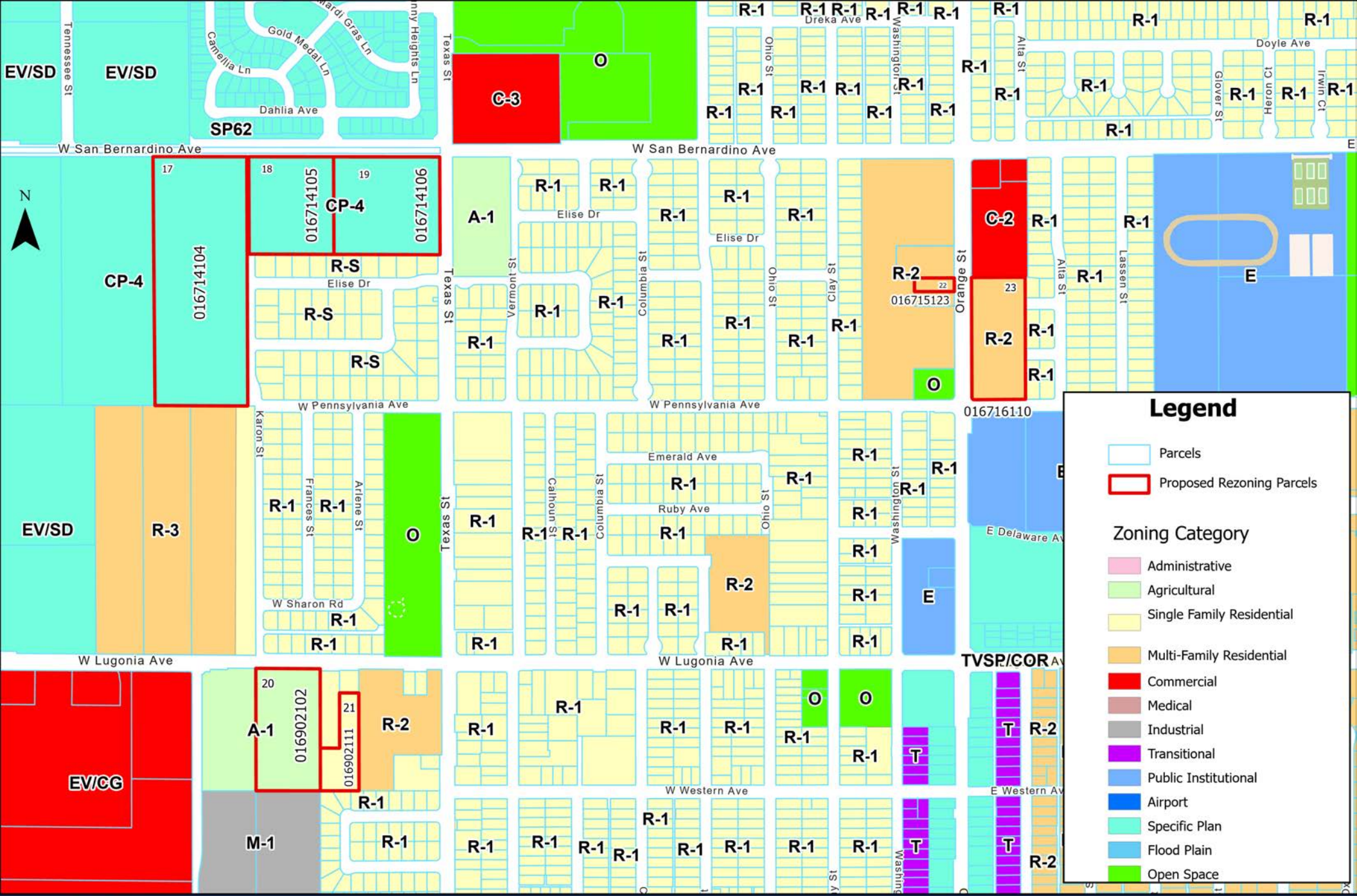
2024 RHNA Rezoning

Proposed Zones / SP District (West)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



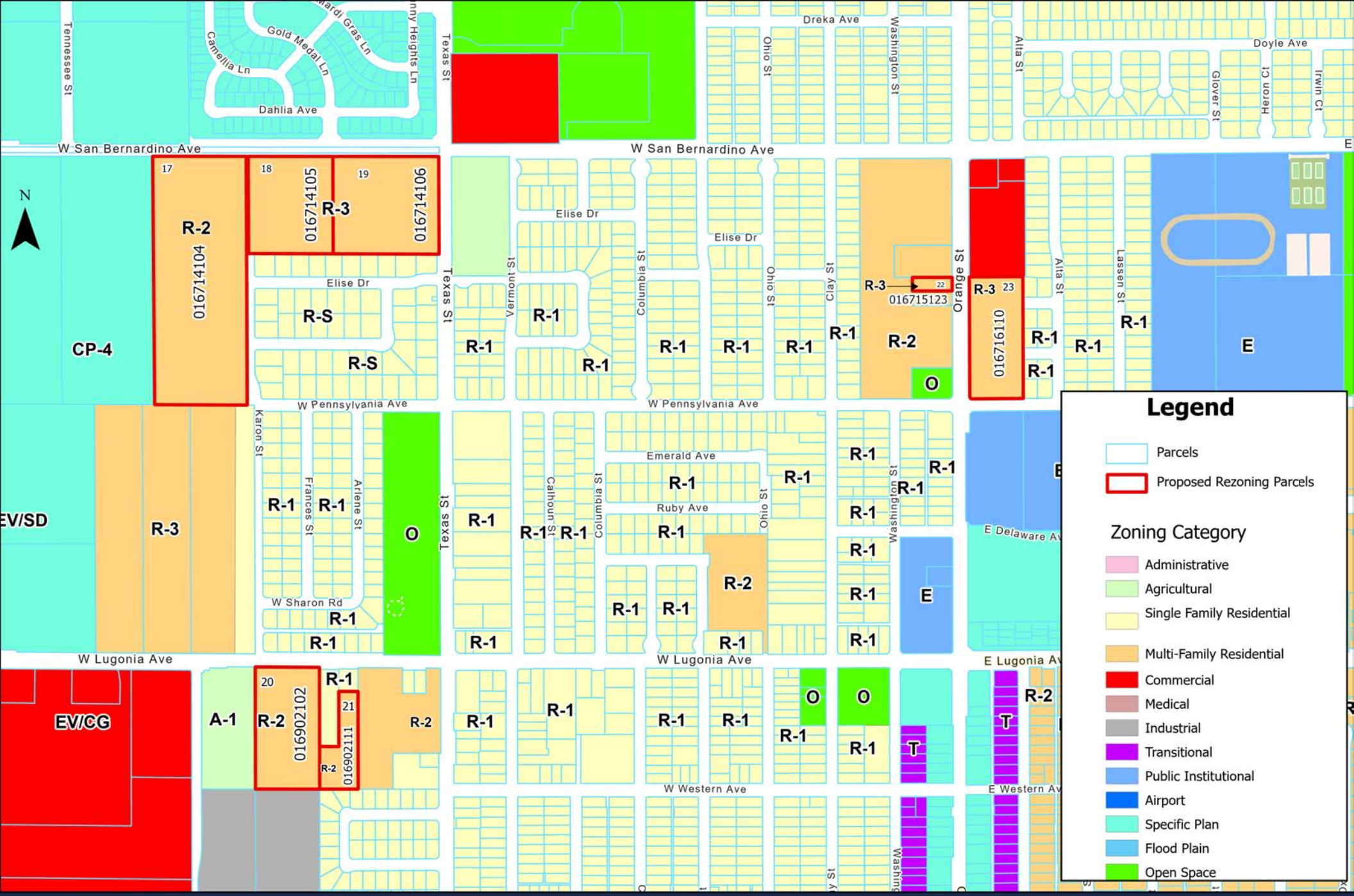
2024 RHNA Rezoning

Existing Zone/SP District (EAST)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: *Redlands GIS*
Date: *July 2024*



2024 RHNA Rezoning

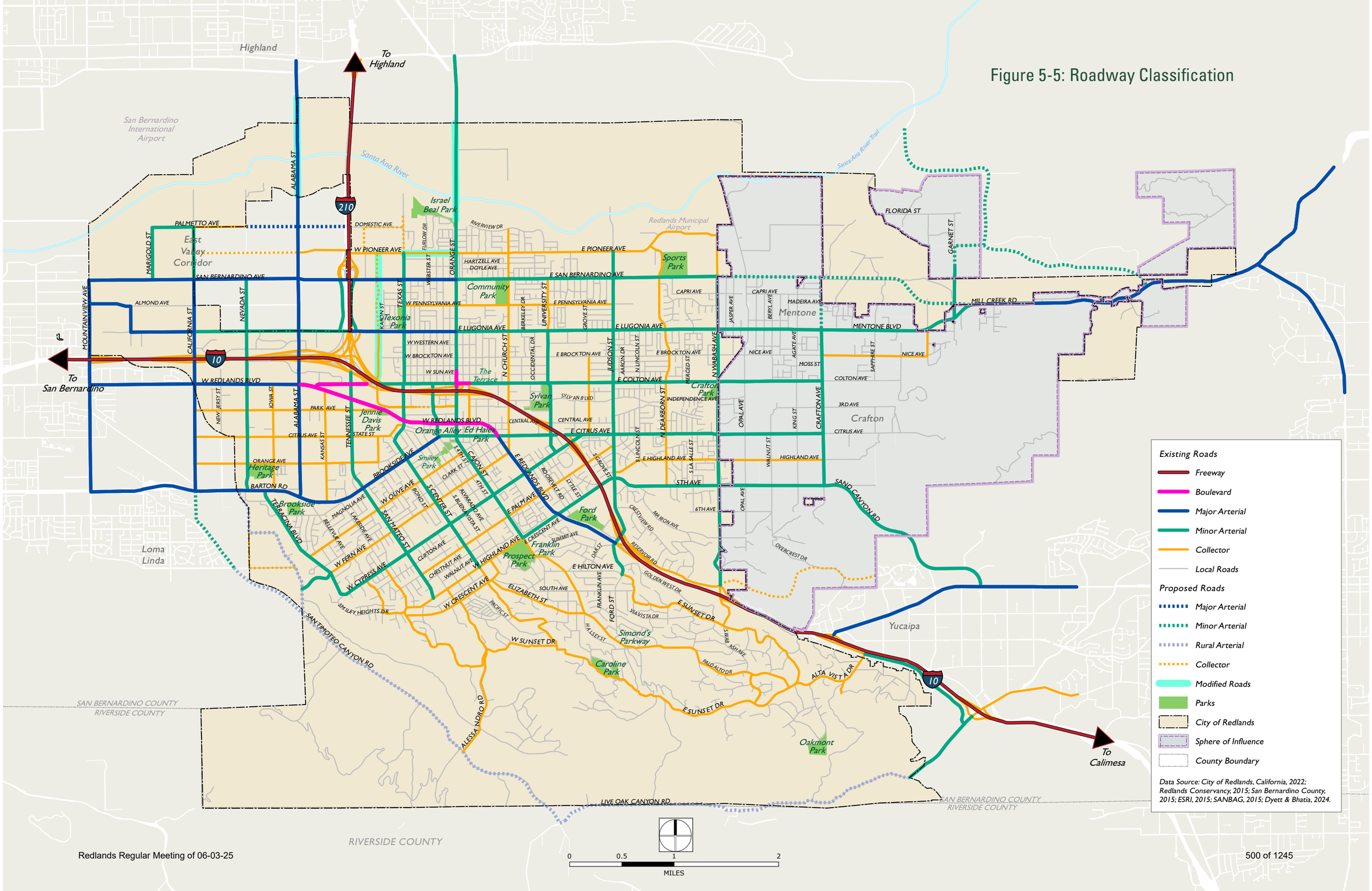
Proposed Zone/SP District (EAST)

0 500 1,000 US Feet

City of Redlands - Development Services

Author: Redlands GIS
Date: July 2024

Figure 5-5: Roadway Classification



REDLANDS RHNA REZONE PROJECT

SCH NO. 2016081041

Final Environmental Impact Report

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

April 2025



Redlands Regular Meeting of 06-03-25

Prepared by

E|P|D SOLUTIONS, INC

949.794.1180
3333 Michelson Drive, Suite 500
Irvine, CA 92612

EPDSolutions.com

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FINAL
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
REDLANDS RHNA REZONE PROJECT
REDLANDS, CALIFORNIA
STATE CLEARINGHOUSE NO. 2016081041

PREPARED FOR:

CITY OF REDLANDS
35 CAJON STREET
REDLANDS, CA 92737
CONTACT: KEVIN BEERY, SENIOR PLANNER

PREPARED BY:

E | P | D SOLUTIONS, INC

3333 MICHELSON DRIVE, SUITE 500
IRVINE, CA 92612

APRIL 2025

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Table of Contents

1. Introduction 1-1
2. Response to Comments 2-1
3. Mitigation Monitoring and Reporting Program 3-1

Tables

TABLE 2-1: COMMENTS RECEIVED ON THE DRAFT EIR 2-1
TABLE 3-1: MITIGATION MONITORING AND REPORTING PROGRAM REDLANDS RHNA REZONE PROJECT 3-3

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1. Introduction

This Final Subsequent Environmental Impact Report (EIR) has been prepared by the City of Redlands in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Redlands RHNA Rezone Project (proposed Project; Project).

According to CEQA Guidelines Section 15132, a Final Subsequent EIR shall consist of:

(a) The Draft Subsequent EIR or a revision of the Draft Subsequent EIR;
(b) Comments and recommendations received on the Draft Subsequent EIR, either verbatim or in summary;
(c) A list of persons, organizations, and public agencies commenting on the Draft Subsequent EIR;
(d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
(e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft Subsequent EIR during the public review period, which began on January 22, 2025, and ended on March 7, 2025. This document has been prepared in accordance with the State CEQA Guidelines and represents the independent judgment of the lead agency, the City of Redlands. This document and the circulated Draft Subsequent EIR comprise the Final Subsequent EIR in accordance with CEQA Guidelines Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following sections are contained within this document:

Section 1.0, Introduction. This section describes CEQA requirements and the contents of the Final Subsequent EIR.

Section 2.0, Response to Comments. This section provides a list of agencies and organizations who commented on the Draft Subsequent EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Section 3.0, Mitigation, Monitoring, and Reporting Program. This section includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in this Final Subsequent EIR.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be "*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible … CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to*

comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

CEQA Guidelines Section 15204(c) further advises, "*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*"

Section 15204(d) also states, "*Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.*" Section 15204(e) states, "*This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.*"

In accordance with CEQA, Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final Subsequent EIR, with copies of this Final Subsequent EIR document, which conforms to the legal standards established for response to comments on the Draft Subsequent EIR pursuant to CEQA. Pursuant to CEQA Guidelines Section 15089(b), lead agencies may provide an opportunity for review of the Final Subsequent EIR by the public or by commenting agencies before a project is approved, but are not required to do so.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, the City of Redlands (City), to evaluate comments on environmental issues received from public agencies, organizations, companies, and individuals who reviewed the Draft Subsequent Environmental Impact Report (EIR) and prepare written responses. This section includes copies of all written comment letters received on the Draft Subsequent EIR and the City of Redlands' responses to the comment letters. Copies of the comment letters and responses to the comment letters will be provided to City decisionmakers as part of the Final Subsequent EIR. Comment letters and specific comments are numbered for reference purposes which correspond to the City's response. A summary of each numbered comment in the commenter's letter precedes the City's response.

The following is a list of public agencies, organizations, and individuals or interested parties that submitted comments on the Draft Subsequent EIR during the public review and comment period (January 22, 2025, through March 7, 2025). All of the comment letters received on the Draft Subsequent EIR and responses to those comments are provided on the following pages.

Table 2-1: Comments Received on the Draft EIR

Letter Number	Agency/Organization/Name	Comment Date Received
Agencies		
A1	San Bernardino County Department of Public Works	February 13, 2025
A2	California Department of Conservation	March 4, 2025

Letter A1: San Bernardino County Department of Public Works (5 pages)

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911

SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Noel Castillo, P.E.
Director

Byanka Velasco, P.E.
Assistant Director

David Doublet, M.S., P.E.
Assistant Director

February 13, 2025

Transmitted Via Email
File: 10(ENV)-4.01

City of Redlands, Development Services Department
Attn: Kevin Beery, Senior Planner
P.O. Box 3005
Redlands, CA 92373
kbeery@cityofredlands.org

RE: PROJECT COMMENT – NOTICE OF AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (DSEIR) FOR THE PROPOSED REDLANDS HOUSING ELEMENT REZONE PROJECT IN THE CITY OF REDLANDS.

Dear Mr. Beery:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on January 21, 2025,** and pursuant to our review, the following comments are provided: **A1.1**

Flood Control Planning/Water Resources/Operations Support Division (Michael Fam, Engineering Manager, (909) 387-8120):

The San Bernardino County Flood Control District (District) possesses fee-owned right-of-way directly adjacent to the eastern side of Site 16 of the project. See attached map. The District also possesses easement-owned right-of-way totally encumbered by Site 16A.

The District's recommendations are most often made for site specific conditions. Therefore, the recommendations made here are general in nature until more detailed plans become available. **A1.2**

1. According to the most recent Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project lies within the Special Flood Hazard Area (SFHA).

2. We recommend that the project includes, and the city enforce, the most recent FEMA regulations for development in a SFHA.

BOARD OF SUPERVISORS
COL. PAUL COOK (RET.) Vice Chairman, First District | JESSE ARMENDAREZ Second District | DAWN ROWE Chair, Third District | CURT HAGMAN Fourth District | JOE BACA, JR. Fifth District
Luther Snoke Chief Executive Officer

3. If any encroachment on District right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations Support Section. Other on-site or off-site improvements may be required, which cannot be determined at this time.

4. We recommend that the San Bernardino County Comprehensive Storm Drain Plan (CSDP) No. 4, dated February 2013, be utilized in the design of drainage facilities. **A1.2 Cont.**

5. The proposed Project may affect storm drains in and around the site. When planning for or altering existing or future storm drains, the Project will be subject to the San Bernardino CSDP No. 4, dated February 2013. It is to be used as a guideline for drainage in the area and is available in the County's Flood Control District offices. Any revision to the drainage should be reviewed and approved by the jurisdictional agency in which the revision occurs.

Permits Division (Johnny Gayman, Engineering Manager, (909) 387-7995):

1. The proposed Project is located adjacent to District right-of-way. As noted in No. 3 above, an encroachment permit may need to be obtained if any work occurs within District right-of-way. If you have any questions regarding this process, please contact the District's Permit Section at (909) 387-7995. **A1.3**

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please directly contact the individuals providing the specific comment, as listed above.

Sincerely,

Nancy Sansonetti

Nancy J. Sansonetti, AICP
Supervising Planner
Environmental Management Division

NJS:MC:aa

Cc: Manie Cruz, Planner II

Attachment: Maps_City of Redlands_NOA_DSEIR_Redlands Housing Element Rezone

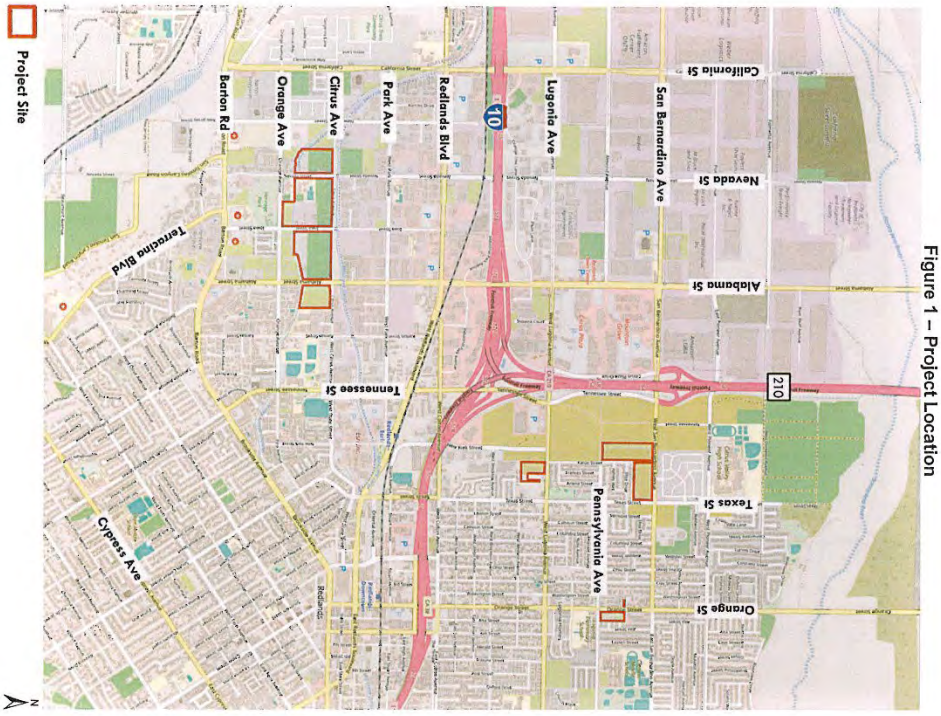
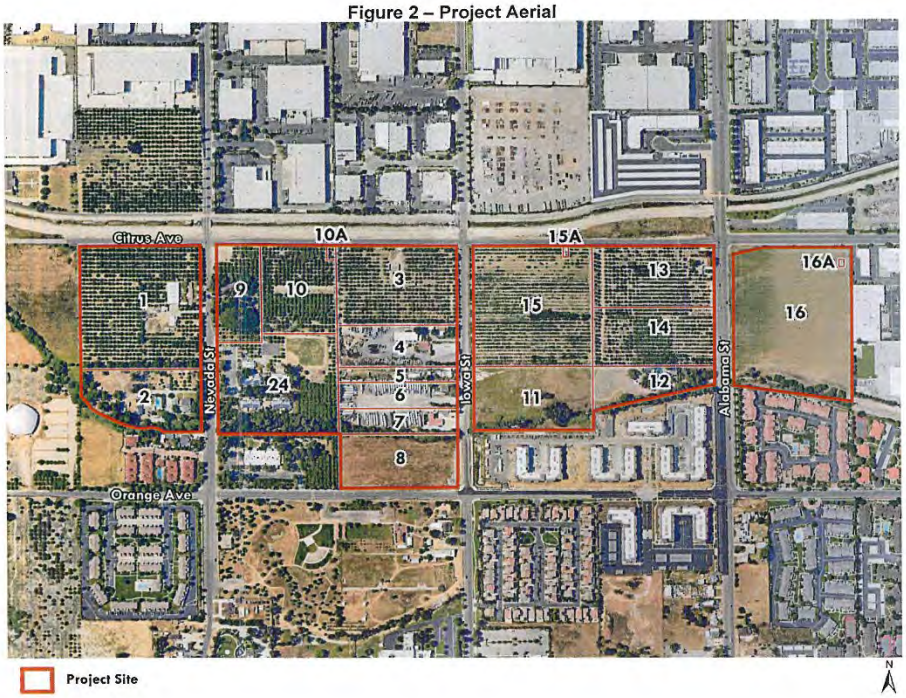


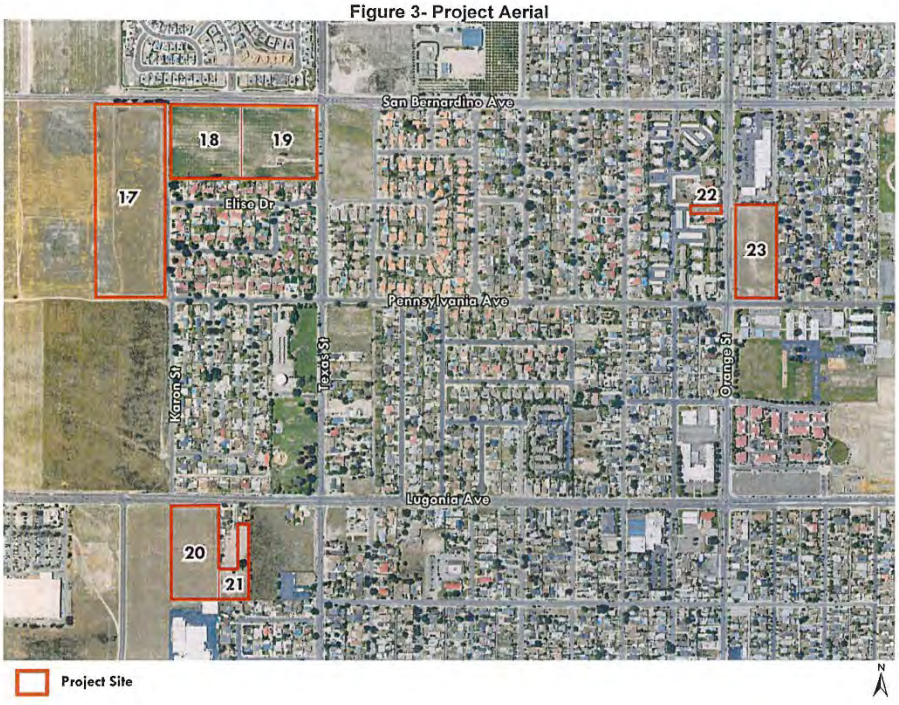
Figure 1 – Project Location

Figure 2 – Project Aerial



8

Figure 3- Project Aerial



9

Response to Letter A1: San Bernardino County Department of Public Works, dated February 13, 2025

Comment A1.1: The comment introduces the letter and states that the letter provides the comments on the Redlands RHNA Rezone Draft Subsequent EIR from the San Bernardino County Department of Public Works.

Response A1.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

Comment A1.2: This comment is provided from the San Bernardino Flood Control District which states that the Project should include FEMA regulations for parcels within a Special Flood Hazard Area. The comment further states that a permit shall be obtained if any encroachment on the District right-of-way is required. The comment also states that if the Project proposes any storm drain alterations, the Project would need to be subject to the San Bernardino County Comprehensive Storm Drain Plan.

Response A1.2: As discussed in Initial Study Section 5.10, *Hydrology and Water Quality* (included as Appendix A to the Draft Subsequent EIR), Sites 1, 2, 6, 7, 8, 11, 12, 14, 15, 16, and 24 are all located within FEMA flood zones. Future developments proposed pursuant to the proposed Project would be required to manage any increases of on-site runoff flows through either direct storm drain improvements, provided through direct modifications to storm drain facilities, or via payment of a storm drain development impact fee that will go towards funding storm drain projects to meet increased flows.

In addition, per the Redlands Flood Damage Prevention Measures (Chapter 15.32 of the Redlands Municipal Code), in a FEMA Flood zone any new "occupiable" finished floor must be at least 2 feet above the 1-percent (100-year) base flood elevation. Any floodplain cross-section modifications (earthen platforms) may not cause more than one-foot water surface elevation increase upstream. As part of the permitting approval process, the proposed drainage design and engineering plans for future development projects would be reviewed by the City's Engineering Division to ensure that the proposed drainage improvements would be consistent with the County's Comprehensive Storm Drain Plan. Future implementing projects located within a FEMA flood zone may be required to obtain a Conditional Letter of Map Revision (CLOMR) or a Letter of Map Revision (LOMR) to show any changes to existing floodplains or flood elevations.

In regard to the need for an encroachment permit, it is acknowledged that an encroachment permit would need to be obtained for any work performed within the District's right-of-way within Sites 16 and 16A. As future site-specific drainage plans are unknown at this time, at the time this improvement needs to be implemented, the City and future developers would coordinate with the District and an encroachment permit would be obtained, as required.

Comment A1.3: This comment is provided by the Permits Division stating that an encroachment permit may be required if any future improvements associated with the proposed Project occur within the District's right-of-way. The comment then concludes with the letter by requesting to be put on the circulation list for all project notices.

Response A1.3: As stated above in Response A1.2, any implementing projects on Sites 16 and 16A requiring improvements within the District's right-of-way would obtain an encroachment permit from the District, as required. The San Bernardino County Public Works department will be added to the notification list for the proposed Project and will receive all future notices for the proposed Project.

Letter A2: California Department of Conservation (3 pages)

California
Department of Conservation
Division of Land Resource Protection

Gavin Newsom, Governor
Jennifer Lucchesi, Director

MARCH 4, 2025

VIA EMAIL: KBEERY@CITYOFREDLANDS.ORG
CITY OF REDLANDS, PLANNING DIVISION
ATTN: KEVIN BEERY, AICP, CITY PLANNER
35 CAJON STREET, SUITE 20
REDLANDS, CA 92373

Dear Mr. Beery:

NOTICE OF COMPLETION AND AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED REDLANDS HOUSING ELEMENT REZONE PROJECT, SCH# 2016081041

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Completion and Availability of a Draft Subsequent Environmental Impact Report for the Proposed Redlands Housing Element Rezone Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents. **A2.1**

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process, and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The City of Redlands is proposing to rezone 24 sites for the purpose of increasing residential development capacity. The Project includes the following components: a General Plan Amendment (GPA) to change the land use designations to enable the proposed rezoning, a Specific Plan Amendment (SPA) in order to remove 15 of the **A2.2**

State of California Natural Resources Agency | Department of Conservation
715 P Street, MS 1904, Sacramento, CA 95814
conservation.ca.gov | T: (916) 324-0850

Project sites out of the East Valley Corridor Specific Plan, and a Zone Change to allow for medium and high-density residential development within the Project site. The Project sites contains Prime Farmland as designated by DOC's Farmland Mapping and Monitoring Program.

A2.2 Cont.

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

A2.3

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (*See* Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."]; *see also King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project's surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

A2.4

California Council of Land Trusts

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

Thank you for giving us the opportunity to comment on the Notice of Completion and Availability of a Draft Subsequent Environmental Impact Report for the Proposed Redlands Housing Element Rezone Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

A2.5

Sincerely,

Monique Wilber

Monique Wilber

Conservation Program Support Supervisor

Page 3 of 3

Response to Letter A2: California Department of Conservation, dated March 4, 2025

Comment A2.1: This comment introduces the comment letter and states that the Department of Conservation (DOC) has reviewed the Draft Subsequent EIR. The comment provides a summary of the DOC's responsibilities and their role in the review process of CEQA documents.

Response A2.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

Comment A2.2: This comment provides a summary of the proposed Project and states that based on the DOC's Farmland Mapping and Monitoring Program, the Project site contains Prime Farmland.

Response A2.2: This comment is informational in nature and does not provide any substantial evidence of significant environmental impacts not already disclosed in the Draft EIR. As discussed in the Draft Subsequent EIR Section 5.1, *Agriculture and Forest Resources*, and as shown in Figure 5.1-1 of the Draft Subsequent EIR, the site contains approximately 44.67 acres of Prime Farmland. This comment does not express any specific concern or question regarding the adequacy of the Draft EIR, and no further response is warranted.

Comment A2.3: This comment states that the conversion of agricultural land is a permanent reduction and impact to California's agricultural land resources. The comment recommends discussion on the type, amount, and location of farmland conversion resulting from the proposed Project. The comment also recommends discussing impacts on any current and future agricultural operation in the vicinity; cumulative impacts on agriculture land; any City or County Agriculture Mitigation Plans, Programs and Policies; and discussion on proposed mitigation measures for impacted agriculture lands within the proposed Project area.

Response A2.3: As discussed in Draft Subsequent EIR Section 5.1, *Agriculture and Forest Resources,* the site contains approximately 44.67 acres of Prime Farmland, as shown in Figure 5.1-1 of the Draft EIR. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production. Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A are designated as Prime Farmland and currently utilized for agricultural production that includes orange groves. These sites have historically been utilized for orange groves.

However, as shown in Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-5a, *Existing Zoning*, of the Draft Subsequent EIR, these sites have a General Plan land use designation of Commercial/Industrial or Medium Density Residential and a zoning designation of Commercial Industrial or Multiple Family Residential within the East Valley Corridor Specific Plan (EVCSP), both of which are intended for urban uses. As evidenced by the site's current land use and zoning designations, urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2017. The site is not among the 948 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2017 and the Project does not represent an unplanned conversion of agricultural land.

As discussed within Section 5.1.2 of the Draft Subsequent EIR, the City of Redlands has several specific policies or programs related to farmland within the City's General Plan and Municipal Code. As discussed in Draft Subsequent EIR Section 5.6 *Land Use and Planning*, while Site 20 is zoned for agricultural use the Project site has not been used for agricultural purposes since at least 1994 and since then the site has remained vacant. Further, Site 20 is not designated as Prime Farmland and is designated as grazing land by the DOC. The remaining Project parcels are currently designated for urban development, and those policies do not apply to the proposed Project. Further, the City of Redlands does not currently have an adopted Agricultural Mitigation Plan. Nevertheless, the rezoning associated with the proposed Project could result in the future development of residential uses within areas designated as Prime Farmland or within agricultural production. Therefore, the Project would result in the direct loss of 44.67 acres of Prime

Farmland, which the Draft Subsequent EIR determined would result in a significant and unavoidable impact. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact not previously disclosed in the Draft Subsequent EIR.

Comment A2.4: This comment states that the DOC advises that the EIR address mitigation for the loss or conversion of agricultural land. The comment states that one potential form of mitigation would be a conservation easement through the outreach purchase of easements or payment of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The comment provides a resource for farmland mitigation strategies and states that the use of conservation easements is only one form of mitigation and the City should consider other mitigation forms as well.

Response A2.4: As discussed on page 5.1-8 within Section 5.1, *Agricultural Resources,* of the Draft Subsequent EIR, there are no feasible mitigation measures to reduce impacts associated with the Project's conversion of agricultural lands designated as Prime Farmland to nonagricultural uses. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production. However, retention of onsite agricultural uses would be infeasible as it would prevent the development of onsite buildings, which would inhibit implementation of the Project as a whole. Existing agricultural uses within the City are becoming economically unsustainable and represent land uses that are increasingly incongruous with continuing urbanization of the City. Furthermore, retention of agricultural uses on the Project site would create or maintain islands of agricultural uses within an urbanized setting, exacerbating potential land use conflicts and land use incompatibility. The transition of existing agricultural uses and farmland to non-agricultural uses is an unavoidable effect of implementing the previously approved General Plan, as detailed in the General Plan EIR. Urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2017. The site is not among the 948 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2017 and the Project does not represent an unplanned conversion of agricultural land.

Additional offsite mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the distant parcels have no relationship to the loss of agricultural lands within the City or County (See *Friends of King River v. County of Fresno* (2014) 232 Cal.App.4th 105, 126.). Replacement of agricultural resources offsite would be infeasible as creation of new farmland-status properties within the City is outside of the City and Applicant control. There is no available replacement acreage of lower quality farmland within the City or County that could be mitigated to Prime Farmland. Farmland within the City or County is either planned for future development of non-agricultural uses or already designated by the DOC as Unique Farmland, Farmland of Statewide Importance, or Prime Farmland.

Moreover, economic and environmental factors may preclude the long-term viability of agriculture within the City or County. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per DOC requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the DOC as well as other climate factors such as rainfall. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland to non-agricultural use (See *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 875-876.). Therefore, impacts would be significant and unavoidable, consistent with the findings of the General Plan EIR. Furthermore, an EIR is not required to adopt a mitigation measure that does not effectively address a significant impact (*Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA4th 342, 365). The commenter does not provide additional data or specific measures for consideration or incorporation when discussing "other feasible mitigation measures". Thus, no further response is warranted.

Comment A2.5: This comment requests that the DOC be notified with future hearing dates as well as staff reports pertaining to the Project. In addition, the comment provides contact information if the City has any questions on DOC's comment letter.

Response A2.5: The DOC will be added to the notification list for the proposed Project. This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft Subsequent EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft Subsequent EIR, no further response is warranted.

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3. Mitigation Monitoring and Reporting Program

3.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "…reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) was prepared to ensure that adopted mitigation measures are successfully implemented for the Redlands RHNA Rezone Project (Project). The City of Redlands (City) is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

3.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program that would be required to be implemented by the City for the Redlands RHNA Rezone Project. The table identifies the Plans, Programs, or Policies (PPPs) and Mitigation Measures required by the City to mitigate or avoid significant adverse impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As the PPPs and Mitigation Measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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Table 3-1: Mitigation Monitoring and Reporting Program
Redlands RHNA Rezone Project

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AIR QUALITY			
Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to: • Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards. • Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes. • Require the use of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings. • The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.	Prior to grading permit and building permit	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment. • The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification.			
Mitigation Measure AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following: • Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized; • Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC); • Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insultation (R-8); • Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF); • Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. • Landscaping palette of drought tolerant plants exceeding City requirements; • Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use); • U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.			
Mitigation Measure AQ-3: Toxic Air Contaminants. Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM_{10} concentrations exceed 2.5 microgram per cubic meter ($\mu g/m^3$), $PM_{2.5}$ concentrations exceed 2.5 $\mu g/m^3$, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:	Prior to issuance of development permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better).			
BIOLOGICAL RESOURCES			
Mitigation Measure BIO-1: Biological Assessment. Future projects proposed within the proposed Project site shall be surveyed by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur or if any riparian habitats, jurisdictional drainages, or wetlands are present onsite. If suitable habitat is present, a qualified biologist shall survey for special-status species during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating any ground disturbing activities in a given area. The focused surveys shall be conducted in accordance with CDFW guidelines. If special-status species are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.	Prior to the issuance of grading permits	City of Redlands Planning Division	
Mitigation Measure BIO-2: Jurisdictional Resources: If potential jurisdictional waters are determined to be present onsite through the biological assessment require by MM BIO-1 above, a jurisdictional assessment shall be conducted for future projects within Sites 1 through 24. Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW. Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction are subject to approval by permitting agencies and shall include, but are not limited to, the following:	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Construction-related equipment shall be stored in developed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage. • Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants. • Substances harmful to aquatic life shall not be discharged into the drainage. All hazardous substances shall be properly handled and stored. • A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction. • To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. • Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. • Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.			
CULTURAL RESOURCES			
PPP CUL-1: Municipal Code Chapter 2.62. The City of Redlands Historic Architectural Design Guidelines shall apply to all future projects within the proposed Project. The Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* may also be applicable to properties or projects that may affect historic buildings and resources.	Prior to issuance of demolition permits	City of Redlands Building & Safety Division	
Mitigation Measure CUL-1. Demolition or alteration of a building or structure that is at least 50 years old at the time of permit application and has not previously been evaluated for demolition or renovation within the last five years from the time demolition or alternation is proposed shall be subject to review at the request of the City by a qualified architectural historian who meets the	Prior to issuance of demolition permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify if the building or structure proposed for demolition or alteration qualifies as a historical resource under CEQA guidelines. Buildings and structures shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the City for review and approval prior to the issuance of a building permit. If no historic resources are identified, no further analysis is warranted. If historic resources are identified, the applicant shall be required to implement Mitigation Measure CR-2.			
Mitigation Measure CUL-2. For renovations involving historical resources identified through the process described in the architectural history evaluation mitigation measure (MM CUL-2), project activities shall comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. The memorandum should recommend design modifications necessary to bring projects into compliance with the Standards for Rehabilitation, which shall be incorporated into project designs to ensure compliance with the Standards. The memorandum shall be submitted to the City for review and approval prior to the issuance of a building permit.	Prior to issuance of building permits	City of Redlands Planning Division	
Mitigation Measure CUL-3: Archeological Resources Assessment. Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G.	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply.			
Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods: • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required. *Moderately Sensitive Sites:* If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods: • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report.			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.			
GEOLOGY AND SOILS			
Mitigation Measure PAL-1: Paleontological Resources. Future project applicants within the Project sites shall provide a paleontological assessment by a qualified paleontologist meeting the standards of the Society of Vertebrate Paleontology (SVP) to determine whether grading for the project could impact underlying soil units or geologic formations that have a low to high potential to yield fossiliferous materials, prior to project approval. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and shall recommend a project-specific paleontological	Prior to issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
resources monitoring and mitigation plan (PRMMP), if warranted, based on paleontological sensitivity. This plan will address specifics of monitoring and mitigation for the development project, and will take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. This PRMMP must meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity: • High- All projects involving ground disturbances in previously undisturbed areas sediments mapped as having high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist and shall be monitored by a qualified paleontological monitor on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be of scientific significance, professionally and efficiently recover the fossil specimens and collect associated data pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010). Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities. • Low to High- All projects involving ground disturbance in previously undisturbed areas mapped with low-to-high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist. The PRMMP shall specify that monitoring shall only be required when construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units shall require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account: a) the most recent local geologic mapping, b) depths at which fossils have been found			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
in the vicinity of the project area, as revealed by the museum records search, and c) geotechnical studies of the project area, if available. • Low- All projects involving ground disturbance in previously undisturbed areas mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found. Paleontological monitoring is usually not required for sediments with low paleontological sensitivity. • None- Projects determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological mitigation measures, but shall implement MM PAL-2, if incidental discoveries occur.			
Mitigation Measure PAL-2: Fossil Discovery. In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50 foot radius of the find until its significance can be determined by a Qualified Paleontologist. Scientifically significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP. A repository shall be identified and a curatorial arrangement will be signed prior to collection of the fossils. Any accredited institution may serve as a repository.	During grading activities	City of Redlands Planning Division	
GREENHOUSE GAS EMISSIONS			
Mitigation Measure AQ-1: Construction Emissions. As listed previously.	Prior to grading permit and building permit	City of Redlands Planning Division	
Mitigation Measure AQ-2: Operational Emissions. As listed previously.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
HAZARDS AND HAZARDOUS MATERIALS			
Plan, Program, or Policy PPP HYD-1: SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			
HYDROLOGY AND WATER QUALITY			
Plan, Program, or Policy PPP HYD-1: SWPPP. As listed previously.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
Plan, Program, or Policy PPP HYD-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be prepared by the Project applicant and submitted to and approved by the City Public Works Department. The WQMP shall identify all Post-Construction, Site Design. Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
NOISE			
Mitigation Measure NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors: • Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity. • Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Mitigation Measure NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall: • Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts; • Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and • Be removed and the site appropriately restored upon the conclusion of the construction activity.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	
Mitigation Measure NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	
Mitigation Measure NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.			
PUBLIC SERVICES			
Plans, Program, or Policy PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the Project site, and prior to issuance of any building permits for the implementing project, the Project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code Chapter 3.60 and/or adopted fee schedules.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
Plans, Program, or Policy PPP PS-2: As a Condition of Approval for implementing projects within the proposed Project, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
RECREATION			
Plans, Program, or Policy PPP PS-2: As listed previously.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
TRANSPORTATION			
Mitigation Measure TR-1: VMT Screening & Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines. If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final	Prior to issuance of building permits	City of Redlands Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to: • *Increase Residential Density*: Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT. • *Integrate Affordable and Below Market Rate Housing*: Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project. • *Implement Commute Trip Reduction Marketing*: Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA). • *Provide Ridesharing Program*: Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA. • *Implement Subsidized or Discounted Transit Program*: Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA. • *Limit Residential Parking Supply*: The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project. • *Unbundle Residential Parking Costs from Property Cost*: Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces,			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
this measure results in decreased vehicle ownership and, therefore, a reduction in VMT. • *Provide Pedestrian Network Improvement*: Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT. • C*onstruct or Improve Bike Facility*: Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT. • C*onstruct or Improve Bike Boulevard*: Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT. • *Expand Bikeway Network*: Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT. • *Implement Conventional Carshare Program*: Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT. • *Implement Electric Carshare Program*: Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions. • *Implement Pedal (Non-Electric) Bikeshare Program*: Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT. • *Implement Electric Bikeshare Program*: Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT. • *Implement Scooter Share Program*: Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT. • *Provide Community-Based Travel Planning (CBTP)*: CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA. • *Implement Market Price Public Parking (On-Street)*: Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. • *Implement Transit-Supportive Roadway Treatments*: Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.			
TRIBAL CULTURAL RESOURCES			
Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed. If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation	Prior to issuance of grading permit	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference: A. Full avoidance. B. If avoidance is not feasible, Preservation in place. C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction. D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)			
Mitigation Measure CUL-3: Archeological Resources Assessment. As listed previously.	Prior to the issuance of grading permits	City of Redlands Planning Division	
Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. As listed previously.	Prior to the issuance of grading permits	City of Redlands Planning Division	

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REDLANDS RHNA REZONE PROJECT

SCH NO. 2016081041

Draft Environmental Impact Report

Prepared for
City of Redlands
35 Cajon Street, Suite 20
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January 2025



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Redlands Regular Meeting of 06-03-25

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Table of Contents

1. Executive Summary 1-1
2. Introduction 2-1
3. Project Description 3-1
4. Environmental Setting 4-1
5. Environmental Impact Analysis 5-1
5.1 Agricultural Resources 5.1-1
5.2 Air Quality 5.2-1
5.3 Cultural Resources 5.3-1
5.4 Energy 5.4-1
5.5 Greenhouse Gases 5.5-1
5.6 Land Use and Planning 5.6-1
5.7 Noise 5.7-1
5.8 Population and Housing 5.8-1
5.9 Public Services 5.9-1
5.10 Transportation 5.10-1
5.11 Tribal Cultural Resources 5.11-1
5.12 Utilities and Service Systems 5.12-1
5.13 Mandatory Findings of Significance 5.13-1
6. Alternatives 6-1
7. EIR Preparers and Persons Contacted 7-1

Figures

FIGURE 3-1: REGIONAL LOCATION 3-5
FIGURE 3-2: LOCAL VICINITY 3-7
FIGURE 3-3A: AERIAL VIEW 3-9
FIGURE 3-3B: AERIAL VIEW 3-11
FIGURE 3-4A: EXISTING GENERAL PLAN LAND USE 3-13
FIGURE 3-4B: EXISTING GENERAL PLAN LAND USE 3-15
FIGURE 3-5A: EXISTING ZONING 3-17
FIGURE 3-5B: EXISTING ZONING 3-19
FIGURE 3-6A: PROPOSED GENERAL PLAN LAND USE DESIGNATION 3-27
FIGURE 3-6B: PROPOSED GENERAL PLAN LAND USE DESIGNATION 3-29
FIGURE 3-7A: PROPOSED ZONING 3-31
FIGURE 3-7B: PROPOSED ZONING 3-33
FIGURE 5-1: CUMULATIVE PROJECTS 5-9
FIGURE 5.1-1: FARMLAND DESIGNATIONS 5.1-5
FIGURE 5.3-1: MOREY ARROYO BUFFER AREA 5.3-9
FIGURE 5.9-1: REDLANDS FIRE AND POLICE STATIONS 5.9-7
FIGURE 5.10-1: TRANSIT PRIORITY AREAS & REZONE SITES 5.10-13
FIGURE 6-1A: ALTERNATIVE 3 AREA 6-17
FIGURE 6-1B: ALTERNATIVE 3 AREA 6-19

Tables

TABLE 1-1: SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE 1-7
TABLE 2-1: SUMMARY OF NOP/INITIAL STUDY COMMENT LETTERS 2-6
TABLE 2-2: SUMMARY OF PUBLIC SCOPING MEETING COMMENTS 2-7
TABLE 3-1: EXISTING GENERAL PLAN BUILDOUT 3-3
TABLE 3-2: PROPOSED RHNA REZONE BUILDOUT 3-21
TABLE 3-3: COMPARISON OF APPROVED GENERAL PLAN 2035 BUILDOUT TO PROPOSED RHNA REZONE PROJECT 3-24
TABLE 5-1: CUMULATIVE PROJECT LIST 5-5
TABLE 5.2-1: AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS 5.2-2
TABLE 5.2-2: AIR QUALITY MONITORING SUMMARY 2021-2023 ..... 5.2-15
TABLE 5.2-3: ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN 5.2-15
TABLE 5.2-4: SCAQMD REGIONAL AIR QUALITY THRESHOLDS 5.2-17
TABLE 5.2-5: SCAQMD LOCALIZED SIGNIFICANCE THRESHOLDS 5.2-17
TABLE 5.2-6: EXISTING GENERAL PLAN BUILDOUT PEAK OPERATIONAL EMISSIONS 5.2-23
TABLE 5.2-7: SUMMARY OF PROJECT PEAK OPERATIONAL EMISSIONS 5.2-23
TABLE 5.2-8: COMPARISON OF OPERATIONAL EMISSIONS 5.2-24
TABLE 5.2-9: TRAFFIC VOLUMES FOR INTERSECTIONS EVALUATED IN 2003 AQMP 5.2-26
TABLE 5.4-1: EXISTING GENERAL PLAN BUILDOUT TRAFFIC ANNUAL FUEL CONSUMPTION 5.4-8
TABLE 5.4-2: PROJECT-GENERATED TRAFFIC ANNUAL FUEL CONSUMPTION 5.4-8
TABLE 5.4-3: PROJECT ANNUAL OPERATIONAL NATURAL GAS AND ELECTRICITY DEMAND SUMMARY 5.4-8

TABLE 5.5-1: EXISTING GENERAL PLAN BUILDOUT OPERATIONAL GHG EMISSIONS 5.5-15
TABLE 5.5-2: PROPOSED PROJECT OPERATIONAL GREENHOUSE EMISSIONS AT BUILDOUT 5.5-16
TABLE 5.5-3: COMPARISON OF OPERATIONAL GREENHOUSE EMISSIONS 5.5-16
TABLE 5.5-4: PROJECT CONSISTENCY WITH THE CARB 2022 SCOPING PLAN ACTIONS 5.5-18
TABLE 5.5-5: PROJECT CONSISTENCY WITH THE CARB 2022 SCOPING PLAN APPENDIX D, LOCAL ACTIONS 5.5-22
TABLE 5.5-6: PROJECT CONSISTENCY WITH THE CITY GENERAL PLAN SUSTAINABLE COMMUNITY ELEMENT POLICIES 5.5-24
TABLE 5.6-1: 2020 SCAG RTP/SCS CONSISTENCY ANALYSIS 5.6-4
TABLE 5.6-2: 2024 SCAG RTP/SCS CONSISTENCY ANALYSIS 5.6-6
TABLE 5.6-3: PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN PRINCIPLES, ACTIONS AND POLICIES 5.6-8
TABLE 5.7-1: CITY OF REDLANDS GENERAL PLAN NOISE/LAND USE COMPATIBILITY MATRIX 5.7-7
TABLE 5.7-2: CITY OF REDLANDS GENERAL PLAN INTERIOR AND EXTERIOR NOISE STANDARDS 5.7-8
TABLE 5.7-3: CITY OF REDLANDS OPERATIONAL NOISE STANDARDS 5.7-9
TABLE 5.7-4: CONSTRUCTION REFERENCE NOISE LEVELS 5.7-14
TABLE 5.7-5: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT 5.7-16
TABLE 5.7-6: CONSTRUCTION EQUIPMENT VIBRATION LEVELS 5.7-17
TABLE 5.7-7: EXISTING CUMULATIVE PROJECTS RELATED TO NOISE AND VIBRATION 5.7-18
TABLE 5.8-1: CITY OF REDLANDS SCAG REGIONAL HOUSING NEEDS ALLOCATION, 2021-2029 ..... 5.8-2
TABLE 5.8-2: SCAG POPULATION ESTIMATES AND PROJECTIONS, 2016–2045 ..... 5.8-5
TABLE 5.8-3: SCAG POPULATION ESTIMATES AND PROJECTIONS, 2019–2050 ..... 5.8-5
TABLE 5.8-4: CITY OF REDLANDS EXISTING HOUSING STOCK, 2024 ..... 5.8-5
TABLE 5.8-5: SCAG HOUSEHOLD PROJECTIONS, 2016–2045 ..... 5.8-5
TABLE 5.8-6: SCAG HOUSEHOLD PROJECTIONS, 2019–2050 ..... 5.8-6
TABLE 5.8-7: SCAG PROJECTED EMPLOYMENT TRENDS, 2016-2045 ..... 5.8-6
TABLE 5.8-8: SCAG PROJECTED EMPLOYMENT TRENDS, 2019-2050 ..... 5.8-6
TABLE 5.8-9: EXISTING AND PROJECTED JOBS - HOUSING BALANCE IN THE CITY AND COUNTY (2016-2045) 5.8-7
TABLE 5.8-10: EXISTING AND PROJECTED JOBS - HOUSING BALANCE IN THE CITY AND COUNTY (2019-2045) 5.8-8
TABLE 5.8-11: GENERAL PLAN AND PROPOSED PROJECT POPULATION GROWTH 5.8-10
TABLE 5.9-1: FIRE STATION SERVING THE PROJECT SITES 5.9-5
TABLE 5.9-2: POLICE STATIONS 5.9-5
TABLE 5.9-3: RUSD SCHOOL SERVING THE PROJECT SITE 5.9-6
TABLE 5.10-1: EXISTING MAJOR ROADWAY CHARACTERISTICS WITHIN THE PROJECT AREA 5.10-4
TABLE 5.10-2: PROPOSED PROJECT TRIP GENERATION COMPARISON 5.10-9
TABLE 5.10-3: VMT ANALYSIS OF SITES 1-2 (TAZ 53827208) 5.10-16
TABLE 5.10-4: VMT ANALYSIS OF SITES 3-7, 9-15 AND 24 (TAZ 53827403) 5.10-16
TABLE 5.10-5: VMT ANALYSIS OF SITE 8 (TAZ 53827403) 5.10-17
TABLE 5.10-6: VMT ANALYSIS OF SITE 16 (TAZ 53827501) 5.10-17
TABLE 5.10-7: VMT ANALYSIS OF SITES 17-19 (TAZ 53836401) 5.10-17
TABLE 5.10-8: VMT ANALYSIS OF SITES 20-21 (TAZ 53835402) 5.10-18
TABLE 5.10-9: VMT ANALYSIS OF SITE 23 (TAZ 53835101) 5.10-18
TABLE 5.10-10: PROJECT'S EFFECT ON CITYWIDE VMT 5.10-19
TABLE 5.12-1: MUED WATER SUPPLY 2020 ..... 5.12-4
TABLE 5.12-2: MUED PROJECTED WATER SUPPLY (AF) 5.12-5
TABLE 5.12-3: NET CHANGE IN WASTEWATER GENERATION FOR PROJECT SITE 5.12-10
TABLE 5.12-4: AVAILABLE WASTEWATER CAPACITY IN THE CITY OF REDLANDS 5.12-10
TABLE 5.12-5: NET CHANGE IN WATER DEMANDS FOR PROJECT SITE 5.12-12
TABLE 5.12-6: PROJECTED MUED WATER DEMAND (AF) 5.12-12

TABLE 5.13-1: CITY OF REDLANDS UNEMPLOYMENT RATES 5.13-4
TABLE 6-1: EXISTING GENERAL PLAN BUILDOUT PEAK OPERATIONAL EMISSIONS 6-11
TABLE 6-2: EXISTING GENERAL PLAN BUILDOUT OPERATIONAL GHG EMISSIONS 6-12
TABLE 6-3: IMPACT COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVES 6-32
TABLE 6-4: COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVES ABILITY TO MEET OBJECTIVES 6-35

Appendices

APPENDIX A IS/NOP, NOP COMMENT LETTERS
APPENDIX B LESA MODEL MEMO AND WORKSHEETS
APPENDIX C AIR QUALITY IMPACT ANALYSIS
APPENDIX D GHG REPORT
APPENDIX E ENERGY ANALYSIS
APPENDIX F TRAFFIC IMPACT ANALYSIS AND VMT ANALYSIS
APPENDIX G WATER SUPPLY ASSESSMENT
APPENDIX H WATER AND SEWER DEMAND STUDY
APPENDIX I SERVICE LETTER RESPONSES

1. Executive Summary

Based on the analysis in the Initial Study included as Appendix A and in accordance with CEQA Guidelines Section 15162, the City has determined that a Subsequent EIR shall be prepared for the proposed Project pursuant to CEQA guidelines Section 15162 because the Project proposes "substantial changes which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." This Draft Subsequent Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Redlands RHNA Rezone (proposed Project) at a programmatic level. This Draft Subsequent EIR has been prepared in conformance with the City of Redlands environmental policy guidelines for implementation of the California Environmental Quality Act (CEQA).

The Subsequent EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft Subsequent EIR will be available for public review on the City's website.

Written comments related to environmental issues in the Draft Subsequent EIR should be addressed to:

Kevin Beery, Senior Planner
City of Redlands
35 Cajon Street, Suite 20
Mailing: P.O. Box 3005
Redlands, CA 92373

Email: kbeery@cityofredlands.org

A Notice of Availability of the Draft Subsequent EIR was published concurrently with distribution of this document.

1.1 PROJECT LOCATION

The city of Redlands is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles east of the city of Los Angeles and approximately 45 miles west of the city of Palm Springs. The city is situated along the Interstate 10 (I-10) corridor, which links it with the cities of San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley to the east. State Route 210 (SR-210) originates in the City of Redlands and traverses the northwest part of the city, heading north then west towards the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change as part of the Project in order to conform with the existing onsite school use and achieve land use compatibility with the surrounding proposed residential designations. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project ("proposed Project", or "Project"). The 24 sites are broken up into two distinct areas:

Sites 1 through 16A and Site 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.
Sites 17 through 23 are also in the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just north of I-10 and Downtown Redlands.

Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, Figure 3-3a, *Aerial View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

1.2 PROJECT BACKGROUND SUMMARY

The City of Redland's 2035 General Plan (General Plan) was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan EIR serves as a Program EIR pursuant to CEQA Guidelines Section 15168 analyzing potential buildout of the City pursuant to the General Plan land use designations. Pursuant to CEQA Guidelines Section 15168(d), the General Plan EIR can simplify the preparation of future environmental documents on later activities pursuant to the General Plan program and can focus a future Subsequent EIR on the effects which had not been considered before. The General Plan provides the long-term policy direction, and quality of life, economic health, and sustainability goals of the Redlands community through 2035. The General Plan includes seven State-mandated elements: Land Use, Circulation, Open Space, Conservation, Health and Safety, Noise, and Housing, which include policies for the entire City. The General Plan Housing Element builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production.

Any decision by the City affecting land use and development must be consistent with the General Plan. Any action, program, or project is considered consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan or not obstruct their attainment. The General Plan EIR evaluated the potential environmental effects associated with implementation of the General Plan and addresses appropriate and feasible mitigation measures that would minimize or eliminate these impacts.

1.3 BASIS FOR A SUBSEQUENT EIR

When an EIR has been adopted and a project is proposed to be modified or expanded upon, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines §15162.

Pursuant to CEQA Guidelines §15162, no subsequent EIR shall be prepared unless one or more of the following conditions is present:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As detailed below, the Project involves a General Plan Amendment and rezoning of parcels to provide for future housing development as required by the RHNA. These actions involve a potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, the City has determined that the preparation of a Subsequent EIR is the appropriate approach to CEQA compliance in accordance with CEQA Guidelines §15162(a)(1). Consistent with CEQA Guidelines §15050, the City of Redlands General Plan 2035 EIR and the 2021-2029 Housing Element are incorporated into this document by reference.

1.4 PROJECT DESCRIPTION SUMMARY

Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites within the City to allow for increased residential development, which includes an application for a General Plan Amendment (GPA) to change the land use designations of the sites to allow for residential development, a Specific Plan Amendment (SPA) in order to remove 17 of the Project sites out of the EVCSP, and a zone change to allow for medium and high-density residential development within the Project site.

According to the Housing Element, upon rezoning, the Project sites could yield 2,436 housing units through a development horizon of 2035. No specific development project is proposed as part of this Project, but this Draft Subsequent EIR assumes and analyzes anticipated impacts associated with the development of 2,436 housing units and 151,048.46 SF of Public/Institutional development compared to buildout under the existing General Plan land use and zoning designations (i.e., the status quo). This Subsequent EIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite.

Infrastructure Improvements

Roadways and utilities may be necessaryto support development of future residential construction within the Project site. Future onsite infrastructure improvements that may be necessary for residential development include storm drains, wastewater, water (potable and reclaimed), and dry utilities that would connect to existing facilities within the Project sites or adjacent to the Project area. Specific infrastructure improvements required to support residential development within the Rezone areas are not known at this time and will not be known until a development project is proposed.

1.5 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

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

1.6 SUMMARY OF ALTERNATIVES

Section 6.0, *Alternatives*, of this EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 6.0 are summarized below.

Alternative 1: No Project/No Development. Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft Subsequent EIR is required to "discuss the existing conditions at the time the Notice of Preparation (NOP) is published, or if no NOP is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services […] In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the Project site were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site is currently developed single family residences, agricultural uses, and industrial storage facilities. See Section 4.0, *Environmental Setting*, for additional details and figures regarding the existing conditions at the Project site.

The No Project/No Development Alternative would result in continuation of the existing uses within the Project site at the time the NOP was published (July 1, 2024), and the proposed development would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Table 1-1 below, which include measures related to air quality, cultural resources, greenhouse gas emissions, noise, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, and vehicle miles traveled. This alternative would result in lessened impacts to all 20 of the environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3 in Section 6.0, *Alternatives*).

However, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands, which is legally required under the RHNA.

Alternative 2: No Project/Buildout of Existing Land Use Alternative. Under this alternative, buildout of the residential and nonresidential uses would occur as permitted under the existing land use designations, but the Project site would not be rezoned to allow for additional residential uses. Pursuant to CEQA Guidelines Section 15126.6(e), this alternative analysis the likely buildout of the Project area according to the existing General Plan Land Use Designations for the site. Buildout would result in up to 2,209,040.26 square feet of Commercial/Industrial or Commercial/Admin Professional uses and 111 units of residential development. As a result, this alternative would not lessen any impacts compared to the proposed Project and would even worsen impacts related to air quality, greenhouse gas emissions, noise, and transportation. This alternative would result in no decrease to any of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3 in Section 6.0, *Alternatives*).

In addition, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands, which is legally required under the RHNA.

Alternative 3: Reduced Project Site Alternative. The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the allowed area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located adjacent to the Morrey Arroyo Creek located just north of Orange Avenue (Sites 2, 7, 8, 11,12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

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

Implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4 as it would introduce additional residential units in the City to help reach the City's RHNA goals. The Reduced Project Site Alternative would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses to allow for less intense development more similar to its surrounding proposed residential uses.

Alternative 4: Reduced Project Development Intensity Alternative. The Reduced Project Development Intensity Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, Project buildout would be reduced by 55 percent; thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF of nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,096 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling-unit deficit in meeting their State mandated RHNA fair share.

The Reduced Project Development Intensity Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, construction air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. However, this alternative would avoid the significant and unavoidable impact related to operational air quality emissions.

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

1.7 SUMMARY OF IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft Subsequent EIR. The level of significance of impacts before and after the proposed mitigation measures are applied are identified as significant and unavoidable, less than significant, or no impact. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts.

Redlands Regular Meeting of 06-03-25

Table 1-1: Summary of Impacts, Mitigation Measures, and Level of Significance

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.1 Agriculture				
Impact AG-1: The Project would convert prime farmland, unique farmland, or farmland of statewide importance (farmland) as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resource Agency, to non-agricultural use.	None	Potentially significant	None	Significant and unavoidable
Impact AG-5: The Project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use.	None	Potentially significant	None	Significant and unavoidable
Cumulative	None	Potentially significant	None	Significant and unavoidable
5.2 Air Quality				
Impact AQ-1: The Project would conflict with or obstruct implementation of an applicable air quality plan.	None	Potentially significant	**MM AQ-1 through MM AQ-3,** as listed below.	Significant and unavoidable
Impact AQ-2: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	None	Potentially significant	**MM AQ-1: Construction Emissions.** Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management	Significant and unavoidable

557 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to: • Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards. • Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes. • Require the use of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize	

558 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			building materials that do not require the use of architectural coatings. • The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines. • The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment. • The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification. **MM AQ-2: Operational Emissions.** Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating	

559 of 1245

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following: • Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized; • Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC); • Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insultation (R-8);	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF); • Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards; • Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. • Landscaping palette of drought tolerant plants exceeding City requirements; • Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use);	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads. **MM AQ-3: Toxic Air Contaminants.** Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 microgram per cubic meter (µg/m3), PM2.5 concentrations exceed 2.5 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			reduce risk may include but are not limited to: • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better).	
Impact AQ-3: The Project could expose sensitive receptors to substantial pollutant concentrations.	None	Potentially significant	**MM AQ-1 through MM AQ-3**, as listed above.	Significant and unavoidable
Cumulative	None	Potentially significant	**MM AQ-1 through MM AQ-3**, as listed above.	Significant and unavoidable
5.3 Cultural Resources				
Impact CUL-2: The Project would not cause a substantial adverse change in the significance of an archaeological resources pursuant to CEQA Guidelines Section 15064.5.	None	Potentially significant	**MM CUL-3: Archeological Resources Assessment.** Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G. Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply. **MM CUL-4: Archaeological Monitoring/Preservation.** • *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			been handled through one of the following methods: • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any	

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.	

568 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• *Moderately Sensitive Sites:* If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods:	

569 of 1245

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.	
Cumulative	None	Potentially significant	**MM CUL-3 and MM CUL-4,** listed above.	Less than significant
5.4 Energy				

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact E-1: The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.	None	Less than significant	None required	Less than significant
Impact E-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	None	No impact	None required	No impact
Cumulative	None	Less than significant	None required	Less than significant
5.5 Greenhouse Gases				
Impact GHG-1: The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	None	Potentially significant	**MM AQ-1 and MM AQ-2,** listed above.	Significant and unavoidable
Impact GHG-2: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	None	Potentially significant	**MM AQ-1 and MM AQ-2,** listed above.	Significant and unavoidable
Cumulative	None	Potentially significant	**MM AQ-1 and MM AQ-2.** Listed above.	Significant and unavoidable
5.6 Land Use and Planning				
Impact LU-2: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation	None	Less than significant	None required	Less than significant

572 of 1245

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
adopted for the purpose of avoiding or mitigating an environmental effect.				
Cumulative	None	Less than significant	None required	Less than significant
5.7 Noise				
Impact NOI-1: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	None	Potentially significant	**MM NOI-1: Construction Noise Levels.** Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors: Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity. Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			MM NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall: Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts; Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and Be removed and the site appropriately restored upon the conclusion of the construction activity.	
Impact NOI-2: The Project would not generate excessive groundborne vibration or groundborne noise levels.	None	Potentially significant	**MM NOI-3: Construction Vibration.** Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing	Less than significant

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects. **MM NOI-4: Construction Vibration Near Fragile Historic.** Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.	
Cumulative	None	Potentially significant	**MM NOI-1 through MM NOI-4**, listed above.	Less than significant

575 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.8 Population and Housing				
Impact POP-1: The Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	None	Less than significant	None required	Less than significant
Cumulative	None	Less than significant	None required	Less than significant
5.9 Public Services				
Impact PS-1: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities.	**PPP PS-1: Development Impact Fees.** As a standard requirement for implementing projects within the TVSP Area, and prior to issuance of any building permits for the implementing project, the project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.	Less than significant	None required	Less than significant
Impact PS-2: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered police station facilities.	**PPP PS-1**, listed above.	Less than significant	None required	Less than significant
Impact PS-3: The Project would not result in substantial adverse physical impacts associated with the construction or expansion of new or physically altered school facilities.	**PPP PS-1**, listed above.	Less than significant	None required	Less than significant

576 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative	**PPP PS-1**, listed above.	Less than significant	None required	Less than significant
5.10 Transportation				
Impact TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle or pedestrian facilities.	None	Less than significant	None required	Less than significant
Impact TR-2: The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (B) regarding vehicle miles traveled.	None	Sites 1-19, 22, and 24 would be less than significant. Sites 20, 21, and 23 would be potentially significant.	**Mitigation Measure TR-1: VMT Screening and Analysis.** Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines. If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance	Sites 20, 21, and 23 significant and unavoidable impacts

577 of 1245

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to: • *Increase Residential Density*: Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT. • *Integrate Affordable and Below Market Rate Housing*: Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project. • *Implement Commute Trip Reduction Marketing*: Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond	

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA). • *Provide Ridesharing Program*: Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA. • *Implement Subsidized or Discounted Transit Program*: Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA. • *Limit Residential Parking Supply*: The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project.	

579 of 1245

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• *Unbundle Residential Parking Costs from Property Cost*: Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT. • *Provide Pedestrian Network Improvement*: Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT. • *Construct or Improve Bike Facility*: Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT. • *Construct or Improve Bike Boulevard*: Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT. • *Expand Bikeway Network*: Expanding the bikeway network connects different parts of the community with safe and accessible	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT. • *Implement Conventional Carshare Program*: Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT. • *Implement Electric Carshare Program*: Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions. • *Implement Pedal (Non-Electric) Bikeshare Program*: Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT. • *Implement Electric Bikeshare Program*: Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible to a broader range of users and	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			encourage more trips to be taken by bike instead of by car, contributing to reduced VMT. • *Implement Scooter Share Program*: Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT. • *Provide Community-Based Travel Planning (CBTP)*: CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA. • *Implement Market Price Public Parking (On-Street)*: Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. • *Implement Transit-Supportive Roadway Treatments*: Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			results in a mode shift from single occupancy vehicles to transit, which reduces VMT.	
Cumulative	None	Less than significant	None required	Less than significant
5.15 Tribal Cultural Resources				
Impact TCR-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	None	Potentially significant	**Mitigation Measure CUL-3 and CUL-4, listed previously.** **Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources.** In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed. If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall	Less than significant

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference: A. Full avoidance. B. If avoidance is not feasible, Preservation in place. C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction. D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)	
Impact TCR-2: The Project would not cause a substantial adverse change in the significance of a	None	Potentially significant	**Mitigation Measures CUL-3 and CUL-4**, listed previously.	Less than significant

584 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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, that considers the significance of the resource to a California Native American tribe.			**Mitigation Measure TCR-1**, listed previously.	
Cumulative	None	Potentially significant	**Mitigation Measure CUL-3 and CUL-4**, listed previously. **Mitigation Measure TCR-1**, listed previously.	Less than significant
5.16 Utilities and Service Systems				
Impact UT-1: The Project would not Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	None	Less than significant	None required	Less than significant
Impact UT-2: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years.	None	Less than significant	None required	Less than significant
Impact UT-3: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the	None	Less than significant	None required	Less than significant

585 of 1245

Redlands Regular Meeting of 06-03-25

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Project's projected demand in addition to the providers existing commitments.				
Cumulative	None	Less than significant	None required	Less than significant

586 of 1245

2. Introduction

2.1 SUBSEQUENT EIR INTRODUCTION

This Draft Subsequent Environmental Impact Report (EIR) has been prepared as a Draft Subsequent EIR to the General Plan 2035 EIR that was certified in July 2017 (State Clearinghouse Number 2016081041). This Draft Subsequent EIR evaluates the environmental effects that may result from the construction and operation of the proposed Project, as detailed in Section 3.0, *Project Description*. This EIR has been prepared by the City of Redlands (City) in its capacity as Lead Agency, as that term is defined in Section 15367 of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) and in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This EIR has been prepared to programmatically identify, analyze, and mitigate the potentially significant environmental effects of the proposed Project.

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze Project impacts, analyses and conclusions regarding the level of significance of impacts both before and after mitigation, the identification and application of mitigation measures to avoid or reduce Project-related impacts, and the consideration of alternatives to the proposed Project. In preparing this Draft Subsequent EIR, the City has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this Draft Subsequent EIR reflect the independent judgment of the City of Redlands as Lead Agency.

2.2 GENERAL PLAN 2035 AND HOUSING ELEMENT HISTORY AND ENVIRONMENTAL BACKGROUND

The City of Redlands General Plan 2035 was adopted in December 2017, after the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan provides the long-term policy direction, and quality of life, economic health, and sustainability goals of the Redlands community through 2035. The General Plan includes seven State-mandated elements: Land Use, Circulation, Open Space, Conservation, Health and Safety, Noise, and Housing, which include policies for the entire City. The General Plan Housing Element builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production.

The General Plan EIR analyzed an assumed buildout of the General Plan with up to 36,561 residences and 39,704,566 square feet of nonresidential development. Table ES-4 of the General Plan EIR Executive Summary provides a list of the impacts that would result from buildout of the General Plan, which include the following:

Significant and Unavoidable Impacts: The General Plan EIR identified significant and unavoidable impacts in the following environmental topic areas:

- Agricultural Resources (Impact 3.2-1);
- Air Quality (Impacts 3.3-2 and 3.3-3); and
- Transportation (Impacts 3.15-1 and 3.15-2).

Less-Than-Significant Impacts with Incorporation of Mitigation: The General Plan EIR did not identify any impacts that could be mitigated to less-than-significant levels with incorporation of mitigation measures.

Less-Than-Significant Impacts: The General Plan EIR identified less-than-significant impacts in the following environmental topic areas:

- Aesthetics (Impacts 3.1-1, 3.1-2, and 3.1-3);
- Agricultural Resources (Impacts 3.2-2 and 3.2-3);
- Air Quality (Impacts 3.3-1, 3.3-4, and 3.3-5);
- Biological Resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-4, 3.4-5, 3.4-6);
- Energy, Greenhouse Gases, and Climate Change (Impacts 3.5-1, 3.5-2, 3.5-3, and 3.5-4);
- Geology, Soils, and Seismicity (Impacts 3.6-1, 3.6-2, 3.6-3, and 3.6-4);
- Hazards (Impacts 3.7-1, 3.7-2, 3.7-3, 3.7-4, 3.7-5, 3.7-6, and 3.7-7);
- Historical, Archaeological, and Paleontological Resources (Impacts 3.8-1, 3.8-2, 3.8-3, 3.8-4, and 3.8-5)
- Hydrology and Water Quality (Impacts 3.9-1, 3.9-2, 3.9-3, 3.9-4, 3.9-5, 3.9-6, 3.9-7, 3.9-8, and 3.9-9);
- Land Use and Housing (Impact 3.10-3);
- Mineral Resources (Impact 3.11-1);
- Noise (Impacts 3.12-1, 3.12-2, 3.12-3, and 3.12-4);
- Public Facilities and Services (Impacts 3.13-1, 3.13-2, 3.13-3, 3.13-4, and 3.13-5);
- Public Utilities and Infrastructure (Impacts 3.14-1, 3.14-2, 3.14-3, 3.14-4, 3.14-5, 3.14-6, and 3.14-7);
- Transportation (Impacts 3.15-3, 3.15-4, 3.15-5, 3.15-6).

No Impact: The General Plan EIR determined that no impact would occur with respect to the following environmental topic areas:

- Land Use and Housing (Impacts 3.10-1 and 3.10-2); and
- Mineral Resources (Impact 3.11-2).

2.3 PURPOSE OF AN EIR

CEQA requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. Pursuant to the provisions of CEQA Guidelines Section 15121(a), this Draft Subsequent EIR is intended as an informational document to inform public agency decision makers and the general public of the significant environmental effects of the proposed Project, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the Project that might avoid or lessen significant environmental effects. Thus, this Draft Subsequent EIR is intended to aid the review and decision-making process.

The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement

among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

Basis for a Subsequent EIR

The 2017 EIR for the General Plan 2035 is a Program EIR that examined the total scope of environmental effects that would occur as a result of buildout of the General Plan. Once a Program EIR has been prepared, subsequent activities within the program or changes to the program must be evaluated to determine whether additional CEQA documentation needs to be prepared. The key considerations in determining the need for additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines §15162, which state that no subsequent EIR shall be prepared unless one or more of the following conditions is present:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As detailed in Section 3.0, *Project Description*, the proposed Project involves a General Plan Amendment, a Specific Plan Amendment, and rezoning of parcels to provide for future housing development as required by the Regional Housing Needs Allocation (RHNA). This Project may involve new significant environmental effects or a substantial increase in the previously identified effects. Thus, the City of Redlands has prepared this Draft Subsequent EIR that evaluates the potential of the proposed Project to result in new or substantially greater impacts than previously identified in the General Plan 2035 EIR, pursuant to the requirements of CEQA, as detailed below.

Program EIR CEQA Coverage

A Program EIR is an EIR prepared to assess a series of actions characterized as one project. The actions can be related to one another geographically, because they are part of a chain of contemplated actions, because they governed by the same rules, regulations, plans, or other general criteria associated with a

program, or because they are individual activities carried out under the same statutory or regulatory authorities and have similar environmental effects and mitigation needs. The General Plan 2035 EIR, certified in 2017, is a Program EIR that examined the General Plan 2035 buildout.

Given the planning and development nature of the proposed Project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions to implement the proposed Project, this document is also a Program EIR has been prepared as a Subsequent EIR, pursuant to Section 15162 of the CEQA Guidelines that tiers from a certified Program EIR.

2.4 SUBSEQUENT EIR SCOPE AND CONTENT

CEQA Updates Since Certification of the General Plan 2035 EIR in 2017

As discussed herein, the General Plan 2035 EIR was certified in 2017. However, in the intervening years, several changes have been made to the CEQA Guidelines, regulatory, and statutory requirements. In December 28, 2018, a comprehensive update to the State CEQA Guidelines became effective, which addressed legislative changes to the CEQA statute, clarified certain portions of the existing CEQA Guidelines, and updated the CEQA Guidelines to be consistent with recent court decisions. The changes to the Guidelines include but are not limited to CEQA Guidelines Section 15064.3, related to vehicle miles traveled (VMT), and incorporation of energy and wildfire as new separate topics in the CEQA Guidelines Appendix G, *Environmental Checklist Form*. Impacts related to wildfires were evaluated in the Initial Study (included as Appendix A) and were found to be less than significant.

This Draft Subsequent EIR addresses these changes, minor updates to other environmental topics, and the proposed Project.

Environmental Setting and Baseline

The environmental setting is normally the existing conditions at the time the CEQA analysis begins (CEQA Guidelines Section 15125). In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when the project is within the scope of a Program EIR (such as the General Plan 2035 EIR), the effective baseline is the previously approved and analyzed project for which the Program EIR was certified (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523). "When a lead agency is considering whether to prepare a Subsequent EIR, it is specifically authorized to limit its consideration of the later project to effects not considered in connection with the earlier project" (*Temecula Band of Luiseño Mission Indians v. Rancho Cal. Water Dist.* [1996] 43 Cal.App.4th 425, 437). Here, the previous project is the General Plan 2035.

CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). The intent of this Subsequent EIR is to provide a reasonably conservative analysis that identifies the reasonable maximum potential impact. Thus, this Subsequent EIR provides an analysis of impacts from buildout of the proposed Project in comparison to those from buildout of Project site per the General Plan 2035.

Impacts Found to Be Potentially Significant. Based on the Initial Study conducted for the proposed Project, the City determined that an EIR should be prepared for the Redlands RHNA Rezone Project ("proposed Project"). Topics requiring a detailed level of analysis evaluated in this Draft Subsequent EIR have been identified based upon the responses to both the Notice of Preparation (NOP) for the Project and a review of the Project by the City of Redlands. The City determined through the Initial Study process that impacts related to the following topics are potentially significant and require a detailed level of analysis in this Draft Subsequent EIR:

- Agriculture and Forestry
- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Impacts Found Not to Be Significant. CEQA Guidelines Section 15126.2(a) states that "[a]n EIR shall identify and focus on the significant effects on the environment." Topics that have been determined not to be significant and are therefore not discussed in detail in the Subsequent EIR were identified based upon the responses to the NOP and an Initial Study prepared by the City of Redlands. The City determined through the initial review process that impacts related to the following topics are not potentially significant and are not required to be analyzed in this Draft Subsequent EIR:

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

2.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The CEQA Guidelines define Lead, Responsible, and Trustee Agencies. The City of Redlands is the Lead Agency because it holds principal responsibility for approving the proposed Project.

A Responsible Agency refers to a public agency other than the Lead Agency that has discretionary approval over the proposed Project. State, regional and/or local government permits may be required for the proposed Project, whether or not they are explicitly listed below. State and regional agencies that may have jurisdiction over some aspects include (but are not limited to):

- Santa Ana Regional Water Quality Control Board
- South Coast Air Quality Management District

Trustee Agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. CEQA Guidelines §15386 designates four agencies as Trustee Agencies: the California Department of Fish and Wildlife with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission with regard to State-owned "sovereign" lands, such as the beds of navigable waters and State school lands; the California Department of Parks and Recreation with regard to units of the State park system; and the University of California with regard to sites within the Natural Land and Water Reserves System. There are no Trustee Agencies for the proposed Project.

2.6 SUBSEQUENT EIR PROCESS

Notice of Preparation/Initial Study

Pursuant to the requirements of CEQA, the City of Redlands, as Lead Agency, prepared an Initial Study (IS) and Notice of Preparation (NOP) for the proposed Project, which was distributed on July 1, 2024, for a 30-day public review and comment period that ended on July 31, 2024. The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the Draft Subsequent EIR being prepared. Comments received on the NOP are included in

Appendix A and summarized in Table 2-1, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP/Initial Study Comment Letters

Comment Letter and Comment	Relevant EIR Section
State Agencies	
Native American Heritage Commission, July 19, 2024	
This letter discusses Project compliance with AB 52 and SB 18. The letter recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project as early as possible. The letter also outlines the AB 52 requirements. In addition, the letter provides recommendations for the Cultural Resources Assessment in order to adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources.	Cultural Resources, Tribal Cultural Resources
Department of Toxic Substances Control, July 17, 2024	
This letter provides background on the proposed Project and makes four requests on the behalf of the Department of Toxic Substances Control (DTSC). The requests include identification of the amount of Pesticides and Organochlorine Pesticides historically used onsite. They also warn that additional contaminants may be found due to specific uses present on the Project site. DTSC also recommends that all soil and fill material should be tested to assess any contaminates. Lastly, they state that surveys should be conducted for the presence of contaminants linked to preexisting building onsite.	Hazards and Hazardous Materials
Regional/Local Agencies	
Department of Public Works, San Bernardino County, July 24, 2024	
This letter informs that The San Bernardino County Flood Control District (District) possesses fee-owned right-of-way adjacent to the eastern side of Site 16 and they also possess easement-owned right-of-way totally encumbered by Site 16A. The comment includes the District's recommendations for the proposed Project. The first is that the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project lies within the Special Flood Hazard Area (SFHA). The District recommends that the Project includes the most recent FEMA regulations for development in an SFHA. If encroachment on District right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations Support Section. They also recommend that the San Bernardino County Comprehensive Storm Drain Plan (CSDP) be utilized in the design of drainage facilities. The Project will be subject to the CSDP No. 4 and is to be used as a guideline for drainage in the area and any design will be subject to review and approval by the jurisdictional agency. The Department has also requested to be included in the circulation list for all Project notices, public reviews, or public hearings.	Hydrology & Water Quality, Land Use & Planning, Utilities & Service Systems
Individuals	
Alan Gotta, July 15, 2024	
This letter provides the commenter's opposition to the Project. The commenter expresses his concern for the landowners in the Western portion of the city. He is concerned about the loss of property value for these landowners and associated infrastructure, as well as associated costs.	Population and Housing
Kim Price, July 2, 2024	

Comment Letter and Comment	Relevant EIR Section
This letter provides the commenter's opposition to the density of the proposed Project. The commenter is concerned that the high-density zoning could lead to heavy traffic due to lot 23's proximity to Lugonia School. The commentor advocates for a lower density of the proposed Project. The letter also requests that entrances and exits to the development be situated away from schools and residential uses and opposition to units facing neighboring residential uses to maintain the privacy of existing residents. Additional requests include a request for at a minimum three spaces per unit and installation of block walls along the perimeter of the Project sites.	Transportation, Land Use and Planning
Richard Ruiz Jr., July 22, 2024	
This letter provides the commenter's concern of the proposed Project, specifically the development of lot 23. The commentor is a neighbor to the proposed Project and is concerned that San Marcos Ave will be open for through traffic and may lead to the increase of traffic and crime. The commentor also expresses their concern for a loss of privacy and also suggests construction of high walls around the property to increase the security of the site. The commentor also expressed concern for the impact of increased traffic on Lugonia Elementary School parents. The commenter advises that the zoning remains as R-2 rather than R-3.	Public Services, Transportation, Alternatives

Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Redlands hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft Subsequent EIR for the proposed Project. The Public Scoping Meeting was held on July 18, 2024, at 4:30 p.m. via Zoom. Comments received during the scoping meeting are summarized in Table 2-2, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

Table 2-2: Summary of Public Scoping Meeting Comments

Comment Letter and Comment	Relevant EIR Section
Redlands Chamber of Commerce	
The commenter asked how the Project aligns with the development horizon past 2035. The commenter also asked who made the determination on the topics screened out of the Draft EIR. They also expressed concern for the loss of farmland since agriculture heritage is what the City was founded on. The last concern they had was what can be done to increase the amount of open space to combat the depletion of air quality with the rising amount of warehouses.	Agricultural Resources, Air Quality, Land Use and Planning
Bobby Garrity	
The Redlands Yes In My Backyard (YIMBY) advocated for higher density to reduce the amount of total space housing takes up within the city and reduce total emissions. Redlands YIMBY requests that zoning in Redlands allows for housing beyond the RHNA requirement.	Air Quality, Energy, Greenhouse Gases, Population and Housing, Land Use and Planning

Public Review of the Draft Subsequent EIR

The City of Redlands filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this Draft Subsequent EIR has been completed and is available for review. A Notice of Availability of the Draft Subsequent EIR was published concurrently with distribution of this document. The Draft Subsequent EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and

Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft Subsequent EIR is available for public review digitally on the City's website:

(https://www.cityofredlands.org/post/environmental-documents)

Written comments related to environmental issues in the Draft Subsequent EIR should be addressed to:

Kevin Beery, Senior Planner
City of Redlands
35 Cajon Street, Suite 20
Mailing: P.O. Box 3005
Redlands, CA 92373

Email: kbeery@cityofredlands.org

Final Subsequent EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft Subsequent EIR will be prepared and incorporated into a Final Subsequent EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final Subsequent EIR will be considered. These comments, and their responses, will be included in the Final Subsequent EIR for consideration by the City, as well as other responsible agencies per CEQA. The Final Subsequent EIR may also contain corrections and additions to the Draft Subsequent EIR, and other information relevant to the environmental issues associated with the Project. The Final Subsequent EIR will be available for public review prior to its certification by the City. Notice of the availability of the Final Subsequent EIR will be sent to all who commented on the Draft Subsequent EIR.

2.7 ORGANIZATION OF THIS DRAFT SUBSEQUENT EIR

The Draft Subsequent EIR is organized into the following sections. To help the reader locate information of interest, a brief summary of the contents of each section of this Draft Subsequent EIR is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the proposed Project, and alternatives. The section also provides a summary of environmental impacts and mitigation measures that lists each identified environmental impact, applicable Project design features, standard conditions, proposed mitigation measure(s) (if any), and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Section 2, Introduction:** This section provides an overview of the purpose and use of the Draft Subsequent EIR, the scope of this Draft Subsequent EIR, a summary of the legal authority for the Draft Subsequent EIR, a summary of the environmental review process, and the general format of the document.
- **Section 3, Project Description:** This section provides a detailed description of the proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5, Environmental Impact Analysis:** This section includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the proposed Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the

feasible mitigation measures that would reduce or eliminate any significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

This section also summarizes the significant and unavoidable impacts that would occur from implementation of the proposed Project and provides a summary of the environmental effects of the implementation of the proposed Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the proposed Project.

- **Section 6, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is identified.
- **Section 7, Report Preparation and Persons Contacted:** This section lists authors of the Draft Subsequent EIR and City staff that assisted with the preparation and review of this document. This section also lists other individuals or organizations that were contacted for information that is included in this Draft Subsequent EIR document.

2.8 INCORPORATION BY REFERENCE

State CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document…[and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Draft Subsequent EIR. Where this Draft Subsequent EIR incorporates a document by reference, the document is identified in the body of the Draft Subsequent EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this Draft Subsequent EIR.

City of Redlands General Plan 2035. The Project is within the geographical limits of the City of Redlands and is covered by its General Plan 2035. The General Plan 2035 was adopted by the City on December 5, 2017, and provides the fundamental basis for the City's land use and development policies. The General Plan 2035 documents are available at https://www.cityofredlands.org/post/planning-division-general-plan. Land use and development policies are utilized throughout this document as a regulatory document governing development and land use activities within the City.

City of Redlands General Plan EIR. The General Plan 2035 was the subject of an environmental review under CEQA; a Program EIR for the General Plan 2035 was certified by the City in 2017 (State Clearinghouse Number 2016081041). The Program EIR contains information relevant to the impacts from building out the Project site pursuant to the existing land use and zoning designations and includes the impact findings that are listed previously. Accordingly, the Program EIR for the General Plan 2035 is herein incorporated by reference in accordance with State CEQA Guidelines Section 15150. The General Plan 2035 documents are available at https://www.cityofredlands.org/post/planning-division-general-plan.

City of Redlands Housing Element: The City of Redlands Housing Element identifies projected housing needs for all economic segments based on Department of Finance population estimates. The 2021-2029 Housing Element includes several provisions that aim to ensure the City can meet the required "fair share" of affordable housing units. During the Housing Element process, the City assessed a number of properties and areas throughout the community able to accommodate the City's assigned 2021 RHNA. The City identified 196 sites as qualifying sites to accommodate their RHNA allocation. Of the 196 Housing Element inventory sites (shown in Appendix B of the Housing Element), 23 of them were identified as necessary for rezoning

under Housing Element Program 1.1-1 to allow for medium and high-density residential development. The City of Redlands Housing Element is incorporated throughout this Subsequent Draft EIR and is available at https://www.cityofredlands.org/post/housing-element.

City of Redlands Municipal Code: The City of Redlands Municipal Code consists of regulatory, penal, and administrative ordinances of the City. The City's Zoning Regulations (Municipal Code Section 18) identifies land uses permitted and prohibited according to the zoning category of particular parcels, and provide regulations for development. The Municipal Code is utilized throughout this document as a regulatory document governing development and land use activities within the City. Regulatory information from the Municipal Code is cited in various sections of this Draft Subsequent EIR.

3. Project Description

"Project," as defined by the State CEQA Guidelines, means "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)… enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700." (14 California Code of Regulations [CCR] Section 15378(a).)

The City has determined that a Subsequent Environmental Impact Report ("EIR") to the City's General Plan Final Recirculated Program EIR (SCH # 2016081041) is necessary pursuant to California Environmental Quality Act ("CEQA") Guidelines Section 15162 to evaluate the potential environmental impacts from the proposed Project. This Draft Subsequent EIR (Draft SEIR) analyzes buildout at a programmatic level of detail, based upon land use changes proposed pursuant to the City of Redlands recently adopted City of Redlands 2021-2029 Housing Element (Housing Element), compared to the buildout of the approved City General Plan.

3.1 PROJECT LOCATION

The City of Redlands is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles east of the City of Los Angeles and approximately 45 miles west of the City of Palm Springs. The city is situated along the Interstate 10 (I-10) corridor, which links it with the cities of San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley to the east. State Route 210 (SR-210) originates in the City of Redlands and traverses the northwest part of the city, heading north then west towards the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the City's Housing Element sites, 23 sites from the Housing Element sites inventory totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site, including Site 24, is approximately 116.19 acres. The Rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change as part of the Project in order to conform with the existing onsite school use and achieve land use compatibility with the surrounding proposed residential designations. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project ("proposed Project", "Project"). The 24 sites are broken up into two distinct areas.

- Sites 1 through 16A and 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.
- Sites 17 through 23 are the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just north of I-10 and Downtown Redlands.

Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, Figure 3-3a, *Aerial*, and Figure 3-3b, *Aerial*.

3.2 PROJECT BACKGROUND

3.2.1 City of Redlands General Plan 2035

The City of Redlands (City) General Plan 2035 was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan provides long-term policy direction, quality of life, economic health, and sustainability of the Redlands community through 2035. The General Plan includes seven State-mandated elements: Land Use, Circulation, Open Space, Conservation, Health and Safety, Noise, and Housing which include policies for the entire City. The General Plan Housing Element builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production.

Any decision by the City affecting land use and development must be consistent with the General Plan. Any action, program, or project is considered consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan or not obstruct their attainment. The General Plan EIR evaluated the potential environmental effects associated with implementation of the General Plan and addresses appropriate and feasible mitigation measures that would minimize or eliminate these impacts.

A project is consistent with the General Plan if the development density does not exceed what was contemplated and analyzed for the parcel(s) in the certified General Plan EIR and complies with the associated standards applicable to that development density (State CEQA Guidelines Section 15183(i)(2)). Development density standards can include the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, size limitations, and use restrictions.

City of Redlands 2021-2029 Housing Element

The California Department of Housing and Community Development (HCD) prepares a RHNA for each Council of Governments in the state of California. The RHNA identifies projected housing needs for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for a six-county area of southern California in which the City of Redlands is included. SCAG then further allocates fair shares of the total regional RHNA to individual local governments within their jurisdiction. Each local government must demonstrate that it has planned to fully accommodate its assigned RHNA within its Housing Element. The intent of the process is to promote a mix of unit types, tenure, and affordability in all cities and counties. SCAG adopted a Final RHNA based on the HCD determination for the region's "fair share" of statewide forecasted growth through October 15, 2029. SCAG assigned the City of Redlands a RHNA share of 3,516 units which the City is required to accommodate in its Housing Element by increasing residential zoning capacity.

The City of Redlands prepared the 2021-2029 Housing Element (Housing Element) of the General Plan in accordance with Government Code Section 65580 et seq. The update to the Housing Element covers the Sixth Cycle planning period from October 15, 2021, to October 15, 2029. On February 1, 2022, the City Council adopted Resolution No. 1565, certifying the Addendum to the certified 2035 General Plan Environmental Impact Report, which analyzed environmental impacts related to the City's Draft Housing Element of the General Plan. Following preparation of the Draft Housing Element Update and adoption of the Addendum, the Draft Housing Element went through several rounds of revisions and submittal for review to the HCD. The City received formal certification of the Housing Element Update from HCD on October 7, 2022.

The 2021-2029 Housing Element includes several provisions that aim to ensure the City can meet the required "fair share" of affordable housing units. During the Housing Element process, the City assessed a number of properties and areas throughout the community able to accommodate the City's assigned 2021 RHNA. The City identified 196 sites as qualifying sites to accommodate their RHNA allocation. Of the 196 Housing Element inventory sites (shown in Appendix B to the Housing Element), 23 of them were identified as necessary for rezoning under Housing Element Program 1.1-1 to allow for medium and high-density residential development.

3.3 EXISTING CONDITIONS

Rezone Sites 1 through 16A and 24

Sites 1 through 16A and 24 are located south of Citrus Avenue and are within the EVCSP. The sites are surrounded by agricultural and mixed uses and are currently designated for commercial and industrial uses. Many of the rezone sites are vacant or are being used for agricultural purposes with no permanent structures onsite. The sites range in size from 1.90 to 10.91 acres. A few properties have single-family homes onsite, and others are used for industrial storage. The sites identified in the EVCSP area are adjacent to multiple schools and parks and have access to nearby local-serving retail and regional job centers, including Esri headquarters and Loma Linda University Medical Center.

Rezone Sites 17 through 23

Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. The sites are surrounded by a variety of uses, including single and multi-family residences, parks, schools, and commercial buildings. These sites are currently vacant and covered with non-native grasses. Sites 17 through 21 had historically been used for agricultural purposes up until approximately 2005. They have remained undisturbed since then except for occasional disking. Sites 22 and 23 are vacant, but heavily disturbed.

3.3.1 Existing General Plan & Zoning Designations

The City of Redlands General Plan currently designates the subject sites (1-24) as Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-4b, *Existing General Plan Land Use*, show the existing General Plan land use designations.

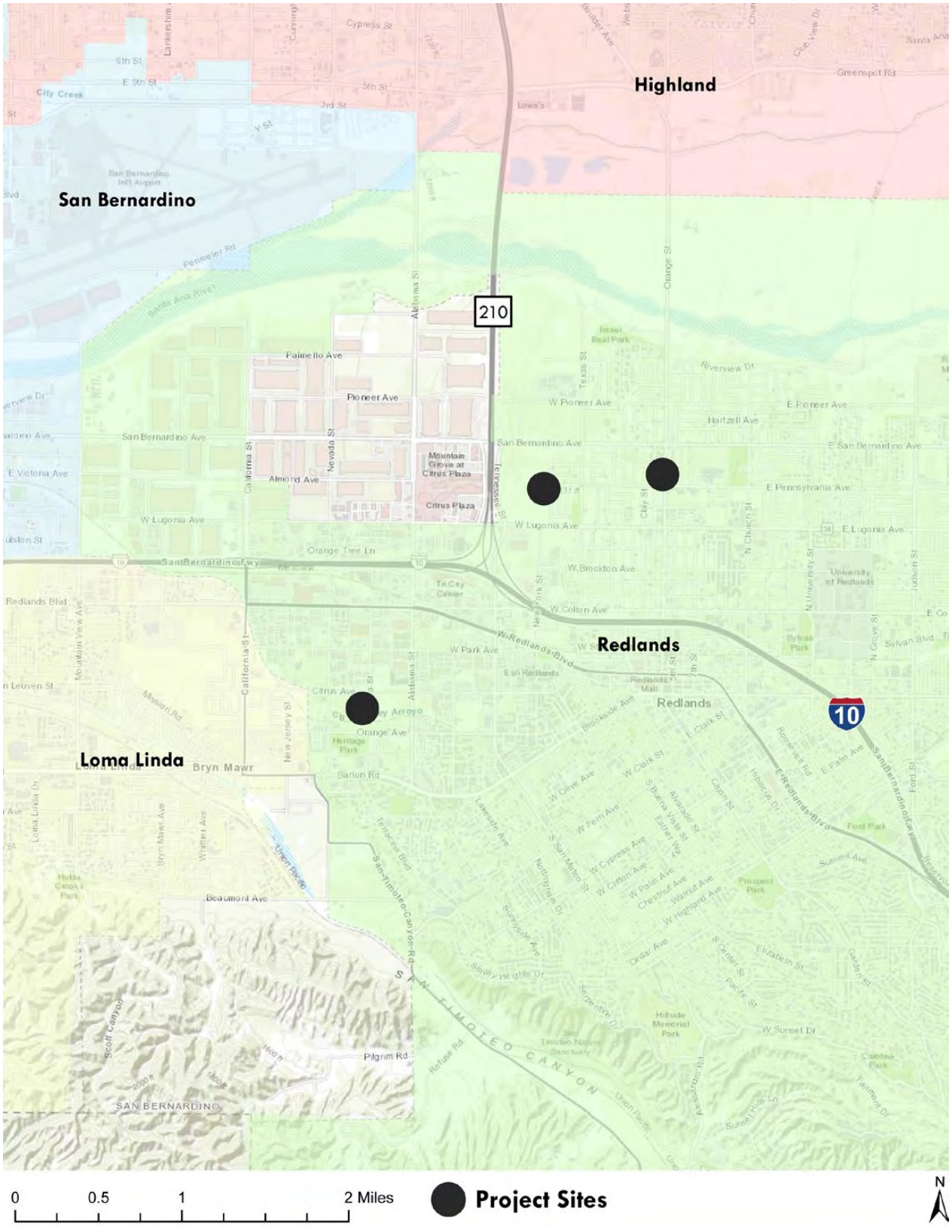
The Rezone sites currently have zoning designations of Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single Family Residential (R-1), and Multiple Family Residential (R-2). Figures 3-5a and 3-5b show the existing zoning designations for the Rezone Sites. Table 3-1, *Existing General Plan Buildout,* shows the existing General Plan land use and zoning designations for each Rezone Site and the potential buildout of each site pursuant to buildout of the existing General Plan land use designation.

Table 3-1: Existing General Plan Buildout

Rezone Site		Acres	General Plan Land Use Designation	Zoning	Residential Buildout Capacity (Dwelling Units)	Non-Residential Buildout Capacity (SF)
1	0292-163-02	8.91	Commercial/Industrial	EV/IC	0	194,059.8
2	0292-163-03	4.26	Commercial/Industrial	EV/IC	0	92,782.8
3	0292-165-05	5.84	Commercial/Industrial	EV/IC	0	127,195.2
4	0292-165-06	3.15	Commercial/Industrial	EV/IC	0	68,607.0

Rezone Site		Acres	General Plan Land Use Designation	Zoning	Residential Buildout Capacity (Dwelling Units)	Non-Residential Buildout Capacity (SF)
5	0292-165-07	1.07	Commercial/Industrial	EV/IC	0	23,304.6
6	0292-165-08	1.9	Commercial/Industrial	EV/IC	0	41,382.0
7	0292-165-09	1.9	Commercial/Industrial	EV/IC	0	41,382.0
8	0292-165-10	4.07	MDR	EV3000RM	40	0
9	0292-165-16	2.5	Commercial/Industrial	EV/IC	0	54,450.0
10	0292-165-17	4.03	Commercial/Industrial	EV/IC	0	87,773.4
10A	0292-165-04	0.08	Commercial/Industrial	EV/IC	0	1,742.4
11	0292-167-02	4.70	Commercial/Industrial	EV/IC	0	102,366.0
12	0292-167-07	2.31	Commercial/Industrial	EV/IC	0	50,311.8
13	0292-167-28	4.70	Commercial/Industrial	EV/IC	0	103,019.4
14	0292-167-29	4.21	Commercial/Industrial	EV/IC	0	91,693.8
15	0292-167-30	8.86	Commercial/Industrial	EV/IC	0	192,970.8
15A	0292-167-17	0.02	Commercial/Industrial	EV/IC	0	435.6
16	0292-201-20	10.65	Commercial/Industrial	EV/IC	0	231,957.0
16A	0292-201-14	0.01	Commercial/Industrial	EV/IC	0	217.8
17	0167-141-04	14.05	Commercial/Admin Professional	CP-4	0	306,009.0
18	0167-141-05	5.0	Commercial/Admin Professional	CP-4	0	108,900.0
19	0167-141-06	6.31	Commercial/Admin Professional	CP-4	0	137,431.8
20	0169-021-02	4.76	MDR	A-1	1	0
21	0169-021-11	1.64	MDR	R-1	9	0
22	0167-151-23	0.33	HDR	R-2	4	0
23	0167-161-10	3.96	HDR	R-2	57	0
24	0292-165-15	6.94	Commercial/Industrial	EV/IC	0	151,048.46
Total		**116.19**			**111**	**2,209,040.46**

Regional Location

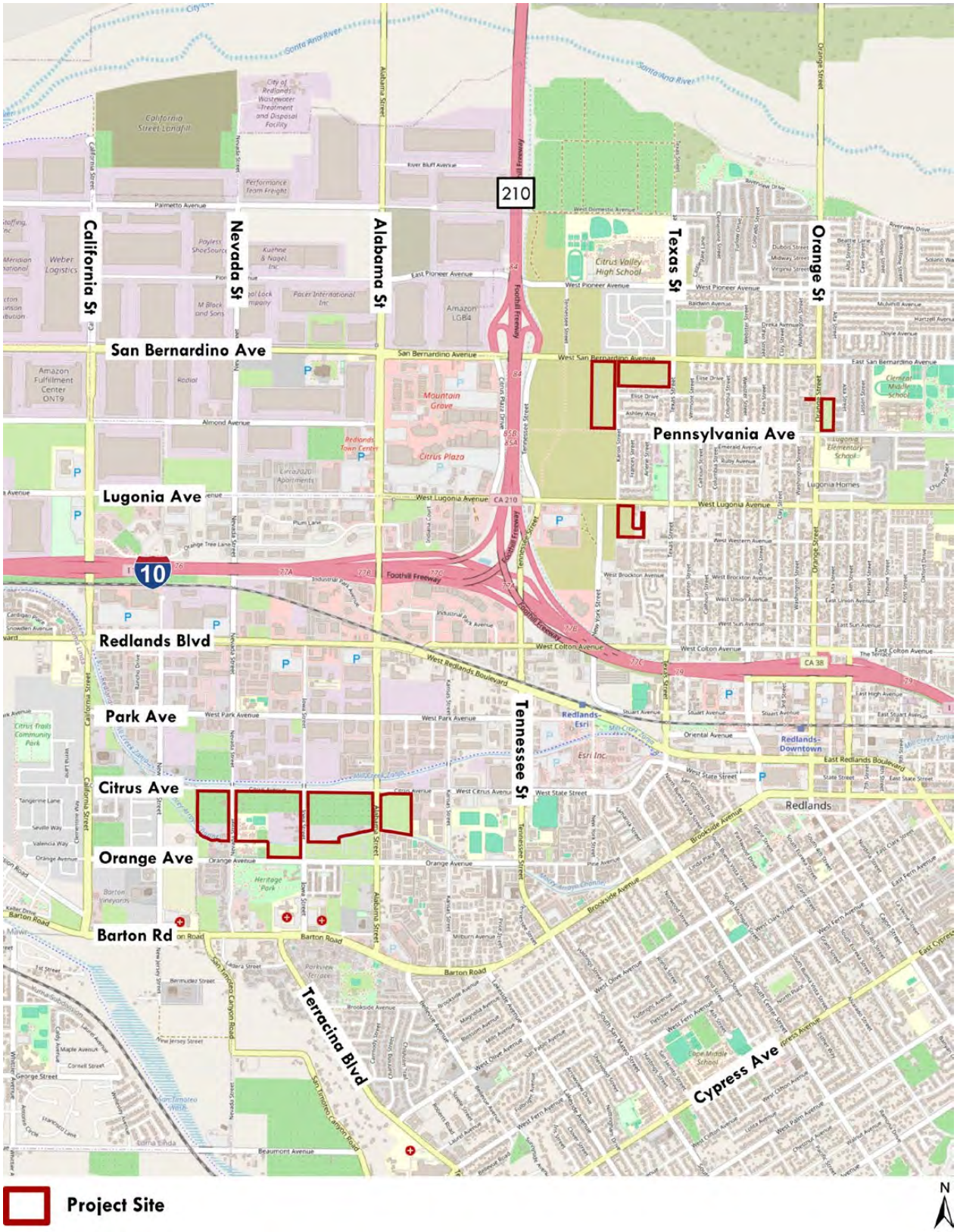


RHNA Rezone Project
City of Redlands

Figure 3-1

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Local Vicinity



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Aerial View



RHNA Rezone Project
City of Redlands

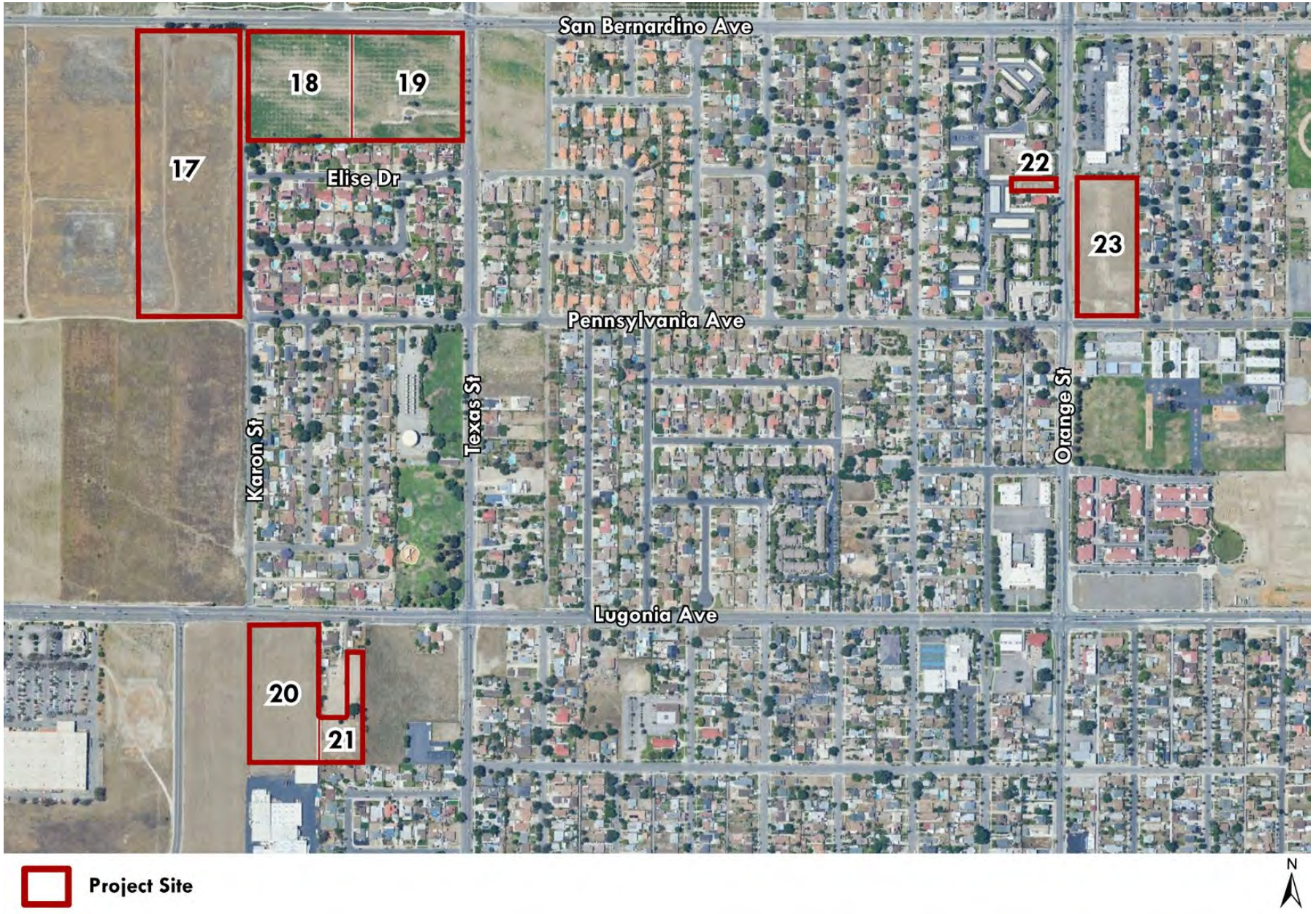
Figure 3-3a

Redlands Regular Meeting of 06-03-25

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606 of 1245

Aerial View



RHNA Rezone Project
City of Redlands

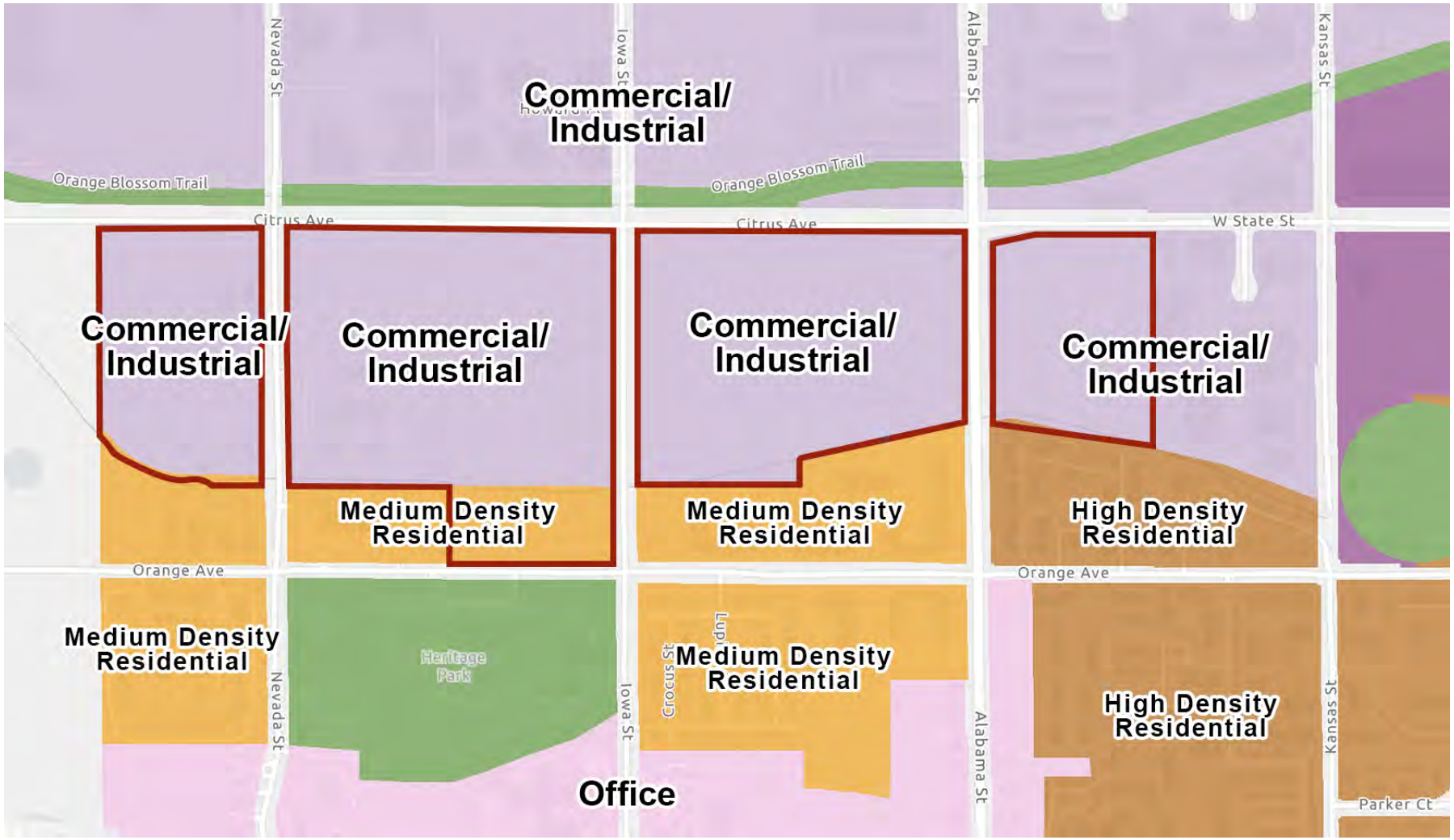
Figure 3-3b

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608 of 1245

Existing General Plan Land Use



RHNA Rezone Project
City of Redlands

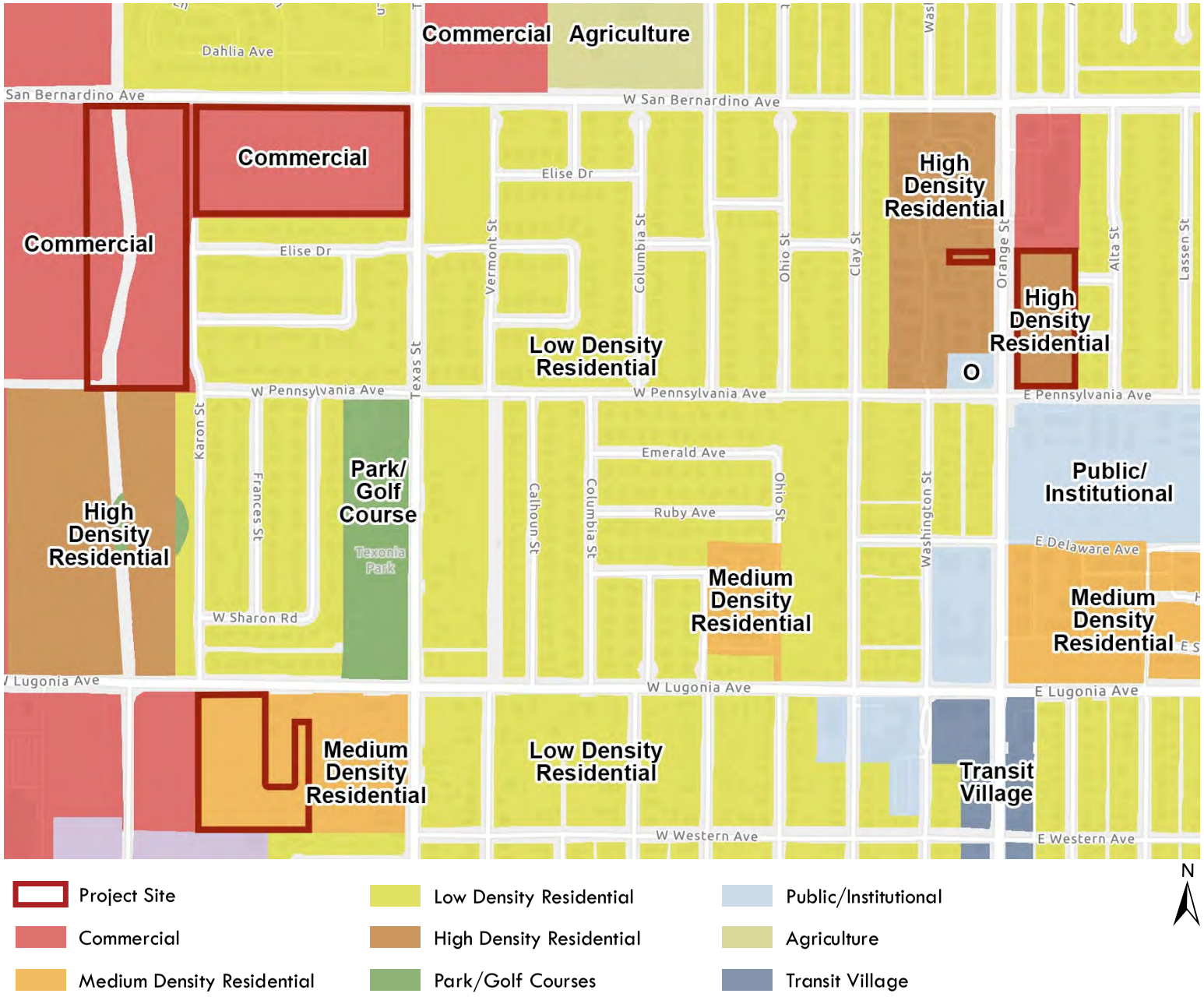
Figure 3-4a

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610 of 1245

Existing General Plan Land Use



RHNA Rezone Project
City of Redlands

Figure 3-4b

Redlands Regular Meeting of 06-03-25

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612 of 1245

Existing Zoning



RHNA Rezone Project
City of Redlands

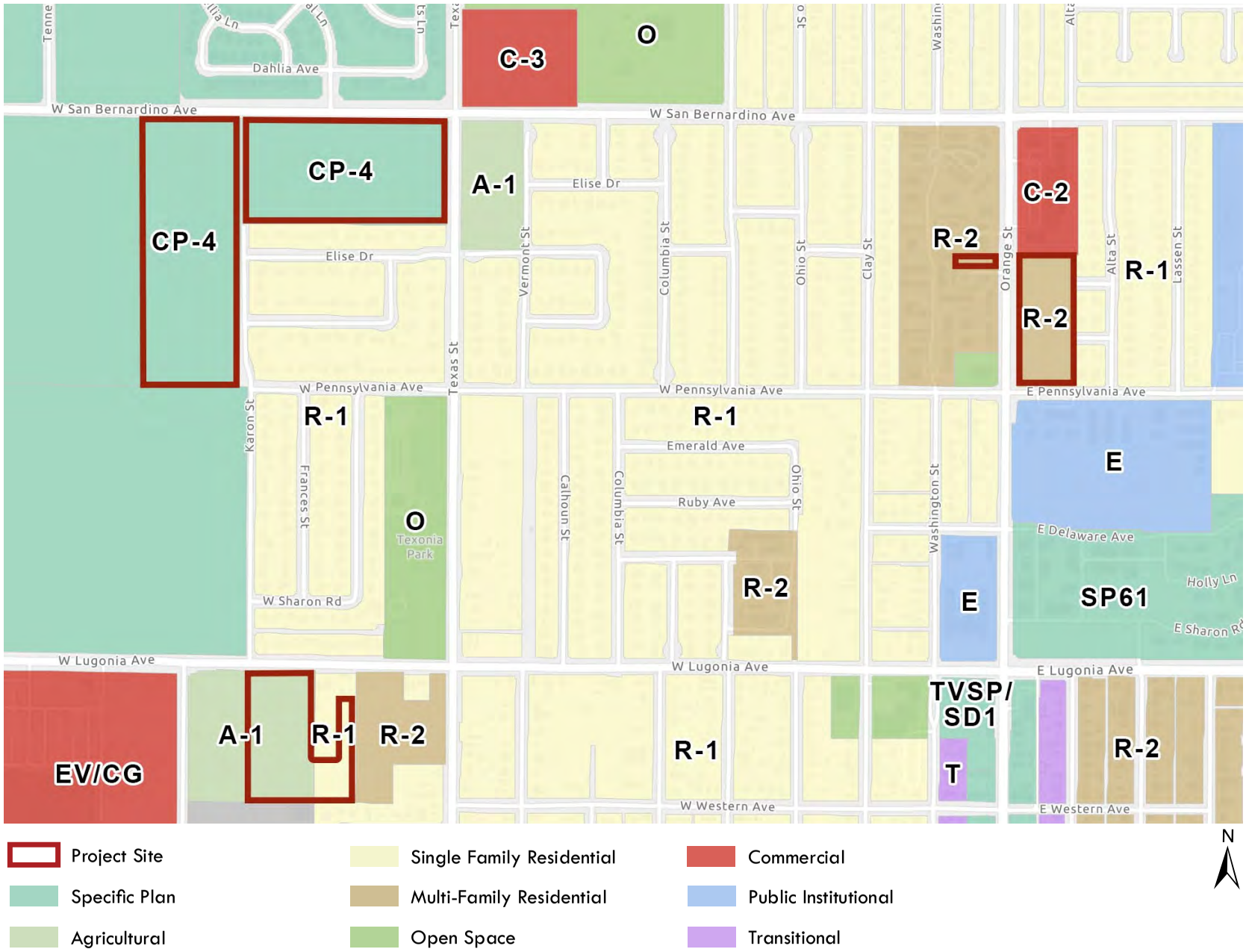
Figure 3-5a

Redlands Regular Meeting of 06-03-25

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614 of 1245

Existing Zoning



RHNA Rezone Project
City of Redlands

Figure 3-5b

Redlands Regular Meeting of 06-03-25

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616 of 1245

3.4 PROJECT OBJECTIVES

In accordance with CEQA Guidelines Section 15124, the following primary objectives support the purpose of the Project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this report, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. Specifically, the Project objectives are as follows:

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

3.5 DESCRIPTION OF THE PROJECT

3.5.1 Project Overview

Pursuant to Housing Element Program 1.1-1, the City of Redlands is proposing to rezone 24 sites within the City to allow for increased residential development, which includes an application for a General Plan Amendment (GPA) to change the land use designations of the sites to allow for residential development, a Specific Plan Amendment (SPA) in order to remove 15 of the Project sites out of the EVCSP, and zone change to allow for medium and high-density residential development within the Project site.

According to the Housing Element, upon rezoning, the Project sites could yield 2,436 housing units through a development horizon of 2035. No specific development project is proposed as part of this Project, but this Draft Subsequent EIR assumes and analyzes anticipated impacts associated with the development of 2,436 housing units and 151,048.46 SF of Public/Institutional development compared to buildout under the existing General Plan land use and zoning designations (i.e., the status quo). While this analysis assumes that Site 24 could be developed to its maximum floor area ratio for approximately 151,048.46 SF of Public/Institutional uses, the existing daycare uses would remain onsite and no redevelopment of the site is proposed by this Project. This Subsequent EIR will also programmatically analyze any impacts associated with the demolition of the existing uses onsite. Table 3-2 lists the proposed General Plan land use designation, zoning, and buildout of the 24 sites.

Table 3-2: Proposed RHNA Rezone Buildout

Site Number	Proposed GP Land Use Designation	Proposed Zoning	Proposed Density (DU/acre)	Acres	Proposed Maximum Buildout (DU)
1	MDR	R-2	15	8.91	133
2	MDR	R-2	15	4.26	63
3	HDR	R-3	30	5.84	175
4	HDR	R-3	30	3.15	94
5	HDR	R-3	30	1.07	32
6	HDR	R-3	30	1.9	57

Site Number	Proposed GP Land Use Designation	Proposed Zoning	Proposed Density (DU/acre)	Acres	Proposed Maximum Buildout (DU)
7	HDR	R-3	30	1.9	57
8	MDR	EV2500RM	15	4.07	61
9	HDR	R-3	30	2.5	75
10	HDR	R-3	30	4.03	120
10A	MDR	R-3	30	0.08	2
11	MDR	R-2	15	4.7	70
12	MDR	R-2	15	2.31	34
13	HDR	R-3	30	4.73	141
14	HDR	R-3	30	4.21	126
15	HDR	R-3	30	8.86	265
15A	HDR	R-3	30	0.02	1
16	MDR	R-2	15	10.65	159
16A	MDR	R-2	15	0.01	0
17	MDR	R-2	15	14.05	210
18	HDR	R-3	30	5	150
19	HDR	R-3	30	6.31	189
20	MDR	R-2	15	4.76	71
21	MDR	R-2	15	1.64	24
22	HDR	R-3	30	0.33	9
23	HDR	R-3	30	3.96	118
24	Public/Institutional (PI)	EV/IP	0.5 Floor Area Ratio (FAR)	6.94	151,048.46 SF
Total				**116.19**	**2,436**

3.5.2 Proposed General Plan Amendment

The General Plan designation of all sites, with the exception of Sites 8, 20, 21, 22, 23 and 24, would be amended from Commercial/Industrial or Commercial/Administrative Professional to Medium Density Residential or High Density Residential and would have a planned density of either 15 or 30 dwelling units per acre (DU/acre), respectively. The intent of the Medium Density Residential land use category is to provide areas for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated Medium Density are generally more suitable for development in the low- to mid-level of the permitted density range for this category. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). The intent of the High Density Residential land use category is to provide for the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated High Density are generally more suitable for development at the mid- to high-level of the density range for this category. Site 24 would require a GPA to change its existing Land Use designation from Commercial/Industrial to Public Institutional. The proposed

General Plan land use designations for all the sites are shown in Figures 3-6a and 3-6b, *Proposed General Plan Land Use Designation*.

3.5.3 Proposed Zone Change

All the sites would require a zone change to allow for medium and high-density residential development, except for Site 24, which would require a zone change to allow for Public/Institutional land uses. The zone change would allow Site 24 to be more aligned with the site's current use as a school and surrounding proposed residential land uses. A majority of the sites are currently within the EVCSP (Sites 1-16A) or Concept Plan No. 4 (Sites 17-19) and would be de-annexed from the Specific Plan and zoned either Multiple Family Residential (R-2) or Multiple Family Residential (R-3). The Multiple Family Residential (R-2) zoning designation allows for single and multi-family development with a maximum density of 3,000 square feet (SF) of lot area per dwelling unit, which equates to approximately 15 DU/acre. The Multiple Family Residential (R-3) zoning designation also allows for single-family and multi-family developments with an allowed density of 1,450 SF of lot area per dwelling unit, which equates to approximately 30 DU/acre. Site 8, located on Iowa Street, would remain in the EVCSP but would require a SPA to modify the zoning of the site from Multi-Family Residential-3000 District to Multi-Family Residential-2500 District. The Multi-Family Residential-2500 District zoning is intended to provide for the development of high-quality apartments on large lots with a maximum density of 15 DU/acre with a minimum of 2,500 SF of lot space for each dwelling unit.

Site 24 would also remain within the EVCSP but would require a SPA to modify the zoning of the site from EV/IC to EV/IP to allow for less intense development more similar to its surrounding proposed residential uses. Sites 20-23 would require a zone change from their current Agriculture (A-1), Single Family Residential (R-1), and Multiple Family Residential (R-2) zoning designations to Multiple Family Residential (R-2) and Multiple Family Residential (R-3) zoning designations. The proposed zoning for all the sites is shown in Figures 3-7a and 3-7b, *Proposed Zoning*.

3.5.4 Proposed Specific Plan Amendment

A SPA would be required to remove Sites 1 through 16A, except for Site 8, from the EVCSP and return them to base zoning of either Multiple Family Residential (R-2) or Multiple Family Residential (R-3). Site 8 would remain within the EVCSP but would require a SPA to change the zoning for the site from Multi Family Residential 3000-District to Multi Family Residential-2500 District.

3.5.5 Comparison of Approved General Plan Buildout to Proposed Land Uses

As detailed in Table 3-3, *Comparison of Approved General Plan 2035 Buildout to Proposed Project*, buildout of the proposed Project would result in a decrease of 2,057,992.2 SF of planned nonresidential uses and an increase of 2,325 dwelling units compared to buildout under the existing General Plan and zoning designations.

Table 3-3: Comparison of Approved General Plan 2035 Buildout to Proposed RHNA Rezone Project

Land Use	Unit	Sites 1-16A		Sites 17-24		GP Total	Proposed Total	Proposed Project minus Approved GP
		Approved GP	Proposed Project	Approved GP	Proposed Project			
CI	SF	1,505,651.40	-	151,048.46	-	1,656,699.86	-	(1,656,699.86)
C	SF	-	-	552,340.80	-	552,340.80	-	(552,340.80)
PI	SF	-	-	-	151,048.46	-	151,048.46	151,048.46
MDR	DU	40	522	10	305	50	827	777
HDR	DU	-	1143	61	466	61	1609	1,548
Total Residential	**DU**	**40**	**1665**	**71**	**771**	**111**	**2,436**	**2,325**
Total Nonresidential	**SF**	**1,505,651.40**	**0**	**703,389.26**	**151,048.46**	**2,209,040.66**	**151,048.46**	**(2,057,992.20)**

The buildout projections listed in Table 3-2, *Proposed RHNA Rezone Buildout*, are used throughout this Draft Subsequent EIR to estimate the magnitude of development that could likely occur in Redlands upon implementation of the proposed Project to year 2035. Land use calculations are used to estimate the number of dwelling units that could be generated by proposed land uses. These projections are then used to provide a conservative estimate of how much noise, traffic, and other impacts could occur due to these changes.

3.5.6 Infrastructure Improvements

While all of the Rezone sites are surrounded by existing roadways and utilities, roadway and utility improvements may be required to support development of future residential construction within the Project site. Future onsite infrastructure improvements that may be necessary for residential development include storm drains, wastewater, water (potable and reclaimed), and dry utilities that would connect to existing facilities within the Project sites or adjacent to the Project area. Specific infrastructure improvements required to support residential development within the Rezone areas are not known at this time and will not be known until a development project is proposed.

3.6 INTENDED USES OF THE SUBSEQUENT EIR

This Draft Subsequent EIR will serve as the primary source of environmental information for the actions and approvals associated with the Redlands RHNA Rezone In accordance with California Public Resources Code Section 21002.1, the purpose of this Draft Subsequent EIR is to provide the City, serving as the lead agency, information on: the potentially significant environmental impacts that would result from implementation of the Redlands RHNA Rezone; alternatives to the Project; and mitigation measures, which may reduce or avoid any significant effects. This Draft Subsequent EIR will also be used as an informational document by other public agencies, in connection with any approvals or permits necessary for construction and operation of the Redlands RHNA Rezone.

This Draft EIR is intended to serve as a Subsequent EIR, as defined in State CEQA Guidelines Section 15162, for use by the City as lead agency and by responsible agencies as needed. This Draft Subsequent EIR analyzes buildout at a programmatic level of detail, based upon land use changes proposed pursuant to the City of Redlands recently adopted City of Redlands 2021-2029 Housing Element (Housing Element), compared to the buildout of the approved City General Plan.

In a Program EIR, CEQA allows the general analysis of broad environmental effects of the program, with the acknowledgement that subsequent, project-specific environmental review may be required for particular aspects or portions of the program at the time of project implementation, in accordance with State CEQA Guidelines Section 15168. The Program EIR can be incorporated by reference into subsequently prepared environmental documentation to address issues such as cumulative impacts and growth-inducing impacts, allowing the subsequent documents to focus on new or site-specific impacts pursuant to State CEQA Guidelines Section 15168(d). To assess the potential broad-scale environmental impacts that may result from implementation of the Redlands RHNA Rezone, development assumptions have been made at this time and are described in Table 3-2, *Proposed RHNA Rezone Buildout*, above.

3.7 DISCRETIONARY APPROVALS AND PERMITS

The City of Redlands has primary approval responsibility for the Project. As such, the City serves as the Lead Agency for this Draft Subsequent EIR pursuant to State CEQA Guidelines Section 15050. The City's Planning Commission will evaluate this Draft Subsequent EIR and make a recommendation to the City Council whether the Redlands RHNA Rezone Project should be adopted and the Draft Subsequent EIR be certified. The City Council is the decision-making authority for the Project and will consider the Project along with the Planning Commission's recommendations and will make a final decision to approve, approve with changes, or deny the Project. The City, including the Planning Commission and City Council, will consider the information in this Draft Subsequent EIR and the Project's administrative record in its decision-making processes. In the event of approval of the Project and certification of the Draft Subsequent EIR, the City would conduct administrative and discretionary review and grant ministerial and discretionary permits and approvals to implement Project requirements, conditions of approval, and future developments within the Project Area. Approval and implementation of the RHNA Rezone Project requires City approval of the following discretionary actions:

City of Redlands

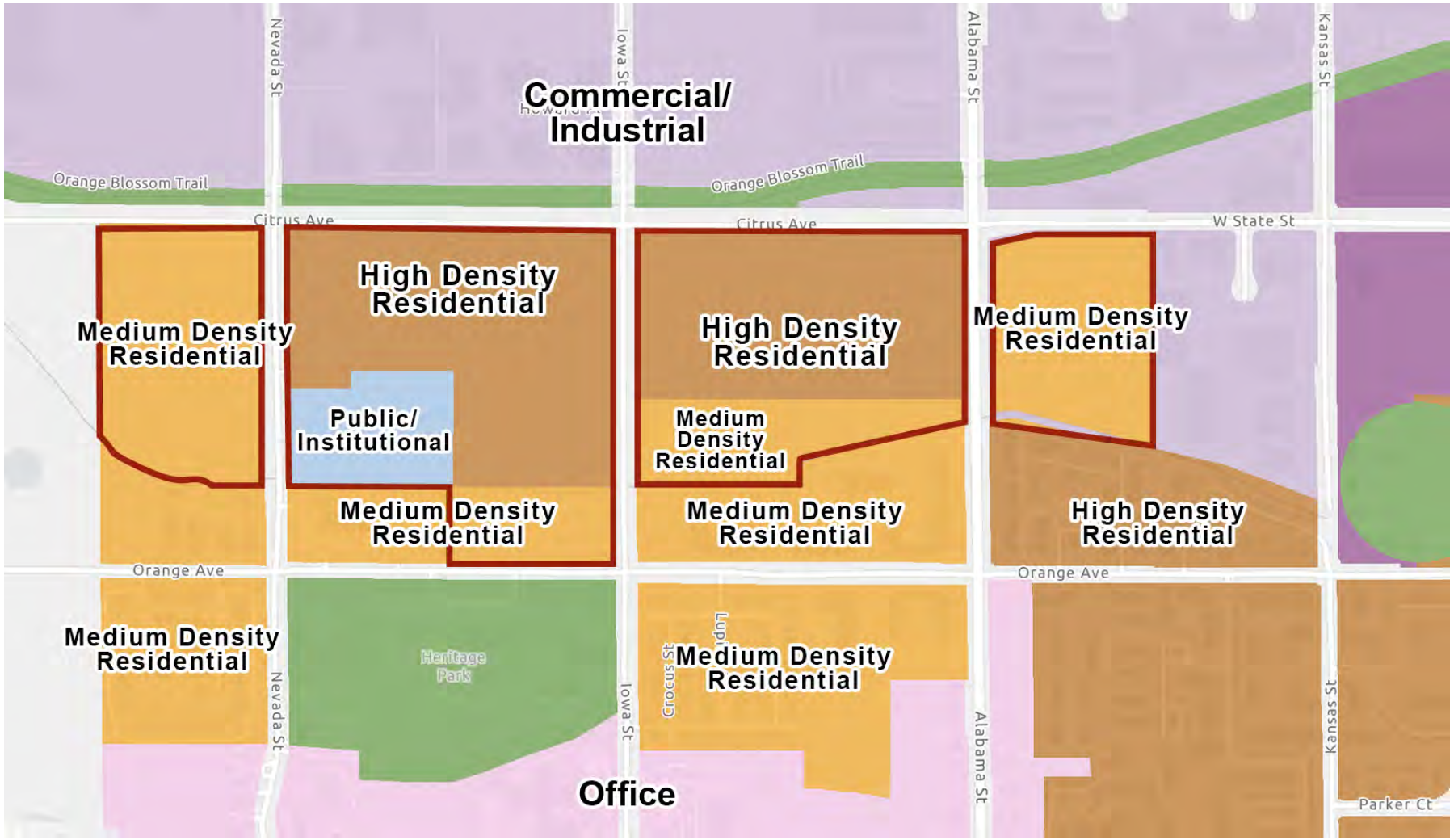
- Adoption of a General Plan Amendment
- Adoption of Specific Plan Amendment(s)
- Approval of a Zone Change
- Certification of the Subsequent EIR.

This Draft Subsequent EIR may be used by various governmental decision-makers for discretionary permits and actions that are necessary or may be requested in connection with implementation of future development projects pursuant to the proposed GPA, zone change, and SPAs. Additional discretionary, administrative and/or ministerial actions may be necessary from other responsible agencies to fully implement the Project. The state or local agencies that may rely upon the information contained in this Draft Subsequent EIR when considering approval of permits may include, but are not limited to, the following:

- South Coast Air Quality Management District (point source emissions permits)
- California Regional Water Quality Control Board (National Pollutant Discharge Elimination System [NPDES] permit)
- State Water Resources Control Board (General Construction Activity Stormwater Permit)
- California Department of Transportation (Caltrans) (improvements to intersections and roadway and underpass design modifications, if located within Caltrans jurisdiction)

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Proposed General Plan Land Use



RHNA Rezone Project
City of Redlands

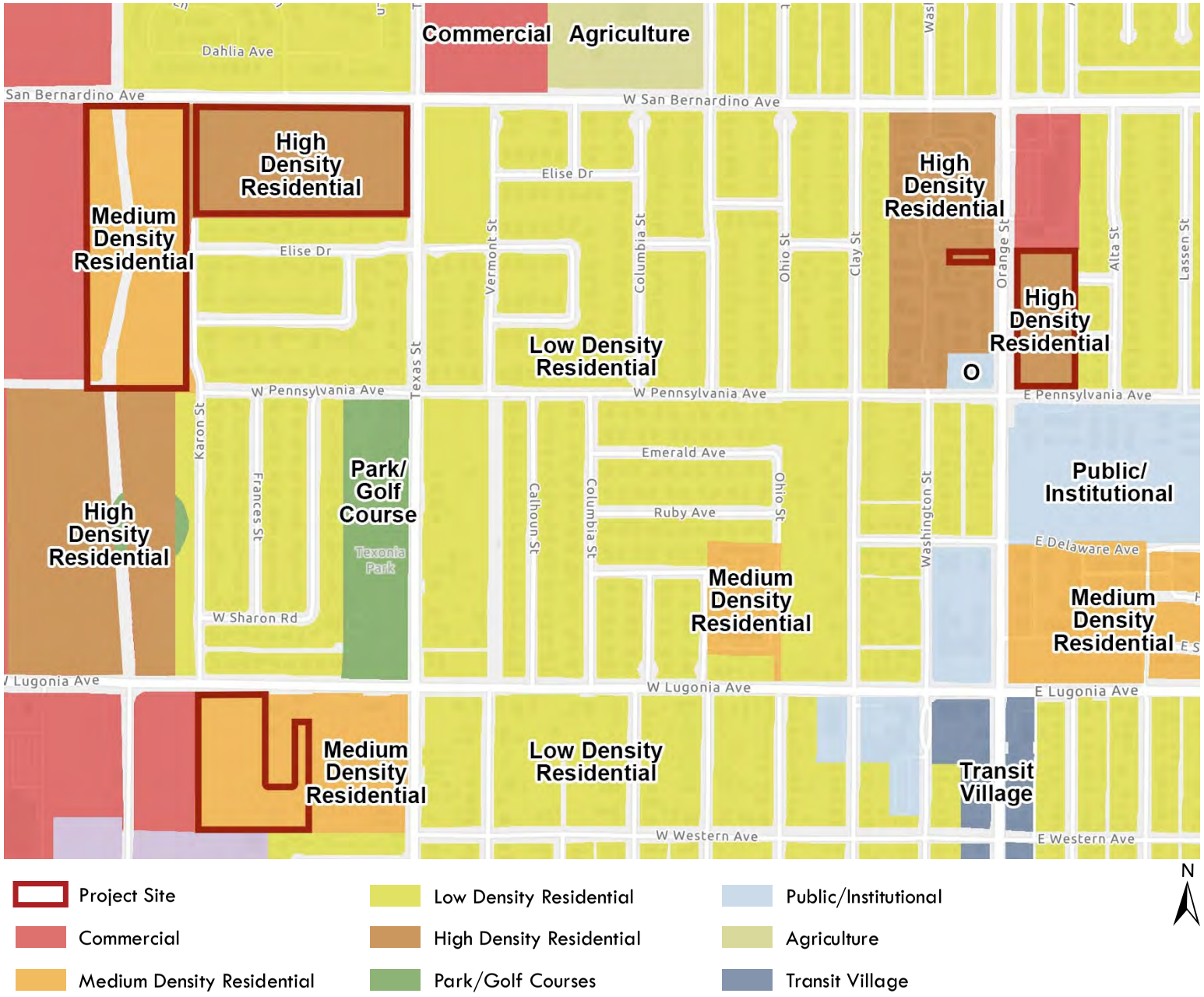
Figure 3-6a

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624 of 1245

Proposed General Plan Land Use



RHNA Rezone Project
City of Redlands

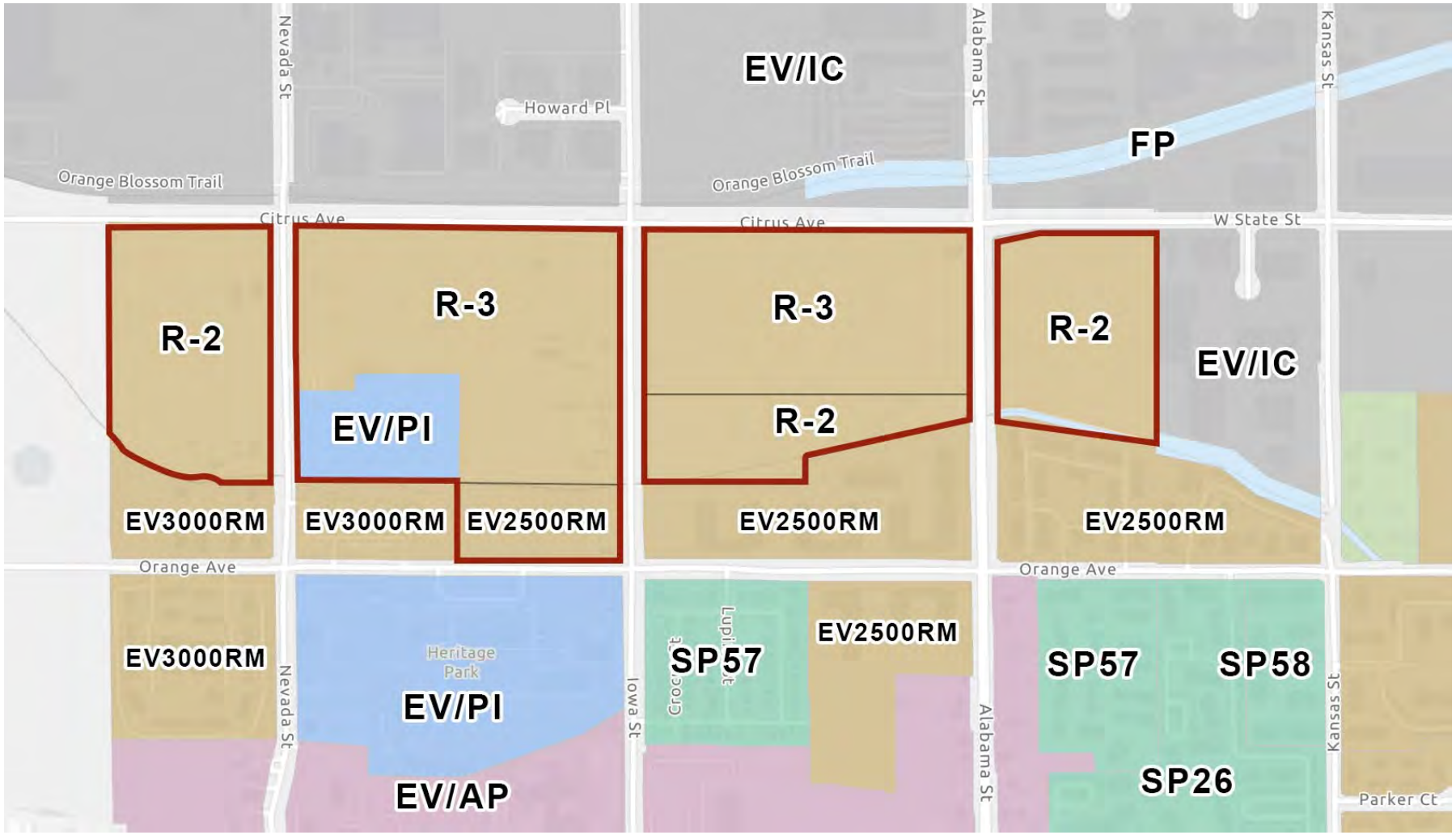
Figure 3-6b

Redlands Regular Meeting of 06-03-25

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626 of 1245

Proposed Zoning



RHNA Rezone Project
City of Redlands

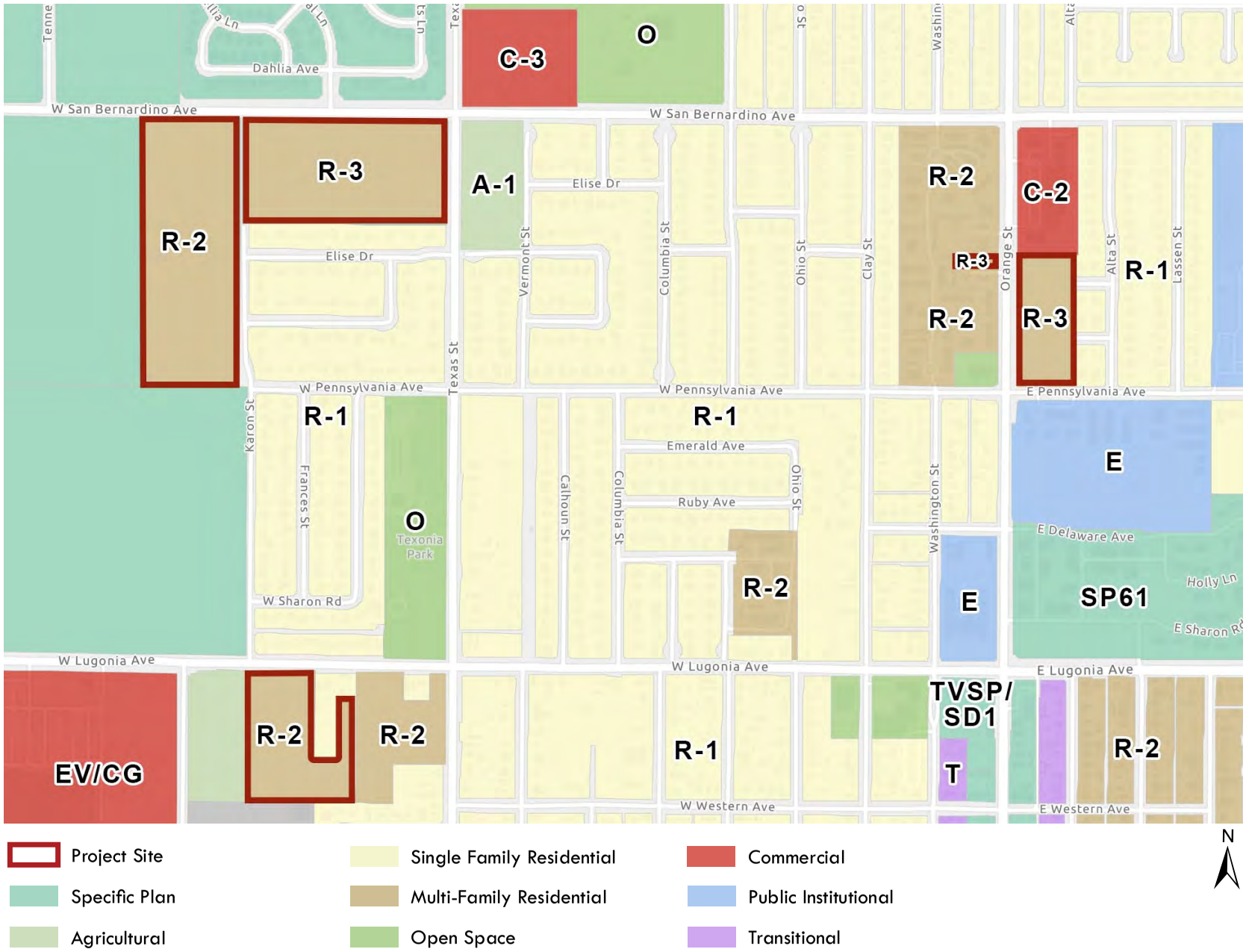
Figure 3-7a

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628 of 1245

Proposed Zoning



RHNA Rezone Project
City of Redlands

Figure 3-7b

Redlands Regular Meeting of 06-03-25

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630 of 1245

4. Environmental Setting

The purpose of this section is to provide a "description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation (NOP) is published, from both a local and a regional perspective" pursuant to CEQA Guidelines Section 15125(a). In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 PROJECT LOCATION

The city of Redlands is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles east of the city of Los Angeles and approximately 45 miles west of the city of Palm Springs. The city is situated along the Interstate 10 (I-10) corridor, which links it with the cities of San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley to the east. State Route 210 (SR-210) originates in the city of Redlands and traverses the northwest part of the city, heading north then west towards the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

4.2 PROJECT SITE DESCRIPTION

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (Rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change as part of the Project in order to conform with the existing onsite school use and achieve land use compatibility with the surrounding proposed residential designations. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project ("proposed Project", or "Project"). The 24 sites are broken up into two distinct areas:

- Sites 1 through 16A and Site 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.
- Sites 17 through 23 are also in the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just north of I-10 and Downtown Redlands.

Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, Figure 3-3a, *Aerial View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

4.3 SURROUNDING LAND USES

Uses surrounding the proposed Rezone sites include single-family residences, multi-family residences, industrial buildings, commercial buildings, and vacant land.

4.4 PHYSICAL ENVIRONMENTAL CONDITIONS

CEQA Guidelines § 15125(a)(1) states that the physical environmental condition in the vicinity of the Project as it existed at the time the EIR's NOP was released for public review normally be used as the comparative baseline for the EIR. In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA's standards limiting the scope of subsequent environmental review. (State CEQA Guidelines §15162.) Once an EIR has been certified for a project (such as the General Plan 2035 EIR), the baseline for analyzing proposed changes to that project is adjusted such that the originally approved project is assumed to exist. (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523, 542-543). Here, the previously approved project is buildout of the City of Redlands General Plan 2035 for the Project sites. Therefore, the baseline for analyzing the changes proposed by the RHNA Rezone is buildout of General Plan 2035. The following sections provide summaries of the environmental conditions for each environmental topic area included in this Drat Subsequent EIR. More information regarding the Project sites' environmental setting is provided in the specific subsections of EIR Section 5.0, *Environmental Analysis*.

4.4.1 Agriculture

Regional

Natural resources in San Bernardino County and City of Redlands include agricultural and grazing lands. In 2017, the County had approximately 11,315 acres of Prime Farmland, 5,705 acres of Farmland of Statewide Importance, and 2,585 acres of Unique Farmland (San Bernardino County, 2015a). In 2020, the County had approximately 9,805 acres of Prime farmland, 5,304 acres of Farmland of Statewide Importance, and 2,575 acres of Unique Farmland (DOC, 2020).

Local

The Redlands General Plan EIR describes that, as of 2014, there was approximately 745 acres of Prime Farmland, 142.9 acres of Farmland of Statewide Importance, and 249.3 acres of Unique Farmland (City of Redlands, 2017b). The General Plan EIR projected continued population growth, and areas designated for residential, commercial, and industrial development, would result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to nonagricultural land use (City of Redlands, 2017b).

Project Site

Portions of the Project site are currently utilized for agricultural production that includes orange groves (Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A). The portions of the Project site that are currently utilized for agricultural purposes have an existing General Plan designation of Commercial/Industrial. As shown in Figure 5.1-1, approximately 44.67 acres of the Project site is designated as Prime Farmland. The relevant sites contain some small structures and have existing irrigation infrastructure throughout the sites that are used for the existing agricultural use.

Approved General Plan 2035 Buildout

The Project site is currently planned for either commercial/industrial or residential development. While Site 20 has a zoning designation of Agriculture (A-1), the site has a General Plan Land Use designation of Medium Density Residential (MDR). Thus, all of the parcels included in the proposed Project are planned for future development that would redevelop the existing farmland onsite.

4.4.2 Air Quality

Climate and Meteorology

The Project area is located within the South Coast Air Basin (SCAB, or Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

Existing Conditions

The SCAQMD maintains monitoring stations within district boundaries, Source/Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The City is located within SRA 35, East San Bernardino. The East San Bernardino monitoring station reports air quality statistics for ozone and particulate matter 10 microns in diameter (PM_{10}). The East San Bernardino Valley monitoring station does not provide information for carbon monoxide (CO), nitrogen dioxide (NO_2), and particulate matter 2.5 microns in diameter ($PM_{2.5}$); as such, statistics for these were obtained from the nearest station with data, the Central San Bernardino 2 monitoring station.

In 2023, the federal and State ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone at most monitoring locations. No areas of the SCAB exceeded federal or State standards for NO_2, SO_2, CO, sulfates, or lead.

The Project area consists of approximately 116.19 acres of land that is currently a mix of undeveloped or agricultural use properties, and sites developed with residences and industrial storage. Air quality emissions are currently generated by operation of these existing uses and related vehicular trips.

Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Existing sensitive receptors within and in the vicinity of the Rezone sites consist of residences and schools.

Approved General Plan 2035 Buildout

The operational emissions from buildout of the existing General Plan land use designations of the 24 rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NOx, CO, PM_{10}, and $PM_{2.5}$.

4.4.3 Cultural Resources

Historic Setting

An asistencia was established in Redlands in 1819 to help facilitate the Mission San Gabriel Arcángel's control and colonization of the surrounding rancheria. Missionaries instructed Serrano, Gabrielino, and Cahuilla workers to build the Mill Creek Zanja, a 12-mile-long irrigation ditch routing water from Mill Creek to Guachama Rancheria, which served as the area's first stable water resource. In 1842, the Lugo family, including José del Carmen Lugo, José María Lugo, Vicente Lugo, and Diego Sepulveda, received a land grant, Rancho San Bernardino, which encompassed the San Bernardino and Yucaipa valleys, including present day City of Redlands.

In 1881, E.G. Judson and Frank E. Brown formed the Redlands Water Company and began construction of a water canal to supply future citrus groves. During the development, the pair noticed the red-colored adobe soil and gave the new town its name, Redlands. Three years later, Brown built the Bear Valley Dam and reservoir, securing a steady supply of water for the town and associated citrus groves. With a stable water source and booming railways, the City of Redlands experienced a development boom with the creation of paved streets, sidewalks, sewage, and electricity systems. The City was officially incorporated in 1888. For 75 years, citrus growing was the main economic source for the City. The citrus industry eventually declined and agricultural areas were replaced with subdivisions.

Archaeological Resources

Archaeological sensitivity in the City of Redlands is often related to proximity to the City's numerous waterways, many of which were constructed to serve as storm water ditches in the 1800s. As shown in Figure 5.3-1, multiple Rezone sites are located in close proximity to the Morey Arroyo. The Morey Arroyo borders Rezone sites 2, 24, 7, 12, and 16 to the south and Site 8 to the north. Site 11 contains a portion of the Morey

Arroyo in the southern part of the site, within the property line. The Morey Arroyo is a partially improved natural drainage that has been used as a storm water ditch since the 1800s. A portion of the Morey Arroyo (Site 36-029388) was originally recorded in 2014 and an additional portion was recorded in 2018 (McKenna, 2015).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources.

4.4.4 Energy

Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Redlands. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2023 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut greenhouse gas emissions 40 percent below 1990 levels by 2030 and 80 percent from the same baseline by 2050 in order to help achieve carbon neutrality by 2045. The Report describes that in 2024, approximately 44% of power that SCE delivered to customers came from carbon-free resources (SCE, 2024).

The Project site is currently served by the electricity distribution systems that exist along the roadways throughout the RHNA area.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Redlands and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of two percent each year through 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure. The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2040 in its 2024 report (CGEU, 2024).

The Rezone sites are currently served by the natural gas distribution system that exists within the roadways throughout the RHNA area.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would

result in the annual consumption of 4,330,815 gallons of fuel per year from traffic, 31,062,419 kBTU of natural gas per year, and 19,869,824 kWh of energy per year.

4.4.5 Greenhouse Gases

Sites 1 through 16A and 24 are located south of Citrus Avenue. Many of these sites are vacant or are being used for agricultural purposes; however, a few sites contain single-family residences, and others are used for industrial storage. Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. These sites are currently vacant and covered with non-native grasses. No activities other than occasional disking occur. The existing GHG emissions from the Project site are limited due to the limited development of the area. The existing primary GHG emissions in the Project site area are from on-road transportation, building energy, and waste.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would generate approximately 46,446.76 MT per year of CO2e or18.16 CO2e per service population.

4.4.6 Land Use and Planning

The City of Redlands General Plan currently designates the subject sites as Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-4b, *Existing General Plan Land Use*, in Section 3.0, *Project Description*, show the existing General Plan land use designations.

The subject sites currently have zoning designations of Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single family Residential (R-1) and Multiple Family Residential (R-2). Figures 3-5a, *Existing Zoning*, and 3-5b, *Existing Zoning*, show the existing zoning designations for the Rezone sites. Table 3-1, *Existing General Plan Buildout,* shows the existing General Plan land use and zoning designations for each Rezone site and the potential buildout of each site pursuant to buildout of the existing General Plan.

4.4.7 Noise

Sensitive Receptors

Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include: residences, schools, hospitals, and recreation areas. Sensitive receptors are located throughout and adjacent to the Project site.

The background ambient noise level in the areas around the proposed Rezone sites is dominated by the transportation-related noise associated with surface streets. The volume of noise is dependent on the traffic volumes and structures, such as walls, that are located between streets and sensitive receptors.

Airports

The nearest airports to the proposed Project site are San Bernardino International Airport, approximately 2.5 miles to the northwest of Site 17, and Redlands Municipal Airport, approximately 1.85 miles northeast of Site 23. Site 23 is the only Rezone Site within airport compatibility Zone D for the Redlands Municipal Airport (City of Redlands, 2017b, p. 3.7-2). Neither of these sites are within the modeled noise contours for

the Redlands Municipal Airport (City of Redlands, 2017b, Figure 3.12-3) or San Bernardino International Airport according to the *2017 Existing CNEL Contours and Generalized Land Uses for San Bernardino International Airport* included within the Final Environmental Assessment for Eastgate Air Cargo Facility (San Bernardino County, 2020). Thus, the proposed Rezone sites are not subject to excessive noise levels from airport operations.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the proposed Rezone sites, other sources of groundborne vibration include heavy-duty trucks on area roadways related to the existing urban uses throughout the City. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, construction activity would be required to comply with Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed General Plan would be subject to the City's noise ordinance.

4.4.8 Population and Housing

Population

The California Department of Finance (DOF) estimates that the City of Redlands population is 72,696, representing approximately 3.3 percent of the County's total population (DOF, 2024). The Southern California Association of Governments (SCAG) estimates that the City will have a population increase of 18.0 percent between 2019 and 2050, and the County will have population growth rate of over 20.6 percent over the same period. Table 5.8-2, in Section 5.8, *Population and Housing*, provides population figures for the City of Redlands and the County in 2019, and SCAG projections for year 2050.

Housing and Households

The DOF estimates that there were 28,139 housing units in Redlands in 2023, which is 3.7 percent of the County total. The City's housing stock is about 64 percent single-family residential and is estimated to be 94.9 percent occupied. The DOF estimated persons per household is 2.62 (DOF, 2024).

According to SCAG's Connect SoCal 2024-2050 RTP/SCS, the City of Redlands is projected to add approximately 5,600 households by 2050. This averages approximately 224 new households annually through 2050(SCAG, 2024).

Employment

According to SCAG's 2024-2050 RTP/SCS, the number of jobs within the City is projected to increase from 49,400 jobs in 2019 to 60,100 jobs in 2050. This represents an increase of over 21 percent, and an average of 345 jobs annually through the year 2050.

The SCAG 2019 Local Profile for Redlands identifies that 22.5 percent of Redlands residents work and live in the City, while 77.5 percent commute to other places. Of the commuters residing in Redlands, the largest percentage commute to the City of San Bernardino (15.3 percent), Loma Linda (7.5 percent), Riverside (5.6 percent), and Los Angeles (3.8 percent) (SCAG, 2019).

Jobs – Housing Balance

The SCAG considers an area balanced when the jobs-housing ratio is 1.36; communities with more than 1.36 jobs per dwelling unit are considered "jobs rich," meaning that more employment opportunities are provided than housing in the area, and those with fewer than 1.36 are "housing rich," meaning that more housing is provided than employment opportunities in the area (SCAG, 2004).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the generation of 2,263 jobs and 294 residents according to the General Plan EIR growth induction rate shown on Table 2.3-6 (City of Redlands, 2008).

4.4.9 Public Services

Redlands Fire Department

The Redlands Fire Department (RFD) provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response to the city of Redlands including the Project area.

According to the Redlands General Plan EIR, the RFD recognizes two response time standards. The first is from the National Fire Protection Association (NFPA), which recommends that the first unit arrive within four minutes 90 percent of the time. The second is a more lenient goal of arriving within seven minutes 90 percent of the time, as recommended by the 2008 High-Level Fire Department Review for the RFD. According to the City of Redlands, the current 90 percent response time is eight and a half minutes, which is over twice the NFPA standard and one and a half minutes slower than the more lenient guideline. In 2023, the RFD received 14,757 calls for service and had 71,776 residents, which results in 0.21 calls per resident (California Department of Finance, 2024).

The Project area would be served by four fire stations as shown in Table 5.9-1 and on Figure 5.9-1 in Section 5.9, *Public Services*. The City currently has plans to relocate Station 264 based on the annual increase in calls for service and location of service needed. RFD is also in the beginning stages of a planned capital improvement project that would include the construction of two new fire stations within the City. The specifications and locations of those stations are not known at this time (Appendix I).

Redlands Police Department

Public safety services in the City, including the Rezone sites, are provided by the Redlands Police Department (RPD). RPD's main police station is located at 1270 West Park Avenue within the boundaries of the New

York Street/Esri Transit Village. The Police Department personnel is made up of approximately 46 sworn officers and five full and part-time civilians, resulting in a service level of 0.54 officers per 1,000 residents. Based on existing staffing levels, RPD estimates response times to Sites 1 through 16A and 24 are 13 minutes and 47 seconds for Priority 1 police service calls and 9 minutes and 44 seconds for Priority 2 police service calls. The RPD estimates a response time of 11 minutes and 22 seconds for Priority 1 police service calls and 14 minutes and 21 seconds for Priority 2 police service calls for Sites 17 through 23 (Appendix I).

School Services

The City, including the Project site, is within the Redlands Unified School District (RUSD). The RUSD has 16 elementary school (grades K-5), four middle schools (grades 6-8), three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, home education leaning program, and a K-12 online academy (City of Redlands, 2017b). Current enrollment is approximately 19,773 students (RUSD, n.d., a).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. As discussed in Section 5.8, *Population and Housing*, this would result in the generation of 2,263 employees and 294 new residences in the City. Similar to the proposed Project, implementing projects of the General Plan would be required to pay Development Impacts Fees which would go towards the maintenance and expansion of service facilities such as police and fire stations to ensure that acceptable levels of service are met.

4.4.10 Transportation

Existing Roadways

Table 5.10-1, *Existing Major Roadway Characteristics Within the Project Area*, shows the roadway characteristics that are observed within the Project area. Roadways within the Project area include:

- Citrus Avenue – Collector
- Nevada Street – Minor Arterial
- Orange Avenue – Collector
- Iowa Street – Collector
- Alabama Street – Major Arterial
- Orange Street – Minor Arterial
- Texas Street – Minor Arterial
- New York Street – Collector
- Pennsylvania Avenue – Collector
- Lugonia Avenue – Major/Minor Arterial
- San Bernardino Avenue – Major/Minor Arterial

Existing Transit Service

The Project area is served by bus service via Omnitrans, which serves the San Bernardino Valley. Omnitrans Route 8 connects San Bernardino and Yucaipa via Loma Linda, Redlands, and Mentone, including the Project area, with buses running every 60 minutes Monday through Sunday, and has stops along Redlands Boulevard and Lugonia Avenue. Omnitrans Route 15 serves the cities of Fontana and Redlands (including the Project area) via San Bernardino and Rialto, with buses running every 60 minutes Monday through Sunday, and has

stops along Orange Street, Redlands Boulevard, and Eureka Street. Omnitrans Route 19 provides service between Fontana, the San Bernardino Transit Center, and Yucaipa. Route 19 has stops at the Redlands Mall and has buses running every 60 minutes, Monday through Sunday.

Furthermore, the San Bernardino County Transportation Authority's (SBCTA) Arrow line connects the city of Redlands to the city of San Bernardino and provides further direct rail trips once a day to the city of Los Angeles.

During morning and afternoon peak commute hours, trains operate every 30 minutes. During non-commute or off-peak hours, trains operate every 60 minutes. Services start at 5 a.m. and run until 10 p.m. In addition to standard passenger rail service, the Metrolink Express train will be extended to serve the Redlands – Downtown Station with limited stop service to and from Los Angeles during peak commute hours.

Existing Bicycle and Pedestrian Facilities

Within the Project site area, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue contain bicycle lanes. The Orange Blossom Trail, a paved walking and cycling path, is located approximately 150 feet north of Site-16 along the northern edge of the drainage channel just north of Citrus Avenue.

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Buildout based on existing General Plan land use designations would result in 45,792 trips.

4.4.11 Tribal Cultural Resources

Native American Tribes

The Project site is within a region where the traditional use territories of the Serrano, Cahuilla, and Gabrielino meet. These three cultural groups spoke languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock.

Serrano

The Serrano people once occupied the Mountain, North Desert, and East Desert Regions of present-day San Bernardino County. Mainly due to the inland territory that the Serrano occupied beyond Cajon Pass, contact between Serrano and Europeans was minimal. As early as 1790, some Serrano people were drawn into mission life. After a failed attack of the Mission San Gabriel in 1811, some Serrano people relocated to Morongo with the Cahuilla tribe. Others followed the Serrano leader Santos Manuel toward the San Bernardino County valley floors and eventually settled to become the San Manuel Band of Mission Indians Reservation.

Cahuilla

The eastern portion of the Valley Region, the southeastern part of the Mountain Region, and the southern portion of the East Desert Region of San Bernardino County were once home to the Cahuilla people. It is

thought that the Cahuilla migrated to southern California approximately 2,000 to 3,000 years ago with related sociolinguistic groups, most likely from the southern Sierra Nevada Mountain ranges. The Cahuilla settled in a territory that extended from the present-day city of Riverside to the central portion of the Salton Sea in the Colorado Desert, and from the San Jacinto Valley to the San Bernardino Mountains.

Gabrielino

The Gabrielino historically occupied the southwestern portion of San Bernardino County, including the Valley Region. The name Gabrielino denotes the people who were under the control of the Spanish from Mission San Gabriel, which included people from the Gabrielino proper as well as other social groups. Many contemporary Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and use the native term Tongva. Historic-era Tongva settlements in the San Bernardino Valley were primarily located at the base of the foothills and along perennial watercourses.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried tribal cultural resources.

4.4.12 Utilities and Service Systems

Water Supply

The Project site is located within the water service area of the City of Redlands Municipal Utilities and Engineering Department (MUED), which provides retail water service to the majority of the City of Redlands, a portion of the City of Loma Linda, and unincorporated areas of the Donut Hole (an area in unincorporated San Bernardino County surrounded by Redlands), Mentone, and most of Crafton.

The City of Redlands participates in the Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (IRUWMP). The IRUWMP is a tool that provides a summary of anticipated supplies and demands for the years 2020 to 2045 within the Valley Region of San Bernardino County, including various incorporated cities such as the City of Redlands.

Supply and Demand – MUED

The MUED utilizes four primary sources for drinking water supply: groundwater, surface water, imported water, and recycled water. The MUED's water supply is a combination of groundwater from the Bunker Hill Subbasin; groundwater from the Yucaipa Subbasin; surface water from the Santa Ana River; surface water from Mill Creek; imported water from the State Water Project (SWP); and recycled water. As shown on Table 5.12-1 in Section 5.12, *Utilities and Service Systems*, in 2020 the MUED obtained the majority of its water supply from the Bunker Hill Subbasin.

As shown in Table 5.12-2, the 2020 IRUWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of surface water, groundwater, and purchased or imported water. The 2020 IRUWMP anticipates that the MUED's water supply will increase from 31,039 AF in 2025 to 35,544 AF in 2045 (increase of 4,505 AFY) to meet MUED's anticipated growth in water demands.

The 2035 projections anticipate that 60.2 percent of supply would be from the groundwater sources, 31.4 percent from surface water, 2.0 percent from imported/purchased sources, and 6.3 percent from recycled water. The IRUWMP also describes that there has been a historical trend associated with drier years and an increase in water use among agencies. Conservation efforts have proven to be effective in decreasing water use in dry years. Additionally, according to the IRUWMP, MUED has adequate supplies to serve 100 percent of its customers during normal, dry year, and multiple dry year demand through 2045 with projected population increases and accompanying increases in water demand (San Bernardino Valley Water Conservation District, 2021).

Groundwater

The Redlands MUED extracts groundwater from the Bunker Hill Subbasin (also known as San Bernardino Basin or SBB) and Yucaipa Subbasin. Extractions from both basins include potable and non-potable water. In 2020, Redlands MUED extracted 13,619 AF of groundwater from the Bunker Hill Subbasin and 297 AF from the Yucaipa Subbasin. The City of Redlands uses 15 wells that pump directly into the system or into reservoirs (San Bernardino Valley Water Conservation District, 2021).

Purchased or Imported Water

Imported water from the SWP is available for the MUED to purchase when needed. The MUED has purchased supplemental water from the SWP only in years when surface water flows have not been able to meet demands and on occasion when surface water supplies are turbid and require blending or for other operational purposes. The MUED contributes to regional efforts to recharge the Bunker Hill groundwater basin with SWP water and local surface water in wet years when available so that storage is available for use in dry years when other supplies may be limited (San Bernardino Valley Water Conservation District, 2021).

Surface Water

The MUED receives water from the Mill Creek watershed and the Santa Ana River watershed. Water from the Mill Creek watershed is treated at Henry Tate Surface Water Treatment Plant. Water from the Santa Ana River watershed is treated at the Horace P. Hinckley Surface Water Treatment Plant. The MUED has ownership in a variety of private and mutual water companies to supply water to the City's Tate and Hinckley Surface Water Treatment Plants (San Bernardino Valley Water Conservation District, 2021).

Recycled Water

The City's Wastewater Treatment Plant has the capability of treating 7.2 million gallons per day (mgd) of wastewater to a Title 22 Recycled Water level. The City's recycled water customers include SCE, a landfill, and recycled/non-potable water customers. SCE uses recycled water for its Mountain View Power Plant and recycled water customers use recycled water for irrigation (San Bernardino Valley Water Conservation District, 2021).

Water Infrastructure

The City's water treatment plants include the Henry Tate Water Treatment Plant and the Horace Hinckley Surface Water Treatment Plant. The Henry Tate Water Treatment Plant is a conventional water treatment plant built in 1967. These facilities treat surface water and groundwater to meet drinking water standards. The design capacity of the Tate plant is 20 million gallons per day (mgd). The City added enhancements to the Tate WTP to provide more water supply reliability by allowing State Water Project water to be mixed with Mill Creek water for treatment. The Horace Hinckley Surface Water Treatment Plant started operation in 1987 and has a permitted capacity of 14.5 mgd. The 10-year average flow (up to and including 2016)

is 6,363 AF at the Henry Tate Plant, and 6,697 AF at the Horace Hinckley Plant. Roads adjacent to the Project site contain a network of water lines from 1 to 36-inches in diameter, which operate within capacity for existing development within the Project area. The City of Redlands maintains approximately 400 miles of pipeline with over 21,500 metered connections that serve potable water (City of Redlands, n.d.).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 square feet of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Fuscoe Engineering, Inc., 2024a).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Appendix G).

Wastewater

Sewer service throughout the Project sites are provided by the City of Redlands. The City's Wastewater Treatment Plant (WWTP) is located on the south side of the Santa Ana River Wash at Nevada Street. The City's WWTP has the capacity to treat up to 9.5 mgd. The City's WWTP includes two treatment systems: a membrane bioreactor with a capacity of 6.0 mgd for producing recycled water, and an activated sludge process with a capacity of 3.5 mgd. The plant's total permitted annual average flow is 9.5 mgd and has an average daily flow around 6 mgd (Fuscoe Engineering, Inc., 2024b).

In 2020, 6,620 AF of wastewater was treated at the City's WWTP. In 2020, 3,813 AF were treated to a secondary level and released to spreading basins east of the City's WWTP for percolation into the Bunker Hill groundwater basin, while 1,806 acre feet was treated to a tertiary level and distributed as recycled water (San Bernardino Valley Water Conservation District, 2021).

The wastewater system has one lift station that serves the western-most portion of the city south of Interstate 10 (I-10). The collections system in the City of Redlands consists of approximately 245 miles of pipelines. Wastewater pipelines range from 6-inches to 48-inches in diameter.

Approved General Plan Buildout Wastewater Generation

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Buildout of the Project area according to the current General Plan would have an annual wastewater generation of approximately 358 AFY (Appendix H).

Stormwater

The City of Redlands's stormwater drainage system serves an area of approximately 37 square miles. The Downtown stormwater drainage system is composed of reinforced concrete pipe (RCP) and corrugated metal pipe (CMP) with diameters ranging from 8 inches to 96 inches, box culverts, covered rubble rock and concrete channels, and concrete and natural drains. Stormwater runoff from the City's drainage systems flows by

gravity into the Mission Channel, Morrey Arroyo Creek, and San Timoteo Canyon, and discharges to the Santa Ana River (City of Redlands, 2017b).

Drainage throughout the City is generally from east to west to one of two main existing major stormwater drainage facilities. The city is divided into five main watersheds: Mission Zanja, Reservoir Canyon, Downtown, North Redlands along the Santa Ana River, and South Redlands along the San Timoteo Channel. Sites 1-16A and 24 are located within the South City subwatershed and Sites 17-23 are located within the North City subwatershed. The North City area contains both open channel and subsurface storm drain facilities. The facilities located within the North City generally drain to the Santa Ana River. South City contains both open channel and subsurface storm drain facilities. The facilities generally drain to Mission Creek, south of Citrus Avenue/West State Street.

Approved General Plan Buildout Stormwater Drainage

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Similar to the proposed Project, buildout of the approved General Plan would result in an increase in impervious surface area. Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the General Plan. Implementation of development projects pursuant to the General Plan would increase the intensity of development within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system.

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5. Environmental Impact Analysis

This section focuses on evaluating the potential for significant environmental effects from the proposed Project, which is described in Section 3.0, *Project Description*. This section describes the existing physical environmental setting (also referred to as the "baseline") for each environmental topic, and the impacts that would result from implementation of proposed Project. Existing federal, State, and local regulations would shape how the proposed Project is implemented, and provide requirements for avoiding and reducing environmental impacts. Thus, a discussion of relevant regulations, plans, programs, and policies pertinent to each environmental issue addressed in each environmental topic section is provided. Additionally, as necessary, feasible mitigation measures are identified to reduce the significant impacts of the proposed Project.

As described in Section 2.0, *Introduction*, the City of Redlands (City) General Plan 2035 was adopted in December 2017, and the General Plan EIR was certified in July 2017 (State Clearinghouse Number 2016081041). The General Plan EIR included standard regulations and General Plan policies that apply to development projects within the City.

ENVIRONMENTAL TOPICS

The subsections in this chapter analyze the following environmental topics:

5.1 Agricultural Resources
5.2 Air Quality
5.3 Cultural Resources
5.4 Energy
5.5 Greenhouse Gas Emissions
5.6 Land Use and Planning
5.7 Noise
5.8 Population and Housing
5.9 Public Services
5.10 Transportation
5.11 Tribal Cultural Resources
5.12 Utilities and Service Systems
5.13 Mandatory Findings of Significance

This Programmatic Subsequent EIR evaluates the impacts resulting from buildout pursuant to the proposed Project, as compared to buildout of the General Plan 2035. Under CEQA, EIRs are intended to focus their discussion on significant environmental impacts of a project on the environment and may limit discussion of other impacts to a brief explanation of why the impacts are not significant. The Initial Study and Notice of Preparation (IS/NOP) that was prepared for the proposed Project (included as Appendix A) and the responses received were used to help determine the scope of the environmental issues to be addressed in this Subsequent EIR. Consistent with CEQA Guidelines Section 15128, issues considered potentially significant in the Initial Study are addressed in this Subsequent EIR.

Issues areas that would not be potentially impacted by the proposed Project or where mitigation measures included in the Initial Study would reduce impacts to a less-than-significant level (this includes aesthetics, biological resources, geology & soils, hazards & hazardous materials, hydrology & water quality, mineral resources, recreation, and wildfire), are not addressed beyond the discussion contained in Section 2.4, *Subsequent EIR Scope and Content*, and Section 5.13, *Mandatory Findings of Significance*.

FORMAT OF ENVIRONMENTAL TOPIC SECTIONS

Each environmental topic section generally includes the following main subsections:

- **Regulatory Setting:** This subsection describes applicable federal, State, and local plans, policies, and regulations that the proposed Project must address, and will shape its implementation.

- **Existing Conditions:** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance:** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are "significant."
- **Methodology:** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant or less than significant.
- **Environmental Impacts:** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
    - A statement of the CEQA threshold being analyzed.
    - The EIR's conclusion as to the significance of the impact.
    - An impact assessment that evaluates the changes to the physical environment that would result from proposed Project.
    - An identification of significance comparing identified impacts of the proposed Project to the significance threshold with implementation of any existing regulations, prior to implementation of any required mitigation.
    - A discussion of potential cumulative impacts that could occur from implementation of the proposed Project and other cumulative projects.
    - A list of any existing regulations that reduce potential impacts.
    - For each impact determined to be potentially significant, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
        - avoid a significant impact;
        - minimize the severity of a significant impact;
        - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
        - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the proposed Project; and/or
        - compensating for the impact by replacing or providing substitute resources or environmental conditions.
    - Actions to be taken to ensure effective implementation of required mitigation measures.

ENVIRONMENTAL SETTING/BASELINE

The environmental setting is normally the existing conditions at the time the CEQA analysis begins (CEQA Guidelines Section 15125). In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA's standards limiting the scope of subsequent environmental review. (State CEQA Guidelines §15162.) Once an EIR has been certified for a project (such as the General Plan 2035 EIR), the baseline for analyzing proposed changes to that project is adjusted such that the originally approved project is assumed to exist. (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523, 542-543). Here, the previously approved project is buildout of the City of Redlands General Plan 2035 for the Project sites. Therefore, the baseline for analyzing the changes proposed by the RHNA Rezone is buildout of General Plan 2035.

The current (2024) physical setting of the Project site and adjacent lands remains largely the same as those that existed in 2017 when the General Plan EIR was certified. CEQA Guidelines Section 15125 states that "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The

environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives."

The CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). In some instances, information is presented in the environmental setting that differs from the precise time of the NOP. This information is considered representative of baseline conditions. Furthermore, environmental conditions may vary from year to year, and in some cases, it is necessary to consider conditions over a range of time periods. The intent of this Draft Subsequent EIR is to provide a conservative analysis that identifies the reasonable maximum potential impact. Thus, this Draft Subsequent EIR provides both conditions from buildout pursuant to the General Plan and current conditions for certain topics, such as the 2021-2023 ambient air quality conditions provided in Section 5.2, *Air Quality*. Although the Subsequent EIR describes current conditions for certain topics, the applicable baseline for the Project is buildout pursuant to the existing General Plan designations.

The NOP prepared for the proposed Project was distributed on July 1, 2024, for a 30-day public review and comment period that ended on July 31, 2024. The baseline conditions relevant to the environmental issues being analyzed are described within Section 4.0, *Environmental Setting*, and within each subsection of this section.

THRESHOLDS OF SIGNIFICANCE/SIGNIFICANCE CRITERIA

CEQA Guidelines Section 15382 defines a significant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The "Thresholds of Significance" subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this Subsequent EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be "significant" (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a "significant" effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as "significant," depending on the nature of the area affected. The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.

IMPACT SIGNIFICANCE CLASSIFICATIONS

The following classifications are used throughout the impact analysis in this Subsequent EIR to describe the level of significance of environmental impacts:

- **Significant Impact:** A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself "shall not be considered a

significant effect on the environment … [but] may be considered in determining whether the physical change is significant." As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.

- **No Impact:** No adverse effect on the environment would occur, and mitigation measures are not required.
- **Less than Significant Impact:** The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **Less than Significant Impact with Mitigation Incorporated:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval and applicable plans, programs, and policies, when implemented, will reduce the significant impact to a less-than-significant level.
- **Significant and Unavoidable Impact:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures, standard conditions of approval, and applicable plans, programs, and policies would not reduce the impact to a less-than-significant level, and a significant and unavoidable impact would remain.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve a project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, that outweigh its significant unavoidable effects, and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(a)).

CUMULATIVE IMPACTS

Cumulative impacts refer to the combined effect of the proposed Project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed Project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts. According to Section 15355 of the CEQA Guidelines, 'cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a) The individual effects may be changes resulting from a single project or a number of separate projects.
b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Subsequent EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects.

Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all significant Project impacts that are evaluated within this Subsequent EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, population and housing, public services, transportation, and utilities and service systems relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal") developed by the Southern California Association of Governments (SCAG). The cumulative analyses for other environmental issues use the list of projects approach and identifies the list of past projects which have recently been constructed, present projects which have recently been approved and are under construction, and probable future projects that are under entitlement review that were known of at the time the NOP was published. As described previously, the cumulative project list is part of the environmental setting/baseline that includes past, present and probable future projects for which development applications were submitted to lead agencies prior to publishing of the NOP.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of noise, for which cumulative impacts are limited to the distance of sound travel. Thus, in assessing noise impacts, only development within and immediately adjacent to the Project sites would contribute to a cumulative increase in noise analyzed, whereas cumulative public service impacts are based upon all development within the area serviced. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic. Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by surrounding cities and the City of Redlands, and Figure 5-1 shows the locations.

Table 5-1: Cumulative Project List

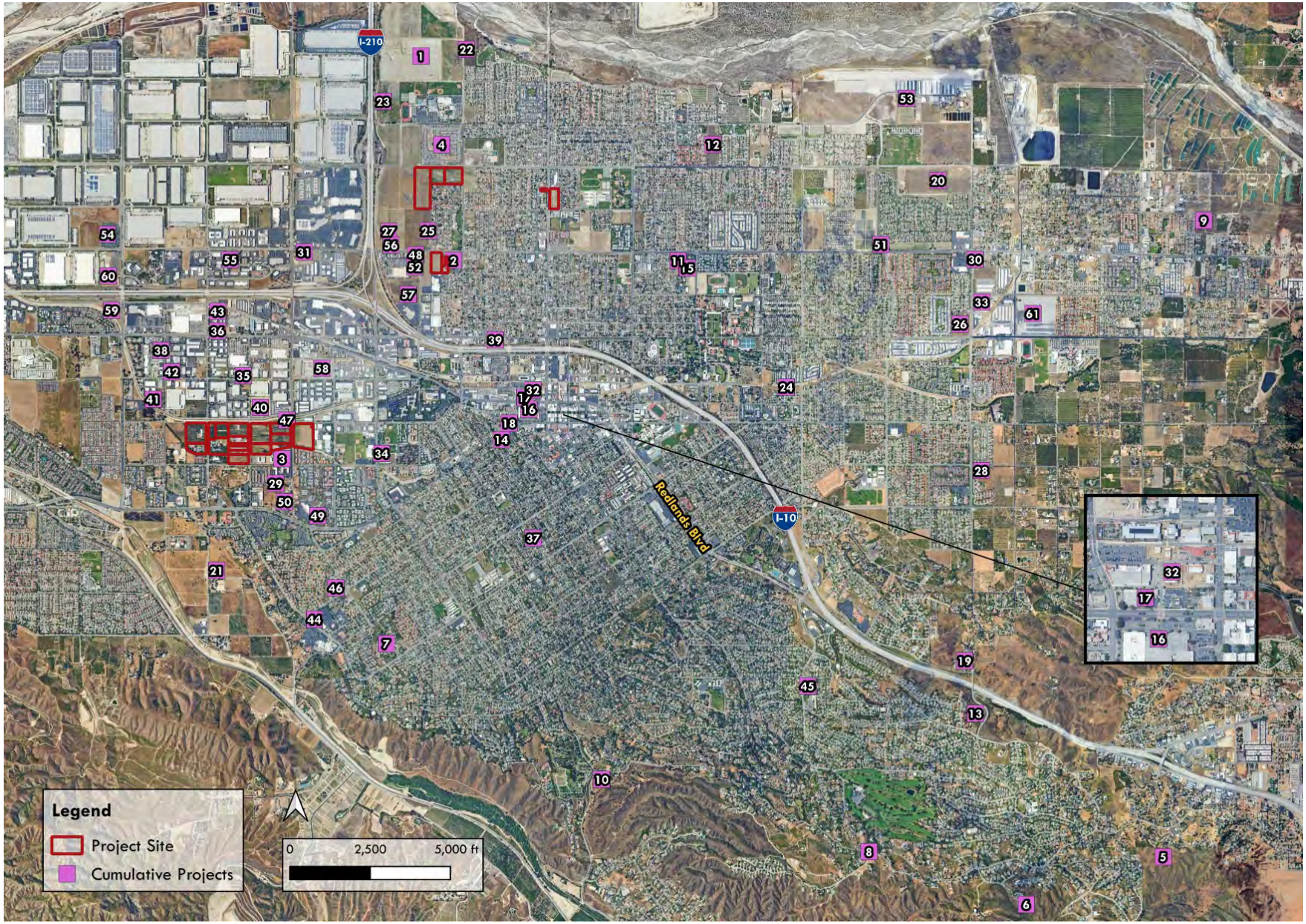
No.	Cumulative Project	Location/Address	Description	Project Status
City of Redlands				
1.	Bergamot Specific Plan, SP 64, TTM 20336	NEC Domestic Ave & SR 210	317 single-family residential units	Under Construction
2.	Liberty Lane Apartments, CUP 1045	SWC Lugonia Ave & Texas Street	80 multi-family residential units	Under Construction
3.	Luxview Apartments, CUP 1108, TTM 20244, SPA 45 & 46	1616 Orange Street	328 multi-family residential units	Completed

No.	Cumulative Project	Location/Address	Description	Project Status
4.	Heritage Specific Plan, TTM 20257, SP 62, GPA 141	NWC Texas St & W. San Bernardino Avenue	207 single-family residential units	Completed
5.	Tract 18845	South of Highview Ave, East of South Ln	24 single-family residences	Entitled
6.	Tract 17265	Live Oak Canyon	24 single-family residences	Entitled
7.	Tract 17675	Sunnyside Ave & Linda Vista Ave	11 single-family residences	Entitled
8.	Parcel Map 17548	Edgemont Dr & Sunset Dr	3 single-family residences	Entitled
9.	Tract 16402 (Annexation)	Madeira Ave	26 single-family residences	Entitled
10.	Tract 16816	Alessandro St, S of Sunset Dr	10 single-family residences	Entitled
11.	Tract 16287	Occidental Dr	12 single-family residences, 138 multi-family residences	Entitled
12.	Tract 18182	San Bernardino Ave, E of Church St	27 single-family residences	Entitled
13.	Tract 17080	Wabash Ave & Sunset Dr	8 single-family residences	Entitled
14.	Brookside Apartments, CRA 893	317 Brookside Ave	8 multi-family residences	Entitled
15.	Casa Loma Apartments, CUP 1096	1215 N. University St	147 multi-family residences	Entitled
16.	State Street Village, CUP 1155, CRA 933, TTM 20425	SWC Orange St & W. Redlands Blvd	700 multi-family residences, 71,778 SF of ground-floor retail, 12,328 SF of office space, amenity areas, community building, a 1,721 SF rooftop restaurant space with a rooftop deck, and a 14,500 SF drugstore	Entitled
17.	The Grand Apartments, CRA 911	120 W. Redlands Blvd	149 multi-family residences	Entitled
18.	City Center Mixed-Use, CUP 1138, VAR 809, LLA 645	212-216 Brookside Ave	131 multi-family residences, 23,476 SF of amenity space, 10,550 SF of restaurant space	Entitled
19.	TTM 20320, CUP 1148	Wabash Ave. north side I-10	67 single-family residences	Entitled
20.	TTM 20473, CUP 1163	SWC Wabash Ave & E. San Bernardino Ave	98 single-family residences	Entitled
21.	TTM 20402, ZC 468	NEC San Timoteo Canyon Rd & Nevada St	27 single-family residences	Entitled
22.	TTM 20520	Texas St, 500' N of Domestic Ave	35 single-family residences	Entitled
23.	TTM 20528, CRA 945, GPA 145, SPA 49 to EVCSP	1160 W. Pioneer Ave	117 single-family residences	Entitled

No.	Cumulative Project	Location/Address	Description	Project Status
24.	CUP 1169, ZC 472	Between Judson Ave & Grove St, N of E. Central Ave	108 senior apartments	Entitled
25.	Lugonia Village, GPA 143, ZC 469, SPA 48 to EVCSP, TTM 40490 & 40491, TPM 40469, CRAs 940, 941, 942	NEC Tennessee St & W. Lugonia Ave	90 single-family residences, 451 multi-family residences	Entitled
26.	Madera at Citrus Trail, TTM 20571, CRA 965, Specific Plan 66	NWC Wabash Ave & Colton Ave	103 single-family residences	Entitled
27.	CUP 1173, CRA 956, SPA 49 to EVCSP	NEC Tennessee St & W. Lugonia Ave	460 multi-family residences	In Planning
28.	TTM 20378, CUP 926, SPA to SP 54	SEC Wabash Ave & Highland Ave	120 low-income senior single-family residences	In Planning
29.	Luxview Phase 2, CRA 958	SWC Alabama St & Orange Ave	164 multi-family residences with affordable housing	Entitled
30.	Jack In The Box, CUP 1139	1248 N. Wabash Ave	3,000 SF fast food drive-thru	Completed
31.	In-N-Out, CUP 1170	SWC Lugonia Ave & 210 Freeway	3,887 SF fast food restaurant with drive-thru	Completed
32.	MOD Packinghouse, CRA 895	330 N. Third St	14,000 SF food hall	Under Construction
33.	CUP 1168	SEC Wabash Ave & Nice Ave	123,456 SF self-storage facility	Under Construction
34.	CRA 753	130 Tennessee St	1,200 SF school addition	Entitled
35.	CRA 907	1702 W. Park Ave	7,198 SF multi-tenant office/retail building	Entitled
36.	CRA 909	1820 W. Redlands Blvd	Two medical office buildings totaling 16,714 SF	Entitled
37.	CRA 918	606 North Place	12,224 SF senior care facility with 28 beds	Entitled
38.	CRA 921	New Jersey St & Essex Ct	5,588 SF medical/sleep clinic	Entitled
39.	Tru Hotel by Hilton, CRA 931	SEC W. Colton Ave & Columbia St	40,415 SF hotel with 90 rooms	Entitled
40.	CRA 938, CUP 1187	350 Iowa St	181,100 SF warehouse	Entitled
41.	CRA 943	10796 New Jersey St	28,500 SF manufacturing building	Entitled
42.	CRA 949	1980 W. Park Ave	48,079 SF light industrial building	Entitled
43.	CRA 950	1060 Nevada St	4,500 SF RV sales, service facility	Entitled
44.	CRA 968	245 Terracina Blvd	7,364 SF Redlands Community Hospital medical clinic	Entitled
45.	CUP 114, Rev. 3	1505 Ford St	4,300 SF education building at church	Entitled
46.	CUP 343, Rev. 1	168 Bellevue Ave	1,800 SF classroom building	Entitled
47.	CRA 952	Alabama St & W Citrus Ave	8,853 SF medical clinic	Entitled

No.	Cumulative Project	Location/Address	Description	Project Status
48.	CRA 963	SWC Lugonia Ave & New York St	16,027 SF grocery store	Entitled
49.	CUP 480, Rev. 1	1500 Barton Rd	4,052 SF retail & restaurant with drive-thru	Entitled
50.	CUP 606, Rev. No. 1	27240 Alabama St	2,960 SF classrooms, 9,270 SF multipurpose school addition	Entitled
51.	Holy Name of Jesus Church, CUP 1136	NWC E. Lugonia Ave & Dearborn St	60,207 SF new church & parish hall, 101,597 SF new elementary schools	Entitled
52.	CUP 1184 & 1185	SWC Lugonia Ave & New York St	Two fast food restaurants w/ drive-thrus totaling 6,020 SF	Entitled
53.	CRA 947, TTM 20635	1660 Sessums Dr	Six light industrial buildings totaling 263,328 SF	In Planning
54.	CRA 954, Amendment #6 to Concept Plan 1	1301 California St.	Phased development of a 948,000 sq. ft. medical campus including a seven-story hospital.	In Planning
55.	CRA 955	NEC Plum Ln & Idaho St	35,963 SF hotel with 54 rooms	In Planning
56.	CRA 959, CUP 1174, & 1175	NEC Lugonia Ave & Tennessee St	Two fast food restaurants with drive-throughs totaling 13,300 SF and 47,085 SF shopping center with four retail buildings	In Planning
57.	Carmax, CRA 962, CUP 1179, SPA 52 to EVCSP	New York St. at Brockton Ave.	4,958 SF used automobile sales building, 47,085 SF automobile repair	In Planning
58.	CRA 971	10616 Kansas St	38,564 SF Edison office building and 36,666 SF service garages and storage buildings	In Planning
59.	CUP 1200	913 California St	56,515 SF hotel with 90 guest rooms and 5,630 SF fast food restaurant w/ drive-thru and carwash	In Planning
60.	Planned Development No. 7	1101 California Street	357,610 sq. ft. warehouse on 16 acres	Under Construction
County of San Bernardino				
61.	Tract 18952 (In County/Sphere of Influence)	Colton Ave & Opal Ave	131 single-family residences	Entitled

Sources: City of Redlands Planning Division



RHNA Rezone Project
City of Redlands

Figure 5-1

Redlands Regular Meeting of 06-03-25

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656 of 1245

5.1 Agricultural Resources

5.1.1 Introduction

This section describes the agricultural resource conditions in the Project region and potential impacts from Project implementation. The analysis in this section is based, in part, on the following documents and resources:

- California Department of Conservation Farmland Mapping and Monitoring Program;
- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017;
- City of Redlands Municipal Code; and
- *Land Evaluation and Site Assessment Model for the Redlands RHNA Rezone Project (LESA Model)*, EPD Solutions, Inc. (Appendix B).

5.1.2 REGULATORY SETTING

5.1.2.1 State Regulations

Farmland Mapping and Monitoring Program

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of important farmland. It divides the State's farmland into different categories based on soil quality and existing agriculture, which are used to identify productive farmland and to analyze impacts on farmland. The various types of farmland identified by FMMP include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, farmland of local importance, and grazing land. The highest rated important farmland is Prime Farmland.

Land Evaluation and Site Assessment (LESA) Model

The California Agricultural Land Evaluation and Site Assessment (LESA) Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in the CEQA environmental process. The LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The Project score becomes the basis for making a determination of a project's potential significance.

5.1.2.2 Local Regulations

City of Redlands General Plan 2035

The City of Redlands General Plan contains the following policies related to agricultural resources that are applicable to the Project:

Distinctive City Element

Policy 2-P.8 Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.

Policy 2-P.21 Encourage conservation and preservation of citrus groves and farms, especially those that have cultural or scenic significance. Encourage retention of existing privately owned citrus groves of all sizes.

Livable Community Element

Policy 4-P.3 Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city.

Policy 4-P.23 Preserve agricultural land in the Planning Area and protect it from premature development.

Action 4-A.34 Preserve agricultural land and protect agricultural operations and soils by identifying and designating these lands as Agriculture.

Action 4-A.35 Preserve connections between agricultural lands with other agricultural lands and supporting uses, and discourage the isolation of agricultural parcels among nonagricultural uses.

Action 4-A.37 Ensure adequate buffers and transitions between agricultural land and non-agricultural development in order to reduce the potential for land use conflicts.

Vital Environment Element

Policy 6-P.11 Retain the maximum feasible amount of agricultural land for its contributions to the local economy, lifestyle, air quality, habitat value and sense of Redlands' heritage.

Action 6-A.23 Permit transfer of development rights (TDR) between agreeable owners to preserve agricultural land and citrus groves. Develop an agricultural land mitigation program to conserve agricultural land through agricultural conservation easements at a ratio of 1:1 or greater.

Action 6-A.25 Utilize State and non-profit funds for agricultural conservation easements with willing participants

Action 6-A.26 Ensure that new development adjacent to an agricultural use is compatible with the continuation of the use by requiring appropriate design criteria, such as site layout, landscaping, and buffer areas.

City of Redlands Municipal Code

Policy to Preserve and Foster Agriculture. City of Redlands Municipal Code Section 19.04.120 states that it is declared to be the policy of the City of Redlands to preserve and foster agriculture as a vital industry and a desirable open space use because of our high soil quality, favorable climate, low water costs and economic benefit to our community. It is further declared to be the policy of the city to retain, wherever feasible, agricultural lands in private ownership and to encourage and assist the maintenance and formation of locally owned farms. The City shall forthwith adopt such policies, ordinances and resolutions as may be necessary to achieve these goals, including, but not limited to, the following:

A. The City shall establish programs to encourage and assist owners in the replanting of dying groves and/or vacant agricultural land, for the installation of water conserving irrigation systems and/or for the protection of agricultural land from theft, vandalism and dumping. Total cost of this assistance shall be borne by those directly benefited;
B. Plan and implement programs wherever feasible in appropriate areas for recreational opportunities for biking, equestrian and hiking uses, consistent with farming needs, agricultural uses and wildlife protection;
C. Develop and implement public service and infrastructure standards compatible with and appropriate to agricultural and rural living purposes.

5.1.3 ENVIRONMENTAL SETTING

5.1.3.1 Agricultural Resources

Regional

Natural resources in San Bernardino County and the City of Redlands include agricultural and grazing lands. In 2017, the County had approximately 11,315 acres of Prime Farmland, 5,705 acres of Farmland of Statewide Importance, and 2,585 acres of Unique Farmland (San Bernardino County, 2020). In 2020, the County had approximately 9,805 acres of Prime Farmland, 5,304 acres of Farmland of Statewide Importance, and 2,575 acres of Unique Farmland (DOC, n.d.).

Local

The Redlands General Plan EIR describes that, as of 2014, there were approximately 745 acres of Prime Farmland, 142.9 acres of Farmland of State importance, and 249.3 acres of Unique Farmland within the City (City of Redlands, 2017b, pg. 3.2-2).

Project Site

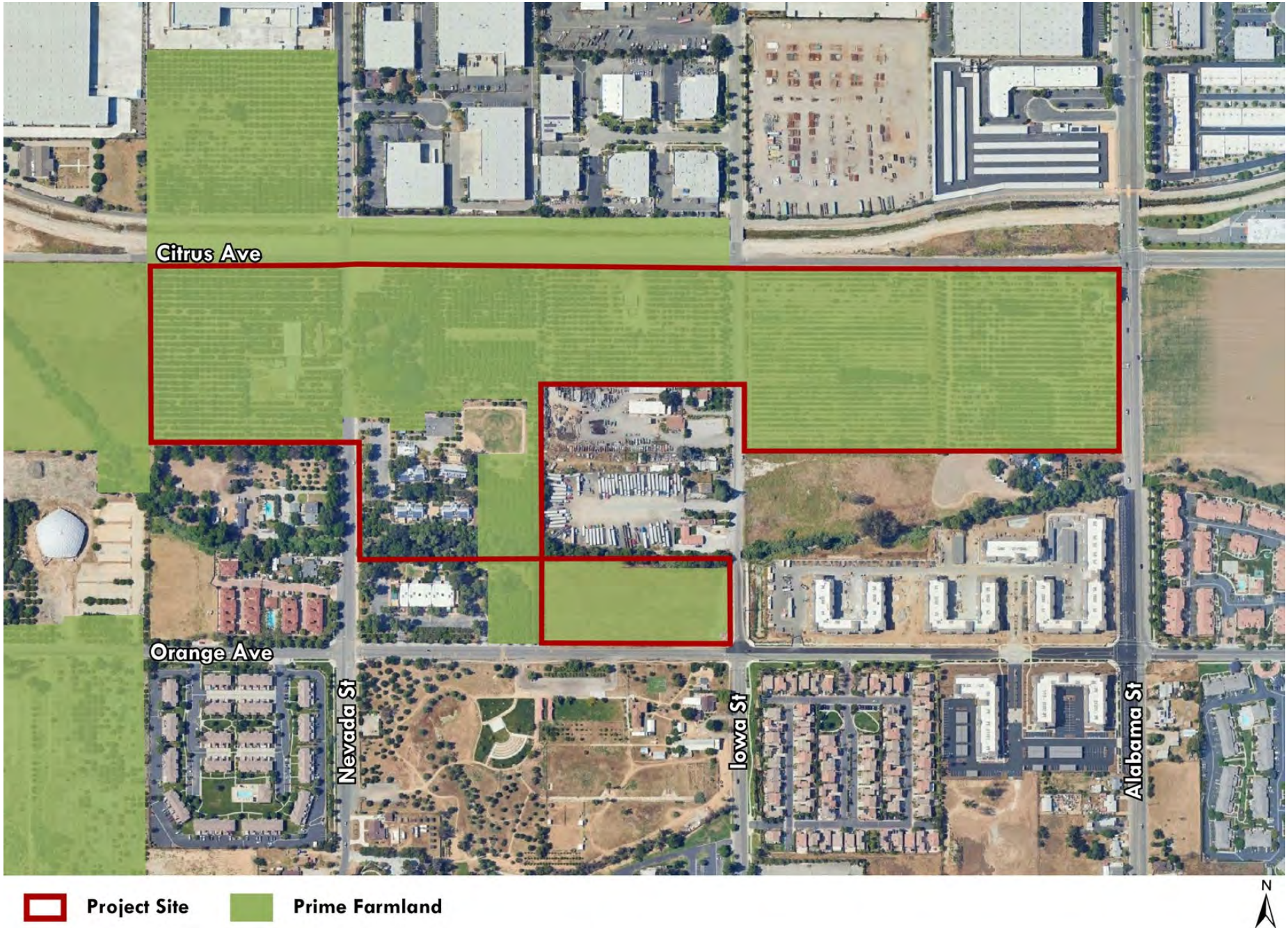
Portions of the Project site are currently utilized for agricultural production that includes orange groves (Sites 1, 3, 9, 10, 10A, 13, 14, 15, and 15A). The portions of the Project site that are currently utilized for agricultural purposes have an existing General Plan designation of Commercial/Industrial. As shown in Figure 5.1-1, approximately 44.67 acres of the Project site is designated as Prime Farmland. The relevant sites contain some small structures and have existing irrigation infrastructure throughout the sites that are used for the existing agricultural use.

Approved General Plan 2035 Buildout

The Project site is currently planned for either commercial/industrial or residential development. While Site 20 has a zoning designation of Agriculture (A-1), the site has a General Plan Land Use designation of Medium Density Residential (MDR). Thus, all of the parcels included in the proposed Project are planned for future development that would redevelop the existing farmland onsite.

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Farmland Designations



RHNA Rezone Project
City of Redlands

Figure 5.1-1

Redlands Regular Meeting of 06-03-25

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662 of 1245

5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

AG-1 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;

AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract;

AG-3 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));

AG-4 Result in the loss of forest land or conversion of forest land to non-forest use; or

AG-5 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.

The Initial Study, included in Appendix A, established that the Project would not result in impacts related to Thresholds AG-2, AG-3, and AG-4. No comments were provided regarding agriculture and forestry in the responses to the Notice of Preparation or the Draft Subsequent EIR scoping meeting. No further assessment of these potential impacts is required in this Draft Subsequent EIR.

5.1.5 METHODOLOGY

Agricultural resources were assessed based on the California Department of Conservation's FMMP, which is a biennial report and mapping resource on the conversion of farmland and grazing land, and the California Agricultural LESA Model, included as Appendix B. The analysis within the LESA model mirrors the steps outlined in the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual. The California Agricultural LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The Project score becomes the basis for making a determination of a project's potential significance. Using these sources, the proposed Project was analyzed for potential conversion of important Farmland, conflicts with zoning designations, and changes resulting from the proposed Project that could remove existing farmland from agricultural production.

5.1.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to agricultural resources in Chapter 3.2. Under the General Plan, approximately 200 acres of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland could be impacted by future development. The General Plan EIR projected that continued population growth and areas designated for residential, commercial, and industrial development would result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural land use (City of Redlands , 2017b, pg. 3.2-11). Despite proposed policies and existing State and local regulations that would make the loss of Prime, Important, or Unique Farmland less severe, the General Plan EIR identified the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Impact AG-1)

as a significant and unavoidable impact. The General Plan EIR discussed that the General Plan policies allow for agricultural uses throughout the City and aim to preserve agricultural land from fragmentation or isolation by directing development to infill sites in the urbanized part of the City and allowing for larger areas of low-density and agricultural uses in the periphery. Therefore, the General Plan EIR determined that impacts related to changes in the existing environment which, due to their location or nature, resulting in the conversion of farmland (Impact AG-5) would be less than significant (City of Redlands, 2017b, pg. 3.2-16).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings).

IMPACT AG-1: THE PROJECT WOULD CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND) AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE.

Significant and Unavoidable Impact. Sites 1, 3, 8, 9, 10, 13, 14, 15, 15A and 24 (50.13 acres) currently contain approximately 44.67 acres of Prime Farmland, as shown on the FMMP and in Figure 5.1-1. Sites 1, 3, 9, 10, 10A, 13, 14, 15 and 15A are all utilized for farming of orange groves. Project implementation would cause the conversion of 44.67 acres of farmland designated as Prime Farmland to non-agricultural uses and would result in a reduction in overall acreage of agricultural lands within the City. In order to assess potential impacts from implementation of the Project and future discontinuation of the existing agricultural uses should redevelopment occur on the aforementioned sites, an agricultural resource evaluation was prepared to determine the value of the land for agricultural production and is included as Appendix B. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. The LESA model only analyzed sites 1, 3, 8, 9, 10, 13, 14, 15 and 15A as they are the only parcels with Farmland present. Onsite soils consist entirely of 50.13 acres of Hanford coarse sandy loam (2 to 9 percent slopes) (Appendix B). The onsite soils are considered good-quality soil for agriculture according to the Department of Conservation FMMP (DOC, 2022). Furthermore, there are no physical barriers to water access onsite as the City of Redlands currently provides irrigation services to the site. Consequently, the site received a LESA score of 67.0 (Land Evaluation Score of 40.75 and a Site Assessment Score of 26.25) out of a 100-point scale. According to the LESA Model significance thresholds, sites receiving a score of between 60 and 70 points are considered significant unless either the Land Evaluation or Site Assessment weighted factor subscore is less than 20 points. Both the Land Evaluation and Site Assessment subscores exceed 20 points. Therefore, the Project's conversion of the site's Farmlands to non-agricultural uses is considered significant.

There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. Retention of onsite agricultural uses would be infeasible as it would prevent the development of future residential buildings, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources offsite would be

infeasible as creation of new farmland-status properties within the City is outside of the City and future applicants' control. Additional offsite mitigation would be infeasible as it would require the future applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as the Project parcels have no relationship to the loss of agricultural lands within the City or County. There is no available replacement acreage of lower quality farmland within the City or County that could be mitigated to Prime Farmland. Farmland within the City or County is either planned for future development of non-agricultural uses or already designated by the Department of Conservation as Unique Farmland, Farmland of Statewide Importance, or Prime Farmland. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per Department of Conservation requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the Department of Conservation as well as other climate factors such as rainfall. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Therefore, impacts would be significant and unavoidable, consistent with the findings of the General Plan EIR.

IMPACT AG-5: THE PROJECT WOULD INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE.

Significant and Unavoidable Impact. Project implementation would result in the conversion of Farmland onsite to non-agricultural use and could facilitate the conversion of existing Farmland within the vicinity to non-agricultural use. The Project's zone of influence pursuant to the LESA model includes land within a one-quarter mile radius of the Project site. Outside of the Project site, within the Project's zone of influence per the LESA model, approximately 126 acres are designated as Prime Farmland. Approximately 21.69 of those acres designated as Farmland are currently in agricultural production (Appendix B). While these lands are currently utilized for agricultural production, they are designated for future development by the City of Redlands General Plan with land use designations of Commercial/Industrial and Medium Density Residential (City of Redlands, 2017a).

Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas are zoned to be developed with urban uses other than for agricultural purposes as areas to the north, west, and east are currently zoned within the East Valley Corridor Specific Plan (EVCSP) Commercial Industrial (EV/IC) and areas to the south are also within the EVCSP zoned Multiple Family Residential-3000 (EV3000). There is the potential that the Project would influence the conversion of surrounding Farmland to non-agricultural use. As a result, the Project would indirectly cause changes in the environment that would convert other farmland to non-agricultural use. Therefore, impacts related to the conversion of farmland would be significant. As discussed under Impact AG-1, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the loss of Farmland and conversion of Farmland to non-agricultural use. Improving agricultural land elsewhere in the City or County would not be effective in mitigating the impact to the agricultural lands onsite, as they would still be removed. If the City were able to locate land that could be improved in order to meet the Prime Farmland designation per Department of Conservation requirements, there is no way to guarantee that any improvements would ultimately result in the change in classification, as that is determined by the Department of Conservation as well as other climate factors such as rainfall. Therefore, impacts would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to changes in the environment resulting in the conversion of farmland to non-agricultural uses would be less than significant.

5.1.7 CUMULATIVE IMPACTS

The cumulative study area for agricultural resources for this Draft Subsequent EIR is the County of San Bernardino as these resources are regularly assessed on the countywide level as part of the State's FMMP. Throughout the County, numerous development projects exist that would result in the additional conversion of agricultural land, including Prime Farmland and Farmland of Statewide Importance, to non-agricultural uses, such as the proposed Project. As discussed in Section 5.1.3.1, above, agricultural use in the County has declined over the last several decades as the result of urban expansion and economic conditions. Consequently, the County and incorporated cities within the County, such as the City of Redlands, have set forth goals and policies to protect agriculture within their individual General Plans. Notwithstanding, the County and incorporated cities within the County continue to plan for growth, including in the vicinity of the City of Redlands. Continued conversion of agricultural lands to urban uses would substantially reduce overall agricultural productivity in the City and the County. According to the City of Redlands General Plan EIR, approximately 200 acres of Prime, Important, or Unique Farmland could potentially be converted under buildout of the General Plan (City of Redlands, 2017b, pg. 3.2-11). The overall decrease in farmland within the City was identified as a significant cumulative impact in the General Plan EIR. Although the site is designated for non-agricultural uses by the General Plan, implementation of the Project would contribute to the reduction of agricultural uses and Farmland within the region and would cumulatively contribute to the loss of agricultural resources within the County. Although the proposed conversion is consistent with the projected decline in agricultural uses by the General Plan EIR, the Project would result in cumulatively considerable impacts to agricultural resources. Impacts would therefore be cumulatively significant and unavoidable.

5.1.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

City of Redlands Policy to Preserve and Foster Agriculture.

Plans, Programs, or Policies (PPPs)

None.

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

- Impact AG-1: Implementation of the Project would convert Farmland to non-agricultural uses.
- Impact AG-5: Implementation of the Project would involve other changes in the environment that could result in the conversion of Farmland to non-agricultural uses.

5.1.10 MITIGATION MEASURES

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland to non-agricultural use and the loss of Farmland.

5.1.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Farmland. As such, Impacts AG-1 and AG-5 would be significant and unavoidable.

5.1.12 REFERENCES

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5.2 Air Quality

5.2.1 INTRODUCTION

This section provides an overview of the existing air quality within the RHNA Rezone area and surrounding region, a summary of applicable regulations, and analyses of potential short-term and long-term air quality impacts from implementation of the proposed Project. Mitigation measures are recommended as necessary to reduce significant air quality impacts. This analysis is based on the following:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- City of Redlands Municipal Code; and
- *Regional Housing Needs Assessment Rezone Air Quality Impact Analysis,* Urban Crossroads, September 2024. Included as Appendix C.

5.2.2 REGULATORY SETTING

5.2.2.1 Federal Regulations

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990.

The CAA requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM_{10} and $PM_{2.5}$), and lead. Table 5.2-1 shows the NAAQS for these pollutants. The CAA also requires each state to prepare an air quality control plan, referred to as a State Implementation Plan (SIP). The CAA Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee state air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Table 5.2-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and nitrogen oxides (NOx) react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial/industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO_2)	1 hour	0.18 ppm	0.100 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm		
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.03 ppm		
Respirable Particulate Matter (PM_{10})	24 hours	50 µg/m^3	150 µg/m^3	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m^3	---		
Fine Particulate Matter ($PM_{2.5}$)	24 hours	---	35 µg/m^3	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3		
Lead (Pb)	30 Day Average	1.5 µg/m^3	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	*Present source:* lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m^3		
	Rolling 3-Month Average	---	0.15 µg/m^3		
Hydrogen Sulfide	1 hour	0.03 ppm	…	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal power plants, petroleum production and refining
Sulfates (SO_4)	24 hour	25 µg/m^3	…	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	…	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See $PM_{2.5}$.

ppm = parts per million; ppb = parts per billion; µg/m3 = micrograms per cubic meter.
Source: Appendix C

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAAA directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). The NESHAPs may differ for major sources than for area sources of HAPs. Major sources are defined as stationary sources with

potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards that were deemed necessary to address risks remaining after implementation of the technology-based NESHAP standards.

The CAAA also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

5.2.2.2 State Regulations

California Air Resources Board

Criteria Air Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, requires CARB to establish the California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. Applicable CAAQS are included in Table 5.2-1, above.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance by local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Toxic Air Contaminants

Air quality regulations also focus on toxic air contaminants (TACs). In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria air pollutants, for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Instead, the USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the MACT or best available control technology (BACT) for toxics and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807 [Chapter 1047, Statutes of 1983]) (Health and Safety Code Section 39650 et seq.) and the Air Toxics Hot

Spots Information and Assessment Act (Hot Spots Act) (AB 2588 [Chapter 1252, Statutes of 1987]) (Health and Safety Code Section 44300 et seq.). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted the USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), which provides guidance concerning land use compatibility with TAC sources. Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way. In addition, CARB has promulgated the following specific rules to limit TAC emissions:

- **CARB Rule 2485** (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **CARB Rule 2480** (13 CCR Chapter 10 Section 2480), Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **CARB Rule 2477** (13 CCR Section 2477 and Article 8), Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to develop fuel economy standards for the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce fuel use and emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy standards for model 2017-2025 vehicles, which are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; and
- Idling necessary to ensure safe operation of the vehicle.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24 Part 11: California Green Building Standards (CALGreen) was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective January 1, 2023.

The 2022 CALGreen standards that reduce air quality emissions and are applicable to the proposed Project include, but are not limited to, the following:

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).
    - New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
    - New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
    - Operations and maintenance instructions for the following:
        - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
        - Roof and yard drainage, including gutter and downspouts.
        - Space conditioning systems, including condensers and air filters.
        - Landscape irrigation systems.
        - Water reuse systems.

- Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
- Public transportation and/or carpool options available in the area.
- Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
- Information about water-conserving landscape and irrigation design and controllers which conserve water.
- Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
- Information about state solar energy and incentive programs available.
- A copy of all special inspection verifications required by the enforcing agency of this code.
- Information from CALFIRE on maintenance of defensible space around residential structures.

- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.
- Paints and coatings. Architectural paints and coatings shall comply with [volatile organic compound] VOC limits in Table 1 of the CARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its glass, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section
- 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled onsite until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed
    - 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed
    - 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

The 2022 CALGreen Building Standards Code has been adopted by the City of Redlands Municipal Code in Chapter 15.16.

5.2.2.3 Regional Regulations

South Coast Air Quality Management District

Criteria Air Pollutants

The South Coast Air Quality Management District (SCAQMD) attains and maintains air quality conditions in the South Coast Air Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of

rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the CAA, CAAA, and CCAA. Air quality plans applicable to the proposed Project are discussed below.

Air Quality Management Plan

The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and State CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin.

The 2012 AQMP was adopted by the SCAQMD Governing Board on December 12, 2012. The purpose of the 2012 AQMP for the Basin is to set forth a comprehensive and integrated program that will lead the region into compliance with the federal 24-hour $PM_{2.5}$ air quality standard, and to provide an update to the Basin's commitment towards meeting the federal 8-hour ozone standards. The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle miles traveled (VMT) emissions offset demonstration. The 2012 AQMP, as approved by CARB, serves as the official SIP submittal for the federal 2006 24-hour $PM_{2.5}$ standard. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The 2012 AQMP set forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, State, and federal.

In March 2017, the SCAQMD finalized the 2016 AQMP, which continues to evaluate integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including updated emission inventory methodologies for various source categories.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx [nitrogen oxides] technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. The SCAQMD proposes a total of 49 control measures for the 2022 AQMP, including control measures focused on widespread deployment of zero emission and low NOx technologies through a combination of regulatory approaches and incentives.

The RTP/SCS also provides a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and federal CAA requirements, preserve open space areas, improve public health and roadway safety, support vital goods movement industry, and use resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions.

SCAQMD Rules and Regulations

All projects within the South Coast Air Basin are subject to SCAQMD rules and regulations. Specific rules applicable to the proposed Project include the following:

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an offsite nuisance. Applicable Rule 403 dust suppression (and PM_{10} generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep onsite streets (and offsite streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

5.2.2.4 Local Regulations

City of Redlands 2035 General Plan

The General Plan Healthy Community Element contains the following policies related to air quality that are applicable to the Project:

Principle 7-P.44 Protect air quality within the city and support efforts for enhanced regional air quality.

Principle 7-P.49 Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.

Action 7-A.147 Cooperate with the ongoing efforts of the U.S. Environmental Protection Agency, the South Coast Air Quality Management District, and the State of California Air Resources Board in improving air quality in the regional air basin.

Action 7-A.149 Ensure that construction and grading projects minimize short-term impacts to air quality.

a. Require grading projects to provide a stormwater pollution prevention plan (SWPPP) in compliance with City requirements, which include standards for best management practices (BMPs) that control pollutants from dust generated by construction activities and those related to vehicle and equipment cleaning, fueling, and maintenance;

b. Require grading projects to undertake measures to minimize mono-nitrogen oxides (NOx) emissions from vehicle and equipment operations; and

c. Monitor all construction to ensure that proper steps are implemented

Action 7-A.152 Enforce regulations to prevent trucks from excessive idling in residential areas.

Action 7-A.153 Require applicants for sensitive land uses (e.g. residences, schools, daycare centers, playgrounds, and medical facilities) to site development and/or incorporate design features (e.g. pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) to minimize the potential impacts of air pollution on sensitive receptors.

Action 7-A.154 Require applicants for sensitive land uses within a Proposition 65 warning contour to conduct a health risk assessment and mitigate any health impacts to a less than significant level.

5.2.3 ENVIRONMENTAL SETTING

5.2.3.1 Climate and Meteorology

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the SCAQMD. The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

5.2.3.2 Criteria Air Pollutants

As described previously, the CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM_{10}), fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$), and lead. These pollutants are referred to as "criteria air pollutants" because they are the most prevalent air pollutants known to be injurious to human health. Extensive health-effects criteria documents regarding the effects of

these pollutants on human health and welfare have been prepared over the years.[1] Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal Clean Air Act (CAA). California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (CAAQS) and has adopted air quality standards for some pollutants for which there is no corresponding national standard (NAAQS), such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Ozone

Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air; but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NOx). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth ("rainout"), or absorption by water molecules in clouds that later fall to earth with rain ("washout").

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2. The combined emissions of NO and NO_2 are referred to as NOx, which are reported as equivalent NO_2. Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

[1] Additional sources of information on the health effects of criteria pollutants can be found at CARB and USEPA's websites at http://www.arb.ca.gov/research/health/health.htm and http://www.epa.gov/air/airpollutants.html, respectively.

Sulfur Dioxide

SO_2 is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfur trioxide (SO_3). Collectively, these pollutants are referred to as sulfur oxides (SOx).

Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO_2 aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. Long-term SO_2 exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter

PM_{10} and $PM_{2.5}$ consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM_{10} and $PM_{2.5}$ represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of $PM_{2.5}$ is diesel exhaust emissions.

PM_{10} consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO_2 and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM_{10} and $PM_{2.5}$ are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. $PM_{2.5}$ can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH_3), NOx, and SOx.

Lead

Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

5.2.3.3 Toxic Air Contaminants

Concentrations of TACs, or in federal parlance, HAPs, are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (diesel particulate matter, or DPM). DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other TACs, no ambient monitoring data are available for DPM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

5.2.3.4 CO Hotspots

An adverse CO concentration, known as a "hot spot" is an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as in attainment, and CO concentrations in the region have steadily declined (Appendix C).

5.2.3.5 Odorous Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. Although unpleasant, offensive odors rarely cause physical harm. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors.

5.2.3.6 Existing Conditions

The SCAQMD maintains monitoring stations within district boundaries, Source/Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The City is located within SRA 35, East San Bernardino. The East San Bernardino monitoring station reports air quality statistics for ozone and PM_{10}. The East San Bernardino Valley monitoring station does not provide information for CO, NO_2, and $PM_{2.5}$, as such, statistics were obtained from the Central San Bernardino 2 monitoring station. The most recent three years of data are shown in Table 5.2-2, which identifies the number of days ambient air quality standards were exceeded in the area. Additionally, data for SO_2 has been omitted as attainment is regularly met in the Basin and few monitoring stations measure SO_2 concentrations.

In 2023, the federal and State ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone at most monitoring locations. No areas of the Basin exceeded federal or State standards for NO_2, SO_2, CO, sulfates, or lead. See Table 5.2-3, for attainment designations of the Basin.

Table 5.2-2: Air Quality Monitoring Summary 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
Ozone				
Maximum Federal 1-Hour Concentration (ppm)		0.145	0.135	0.143
Maximum Federal 8-Hour Concentration (ppm)		0.119	0.109	0.118
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	74	63	54
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	118	106	83
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.0	1.7	1.6
Maximum Federal 8-Hour Concentration	> 20 ppm	1.6	1.4	1.2
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.053	0.056
Annual Federal Standard Design Value		0.015	0.016	0.014
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	44	50	49
Annual Federal Arithmetic Mean (µg/m^3)		23.2	22.0	21.3
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	0	0	0
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	57.9	40.1	25.4
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	11.9	11.26	10.16
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	1	2	0

ppm = Parts Per Million
µg/m3 = Microgram per Cubic Meter
Source: Appendix C

Both CARB and the USEPA use this type of monitoring data to designate areas with air quality problems and to initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

Table 5.2-3: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	--
Ozone – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment

Criteria Pollutant	State Designation	Federal Designation
SO_2	Attainment	Unclassifiable/Attainment
Pb_3	Attainment	Unclassifiable/Attainment

Source: Appendix C

The Project area consists of approximately 116.19 acres of land that is currently a mix of undeveloped or agricultural use properties, and sites developed with residences and industrial storage. Air quality emissions are currently generated by operation of these existing uses and the related vehicular trips.

5.2.3.7 Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Existing sensitive receptors within and in the vicinity of the RHNA rezone sites consist of existing residences and schools.

5.2.3.8 Approved General Plan 2035 Buildout

The operational emissions from buildout of the existing General Plan land use designations of the 24 rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NOx, CO, PM_{10}, and $PM_{2.5}$. This is consistent with the findings of the General Plan EIR.

5.2.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project could have a significant adverse effect on air quality resources if it would:

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan;

AQ-2 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;

AQ-3 Expose sensitive receptors to substantial pollutant concentrations; or

AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Initial Study established that the proposed Project would not result in impacts related to Threshold AQ-4; therefore, no further assessment of this impact is required in this EIR.

Regional Thresholds

The SCAQMD's most recent regional significance thresholds from April 2019 for regulated pollutants are listed in Table 5.2-4. The SCAQMD's CEQA air quality methodology provides that any projects that result in daily emissions that exceed any of the thresholds in Table 5.2-4 would be considered to have both an individually (project-level) and cumulatively significant air quality impact.

Table 5.2-4: SCAQMD Regional Air Quality Thresholds

Pollutant	Construction	Operations
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Source: Appendix C

Localized Significance Thresholds

SCAQMD developed localized significance thresholds (LSTs) to determine if emissions of NO_2, CO, PM_{10}, or $PM_{2.5}$ generated at a project site would expose sensitive receptors to substantial concentrations of criteria air pollutants. LSTs are the maximum emissions from a project's onsite activities that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. However, an LST analysis can only be conducted at a development project level, as LST thresholds are based on specific project site data points such as graded acres per day and distance to sensitive receptors, and quantification of LSTs is not applicable for this program-level environmental analysis. For informational purposes, Table 5.2-5 provides the LSTs for projects in the Basin.

Table 5.2-5: SCAQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO_2 Standard (CAAQS)	0.18 ppm
Annual NO_2 Standard (CAAQS)	0.03 ppm
24-Hour PM_{10} Standard – Construction (SCAQMD)	10.4 µg/m^3
24-Hour $PM_{2.5}$ Standard – Construction (SCAQMD)	10.4 µg/m^3
24-Hour PM_{10} Standard – Operation (SCAQMD)	2.5 µg/m^3
24-Hour $PM_{2.5}$ Standard – Operation (SCAQMD)	2.5 µg/m^3
Annual Average PM_{10} Standard (SCAQMD)	1.0 µg/m^3

Source: Appendix C

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm, which are the thresholds.

5.2.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project, based on comparison of the maximum development assumptions from buildout of the approved General Plan land uses and from buildout of the proposed Project, as outlined in Section 3.0*, Project Description*.

Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally, emissions would be generated from operations of the future residential and institutional uses and from traffic volumes generated by these new uses. The net change in emissions generated by these Project activities and other secondary sources have been quantitatively estimated and compared to those that would occur from buildout of the existing General Plan assumptions and to the applicable thresholds of significance recommended by the SCAQMD.

Although the Project would comply with all of the applicable SCAQMD requirements, it should be noted that emission reductions associated with Rules 402, 1301, 1401, and 2305 cannot be quantified in the California Emissions Estimator Model (CalEEMod) and are therefore not reflected in the emissions presented herein. Conversely, Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) can be modeled in CalEEMod. As such, credit for Rule 403 and Rule 1113 has been taken in the analysis.

AQMP Consistency

The SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed General Plan land use and zoning designation changes) would be consistent with the AQMP:

1. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.
2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecast and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities and counties located within the SCAG region. Therefore, if the level of housing or employment related to the proposed Project are consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP.

Consistency Criterion No. 2 refers to the CAAQS. An impact would occur if the long-term emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds for operation-phase emissions.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors, including mobile- and area-source emissions from the Project, were quantified using the CalEEMod computer model. Area-source emissions were modeled according to the size and type of the land uses proposed. Mass mobile-source emissions were modeled based on the increase in daily vehicle trips that would result from the proposed Project and those that would occur from buildout of the existing General Plan land uses. Predicted long-term operational emissions were compared and also evaluated against applicable SCAQMD thresholds for determination of significance.

To evaluate the approved General Plan buildout, operational emissions from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses were modeled on the Project sites' 116.19 acres. Buildout of the proposed Project would result in 2,436 multi-family dwelling units and 151,048.46 SF of Public/Institutional uses on the 116.19 acres.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels as well as implementation of control technology on industrial facilities, CO concentrations in the Basin and the state have steadily declined. The analysis of CO hotspots compares the volume of traffic that has the potential to generate a CO hotspot and the volume of traffic generated by the proposed Project to determine if the project would exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm.Environmental Impacts

Summary of Impacts Identified in the General Plan EIR

Air Quality Plan. The General Plan EIR describes that the emissions generated by development projects in addition to existing sources within the City are not considered to cumulatively contribute to the nonattainment designations of the Basin. Buildout of the proposed General Plan would not contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout of the proposed General Plan would not result in a significant air quality impact (City of Redlands, 2017b, p. 3.3-18).

The General Plan EIR describes that individual projects pursuant to the General Plan would be required to undergo subsequent environmental review pursuant to CEQA, and as part of this review effort, projects requiring discretionary approval would be required to demonstrate compliance with the AQMP. Individual projects would also be required to demonstrate compliance with SCAQMD rules and regulations governing air quality, specifically particulate matter. The General Plan EIR also describes that the General Plan principles and actions would help to reduce potential impacts related to conflicts with an applicable air quality plan, and that the General Plan would not conflict with or obstruct the implementation of the applicable air quality plan. Impacts would be less than significant (City of Redlands, 2017b, p. 3.3-20).

Construction. The General Plan EIR describes that it is not possible to determine whether the scale and phasing of individual projects would exceed the SCAQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and the CARB's Airborne Toxic Control Measures), mitigation imposed at the project level may include extension of construction schedules and/or use of special equipment. Existing City policies and regulations and proposed General Plan principles and actions are intended to minimize impacts associated with non-attainment criteria pollutants. While these regulations and policies would reduce impacts associated with construction activities, there is no guarantee emissions would be mitigated below SCAQMD thresholds. Therefore, construction air quality impacts were determined to be significant and unavoidable (City of Redlands, 2017b, p. 3.3-25).

Operation. The General Plan EIR describes that operational emissions from buildout of the General Plan, would exceed the SCAQMD's significance threshold for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$; therefore, impacts would be significant. The General Plan EIR details that buildout of the General Plan would be required to comply with the AQMP, SIP, CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and the proposed General Plan principles and actions; however, there is no guarantee that emissions would be mitigated below SCAQMD thresholds. Therefore, the General Plan EIR determined that operational impacts would remain significant and unavoidable (City of Redlands, 2017b, p. 3.3-26).

Sensitive Receptors. The General Plan EIR describes that construction related to implementation of the proposed General Plan is not anticipated to result in a long-term exposure of sensitive receptors to substantial concentration of TACs. Impacts would be less than significant. The General Plan EIR also describes that buildout of the General Plan could allow residential and other sensitive land uses to locate in the vicinity of air pollutant sources such as stationary sources and freeways. Policies in the proposed General Plan would serve to protect new sensitive receptors from exposure to substantial pollutant concentrations. Proposed policies would require applicants for sensitive land uses to minimize the potential for air pollution exposure through siting and design. Proposed policies also would require the development of requirements for retrofitting existing residential buildings within a 500-foot buffer along the freeway to abate air pollution and limit new residential developments within the buffer. The SCAQMD permitting process for new emissions sources and existing sources in the vicinity of new sensitive developments would further help to ensure that substantial exposure to air pollutants would be avoided. Thus, the General Plan EIR determined that impacts to sensitive receptors from operation of the General Plan land uses would be less than significant (City of Redlands, 2017b, p. 3.3-29).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). As detailed in Section 5.10, *Transportation,* the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

IMPACT AQ-1: THE PROJECT WOULD CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF AN APPLICABLE AIR QUALITY PLAN.

Significant and Unavoidable Impact. The SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project area. Pursuant to Consistency Criterion No. 1, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

As detailed in Section 5.8, *Population and Housing*, buildout of the proposed Project would allow development of 2,436 residential units and 151,048.46 square feet of public/institutional development, representing a population of approximately 6,456 persons and 550 employees at buildout and full

occupancy (maximum impact condition). This would result in an increase of 6,162 residents and a reduction of 1,713 employees compared to the buildout of the area pursuant to the City's General Plan.

Development pursuant to the proposed Project would consist mostly of projects that are market and need dependent. Because the employment generating areas in the Project area are existing, the 550 jobs expected from buildout of the Project are included in the SCAG projections. The SCAG 2020 RTP/SCS projections for the City of Redlands anticipate a 32.2 percent increase in employment in the City between 2016 and 2045 (an increase of 13,700 jobs). The 550 jobs that are anticipated to occur within the Project area would be approximately 4 percent of the anticipated job growth, and within the growth assumptions of the 2020 SCAG AQMP. The SCAG 2024 RTP/SCS projections for the City show a 21.7 percent increase in employment in the City between 2019 and 2050 (an increase of 10,700 jobs). The 550 jobs that are anticipated to occur within the Project area would be approximately 5.1 percent of the anticipated job growth, and within the growth assumptions of the 2024 SCAG RTP/SCS.

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

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations: as described previously, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds for operation-phase emissions. As detailed below under Impact AQ-2, although the proposed Project would result in decreased emissions in comparison to those occurring under buildout of the existing General Plan land uses, the Project would continue to result in regional operational-source emissions that would exceed the thresholds of significance for CO, VOCs, and NO_X emissions after implementation of regulatory requirements and Mitigation Measures AQ-1 and AQ-2. Therefore, the Project would result in an increase in the frequency or severity of existing air quality violations and contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. As a result, the proposed Project would result in an impact related to Consistency Criterion No. 2.

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

IMPACT AQ-2: THE PROJECT WOULD RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF A CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD.

Construction

Significant and Unavoidable. Construction activities associated with buildout of the Project would result in emissions of CO, VOCs, NOx, SOx, PM_{10}, and $PM_{2.5}$. Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, grading, and excavation; (2) construction workers traveling to and from the construction area; (3) delivery and hauling of construction supplies to, and debris from, the construction area; (4) fuel combustion by onsite construction equipment; and (5) building construction; application of architectural coatings; and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

As described previously, the timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically over a 10-year period or longer. Because of the uncertainty of the specific timing and methods of construction activities for future site-specific development projects that would occur pursuant to the proposed Project, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process, per CEQA Guidelines Section 15145. Due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours, etc.), it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant air quality impact. Conversely, implementation of the Project has a potential to result in a significant and unavoidable impact with respect to construction activity associated with future development projects particularly if multiple construction projects overlap for emissions of CO, VOCs, NO_x, SO_x, PM_{10}, and $PM_{2.5}$. Thus, Mitigation Measure AQ-1 has been included to require that future projects prepare a technical assessment of potential air quality impacts from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. However, it is possible that emissions from future construction projects could exceed thresholds with implementation of feasible mitigation. Therefore, impacts related to construction air quality would be significant and unavoidable after implementation of mitigation. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to construction emissions would be significant and unavoidable.

Operation

Significant and Unavoidable. Consistent with the existing General Plan land use and zoning of the Project site, development pursuant to the proposed Project would consist of projects that are market and need dependent. Both buildout of the existing land use and zoning designations would generate long-term emissions of criteria air pollutants from area sources generated by vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products, which are typical of residential, commercial/industrial, and office uses.

The operational emissions from buildout of the existing General Plan land use designations of the 24 Rezone sites with 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings are shown in Table 5.2-6, which identifies that emissions would exceed the SCAQMD numerical thresholds of significance for emissions of VOCs, NOx, CO, PM_{10}, and $PM_{2.5}$. This is consistent with the findings of the General Plan EIR.

Table 5.2-6: Existing General Plan Buildout Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	221.10	201.66	1,439.33	3.32	258.06	67.62
Area Source	72.21	2.71	103.10	0.02	0.32	0.28
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	**293.77**	**212.70**	**1,549.29**	**3.38**	**259.01**	**68.54**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Winter						
Mobile Source	203.24	215.05	1,255.01	3.13	258.06	67.63
Area Source	55.88	1.84	0.78	0.01	0.15	0.15
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	**259.58**	**225.21**	**1,262.66**	**3.19**	**258.84**	**68.41**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: Appendix C

The operational emissions from buildout of the proposed rezoning, which would result in 2,436 multi-family dwelling units and 151,048.46 SF Public/Institutional uses, is shown in Table 5.2-7. As detailed, operation of the proposed land uses at buildout and full occupancy under the proposed Project would generate emissions that would also exceed the applicable SCAQMD thresholds for VOC, CO, and NO_X.

Table 5.2-7: Summary of Project Peak Operational Emissions

Area	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	47.35	40.23	441.68	1.29	131.89	33.93
Area Source	73.20	41.74	162.66	0.26	3.34	3.32
Energy Source	0.45	7.77	3.71	0.05	0.62	0.62
Total Maximum Daily Emissions	**121.01**	**89.74**	**608.04**	**1.61**	**135.85**	**37.88**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**No**	**No**
Winter						
Mobile Source	45.11	43.17	369.10	1.21	131.89	33.93
Area Source	60.17	40.41	17.20	0.26	3.27	3.27
Energy Source	0.45	7.77	3.71	0.05	0.62	0.62
Total Maximum Daily Emissions	**105.73**	**91.35**	**390.00**	**1.52**	**135.78**	**37.82**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

Source: Appendix C

Table 5.2-8 provides a comparison of emissions from buildout of the existing General Plan land uses (Table 5.2-6) and buildout under the proposed Project (Table 5.2-7). As shown, the proposed Project would result in fewer operational emissions than buildout of the existing General Plan. As such, the proposed Project would not result in any new or more severe impacts to air quality beyond what was disclosed by the 2017 EIR.

Table 5.2-8: Comparison of Operational Emissions

Area	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Proposed Project	121.01	89.74	608.04	1.61	135.85	37.88
Approved General Plan Buildout	293.77	212.70	1549.29	3.38	259.01	68.54
Net Emissions (Proposed – Approved)	**-172.76**	**-122.96**	**-941.25**	**-1.78**	**-123.16**	**-30.66**
Winter						
Proposed Project	105.73	91.35	390.00	1.52	135.78	37.82
Approved General Plan Buildout	259.58	225.21	1262.66	3.19	258.84	68.41
Net Emissions (Proposed – Approved)	**-153.85**	**-133.87**	**-872.65**	**-1.67**	**-123.07**	**-30.59**

Source: Appendix C

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

It is important to note that the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the City cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds.

Additionally, it should be noted that the majority of the Project's CO and NO_X emissions are derived from vehicle usage. Since neither future project applicants nor the City have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to operational emissions would be significant and unavoidable.

Health Impacts of Exceeded Criteria Pollutant Emissions. The Draft EIR identifies a significant and unavoidable impact with respect to CO, NOx, and VOC emissions, due largely to the use of consumer products and vehicle trips. NOx is a "criteria" pollutant, a pollutant that is regulated by the US EPA pursuant to the federal Clean Air Act. The potential health impacts of criteria pollutants are analyzed on a regional level, not on a facility/project level. The SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPD), experts in the area of air quality, both recognize that a meaningful, accurate analysis of potential health impacts resulting from criteria pollutants is not currently possible and not likely to yield

substantive information that promotes informed decision making.[2] The SJVAPD, in its amicus curiae brief for the recent California Supreme Court decision in *Sierra Club v. County of Fresno* (2018)6 Cal.5th 502, explained that "it is not feasible to conduct a [health impact analysis] for criteria air pollutants because currently available computer modeling tools are not equipped for this task." The SJVAPD described a project-specific health impact analysis as "not practicable and not likely to yield valid information" because "currently available modeling tools are not well suited for this task." The SJVAPD further noted that "…the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional" cumulative impacts.

It should also be noted that CO, NOx, and VOCs are "precursor" pollutants, which makes analysis of potential health impacts even more difficult. CO, NOx, and VOCs are precursors to ozone, which is formed in the atmosphere from the chemical reaction of CO, NOx, and VOCs in the presence of sunlight. As explained by the SCAQMD in its amicus curiae brief for *Sierra Club v. County of Fresno*, it takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." Given this, "…it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region." Therefore, SCAQMD opined that while it "may be feasible" for large, regional projects with very high emissions of CO, NOx, and VOCs to conduct an accurate health impact analysis, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by CO, NOx, or VOC emissions from relatively small projects.

Thus, the difficulties with preparing potential health impact analysis related to the Project's CO, NOx, and VOC emissions are twofold. First, current modeling is not capable of correlating emissions of criteria pollutants to concentrations that can be reasonably linked to specific health impacts. Second, CO, NOx, and VOCs are precursor emissions and concentrations of CO, NOx, and VOC are impacted by regional atmospheric conditions. CO, NOx, and VOCs emitted by the Project may, depending upon interactions with the sun and other emissions, convert to ozone by complex chemical processes. Thus, there is a significant level of unpredictability associated with such conversion to ozone, as noted by the SCAQMD and the SJVAPD. It should also be noted that the EIR does identify health concerns related to CO and NOx emissions. Table 5.2-1 includes a list of criteria pollutants and summarizes common sources and effects. Furthermore, due to the programmatic nature of the Rezone, modeling of health impacts associated with criteria pollutants would be infeasible due to lack of specific site plans and the speculative nature of future development and its associated traffic distribution. Thus, the EIR's analysis is reasonable and intended to foster informed decision making.

[2] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno (2018) 6 Cal.5th 502* ("Friant Ranch") in the review and analysis of development projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in the Friant Ranch case by SJVAPD and SCAQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of development to likely human health impacts from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the court's advice to explain in a meaningful way why this analysis is infeasible. Since this interim memorandum, SMAQMD has provided methodology to address impacts; however, a similar analysis for projects within SCAQMD jurisdiction is not yet available.

IMPACT AQ-3: THE PROJECT COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.

Localized Air Quality Impacts

Construction

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

Operational

Less than Significant Impact. According to the SCAQMD LST methodology, LSTs apply to project-related stationary mobile sources. Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational LSTs. Buildout of the proposed Project would result in additional residential and public developments, which do not typically involve vehicles idling or queueing for long periods. Therefore, due to the lack of significant stationary source emissions, impacts related to operational LSTs would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to operational emissions impacting sensitive receptors would be less than significant.

CO Hotspots

Less than Significant Impact. An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the State's one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. The 2003 AQMP estimated traffic volumes that could generate CO concentrations to result in a "hot spot." As shown in Table 5.2-9, according to the 2003 AQMP, the Wilshire-Veteran intersection had a daily traffic volume of approximately 100,000 vehicles per day, and the 1-hour CO concentration was 4.6 ppm. This indicates that, even with a traffic volume of 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not exceed the most stringent 1-hour CO standard (20.0 ppm).[3]

Table 5.2-9: Traffic Volumes for Intersections Evaluated in 2003 AQMP

Intersection Location	Peak Traffic Volumes (vehicles per hour [vph])				
	Eastbound (a.m./p.m.)	Westbound (a.m./p.m.)	Southbound (a.m./p.m.)	Northbound (a.m./p.m.)	Total (a.m./p.m.)
Wilshire-Veteran	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset-Highland	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374

[3] Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

Intersection Location	Peak Traffic Volumes (vehicles per hour [vph])				
	Eastbound (a.m./p.m.)	Westbound (a.m./p.m.)	Southbound (a.m./p.m.)	Northbound (a.m./p.m.)	Total (a.m./p.m.)
La Cienega-Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach-Imperial	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: Appendix C

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

Toxic Air Contaminants

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

5.2.6 CUMULATIVE IMPACTS

As described previously, per the SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described under Impact AQ-2 above, emissions from construction of the proposed Project could exceed the SCAQMD's thresholds after implementation of SCAQMD rules and mitigation measures. Also, emissions from operation of the proposed Project at buildout would exceed SCAQMD's threshold for CO, VOC, and NOx after implementation of mitigation measures. Because the large majority of operational-source CO and NOx emissions (by weight) would be generated by project vehicles, and the VOC emissions would be generated by consumer products that neither future project applicants nor the City have the ability to reduce emissions of. Therefore, similar to the analysis presented in the General Plan EIR, operational-source CO, VOC, and NOx emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

5.2.7 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)

- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1108: Volatile Organic Compounds
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1143: Paint Thinners and Solvents

Plans, Programs, or Policies

None.

5.2.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact AQ-1: Buildout of the proposed Project would increase the frequency or severity of existing air quality violations, and an impact regarding AQMP Consistency Criterion No. 2 would occur.

Impact AQ-2: Construction and operation associated with buildout of the proposed Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the Basin.

Impact AQ-3: Buildout of the proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors.

5.2.9 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:

- Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards.

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

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

- Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized;
- Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC);
- Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insultation (R-8);
- Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF);
- Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.
- Landscaping palette of drought tolerant plants exceeding City requirements;
- Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use);

- U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.

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

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

5.2.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact AQ-1: Land use change of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation. Therefore, the proposed Project would result in a conflict with, or obstruct, implementation of the AQMP and impacts would be **significant and unavoidable.**

Impact AQ-2: Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1.

Emissions from operation of the proposed Project at buildout would exceed SCAQMD's thresholds for CO, VOC, and NOx after implementation of regulations and Mitigation Measure AQ-2. Because a majority of operational-source CO and NOx emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NOx emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be **significant and unavoidable**.

Impact AQ-3: After implementation of Mitigation Measures AQ-1 through AQ-3, localized emissions could exceed the SCAQMD's localized significance threshold for a pollutant. Thus, impacts would be **significant and unavoidable**.

5.2.11 REFERENCES

City of Redlands. (2017a). *Redlands General Plan 2035*. Retrieved July 2, 2024, from https://www.cityofredlands.org/post/planning-division-general-plan

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City of Redlands. (2024). *City of Redlands Municipal Code*. Retrieved July 2, 2024, from https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1

Southern California Association of Governments (SCAG). (n.d.). *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*. https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071

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5.3 Cultural Resources

5.3.1 INTRODUCTION

This section addresses potential environmental impacts from buildout pursuant to the Redlands RHNA Rezone Project on cultural resources, which include historical and archaeological resources. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

In accordance with Public Resources Code Section 15120(d), certain information and communications that disclose the location of archaeological sites and sacred lands are allowed to be exempt from public disclosure.

Cultural Resources Terminology

- **Archaeological resources** include any material remains of human life or activities that are at least 100 years of age, and that are of scientific interest. A unique or significant archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Cultural resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to the California Environmental Quality Act (CEQA).
- **Historic building** or **site** is one that is noteworthy for its significance in local, State, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic context** refers to the broad patterns of historical development in a community or its region that is represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.
- **Historic integrity** is defined as "the ability of a property to convey its significance."
- **Historical resources** are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (CRHR) (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term "historical resources" includes the following:

  (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).
  (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
  (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific,

economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
(B) Is associated with the lives of persons important in California's past;
(C) 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; or
(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

5.3.2 REGULATORY SETTING

5.3.2.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria per 36 Code of Federal Regulations Part 60:

a) Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
b) Properties that are associated with the lives of persons significant in our past;
c) Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d) Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic "integrity," which is "the ability of a property to convey its significance." The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the NRHP are also eligible for listing in the California Register of Historic Resources, and as such, are considered historical resources for CEQA purposes.

National Register of Historic Places

The National Register of Historic Places (NRHP) was established by the NHPA of 1966 as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A It is associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B It is associated with the lives of persons who are significant in our past;

Criterion C It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or

Criterion D It has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources.

5.3.2.2 State Regulations

California Register of Historical Resources

Eligibility for inclusion in the California Register of Historical Resources (CRHR) is determined by applying the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in California's past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value; or
4. It has yielded or is likely to yield information important in prehistory or history. The Register includes properties which are listed or have been formally determined to be eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest (PRC §5024.1).

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Public Resources Code Section 5097.98

Public Resources Code Section 5097.98 provides guidance on the appropriate handling of Native American remains. Once the California Native American Heritage Commission (NAHC) receives notification from the Coroner of a discovery of Native American human remains, the NAHC is required to notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

CEQA Guidelines Section 15064.5

Section 15064.5 provides guidelines for determining the significance of impacts to archaeological and historical resources. The section provides the definition of historical resources, and how to analyze impacts to resources that are designated or eligible for designation as a historical resource. Section 15064.5 additionally provides provisions for the accidental discovery or recognition of human remains in any location other than a dedicated cemetery.

5.3.2.3 Local Regulations

City of Redlands General Plan 2035

The City of Redlands General Plan Distinctive City Element contains the following policies and actions related to historical and archaeological resources that are applicable to the proposed Project:

Principle 2-P.8 Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and

rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.

Principle 2-P.9 Provide incentives to protect, preserve, and maintain the City's heritage

Principle 2-P.11 Encourage retention of the character of existing historic structures and urban design elements that define the built environment of the City's older neighborhoods.

Principle 2-P.12 Encourage retention of historic structures in their original use or reconversion to their original use where feasible. Encourage sensitive, adaptive reuse where the original use is no longer feasible.

Principle 2-P.14 Coordinate preservation of historic resources with policies designed to preserve neighborhoods and support the affordability of housing in historical structures.

Principle 2-P.15 Balance the preservation of historic resources with the desire of property owners of historic structures to adopt energy efficient strategies.

Action 2-A.25 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.

Action 2-A.26 Provide development standards and guidelines to encourage conversion of historic structures to alternative uses without compromising the quality of the neighborhood if preservation of the original use is an economic hardship.

Action 2-A.34 Uphold the designation of the following streets within the city as scenic highways, drives, and historic streets. Special development standards have been adopted by Resolution for these streets. The streets are:

- Brookside Avenue, from Lakeside Avenue to Eureka Street;
- Olive Avenue, from Lakeside Avenue to Cajon Street;
- Center Street, from Brookside Avenue to Crescent Avenue;
- Highland Avenue, from Serpentine Drive to Cajon Street;
- Sunset Drive, from Serpentine Drive to Edgemont Drive;
- Cajon Street;
- Mariposa Drive, between Halsey and Sunset Drive; and
- Dwight Street, between Pepper Street and Mariposa Drive.

In addition, consider designating the following roads as scenic drives within the community as neighborhood connectors and recreational routes for drivers and bike riders.

- Riverview Drive along the Santa Ana River Wash;
- Like Oak Canyon Road;
- San Timoteo Canyon Road;
- Sylvan Boulevard;
- Nevada Street, from the Orange Blossom Trail to Barton Road;
- Pioneer Avenue, from River Bend Drive to Judson Street; and
- Rural roads in Crafton.

Action 2-A.37 Maintain and improve City-owned historic buildings and houses in an architecturally and environmentally sensitive manner.

Action 2-A.38 Use exemplary design quality and sensitivity to surrounding historic structures in new City construction, public works, entry ways, and City signs.

Action 2-A.39 Ensure that permanent changes to the exterior or setting of a designated historic resource be done in accordance with the Secretary of the Interior standards for historic properties.

Action 2-A.41 Encourage appropriate adaptive reuse of historic resources in order to prevent disuse, disrepair, and demolition, taking care to protect surrounding neighborhoods from disruptive intrusions.

Action 2-A.42 Should demolition of a designated historic resource occur, endeavor to ensure that a building of equal or greater design quality and/or use of equal or greater benefit to the community be constructed. Require that a report documenting the history of the property and archival-quality drawings and/or photographic records be prepared to document the historic resource.

Action 2-A.43 Institute an architectural salvage program to preserve architectural artifacts from buildings that are demolished.

Action 2-A.48 Establish design review guidelines for historic areas to ensure that new architecture will relate to and respect the historical and environmental context.

Action 2-A.70 Encourage preservation of historic public and private improvements, such as street curbs, street trees, specimen trees, streetlights, hitching posts, masonry walls, unpaved and early paved sidewalks, etc.

City of Redlands Historic and Scenic Preservation Ordinance

The City of Redlands maintains its own local designation program for historic and scenic properties within the city. The Redlands Historic and Scenic Preservation Commission was established in 1986 to make recommendations, decisions, and determinations regarding the designation and protection of the historical, scenic, and cultural resources in Redlands. The Historic and Scenic Preservation Commission also reviews any exterior modifications to a designated historic resource or the demolition of a designated resource or any structure over fifty years old.

Redlands has eight locally-designated historic districts, none of which are located in proximity to the Rezone sites:

- Eureka Street Historic District
- West Highland Avenue Historic and Scenic District
- Early Redlands Historic and Scenic District
- Normandie Court Historic District
- East Fern Avenue Historic and Scenic District
- Garden Hill Historic and Scenic District
- La Verne Street Historic and Scenic District
- Smiley Park Historic and Scenic District

Redlands Historic Architectural Design Guidelines

The City of Redlands adopted an update to the City of Redlands Historic Architectural Design Guidelines on September 3, 2024. The Redlands Historic Architectural Design Guidelines provide historic preservation standards and resources for property owners, design professionals, the City of Redlands Planning Department, and the Historic and Scenic Preservation Committee. The Design Guidelines provide standards for best preservation practices and contextual design when undertaking an exterior alteration or addition, changes to site or accessory features, restoration or rehabilitation of a historic building, or new construction on or adjacent to a historic site, historic and/or scenic district, or Character Category. The Design Guidelines also inform the reviews of demolition permit applications for structures that may be eligible or potentially eligible for local designation or preservation.

East Valley Corridor Specific Plan Preservation Overlay District

The East Valley Corridor Specific Plan provides for a Preservation – Historical/Archaeological Overlay District ("Preservation Overlay District") in Division 5 of the Specific Plan, which is intended to preserve and protect historical and archaeological resources. The Preservation Overlay District provides development standards for developments within the district that are in addition to those required by the Specific Plan. Within the East Valley Corridor Specific Plan, the Preservation Overlay District is applied to areas approximately 600 feet on either side of the historic alignment of the Mission Zanja irrigation canal and to potential historic structures. The development standards set forth within the Preservation Overlay District set forth requirements for investigation, data recovery, and preservation of archaeological and historic resources (City of Redlands, 2024).

5.3.3 ENVIRONMENTAL SETTING

Historic Setting

An asistencia was established in Redlands in 1819 to help facilitate the Mission San Gabriel Arcángel's control and colonization of the surrounding rancheria. Missionaries instructed Serrano, Gabrieleño, and Cahuilla workers to build the Mill Creek Zanja, a 12-mile-long irrigation ditch routing water from Mill Creek to Guachama Rancheria, which served as the area's first stable water resource. In 1842, the Lugo family, including José del Carmen Lugo, José María Lugo, Vicente Lugo, and Diego Sepulveda, received a land grant, Rancho San Bernardino, which encompassed the San Bernardino and Yucaipa valleys, including present day Redlands.

In 1881, E.G. Judson and Frank E. Brown formed the Redlands Water Company and began construction of a water canal to supply future citrus groves. During the development, the pair noticed the red-colored adobe soil and gave the new town its name, Redlands. Three years later, Brown built the Bear Valley Dam and reservoir, securing a steady supply of water for the town and associated citrus groves. With a stable water source and booming railways, the City of Redlands experienced a development boom with the creation of paved streets, sidewalks, sewage, and electricity systems. The City was officially incorporated in 1888. For 75 years, citrus growing was the main economic source for the City. The citrus industry eventually declined and agricultural areas were replaced with subdivisions.

Archaeological Resources

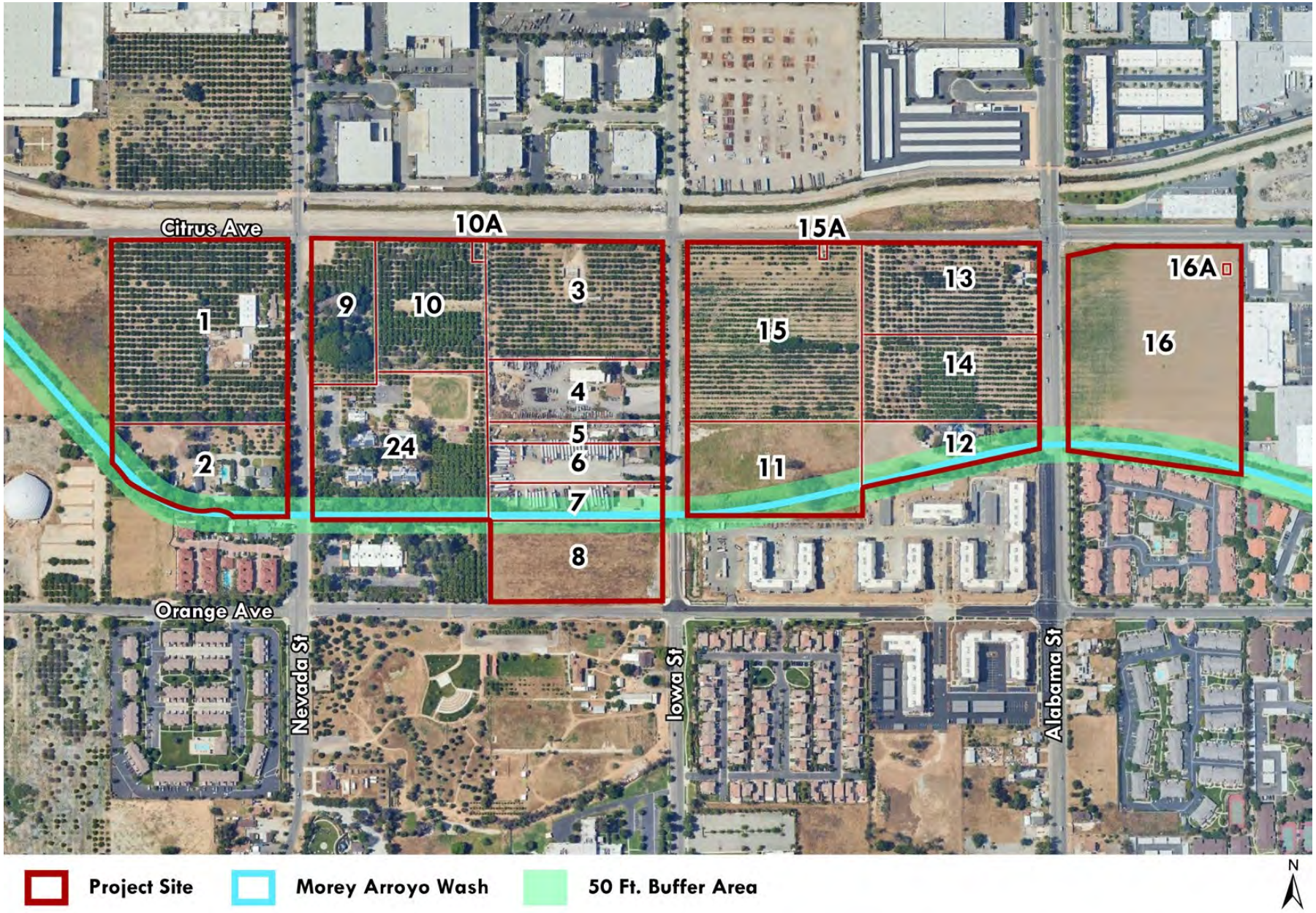
Archaeological sensitivity in the City of Redlands is often related to proximity to the City's numerous waterways, many of which were constructed to serve as storm water ditches in the 1800s. As shown in Figure 5.3-1, multiple Rezone sites are located in close proximity to the Morey Arroyo. The Morey Arroyo borders Sites 2, 24, 7, 12, and 16 to the south and Site 8 to the north. Site 11 contains a portion of the Morey Arroyo

in the southern part of the site, within the property line. The Morey Arroyo is a partially improved natural drainage that has been used as a storm water ditch since the 1800s. A portion of the Morey Arroyo (Site 36-029388) was originally recorded in 2014 and subsequently an additional portion was recorded in 2018 (McKenna, 2015).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources.

Morey Arroyo Buffer Area



RHNA Rezone Project
City of Redlands

Figure 5.3-1

Redlands Regular Meeting of 06-03-25

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710 of 1245

5.3.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;

CUL-3 Disturb any human remains, including those interred outside of formal cemeteries.

The Initial Study established that the proposed Project would result in less-than-significant impacts with mitigation related to Threshold CUL-1 and less-than-significant impacts related to Threshold CUL-3, and no further assessment of these impacts is required in this Draft Subsequent EIR. Mitigation Measures CUL-1 and CUL-2 from the Initial Study are included below in Section 5.3.10, *Mitigation Measures*.

5.3.5 METHODOLOGY

In determining whether an archaeological related impact would result from the proposed Project, the programmatic analysis includes consideration of the archaeologic sensitivity of the Rezone sites and the past disturbance within the Rezone sites. The analysis combines these factors to identify the potential of construction from implementing projects to impact any unknown archaeological resources. This analysis is partially based on the records search results conducted for the General Plan EIR at the South Central Coastal Information Center (SCCIC), located at the California State University, Fullerton, and at the Eastern Information Center (EIC), located at University of California Riverside.

5.3.6 ENVIRONMENTAL IMAPCTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to cultural resources in Chapter 3.8. The General Plan EIR described that future development pursuant to the General Plan could result in impacts on historical and archaeological resources within the city. The EIR describes that policies included in the General Plan would serve to protect cultural resources. In addition, the General Plan EIR describes that future projects would require project-level CEQA analysis, which would identify potential impacts on known or potential historic sites and structures. Therefore, the EIR concluded that implementation of the General Plan would result in less-than-significant impacts to historical resources with adherence to General Plan policies and federal, State, and local regulations. The General Plan EIR discussed that the entire city has not been surveyed for archaeological resources and that there is potential for new archaeological resources to be discovered in the future. Future development pursuant to the General Plan may involve grading, excavation, or other ground-disturbing activities, which could disturb or damage unknown archaeological resources. However, the General Plan EIR concluded that General Plan policies would require that areas identified to contain archaeological resources be evaluated and include mitigation, and impacts would be less than significant. In addition, the General Plan EIR concluded that adherence to Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5 would reduce impacts related to the disturbance of human remains to a less-than-significant level (City of Redlands, 2017b, pp. 3.8-23 – 3.8-24).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings).

IMPACT CUL-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO CEQA GUIDELINES SECTION 15064.5.

Less than Significant with Mitigation Incorporated. The Project site is located in an urbanized or urbanizing area. Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 are heavily disturbed by development, current agricultural activities, or previous agricultural activities and do not contain any known resources that would increase the archaeological sensitivity of the sites. In addition, these sites are already slated for urban development activities pursuant to their respective current General Plan land use and zoning designations, as analyzed in the General Plan EIR. However, future development pursuant to the Redlands RHNA Rezone Project could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried archaeological resources. As such, future development projects within Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 would be required to implement Mitigation Measure CUL-3, which requires preparation of an archaeological resource assessment of the specific site and proposed development in accordance with the California Office of Historic Preservation. On properties where the potential for resources is identified through implementation of Mitigation Measure CUL-3, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified cultural preservation expert, included as Mitigation Measure CUL-4.

In addition, the Morey Arroyo is located adjacent to or partially within Sites 2, 7, 8, 11, 12, 16, and 24. While other segments of the Morey Arroyo were found to not constitute significant archaeological resources, water sources within the City are known to result in increased archaeological sensitivity in the surrounding areas. Therefore, future site-specific development projects pursuant to the Redlands RHNA Rezone Project within proximity to the Morey Arroyo could result in ground disturbing activities in areas highly sensitive for archaeological resources and could result in disturbance of unknown archaeological resources. Therefore, any future development in Sites 2, 7, 8, 11, 12, 16, and 24 that results in ground disturbing activities within 50 feet of the Morey Arroyo would be required to implement Mitigation Measure CUL-4 due to the high archaeological sensitivity.

With implementation of Mitigation Measures CUL-3 and CUL-4, impacts related to a substantial adverse change in the significance of an archaeological resource during buildout pursuant to the Redlands RHNA Rezone Project would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to archaeological resources would be less than significant.

5.3.7 CUMULATIVE IMPACTS

Cumulative impacts on cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic ethnic sites or an industry (e.g., Santa Fe Depot), that

occur within a larger geographic context than a site-specific development project site. Thus, this analysis considers cumulative development within the Valley Region of San Bernardino County, which is identified as sensitive for archaeological resources.

As described above, there is a possibility that ground-disturbing activities during future construction may uncover or disturb unknown archaeological resources. However, implementation of Mitigation Measures CUL-3 and CUL-4 would reduce the potential impact to unknown resources. The likelihood of uncovering multiple currently unknown resources within the previously developed area that is sufficient to create a significant cumulative impact is low given the disturbed nature of the Sites and the few archaeological resources that have been found in the City to date. Thus, the cumulative effects of development on archaeological resources from implementation of the proposed Project with mitigation in combination with other projects would be less than significant.

5.3.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies

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

5.3.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact CUL-2 would be **potentially significant.**

5.3.10 MITIGATION MEASURES

Initial Study Mitigation Measures

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

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

EIR Mitigation Measures

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

MM CUL-4 **Archaeological Monitoring/Preservation.**

- *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling,

pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan.

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

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

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

If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer)

shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.

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

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

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

  If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer)

shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.

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

5.3.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact CUL-2 would be less than significant after mitigation.

5.3.12 REFERENCES

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EPD Solutions, Inc. (July 2022). *Redlands General Plan Transit Villages District and Specific Plan Project Draft Environmental Impact Report*. Retrieved July 2, 2024, from https://ceqanet.opr.ca.gov/2021080622/2

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5.4 Energy

5.4.1 INTRODUCTION

This section of the Draft Subsequent EIR assesses the significance of the use of energy, including electricity, natural gas, and gasoline and diesel fuels, that would result from buildout pursuant to the proposed Redlands RHNA Rezone Project. It discusses existing energy use patterns and examines whether the proposed RHNA (including development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner.

Refer to Section 5.5, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 5.12, *Utilities and Service Systems*, for a discussion of water consumption.

This section includes data from the following City documents and reports:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- City of Redlands Municipal Code; and
- *Regional Housing Needs Assessment Energy Tables*, Urban Crossroads, September 2024. Appendix D.

5.4.2 REGULATORY SETTING

5.4.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, and promote research for alternative energy, as well as additional research in carbon capture, international energy programs, and the creation of green jobs.

5.4.2.2 State Regulations

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24, Part 6, *California Energy Code*, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24, Part 11, *California Green Building Standards* (CALGreen), was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022

California Green Building Standards that became effective January 1, 2023. The updated 2022 standards include the following:

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).
    - New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
    - New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
    - Operations and maintenance instructions for the following:
        - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
        - Roof and yard drainage, including gutter and downspouts.
        - Space conditioning systems, including condensers and air filters.
        - Landscape irrigation systems.
        - Water reuse systems.
    - Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
    - Public transportation and/or carpool options available in the area.
    - Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
    - Information about water-conserving landscape and irrigation design and controllers which conserve water.

- Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
- Information about state solar energy and incentive programs available.
- A copy of all special inspection verifications required by the enforcing agency of this code.
- Information from CALFIRE on maintenance of defensible space around residential structures.

- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.
- Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the CARB [California Air Resources Board] Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its glass, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled onsite until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CALGreen has been adopted by the City of Redlands by reference in Municipal Chapter 15.16.

5.4.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Sustainable Community Element contains the following policies related to energy that are applicable to the Project:

Principle 8-P.1 Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.

Action 8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.

Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.

5.4.3 ENVIRONMENTAL SETTING

Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Redlands. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2023 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut GHG emissions 40 percent below 1990 levels by 2030 and 80 percent from the same baseline by 2050 in order to help achieve carbon neutrality by 2045. It describes that in 2023 approximately 49 percent of power that SCE delivered to customers came from carbon-free resources (SCE, 2023).

The Project site is currently served by the electricity distribution systems that exist along the roadways throughout the Project area.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Redlands and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of 2 percent each year through 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure. The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2040 in its 2024 report (CGEU, 2024).

The Project site is currently served by the natural gas distribution system that exists within the roadways throughout the Project site.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the annual consumption of 4,330,815 gallons of fuel per year from traffic, 31,062,419 kBTU per year, and 19,869,824 kWh per year.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a project could have a significant effect if it were to:

E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.4.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a proportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of onsite renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing "the wasteful, inefficient, and unnecessary consumption of energy."

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used. Energy usage during project operation would be considered "wasteful, inefficient, and unnecessary" if the project were to violate federal, State, and/or local energy standards, including Title 24 of the California Code of Regulations, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

5.4.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that future development would result in an increased use of energy since there would be an additional demand for electricity and natural gas supply and services. Despite the overall increase in future energy use with implementation of the State's current and future energy code and the General Plan policies, energy efficient designs in new developments would be ensured. As a result, the General Plan EIR concluded that there is a less-than-significant impact related to development under the General Plan causing a wasteful, inefficient, and unnecessary consumption of energy during construction, operation, and/or maintenance. It was also determined that the General Plan would have a less-than-significant impact related to conflict with the California Energy Efficiency Standards, the California Air Resources Board (CARB) passenger vehicle GHG emission reduction targets for 2020 and 2035, or any other applicable energy conservation regulations.

Proposed Project

As detailed in Section 3.0, *Project Description*, the proposed Project would rezone 24 sites totaling 116.19 acres for the City of Redlands Housing Element Regional Housing Needs Allocation (RHNA). Buildout of the proposed Project would change the maximum buildout of the Project area form 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses, 111 multi-family dwelling units, to residential uses with an allowed capacity of 2,436 units and 151,048.46 SF of Public/Institutional development. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). However, the timing of development and operation of the development pursuant to the RHNA rezone would be dependent upon market conditions and development applications for new projects.

IMPACT E-1: THE PROJECT WOULD NOT RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES, DURING PROJECT CONSTRUCTION OR OPERATION.

Construction

Less than Significant Impact. Construction of future new uses pursuant to the proposed zoning would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities pursuant to buildout of the proposed rezoned sites would not involve consumption of natural gas because the construction-related equipment would not be powered by natural gas. Construction activities are not expected to result in demand for fuel greater on a per-unit-of-development basis than either that used to buildout the existing land use and zoning designations and other development projects in Southern California as each project would be reviewed and permitted pursuant to City requirements, including Title 24 and CALGreen. Also, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment.

Construction contractors are required to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Overall, construction activities would be required by City permitting to comply with all existing regulations and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation

Less than Significant Impact. Once operational, the new developments from both the buildout of the existing General Plan land uses and the proposed rezoning provide for urban uses that would generate demand for electricity and natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be used. This use of energy is typical for urban development, and no operational activities or land uses are included that would result in extraordinary energy consumption.

As described above, buildout of the Project site with the existing General Plan land uses would result in development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family residences, whereas buildout of the proposed Project would result in development of 2,436 residential units and 151,048.46 SF of Public/Institutional development. As detailed in Section 5.10, *Transportation*, buildout pursuant to the proposed Project is forecasted to generate a net decrease of 27,450 average daily trips, net increase of 1,034 AM trips, and net decrease of 1,716 PM trips. As such, buildout pursuant to the Project would result in decreased daily vehicle trips compared to buildout pursuant to the existing General Plan. The estimated transportation energy demands from the existing General Plan buildout are summarized in Table 5.4-1.

Table 5.4-1: Existing General Plan Buildout Traffic Annual Fuel Consumption

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)
Approved GP Buildout (All Vehicles)	93,509,476	4,330,815

Source: Appendix D.

As detailed in Table 5.4-2, operation of the proposed Project at buildout is estimated to annually use 2,081,210 gallons of fuel, which is an net decrease of 2,249,606 gallons of fuel compared to buildout of the existing General Plan land uses of the Project sites.

Table 5.4-2: Project-Generated Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT[1]	Estimated Annual Fuel Consumption (gallons)
LDA	39.94	29,560,918	740,041
LDT1	30.29	2,006,017	66,234
LDT2	30.34	14,420,934	475,322
MDV	25.15	9,321,507	370,627
LHD1	23.08	1,667,662	72,259
LHD2	21.02	455,739	21,678
MHD	12.16	1,238,093	101,833
HHD	7.82	1,254,368	160,374
OBUS	8.08	32,700	4,046
UBUS	12.86	17,884	1,391
MCY	43.29	1,214,606	28,060
SBUS	7.28	62,867	8,637
MH	5.98	183,552	30,707
Total (All Vehicles)		**61,436,848**	**2,081,210**
Approved GP Buildout (All Vehicles)		93,509,476	4,330,815
Net (Proposed – Approved GP Buildout)		**-32,072,628**	**-2,249,606**

Source: Appendix D.

Table 5.4-3 details that operation of the proposed rezoning at buildout would use approximately 30,522,697 thousand British thermal units (kBTU) per year of natural gas and 11,493,948 kWh per year of electricity. The proposed Project would result in an estimated annual net decrease of 539,722 kBTU/year of natural gas and an annual decrease of 8,375,876 kWh/year in electricity compared to operation of the existing General Plan land uses at buildout.

Table 5.4-3: Project Annual Operational Natural Gas and Electricity Demand Summary

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Multi-family Housing	26,886,569	10,514,171
Day Care Center	3,636,128	979,777
Total Project Energy Demand	**30,522,697**	**11,493,948**

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Approved GP Buildout Energy Demand	31,062,419	19,869,824
Net (Proposed – Approved GP Buildout)	**-539,722**	**-8,375,876**

Source: Appendix D.

The proposed Project would result in less energy consumption compared to buildout of the existing General Plan. Additionally, because this use of energy is typical for urban development, no operational activities or land uses would occur that would result in extraordinary energy consumption, and through City permitting, assurance would be provided that existing regulations related to energy efficiency and consumption, such as Title 24 regulations, would be implemented. Likewise, many of the future developments would include solar panels on rooftops and over parking areas to provide onsite energy generation. Each future project would be reviewed for inclusion of solar infrastructure as required by CALGreen regulations through the City's development review and permitting process. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources from operational activities would be less than significant.

IMPACT E-2: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

No Impact. As described previously, the development that would occur pursuant to the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of future development projects. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Likewise, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Future buildings pursuant to the proposed zoning would have solar infrastructure as required by CCR Title 24 requirements. Thus, the Project would not obstruct use of renewable energy or energy efficiency. Overall, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR.

5.4.7 CUMULATIVE IMPACTS

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

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

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

5.4.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

The following standard regulations would reduce potential impacts related to energy:

- California Energy Code (Code of Regulations, Title 24 Part 6).
- CALGreen as included in the City's Municipal Code in Chapter 15.16.

Plans, Programs, or Policies

None.

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts E-1and E-2 would be less than significant.

5.4.10 MITIGATION MEASURES

Impacts related to energy would be less than significant and no mitigation measures are required.

5.4.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant.

5.4.12 REFERENCES

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5.5 Greenhouse Gases

5.5.1 INTRODUCTION

This section evaluates the potential for implementation of the proposed Project to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, impacts of the proposed Project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing GHG emissions. The analysis within this section is based on the following City documents and technical report prepared for the Project:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- City of Redlands Municipal Code; and
- *Regional Housing Needs Assessment Rezone Greenhouse Gas Impact Analysis*, Urban Crossroads, September 2024. Included as Appendix E.

5.5.2 REGULATORY SETTING

5.5.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

5.5.2.2 State Regulations

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted Assembly Bill (AB) 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). In September 2009, CARB adopted amendments to the Pavley Regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway

Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was signed by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), which created a comprehensive, multi-year program to reduce GHG emissions in California to 1990 levels by 2020. This goal has been met.[1] GHGs as defined under AB 32 include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride (NF_3), has also been added to the list of GHGs. CARB is the State agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."*

Senate Bill 375 (Chapter 728, Statutes of 2008)

In August 2008, the Legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, Senate Bill [SB] 375, which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through

[1] Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 $MMTCO_2e$ (Appendix E). This is less than the 2020 emissions target of 431 $MMTCO_2e$.

alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375 provides incentives for streamlining CEQA requirements by substantially reducing the requirements for "transit priority projects," as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State's 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor's Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C, the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Senate Bill 32 (Chapter 249, Statutes of 2016)

Senate Bill 32 was signed on September 8, 2016, by Governor Jerry Brown. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. A related bill that was also approved in 2016, AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that ARB is not only responsive to the Governor, but also the Legislature.

Senate Bill 97 (Chapter 185, Statutes of 2007)

SB 97 (Health and Safety Code Section 21083.5) was adopted in 2007 and required the Office of Planning and Research to prepare amendments to the CEQA Guidelines for the mitigation of GHG impacts. The amendments became effective on March 18, 2010. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. A new section, CEQA Guidelines Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. The CEQA Section gives discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant or cumulatively considerable.

Also amended were CEQA Guidelines Sections 15126.4 and 15130, which address mitigation measures and cumulative impacts, respectively. However, GHG mitigation measures are referenced in general terms, and no specific measures are identified. Additionally, the revision to the cumulative impact discussion requirement (Section 15130) simply directs agencies to analyze GHG emissions in an EIR when a project's incremental contribution of emissions may be cumulatively considerable, however it does not answer the question of when emissions are cumulatively considerable.

Section 15183.5 permits programmatic GHG analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support a determination

that a project's cumulative effect is not cumulatively considerable, according to proposed Section 15183.5(b).

California Air Resources Board Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the previous 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation; the regulations that effect this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> *"The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."*
>
> *"[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."*

Under the 2022 Scoping Plan, the 2045 carbon neutrality goal is to be implemented by the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.

- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects; CARB states in Appendix D (page 4) that this section "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

California Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CCR Title 24 Part 11: California Green Building Standards (CALGreen) was first published in 2008 and took effect in 2009. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective January 1, 2023.

The 2022 CALGreen Building Standards Code has been adopted by the City of Redlands in Section 15.16 of the City's Municipal Code.

Residential Mandatory Measures

- Electric vehicle (EV) charging stations. New construction shall comply with Section 4.106.4.1, 4.106.4.2, 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. (4.106.4).

  - New one- and two-family dwellings and town-houses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
  - New hotels and motels. All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1.

- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:

  - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
  - Operations and maintenance instructions for the following:

    - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
    - Roof and yard drainage, including gutter and downspouts.
    - Space conditioning systems, including condensers and air filters.
    - Landscape irrigation systems.
    - Water reuse systems.

  - Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
  - Public transportation and/or carpool options available in the area.
  - Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
  - Information about water-conserving landscape and irrigation design and controllers which conserve water.
  - Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
  - Information about state solar energy and incentive programs available.
  - A copy of all special inspection verifications required by the enforcing agency of this code.
  - Information from CALFIRE on maintenance of defensible space around residential structures.

- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.

- Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the CARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its glass, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section
- 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed
    - 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed
    - 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5.5.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Sustainable Community Element contains the following policies related to GHG emissions that are applicable to the Project:

Principle 8-P.1 Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.

Action 8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.

Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.

Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.

Principle 8-P.8 Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.

City of Redlands Climate Action Plan

The City of Redlands Climate Action Plan (CAP) was designed to reinforce the City's commitment to reducing GHG emissions and demonstrate compliance with the State's GHG emissions reduction standards. The CAP includes goals and policies to promote energy efficiency, waste reduction, and resource conservation and

recycling. The CAP's GHG emission targets and goals were based on meeting the goals in Executive Order B-30-15 and SB 32 and the 2017 Scoping Plan. The CAP used the 2017 Scoping Plan's recommended Plan Level emissions target of 6.0 $MTCO_2e$ per capita per year for 2030. Based on the CAP analysis, the City of Redlands will achieve the 2030 target based on State actions and existing development standards and would not require any specific measures to reduce GHG emissions. Regardless, the CAP does recommend some actions including encouraging the development of solar photovoltaic systems on residential and non-residential development, increasing energy efficiency 5 percent over standards, increasing the use of high efficiency lighting, and reducing the intensity of GHG emissions associated with water delivery and treatment.

5.5.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potentials, and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, SF_6 is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF_6, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO_2. Therefore, an emission of one metric ton (MT) of SF_6 could be reported as an emission of 22,800 MT of CO_2e. Large emission sources are reported in million metric tons (MMT) of CO_2e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide (CO_2): CO_2 is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane (CH_4): CH_4 is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide (N_2O): N_2O (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride (SF_6): SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons (PFCs): PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons (HFCs): HFCs are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years. Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects:

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities, and other equipment used directly by land uses onsite. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal, which produce offsite emissions.

Existing Project Site Conditions

The Project site area consists of about 116.19 acres, which includes 24 sites. Sites 1 through 16A and 24 are located south of Citrus Avenue. Many of these sites are vacant or are being used for agricultural purposes; however, a few sites contain single-family residences, and others are used for industrial storage. Sites 17 through 23 are located 0.25 miles east of SR-210, just south of West San Bernardino Avenue. These sites are currently vacant and covered with non-native grasses. No activities other than occasional disking occur. The existing GHG emissions from the Project site are limited due to the limited development of the area. The existing primary GHG emissions in the Project site area are from on-road transportation, building energy, and waste.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would generate approximately 46,446.76 MT per year of CO2e or18.16 CO2e per service population.

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

GHG-1 Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

GHG-2 Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4 provides discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant, but recommends that lead agencies consider several factors that may be used in the determination of significance of project related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15130(f) describes that the effects of GHG emissions are by their very nature cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Additionally, CEQA Guidelines Section 15064(h)3 states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lesson the cumulative problem.

The SCAQMD formed a working group to identify greenhouse gas emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - All land use types: 3,000 $MTCO_2e$ per year
    - Based on land use type:
        - Residential: 3,500 $MTCO_2e$ per year
        - Commercial: 1,400 $MTCO_2e$ per year
        - Mixed use: 3,000 $MTCO_2e$ per year
- Tier 4 has the following options:
    - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.

- Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
- Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans.
- Option 3, 2035 Target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

The SCAQMD defines the Service Population (SP) used under Tier 4 thresholds as the total residents and employees associated with a project. The origin of the SP is based on CARB's 2008 Scoping Plan. The 2008 Scoping Plan identified that based on the GHG emissions inventories for the State, the people of California generate approximately 14 tons of GHG emissions per capita and would need to reduce annual emissions to approximately 10 tons per capita in order to meet the GHG reduction target of AB 32.

Relevant to the proposed Project, the SCAQMD Tier 4 Option 3 is to utilize an efficiency target. The SCAQMD has proposed targets for project-level and plan-level analysis. At the September 2010 working group meeting the SCAQMD recommended a project-level efficiency target of 4.1 $MTCO_2e$/SP as a 2035 target[2].

The calculations behind this option are based on a 40 percent reduction by the SB 375 target date of 2020 and the same inventory calculated by CARB. The 2020 4.8 MT/SP target is based on the same statewide 2020 GHG inventory in the CARB *Scoping Plan*. Overall, GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. This 40 percent reduction was applied to the 2020 targets, resulting in an efficiency threshold for plans of 4.1 $MTCO_2e$/yr and an efficiency threshold at the project level of 3.0 $MTCO_2e$/yr.

The SP threshold is widely accepted and used by numerous cities in the basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. The SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

> "…the…screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [$MMTCO_2e$/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their

[2] It should be noted that SCAQMD identifies a plan-level threshold of 4.1 $MTCO_2e$ per SP. As a conservative measure, the Project utilizes the 3.0 $MTCO_2e$ per SP as the basis of establishing long-term thresholds for buildout conditions.

> overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Based on the type of programmatic planning project being proposed and the SCAQMD guidance described above, the City has determined that the SCAQMD's Tier 4, Option 3 project-level efficiency threshold methodology is an appropriate significance criterion by which to determine whether the Project emits a significant amount of GHG due to the threshold's applicability to programmatic planning projects. As such, based on SCAQMD guidance and to provide a conservative analysis of GHG emissions from buildout of the proposed Project, the SP threshold for the Project's buildout year of 2035 is 3.0 $MTCO_2e$/yr. The proposed Project would be considered to create a significant cumulative GHG impact if implementation of the Project would exceed this threshold.

5.5.5 METHODOLOGY

The California Emissions Estimator Model (CalEEMod) version 2022.1.1.23 has been used to determine construction and operational GHG emissions for buildout of the proposed Project, based on the maximum development assumptions outlined in Section 3.0*, Project Description* and from buildout of the approved General Plan land uses. The purpose of the CalEEMod model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from measures incorporated into the Project to reduce or minimize GHG emissions. For construction phase Project emissions, GHGs are quantified and, per SCAQMD methodology, the total GHG emissions for construction activities are divided by 30-years, and then added to the annual operational phase of GHG emissions to determine whether the applicable threshold would be exceeded.

In addition, CEQA requires the lead agency consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, this section provides an analysis that details the relevant plans and policies and details whether the Project is consistent or would result in a conflict with the measures designed to reduce GHG emissions.

5.5.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that development under the proposed General Plan would increase GHG emissions. Future development projects and land uses proposed under the proposed General Plan would increase the population and employment in the city, and associated GHG emissions above existing conditions. However, implementation of the General Plan policies aimed at reducing GHG emissions, and the CAP that serves as the implementation tool for GHG monitoring and reporting, the General Plan would serve to implement a number of strategies and measures aimed at reducing GHG emissions. Therefore, future development projects under the General Plan and CAP would, by nature, result in reduced transportation GHG emissions. This achieves the overarching goals of local, regional, and State plans to reduce GHG emissions. As such, the General Plan EIR determined that buildout of the General Plan would result in less-than-significant GHG emissions and would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The General Plan EIR concluded that impacts from implementation of the proposed General Plan and CAP would be less than significant (City of Redlands, 2017b, p. 3.5-38).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). As detailed in Section 5.10, *Transportation,* the proposed Project is anticipated to generate a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

Service Population (SP)

As detailed in Section 5.8, *Population and Housing*, the buildout of the proposed 2,325 extra residential units under the proposed Project would result in an increase of approximately 6,162 residents and the reduction on non-residential square footage would result in a reduction of approximately 1,713 employees compared to buildout of the existing zoning.

SCAG Connect SoCal Demographics and Growth Forecast information shows that the City had approximately 25,600 households and approximately 49,400 jobs in 2019 (SCAG, 2024). Thus, the City of Redlands has 1.93 jobs for each household. The proposed Project would reduce (improve) the jobs-housing ratio slightly by adding 2,325 residential units and provide a regional beneficial effect of providing the opportunity for housing where employees can easily travel to nearby employment opportunities. Thus, the additional residential units would only result in an increase in residents that would be new to the SP. As shown in Table 5.8-7, *General Plan and Proposed Project Population Growth*, of this Draft Subsequent EIR, the proposed Project would result in an increase of 6,162 residents at buildout, which is the SP that would be generated by the Project.

IMPACT GHG-1: THE PROJECT WOULD GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.

Significant and Unavoidable.

Construction

Construction activities would occur at different sites throughout the Project area pursuant to individual proposed developments. The site-specific development projects that would occur pursuant to the Project would be temporary at any one location, but numerous site-specific development projects are anticipated to occur pursuant to buildout of the proposed rezoning parcels. Construction of site-specific development projects would create new sources of GHGs and could contribute to global climate change. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. As described previously, the timing of development and operation of the development pursuant to the Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically over a 10-year period or longer. Because of the uncertainty of the specific timing and methods of construction activities for future site-specific development projects that would occur under the proposed Project, construction-related GHG emissions are speculative and cannot be accurately determined at this stage of the planning process, per CEQA Guidelines Section 15145. Thus, Mitigation Measure AQ-1 has been

included to require that future projects prepare a technical assessment of GHG emissions from construction and include appropriate mitigation to reduce emissions to the greatest extent feasible. Due to the variables that must be considered when examining GHG construction emissions, and because SCAQMD methodology includes amortizing construction emissions over 30 years and adding them to the operation of the Project to determine significance, it would be speculative to state conclusively that construction activity associated with the Project would not cause a significant GHG impact. Further, the volume of GHG emissions that could be reduced through mitigation measures are specific to each proposed development, which are currently unknown.

Operation

Long-term operations from both buildout of the existing General Plan land uses and the proposed Project would generate GHG emissions from the following primary sources:

- **Area Source Emissions.** Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping.
- **Energy Source Emissions.** GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.
- **Mobile Source Emissions.** The Project related GHG emissions are derived primarily from vehicle trips generated by the Project, including employee trips to and from the Project area, truck trips associated with the proposed uses, and trips related to residential uses. Trip characteristics from the Project's Trip Generation (Appendix F) were utilized to quantify the GHGs from operation of the Project at buildout.
- **Water Supply, Treatment, and Distribution.** Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required depends on the volume of water as well as the sources of the water. For purposes of analysis, CalEEMod default parameters were used in modeling GHGs from Project water demand.
- **Solid Waste.** The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. For purposes of analysis, CalEEMod default parameters were used in modeling GHGs from Project generation of solid waste.

The operational emissions from buildout of the existing General Plan land use designations of the 24 Project sites, which would include 1,656,699.86 SF of commercial/industrial land uses, 552,340.90 SF of commercial land uses, and 111 multi-family dwellings are shown in Table 5.5-1. As shown, 46,446.76 $MTCO_2e$ per year would be generated by operation of the existing General Plan land uses at buildout, which equates to 18.16 $MTCO_2e$/SP annually.

Table 5.5-1: Existing General Plan Buildout Operational GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Mobile Source	39,117.93	2.76	2.67	67.32	40,049.49
Area Source	73.21	0.00	0.00	0.00	73.41
Energy Source	4,790.37	0.44	0.04	0.00	4,813.13

Water Usage	455.87	10.67	0.26	0.00	799.25
Waste	203.19	20.31	0.00	0.00	710.90
Refrigerants	0.00	0.00	0.00	0.59	0.59
Total CO_2e (All Sources)	**46,446.76**				
Service Population (SP)	**2,557.00**				
Total CO_2e/SP	**18.16**				

Source: Appendix E

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

Table 5.5-2: Proposed Project Operational Greenhouse Emissions at Buildout

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Mobile Source	18,890.95	0.73	0.87	10.34	19,180.17
Area Source	626.61	0.01	0.00	0.00	627.37
Energy Source	2,979.17	0.32	0.02	0.00	2,994.18
Water Usage	121.25	3.52	0.08	0.00	234.64
Waste	178.25	17.82	0.00	0.00	623.62
Refrigerants	0.00	0.00	0.00	0.42	0.42
Total CO_2e (All Sources)	**23,660.41**				
Service Population (SP)	**6,637.00**				
Total CO_2e/SP	**3.56**				
Screening Threshold (CO_2e)	**3.00**				
Threshold Exceeded?	**Yes**				

Source: Appendix E

Table 5.5-3 provides a comparison of the operational emissions from buildout of the existing General Plan land use designations (Table 5.5-1) and buildout of the proposed Project (Table 5.5-2). As shown on Table 5.5-3, the proposed Project would result in fewer GHG emissions per capita than emissions occurring under buildout of the existing General Plan.

Table 5.5-3: Comparison of Operational Greenhouse Emissions

Emission Source	Emissions (MT/yr)
Proposed Project	3.56
Approved General Plan Buildout	18.16
Net Emissions (Proposed – Approved)	**-14.60**

Source: Appendix E

However, because buildout of the proposed land uses would result in exceedance of the SP screening threshold, Mitigation Measures AQ-1 and AQ-2 would be implemented to require development projects to prepare a technical GHG analysis and include all applicable mitigation measures to reduce project specific operational emissions. Because the details of future proposed projects are currently unknown, the volume of emissions that could be reduced through mitigation measures are specific to each proposed development

and are also currently unknown. Therefore, even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions could continue to exceed SP screening threshold, and impacts related to GHG emissions would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to GHG emissions would be less than significant.

IMPACT GHG-2: THE PROJECT COULD CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES.

Significant and Unavoidable. The proposed rezoning would be consistent with SCAG strategies to provide infill residential development, as further detailed in Section 5.6, *Land Use and Planning*. The proposed Project would provide for housing near freeways, transit, employment, and commercial uses to plan for projected growth in the City pursuant to the HCD RHNA allocations and the City's Housing Element. Likewise, the proposed Public/Institutional use would complement the future housing, employment, and services. The close location of complementary uses would reduce the need to travel far distances to access amenities and retail/service needs, which would reduce VMT and the related GHG emissions. Providing additional residential within mixed-use areas is consistent with the intent of the AB 32 Scoping Plan and SB 375, which is focused on changing land use patterns and improving transportation alternatives.

The future development pursuant to the proposed Project would be implemented pursuant to the CALGreen Building/Title 24 requirements, included in the Redlands Municipal Code in Section 15.16, that would provide new land uses in a sustainable manner. The City's administration of the Title 24 requirements includes review of proposed energy conservation measures during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment; solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, and solar infrastructure. In complying with the Title 24 standards, the proposed Project would be implementing regulations that reduce GHG emissions.

In addition, the proposed Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions.

- Pavley emissions standard and Low Carbon Fuel Standard: Pavley emissions standards (AB 1493) apply to all new passenger vehicles and the Low Carbon Fuel Standard became effective in 2010 and regulates the transportation fuel used. The second phase of implementation of the Pavley regulations per AB 1493 is referred to as the Advanced Clean Car program, which combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for current model years through 2025. The regulation reduces GHGs from new cars by 34 percent from 2016 levels by 2025. The proposed Project is consistent with these requirements as they apply to all new passenger vehicles and vehicle fuel purchased in California.
- Medium/Heavy-Duty Vehicle Regulations: Medium/heavy-duty vehicle regulations are implemented by the State to reduce emissions from trucks. Since the new development that would occur pursuant to the proposed RHNA rezoning would utilize trucks for construction and some operational purposes, these regulations would aid in reducing GHG emissions. The proposed Project is consistent with this measure and its implementation as medium and heavy-duty vehicles associated with construction and operation would be required to comply with the requirements of this regulation.
- Tractor-Trailer Greenhouse Gas Regulation: Tractor-trailers subject to this State regulation are primarily 53-foot or longer box-type trailers, are required to either use USEPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The proposed Project would be consistent with this regulation, as it applies to specific trucks that are used throughout the state.

- Renewable Portfolio Standard. As a customer of Southern California Edison (SCE), the new development that would occur pursuant to the proposed Project would include onsite solar infrastructure and would purchase from an increasing supply of renewable energy sources and more efficient baseload generations, reduce GHG emissions, and be consistent with this requirement.
- Million Solar Roofs Program: The proposed Project is consistent with this scoping plan measure as the new development that would occur pursuant to the proposed Project would be required to comply with existing CALGreen/Title 24 standards, including the installation of solar panels.

CARB Scoping Plan

As detailed in the Section 5.5.2, *Regulatory Setting*, the CARB Scoping Plan recommends actions for achieving carbon neutrality through reduced GHG emissions levels. New development pursuant to the proposed RHNA rezoning would include energy-efficient/energy-conserving design features and would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction actions listed in CARB's most recent Scoping Plan (2022), as demonstrated in Table 5.5-4.

Table 5.5-4: Project Consistency with the CARB 2022 Scoping Plan Actions

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40 percent below 1990 levels by 2030.	**Consistent.** Future development pursuant to the proposed rezoning would comply with the Title 24, Part 6, building energy requirements along with other local and State initiatives that aim to achieve the 40 percent below 1990 levels by 2030 goal. This would be ensured through the City's existing development permitting process. Further, Mitigation Measures AQ-1 and AQ-2 would require project specific GHG emission studies and emissions reduction measures, which would lower GHG emissions from operation of buildout of the proposed rezoning area.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	**Consistent.** As discussed in Section 5.10, *Transportation*, in Table 5.10-10, although it is possible that a VMT impact may occur from buildout of three of the sites included in the proposed Project, the cumulative Redlands Citywide VMT/SP with buildout of the entire Project would be 3.1 percent lower than cumulative VMT without the Project. As such, the Project's cumulative impacts related to VMT would be less than significant.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100 percent of LDV sales are ZEV by 2035.	**Consistent.** Future development Projects would be designed and constructed in accordance with the Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces and charging stations.
Truck ZEVs	
100 percent of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	**Consistent.** The new development pursuant to the proposed rezoning would be designed and constructed in accordance with the most updated Title 24 regulations, which includes prewiring for truck ZEV charging stations and/or providing electrical plug-ins at applicable locations.

Action	Consistency
Aviation	
20 percent of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	**Not Applicable.** Development and operation of the proposed rezoning sites would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25 percent of OGVs utilize hydrogen fuel cell electric technology by 2045.	**Not Applicable.** Development and operation of the proposed rezoning sites would not utilize any OGVs.
Port Operations	
100 percent of cargo handling equipment is zero-emission by 2037. 100 percent of drayage trucks are zero emission by 2035.	**Not Applicable.** Development and operation of the proposed rezoning sites would not impact any operations at any ports.
Freight and Passenger Rail	
100 percent of passenger and other locomotive sales are ZEV by 2030. 100 percent of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	**Not Applicable.** Development and operation of the proposed rezoning sites would not involve any rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	**Not Applicable.** The proposed Project would not involve any oil or gas extraction.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	**Not Applicable.** The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2030 and 30 $MTCO_2e$ in 2035. Retail sales load coverage of 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	**Consistent.** The development and operation of the rezoning sites would comply with the Title 24, Part 6 building requirements, including related to renewable energy generation requirements as well as improved insulation reducing energy consumption.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The development and operation of the rezoning sites would comply with the Title 24, Part 6 building energy requirements.
Existing Residential Buildings	
80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The proposed Project does not involve the operation of any existing residential buildings. However, appliances within future residences would comply with the Title 24, Part 6 building energy requirements.

Action	Consistency
Existing Commercial Buildings	
80 percent of appliance sales are electric by 2030, and 100 percent of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The proposed Project does not involve the continued operations of existing commercial buildings. However, appliances within future buildings would comply with the Title 24, Part 6 building energy requirements.
Energy Demand	
7.5 percent of energy demand electrified directly and/or indirectly by 2030; 75 percent by 2045.	**Consistent.** The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6 building energy requirements, including renewable energy generation requirements, as well as improved insulation reducing energy consumption.
Construction Equipment	
25 percent of energy demand electrified by 2030 and 75 percent electrified by 2045.	**Consistent.** Through City permitting, the new development pursuant to the proposed rezoning would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25 percent in 2030 and 75 percent in 2045.
Energy Generation	
Electrify 0 percent of boilers by 2030 and 100 percent of boilers by 2045. Hydrogen for 25 percent of process heat by 2035 and 100 percent by 2045. Electrify 100 percent of other energy demand by 2045.	**Consistent.** The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances, electric outlets for landscape equipment, solar panels, and provision of electric charging stations.
Stone, Clay, Glass, and Cement	
CCS on 40 percent of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	**Not Applicable.** Uses proposed in the rezoning sites do not involve manufacturing or storage of stone, clay, glass, or cement.
Other Industrial Manufacturing	
0 percent energy demand electrified by 2030 and 50 percent by 2045.	**Not Applicable**. The proposed rezoning does not include industrial manufacturing, but would comply with the Title 24, Part 6, including increases in renewable energy generation requirements as well as improved insulation reducing energy consumption.
Combined Heat and Power	
Facilities retire by 2040.	**Not Applicable.** The proposed rezoning does not involve any existing combined heat and power facilities.
25 percent energy demand electrified by 2030 and 75 percent by 2045.	**Not Applicable.** The proposed rezoning does not involve generation of energy; but future development per the proposed rezoning would comply with the Title 24 renewable energy generation requirements.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	**Not Applicable.** The proposed rezoning does not involve any production of biofuels.
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane135 blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7 percent energy (~20 percent by volume),	**Not Applicable.** The proposed rezoning does not involve any production of fuels for buildings and industry.

Action	Consistency
ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	
Non-combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75 percent of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50 percent by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	**Not Applicable.** The proposed rezoning does not involve any landfill and/or dairy uses.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	**Consistent.** The new development pursuant to the proposed rezoning would comply with the Title 24, Part 6, building energy requirements, including use of low GWP refrigerants, which would be verified through the City's existing development permitting process.

Scoping Plan Appendix D, Local Actions

The 2022 CARB Scoping Plan includes a set of Local Actions set forth in Appendix D to the Scoping Plan, which aim at providing local jurisdictions with tools to reduce GHG emissions to assist the State in reaching the reduction targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section for evaluating plan-level and project-level alignment with the State's Climate Goals within CEQA GHG analysis. Within this section, CARB identifies multiple recommendations and strategies that should be considered for new development to demonstrate consistency with the 2022 Scoping Plan. Specifically, this section is focused on strategies for residential and mixed-use projects. The document is organized into two categories: examples of plan-level GHG reduction actions that could be implemented by local governments and examples of onsite project design features and mitigation measures that could be applied to individual projects under CEQA.

The future development that would occur pursuant to the proposed rezoning would include a number of example project design features and mitigation measures from the 2022 CARB Scoping Plan for construction and operation. For instance, the Scoping Plan's construction measures include enforcing idling time restrictions on construction vehicles, requiring construction vehicles to operate highest tier engines commercially available, diverting and recycling construction waste, minimizing tree removal, and increased use of electric and renewable fuel powered construction equipment and required renewable diesel fuel where commercially available. These measures are consistent with existing requirements for idling trucks [CCR Title 13, Motor Vehicles, Section 2449(d)(3)].

Appendix D notes that residential and mixed-use projects that include key project attributes are clearly consistent with the State's goals and would accommodate growth in a manner which is consistent with the State's GHG reduction and equity prioritization goals. The Project's consistency with the 2022 CARB Scoping Plan Appendix D, Local Actions is detailed in Table 5.5-5.

Table 5.5-5: Project Consistency with the CARB 2022 Scoping Plan Appendix D, Local Actions

Priority Areas	Key Project Attribute	Proposed Project Consistency with Attribute
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval	**Potentially Inconsistent.** Future implementing projects in Sites 1 through 24 would be required to include EV charging infrastructure as required by the California Green Building Standards Code; it is unknown if all future development projects would meet the most ambitious voluntary standards. Therefore, the Project has the potential to be inconsistent with this attribute.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	**Potentially Inconsistent.** Future implementing projects in Sites 1 through 24 would be developed on underdeveloped or underutilized land which may or may not be served by existing infrastructure and public services. Therefore, the Project has the potential to be inconsistent with this attribute.
	Does not result in the loss or conversion of natural and working lands	**Potentially Inconsistent.** Future implementing projects in Sites 1 through 24 are currently developed or vacant. The Project would have the potential to result in the loss or conversion of natural and working lands. Therefore, the Project has the potential to be inconsistent with this attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS	**Potentially Inconsistent.** The overall density for future implementing residential projects in Sites 1 through 23 would be 15 to 30 dwelling units per acre; and thus, could be less than the 20 units per acre minimum. Therefore, the Project has the potential to be inconsistent with this attribute.
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or	**Potentially Inconsistent.** As this is a programmatic analysis, and parking specifics about future implementing projects are not known at this time. As such, the Project would have the potential to be inconsistent with parking reductions provided by the 2022 Scoping Plan.

Priority Areas	Key Project Attribute	Proposed Project Consistency with Attribute
	For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	
	At least 20 percent of units included are affordable to lower-income residents	**Potentially Inconsistent.** Although the Project's intent is to meet the City's RHNA allocation, including lower income residential units, this is a programmatic analysis, and specifics about future implementing projects are not known at this time. As such, future development under the Project could have the potential to be inconsistent with provision of at least 20 percent of units for lower-income residents.
	Results in no net loss of existing affordable units	**Consistent.** Sites 1 through 23 are currently underdeveloped or underutilized. The Project's intent is to meet RHNA requirements per the City's 2021-2029 Housing Element, including provision of affordable units. No net loss of affordable units would occur. Therefore, the Project would be consistent with this attribute.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking	**Potentially Inconsistent.** Future developments pursuant to the proposed rezoning would be required to meet CALGreen energy efficiency standards as included in the Redlands Municipal Code Section 15.16, including installing electrical wiring for all built in appliances, electric outlets for landscape equipment, solar panels, and provision of electric charging stations. Also, Mitigation Measure AQ-2 requires implementation of project specific mitigation measures to reduce GHG emissions. Therefore, the future development that would occur pursuant to the proposed rezoning would be developed in a manner that promotes energy efficiency and minimizes the reliance on fossil fuels. However, it is possible that future development would include natural gas, propane, or other fossil fuels. Therefore, the Project could have the potential to be inconsistent with this attribute.

The proposed Project would implement key residential and related mixed-use attributes included in 2022 Scoping Plan Appendix, *Local Actions*; however, as detailed in Table 5.5-5, the proposed Project would have the potential to be inconsistent with the key project attributes that include: sites presently served by utilities, loss of natural and working lands, residential densities less than 20 units per acre, reduction in parking, and affordable housing guarantees. Due to the potential inconsistency with the 2022 Scoping Plan Appendix D the proposed Project would result in a significant and unavoidable impact regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the GHG emissions.

Redlands CAP

As described previously, the City of Redlands CAP was designed to reinforce the City's commitment to reducing GHG emissions and demonstrate compliance with the State's GHG emissions reduction standards. The CAP used the 2017 Scoping Plan recommended Plan Level emissions target of 6.0 $MTCO_2e$ per capita per year for 2030. As described under Impact GHG-1, the Project would result in GHG emissions of 3.56 $MTCO_2e$/SP, which is less than the 6.0 $MTCO_2e$ target and therefore would be consistent with the CAP emission goals. Also, the Project would implement energy and water efficiency standards per CALGreen (as included in the Redlands Municipal Code Section 15.16), as verified through the City's permitting process, which include requirements such as solar photovoltaic systems, increased energy and water efficiency.

General Plan

As detailed in Table 5.5-6, the Project would not conflict with the relevant General Plan policies related to GHG emissions.

Table 5.5-6: Project Consistency with the City General Plan Sustainable Community Element Policies

General Plan Policy	Consistency
Principle 8-P.1 Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.	**Consistent.** As described previously, future development under the proposed rezoning would implement a variety of building, water, and solid waste efficiencies consistent with the most current CALGreen requirements. Therefore, the Project is consistent with Principle 8-P.1.
Action 8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.	**Consistent.** As described previously, the future development under the proposed rezoning would implement the most current CALGreen requirements per Redlands Municipal Code Section 15.16. Therefore, the proposed Project is consistent with Action 8-A.8.
Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.	**Consistent.** As described previously, the future development under the proposed rezoning would implement the most current CALGreen requirements per Redlands Municipal Code Section 15.16. This includes use of materials with solar reflectance and thermal emittance required by Title 24. Therefore, the proposed Project is consistent with Action 8-A.9.
Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	**Consistent.** The future development under the proposed rezoning would include landscaping throughout the public realm and private development areas as required by the City's Municipal Code and development standards. Therefore, the proposed Project is consistent with Action 8-A.10.

General Plan Policy	Consistency
Principle 8-P.8 Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.	**Consistent.** The pattern of infill residential development that would be implemented by the proposed rezoning would reduce vehicle miles traveled and related GHG emissions while providing for projected growth. Thus, the proposed Project is consistent with Action 8-P.8.

Overall, the future development implemented by the proposed rezoning would be in compliance with State energy standards provided in Title 24 and other statewide standards for fuel and solar use. The Project would also be consistent with the relevant City General Plan policies and the City's Climate Action Plan. However, as detailed in Table 5.5-5, the proposed Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, Local Actions key project attributes. Due to this potential inconsistency, the proposed Project could result in a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be significant and unavoidable. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to consistency with applicable plan, policies, or regulations for reducing GHG emissions would be less than significant.

5.5.7 CUMULATIVE IMPACTS

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a Project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Executive Order S-3-05, Executive Order B-30-15, AB 32, and SB 32 recognizes that California is the source of substantial amounts of GHG emissions and recognizes the significance of the cumulative impact of GHG emissions from sources throughout the state and sets performance standards for reduction of GHGs.

The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. As described previously, the estimated GHG emissions from development pursuant to the proposed Project at buildout would be substantially less than those from buildout of the existing General Plan land uses but could exceed the service population threshold of 3.0 $MTCO_2e$ per year after implementation of mitigation. Therefore, buildout of the Project would result in a cumulatively considerable significant impact. In addition, the Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, *Local Actions*, key project attributes, which could combine with inconsistencies of potential other/future projects. Therefore, impacts related to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, could be cumulatively considerable, and therefore, significant.

5.5.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Clean Car Standards – Pavley Assembly Bill 1493
- California Executive Order S-3-05
- Assembly Bill 32 (Global Warming Solutions Act of 2006)
- Senate Bill 375
- California Executive Order B-30-15
- Senate Bill 32
- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Local

- City of Redlands Climate Action Plan
- City of Redlands General Plan Sustainable Community Element

Plans, Programs, or Policies

None.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact GHG-1: Buildout of the proposed Project would generate GHG emissions directly and indirectly that would have a potentially significant impact.

Impact GHG-2: Construction and operation associated with buildout of the proposed Project could conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions, and impacts are potentially significant.

5.5.10 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

The mitigation measures listed below are also listed in Section 5.2, *Air Quality*, of this Draft Subsequent EIR.

Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air

pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to:

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

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

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

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

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact GHG-1: GHG emissions at buildout of the proposed Project could exceed thresholds after implementation Mitigation Measures AQ-1 and AQ-2. Thus, impacts related to GHG emissions would be **significant and unavoidable** and **cumulatively considerable**.

Impact GHG-2: The proposed Project would have the potential to be inconsistent with the 2022 Scoping Plan Appendix D, Local Actions key project attributes, which could combine with potential inconsistencies of other/future projects. Thus, impacts related to conflict with a policy, plan or regulation adopted for the purpose of reducing GHG emissions would be **significant and unavoidable** and **cumulatively considerable**.

5.5.12 REFERENCES

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5.6 Land Use and Planning

5.6.1 INTRODUCTION

This section provides an analysis of the consistency of the proposed Project with applicable land use plans, policies, and regulations that guide development of the Project site and evaluates the relationship of the Project with surrounding land uses. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

5.6.2 REGULATORY SETTING

5.6.2.1 Regional Regulations

SCAG Regional Transportation Plan and Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is designated by federal law as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops transportation and housing strategies for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), which includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Most of the plan's goals are related to regional transportation infrastructure and the efficiency of transportation in the region (SCAG 2020).

The 2024 SCAG Connect SoCal RTP/SCS was officially adopted in April 2024 as the new RTP/SCS for the SCAG jurisdiction. Several updates are reflected within Connect SoCal 2024 plan, including growth projections and forecasting for the region. Connect SoCal 2024 reflects a continuation of the shift toward more efficient resource management. This refers to transportation infrastructure, land resources, and environmental resources. This plan projects that 66 percent of new households and 54 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities.

5.6.2.2 Local Regulations

Redlands General Plan 2035

The City of Redlands adopted the 2035 General Plan on December 5, 2017. The General Plan serves as a policy document or blueprint for future development to guide future growth in Redlands. The seven themes in the 2035 General Plan include the following:

1. **Distinctive City.** This chapter sets policies to preserve and enhance the City's unique architectural, historical, and cultural resources.

2. **Prosperous Economy.** This chapter sets forth principles and actions specific to major sectors of Redlands' economy – including tourism, innovation, and retail, - in order to ensure prosperity and opportunity for all Redlanders.
3. **Livable Community.** This chapter describes the existing land use pattern and growth management framework. Development and other factors impacting quality of life – including public facilities, public safety, and education – are guided so as to retain the community's character.
4. **Connected City.** This chapter includes policies, programs, and standards to maintain efficient circulation for all modes of travel. It identifies future street and traffic improvements, and addresses walking, biking, transit, and parking to enable a multi-model circulation system.
5. **Vital Environment.** Redlands is renowned for its natural beauty. This chapter sets forth policies regarding land conservation, open space, agriculture, and water supply, in order to protect the Planning Area's natural environment.
6. **Healthy Community.** This chapter shapes policy specific to health outcomes of Redlanders. Topics addressed include recreational activity, public health, safety, and air quality.
7. **Sustainable Community.** This chapter outlines strategies to preserve Redlands' natural resources for the benefit of future Redlanders. This chapter incorporates innovative strategies to minimize the environmental footprint associated with water, energy, and resource consumption.

City of Redlands Municipal Code

Chapter 18.16, Districts and Zoning Map

The City's Code of Ordinances Chapter 18.16, *Districts and Zoning Maps*, establishes the zoning districts and boundaries of those districts within the City.

5.9.3 ENVIRONMENTAL SETTING

The City of Redlands is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles east of the City of Los Angeles and approximately 45 miles west of the City of Palm Springs. The City is situated along the Interstate 10 (I-10) corridor, which links it with the cities of San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley to the east. State Route 210 (SR-210) originates in the city of Redlands and traverses the northwest part of the city, heading north then west towards the cities of Highland and Pasadena (see Figure 3-1, *Regional Location*).

The City of Redlands Housing Element Regional Housing Needs Allocation (RHNA) includes 196 housing sites. Of the 196 sites, 23 sites totaling approximately 109.25 acres were identified as requiring future rezone (rezone sites). The entire Project site including Site 24 (which is not included in the Housing Element) is approximately 116.19 acres. The rezone sites are a subset of the Housing Element Sites Inventory, included in Appendix B of the Housing Element, which represent sites that require rezoning by the City to achieve housing targets. Site 24 is not included in the Housing Element but would require a zone change as part of the Project in order to conform with the existing onsite school use and achieve land use compatibility with the surrounding proposed residential designations. The rezoning of these 24 sites constitutes the proposed Redlands RHNA Rezone Project ("proposed Project", or "Project"). The 24 sites are broken up into two distinct areas:

- Sites 1 through 16A and 24 are in the western portion of the City, approximately 0.75 miles south of the I-10, bordered to the north by Citrus Avenue, the south by Orange Avenue, the west by New Jersey Street, and the east by Kansas Street. These sites are within the East Valley Corridor Specific Plan (EVCSP) which aims to strengthen the local economy, attract major businesses, and result in the orderly and aesthetic development of industrial, commercial, and residential areas.

- Sites 17 through 23 are the western portion of the City, approximately 1.25 miles northeast of Sites 1 through 16A and 0.32 miles east of SR-210, just south of East San Bernardino Boulevard. The sites are located in North Redlands just north of I-10 and Downtown Redlands.

Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, Figure 3-3a, *Aerial View*, and Figure 3-3b, *Aerial View*, in Section 3.0, *Project Description*.

5.6.3 ENVIRONMENTAL SETTING

Existing General Plan

The City of Redlands General Plan currently designates the Rezone sites as Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a, *Existing General Plan Land Use*, and Figure 3-4b, *Existing General Plan Land Use*, show the existing General Plan land use designations.

Existing Zoning

The Rezone sites currently have zoning designations of Commercial Industrial (EV/IC), Concept Plan 4 (CP-4), Agriculture (A-1), Single Family Residential (R-1) and Multiple Family Residential (R-2). Figures 3-5a, *Existing Zoning*, and 3-5b, Existing Zoning, show the existing zoning designations for the Rezone Sites. Table 3-1, *Existing General Plan Buildout,* shows the existing General Plan land use and zoning designations for each Rezone site and the potential buildout of each site pursuant to buildout of the existing General Plan land use designation.

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

LU-1 Physically divide an established community; or

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

The Initial Study established that the proposed Project would result in less-than-significant impacts related to Threshold LU-1; thus, no further assessment of this impact is required in this Draft Subsequent EIR.

5.6.5 METHODOLOGY

This analysis of land use consistency impacts considers whether the proposed Project would be inconsistent with (or conflict with) regional and local plans, policies, and regulations that are applicable to the proposed Project and Rezone sites, including the SCAG RTP/SCS, the City of Redlands General Plan, and the City's Municipal Code. Consistent with the scope and purpose of this Draft EIR, this discussion primarily focuses on those goals and policies that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. Thus, a project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (as defined by CEQA Guidelines Section 15382).

CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. A project need not be consistent with each and every policy and objective in a planning document. Rather, a project is considered consistent with the provisions of the identified regional

and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary goals of the land use plan or policy.

5.6.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR determined that the General Plan would not physically divide an established community since it does not propose the development of highways or infrastructure that would physically divide the community, thus there would be no impact. Additionally, the General Plan EIR found that there would be no impact related to applicable land use plans, policies, or regulations. The General Plan proposed an increase of housing units from 30,200 to 36,600 by 2035 specifically focusing on infill development; thus, the General Plan would not displace substantial numbers of existing housing or people. If residents were to be displaced, they would be able to find housing elsewhere since buildout of the General Plan would result in additional housing units and impacts would be less than significant (City of Redlands, 2017, p.3.10-11 through 3.10-16).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 square feet (SF) of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses, and 111 multi-family dwelling units, to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings).

IMPACT LU-2: THE PROJECT WOULD NOT CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT.

Less than Significant Impact.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS goals that are relevant to the proposed Project focus largely on maximizing mobility, encouraging development patterns and densities that reduce infrastructure costs, and provide for efficiency. The proposed Project would be consistent with the applicable 2020 and 2024 RTP/SCS goals, as detailed below in Table 5.6-1 and Table 5.6-2. Therefore, implementation of the proposed Project would not result in conflict with RTP/SCS goals.

Table 5.6-1: 2020 SCAG RTP/SCS Consistency Analysis

RTP/SCS Goal Statements	Project Consistency Discussion
1. Encourage regional economic prosperity and global competitiveness.	**Consistent.** As discussed in Section 5.8, *Population and Housing*, the proposed Project would bring more housing to the City to assist with the jobs and housing balance.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with applicable roadway standards.

RTP/SCS Goal Statements	Project Consistency Discussion
3. Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent.** As a Rezone, the proposed Project is limited in its ability to ensure security and resilience of the regional transportation system. There are no components of the proposed Project that would result in the deterioration of the transportation system. However, as a measure to safeguard security, the proposed Project would comply with applicable policies included in the City of Redlands Hazards Element, including development outside 100-year flood zones, dam inundation areas, Alquist-Piolo earthquake fault zones, and very high fire severity zones.
4. Increase person and goods movement and travel choices within the transportation system.	**Consistent.** As a RHNA Rezone, the proposed Project is limited in its ability to maximize the goods movement and travel choices within the SCAG region. The proposed Project would not create substantial traffic impediments and would provide infill residential development in the City of Redlands.
5. Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Proposed Project would not prevent SCAG from implementing actions that would improve air quality within the region. As discussed in Section 5.2, *Air Quality*, and Section 5.5, *Greenhouse Gas Emissions*, implementing projects would incorporate various measures related to building design, landscaping, and energy systems to promote the efficient use of energy, pursuant to Title 24 CALGreen Code and Building Energy Efficiency Standards.
6. Support healthy and equitable communities.	**Consistent.** Implementing projects would be required to comply with the City of Redlands Health Community Element goals and policies to support healthy and equitable communities, which are listed in Table 5.6-3. Additionally, implementing projects would construct frontage improvements, including landscaping which would not hinder pedestrian access near the proposed Project area.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent.** This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Proposed Project would not conflict with this goal.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** The RHNA Rezone Project would result in the development of infill residential which would comply with the Municipal Code design standards. The development of infill residential would also assist in the growth of Redlands.

RTP/SCS Goal Statements	Project Consistency Discussion
10. Promote conservation of natural and agricultural lands and restoration of habitats	**Consistent.** The Project would be consistent with goals and policies of the General Plan. Although the Project would result in the loss of agricultural land, the existing farming uses on the Project site are lawful nonconforming uses that would otherwise not be permitted under the site's General Plan or zoning designations which include Commercial and Industrial uses. This loss of agricultural land was already accounted for within the 2017 General Plan EIR as a significant and unavoidable impact, and therefore does not represent a conflict. In addition, Initial Study (Appendix A) Mitigation Measures BIO-1 and BIO-2 would reduce potential impacts associated with biological resources. The Project would not conflict with this goal.

Table 5.6-2: 2024 SCAG RTP/SCS Consistency Analysis

Goals	Project Consistency
Transit and Multimodal Integration	
Increase multimodal connectivity (e.g., first/last mile transit and airport connections), which includes planning for and developing mobility hubs throughout the SCAG region	**Consistent.** As discussed in Section 5.10, *Transportation*, The Project would develop infill residential units which are of close proximity to a variety of public transit access points. The Project site is served by Omnitrans and the San Bernardino County Transportation Authority (SBCTA) and there are two bus stops within one mile of the Project site. Furthermore, specific infrastructure improvements required to support future residential would be required to fund transit facilities as deemed necessary.
Through land use planning, support residential development along high-frequency transit corridors and around transit/rail facilities and centers	
Expand the region's networks of bicycle and pedestrian facilities. This includes creating more low stress facilities, such as separated bikeways and bike paths, slow streets, and open streets	**Consistent.** As discussed in Section 5.10, *Transportation*, potential future projects would be required, if deemed necessary, to provide bicycle facilities, as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
Safety	
Work with local, state and federal partners to advance safer roadways, including reduced speeds to achieve zero deaths and reduce GHGs	**Consistent.** As discussed in Section 5.10, *Transportation*, future development implemented pursuant to the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
15-Minute Communities	
Develop technical-assistance resources and research that support 15-minute communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access to neighborhood amenities, open space and urban greening, job centers and multimodal mobility options	**Consistent.** As discussed in Section 3.0, *Project Description,* the Project would develop underutilized properties and create infill residential units. The site has two bus stops within one mile and is surrounded by a variety of open spaces including Heritage Park, Texonia Park, and Orange Blossom Trail.

Goals	Project Consistency
Sustainable Development	
Research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure	**Consistent.** As discussed in Section 5.4, *Energy*, the proposed Project would comply with CALGreen/Title 24 requirements to implement energy conservation measures and water efficient plumbing.
Air Quality	
Coordinate with local, regional, state and federal partners to meet federal and state ambient air-quality standards and improve public health	**Consistent.** As described in Section 5.2, *Air Quality*, the proposed Project would result in cumulatively considerable impact and would be required to comply with all relevant State, regional, and local regulations and policies for reducing particulate emissions.
Clean Transportation	
Facilitate development of EV charging infrastructure through public-private partnerships	**Consistent.** As discussed in Section 5.4, *Energy*, future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Support the deployment of clean transit and technologies to reduce greenhouse gas emissions as part of the CARB innovative clean technology (ICT) rule	**Consistent.** The Project would not conflict with this measure and future developments under the proposed Project would comply with CALGreen/Title 24 requirements and include EV charging infrastructure.
Natural and Agricultural Lands Preservation	
Work with implementation agencies to support, establish or supplement voluntary regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process	**Consistent.** As discussed in Section 5.10, *Transportation*, future developments under the proposed Project would be required, if deemed necessary, to fund transit facilities, pedestrian facilities, and bicycle facilities as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. Since Sites 20, 21 and 23 could have a potentially significant VMT impact, future developments on these sites would be required to conduct project-specific VMT screening analysis to determine if the development would screen out of a VMT analysis.
Continue efforts to support partners in identifying priority conservation areas— including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection	**Consistent.** As discussed in the Initial Study (Appendix A), the Rezone sites are located in an urbanized and developed area, with some vacant sites. Mitigation Measure BIO-1 would be implemented to require future projects within the area to have a biologist evaluate the site prior to any ground disturbing activities.
Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts	
Climate Resilience	
Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives	**Consistent.** As discussed in Section 5.12, *Utilities and Service Systems,* the proposed Project would be required to implement the CALGreen requirements for efficient use of water. Additionally, as discussed in the Initial Study, included as Appendix A, development and construction of the Project site would require preparation and adherence to SWPPP and WQMP. Therefore, development of the site would not deplete or pollute groundwater resources.
Collaborate with partners to foster adoption of systems and technologies that can reduce water demand and/or increase water supply, such as alternative groundwater recharge technologies, stormwater capture systems, urban cooling infrastructure and greywater usage systems	

City of Redlands General Plan 2035

Table 5.6-3 lists the policies from the City of Redlands General Plan that are relevant to the proposed rezone. For each topic of the General Plan, the General Plan established policies that consist of principles and actions that form the supporting policies for the goal. As shown in Table 5.6-3 below, the Project would be consistent with the actions and policies of the City's General Plan.

Table 5.6-3: Project Consistency with Applicable General Plan Principles, Actions and Policies

General Plan Policy	Proposed Project
Principle 2-P.2 Embrace the unique identities of individual neighborhoods in Redlands and encourage the celebration and enhancement of characteristics that make each neighborhood distinct.	**Consistent.** While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Action 2-A.4 Maintain continuity in streetscape design along major streets and avenues that traverse north and south – California, Nevada, Alabama, Tennessee, Orange, Church, University, Judson, and Wabash; and those that traverse east and west – Pioneer, San Bernardino, Lugonia, Redlands Boulevard, and Citrus.	**Consistent.** While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with applicable roadway standards.
Action 2-A.8 Insist on high-quality development and revitalization in older neighborhoods, such as the Orange Street and Colton Avenue commercial corridors, that is sensitive to historic architecture, and provides a broad range of retail, restaurants, professional services, and offices that meet the community's needs. Build a sense of community in these commercial areas.	**Consistent.** As discussed in Section 3.0, *Project Description*, the General Plan designated some of the Project sites as Industrial and Commercial and this Project is proposing a zone change to Residential for these sites. The proposed General Plan Amendment and zone changes would preserve the sense of community within the respective commercial areas in comparison to the original land use and zoning designations.
Action 2-A.10 Permit densities, design, and uses that will help preserve the character and amenities of existing neighborhoods.	**Consistent.** While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Action 2-A.13 Maintain continuity in land uses, including commercial and residential uses, across barriers such as I-10 and Highway 210. These barriers should not be seen as "walls" that define completely different neighborhoods or divide the city by land use.	**Consistent.** All developments within the RHNA Rezone Project area would be consistent with the surrounding area and land uses.
Action 2-A.14 Use development standards to ensure smooth transitions for neighborhoods that border one another so that neighborhoods maintain their unique qualities while being compatible with one another.	**Consistent.** While no development is proposed at this time, future projects developed pursuant to the RHNA Rezone would be required to comply with Municipal Code design standards.
Policy 2-P.8 Identify, maintain, protect, and enhance Redlands' cultural, historic, social, economic, architectural, agricultural, archaeological, and scenic heritage. In so doing, Redlands will preserve its unique character and beauty, foster community pride, conserve the character and architecture of its neighborhoods and commercial and rural areas, enable citizens and visitors to enjoy and learn about local history, and provide a framework for making appropriate physical changes.	**Consistent.** The RHNA Rezone area includes the development of infill residential which would comply with the Municipal Code design standards. The development of infill residential would also assist in the growth of Redlands unique community and enable future tenants to enjoy the local history.
Policy 2-P.9 Provide incentives to protect, preserve, and maintain the city's heritage.	**Consistent.** As discussed in the Initial Study (Appendix A), there are no structures in the Project site that are considered historic resources. However, Mitigation Measures CUL-1 and CUL-2 are included to require proper evaluation of
Policy 2-P.11 Encourage retention of the character of existing historic structures and urban design elements that	

General Plan Policy	Proposed Project
define the built environment of the city's older neighborhoods.	historic resources for future projects developed pursuant to the RHNA Rezone.
Policy 2-P.12 Encourage retention of historic structures in their original use or reconversion to their original use where feasible. Encourage sensitive, adaptive reuse where the original use is no longer feasible.	
Policy 2-P.13 Encourage preservation of and public access to defined and established significant scenic vistas, viewpoints, and view corridors.	**Consistent.** As discussed in the Initial Study (Appendix A), the Project area consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the RHNA Rezone are in or near already developed areas of the City and coincide with areas designated for development under the General Plan.
Policy 2-P.14 Coordinate preservation of historic resources with policies designed to preserve neighborhoods and support the affordability of housing in historical structures.	**Consistent.** As discussed in the Initial Study (Appendix A), there are no structures in the Project site that are considered historic resources. However, Mitigation Measures CUL-1 and CUL-2 are included to require proper evaluation of historic resources for future Projects developed pursuant to the RHNA Rezone.
Policy 2-P.15 Balance the preservation of historic resources with the desire of property owners of historic structures to adopt energy efficient strategies.	
Policy 2-P.16 Work with local paleontologists to identify significant non-renewable paleontological resources.	**Consistent.** As discussed in the Initial Study (Appendix A), the proposed Project area is in an urban environment that has been previously disturbed. Future projects would also be required to adhere to Mitigation Measure PAL-1 and PAL-2 which would require proper analysis and management of paleontological resources.
Policy 2-P.17 Protect archaeological and paleontological resources for their aesthetic, scientific, educational, and cultural values.	**Consistent.** As discussed in Section 5.3, *Cultural Resources*, the Project sites are located in urbanized areas. Many of the sites have been disturbed by agricultural activities and are not known to contain any archeological or paleontological resources. Future development projects within the RHNA Rezone Project area would be required to implement Mitigation Measure CUL-3 which requires an archeological resource assessment prior to ground disturbing activities. If resources are discovered Mitigation Measure CUL-4, would require a mitigation plan be prepared. Mitigation Measure CUL-4 will be required for any ground disturbing activities with 50 feet of the Morey Arroyo due to the areas of high archeological sensitivity.
Action 2-A.25 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50 years old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.	**Consistent.** As discussed in the Initial Study, included as Appendix A, implementing developments could impact historic structures. However, the proposed Project would require evaluation of potential historic resources for implementing projects that could potentially impact a building or structure in excess of 45 years of age as included as Mitigation Measure CUL-1.
Action 2-A.26 Provide development standards and guidelines to encourage conversion of historic structures to alternative uses without compromising the quality of the neighborhood if preservation of the original use is an economic hardship.	**Consistent.** As discussed above, any future development within the RHNA Rezone area would be required to adhere to Mitigation Measure CUL-1 which requires evaluation of potential historical buildings. If a structure is identified as a historical resource, then Mitigation Measure CUL-2 would be required. Mitigation Measure CUL-2 requires modification of identified historical resources to meet the Secretary of the Interior's Professional Qualification

General Plan Policy	Proposed Project
	Standards to ensure compliance with Standards for Rehabilitation.
Action 2-A.39 Ensure that permanent changes to the exterior or setting of a designated historic resource be done in accordance with the Secretary of the Interior standards for historic properties.	**Consistent**. As discussed in the Initial Study (Appendix A) all rehabilitations and additions to historic buildings shall conform to the recommendations of the Secretary of the Interior's *Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Structures and/or the Redlands Historic Architectural Design Guidelines*.
Action 2-A.49 Encourage compatibility of new land uses and new construction adjacent to historical buildings. Encourage construction that is physically and aesthetically complementary to the historic buildings in architectural features and relationship to adjoining structures.	**Consistent.** As discussed in the Initial Study (Appendix A) new development and redevelopment would be visually compatible with the surrounding environment.
Action 2-A.51 Encourage new construction that ties the new with the old in a harmonious fashion, enhancing the historic pattern.	
Action 2-A.66 Promote neighborhood preservation and stabilization.	**Consistent.** The new residential developments would help preserve the livelihood of preexisting neighborhoods and add to the value of the area.
Action 2-A.67 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	**Consistent.** Future residential developments within the RHNA Rezone site would be within the permitted densities of the site. As stated above the new developments and redevelopments would be visually compatible with the surrounding environment.
Action 2-A.68 Discourage changes in residential areas that would disturb the character or clearly have a destabilizing effect on the neighborhood.	
Action 2-A.69 Encourage shared parking or in-lieu parking in older neighborhoods.	**Consistent.** Future development designs would receive approval from the City and in compliance with parking requirements.
Action 2-A.71 Using an annually updated Archaeological Resource Sensitivity Map, review proposed development projects to determine whether a site contains known prehistoric or historic cultural resources and/or to determine the potential for discovery of additional cultural resources.	**Consistent.** As discussed in Section 5.3, *Cultural Resources*, the Rezone sites are located in urbanized areas. Many of the sites have been disturbed by agricultural activities and do not contain any known archeological or paleontological resources. Future development projects within the RHNA Rezone Project area would be required to implement Mitigation Measure CUL-3 which requires an archeological resource assessment prior to ground disturbing activities. If resources are discovered Mitigation Measure CUL-4 would require a mitigation plan be prepared. Mitigation Measure CUL-4 will also be required for any ground disturbing activities with 50 feet of the Morey Arroyo due to the areas of known high archeological sensitivity.
Action 2-A.72 Require that applicants for projects identified by the South Coastal Information Center as potentially affecting sensitive resource sites hire a consulting archaeologist to develop an archaeological resource mitigation plan and to monitor the project to ensure that mitigation measures are implemented.	
Action 2-A.73 Require that areas found during construction to contain significant historic or prehistoric archaeological artifacts be examined by a qualified consulting archaeologist (RPA certified) or historian for appropriate protection and preservation.	
Action 2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.	

General Plan Policy	Proposed Project
Action 2-A.75 Require, as a standard condition of approval, that project applicants provide an assessment as to whether grading for the proposed project would impact underlying soil units or geologic formations that have a moderate to high potential to yield fossiliferous materials, prior to issuance of a grading permit. If the potential for fossil discovery is moderate to high, require applicants to provide a paleontological monitor during rough grading of the project.	
Action 2-A.76 Establish a procedure for the management of paleontological materials found onsite during a development, including the following provisions: If materials are found onsite during grading, require that work be halted until a qualified professional evaluates the find to determine if it represents a significant paleontological resource. If the resource is determined to be significant, the paleontologist shall supervise removal of the material and determine the most appropriate archival storage of the material. Appropriate materials shall be prepared, catalogued, and archived at the applicant's expense and shall be retained within San Bernardino County if feasible.	
Principle 2-P.18 Reinforce Redlands' identity as a "Tree City" through cohesive streetscapes that enhance its sense of place and its heritage, and that promote pedestrian comfort.	**Consistent.** The RHNA Rezone area would comply with the municipal code design standards and receive approval from the City prior to buildout.
Action 2-A.79 Avoid sound walls as a standard on arterial streets in residential areas.	
Principal 2-P.21 Encourage conservation and preservation of citrus groves and farms, especially those that have cultural or scenic significance. Encourage retention of existing privately-owned citrus groves of all sizes.	**Consistent.** There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.
Principal 2-P.23 Incorporate citrus trees, in groves of sufficient size and depth to be a viable grove, as part of streetscapes and scenic views, and encourage their conservation in historic neighborhoods.	
Action 2-A.86 Take advantage of desirable environments, such as the Crafton subarea, that can provide citrus groves and agricultural land that otherwise would be subject to strong development pressures. Encourage or incentivize homeowners to maintain the groves.	
Action 2-A.93 Preserve historic buildings and sites while permitting sensitive adaptive reuse.	**Consistent.** As discussed previously, all rehabilitations and additions to historic buildings shall conform to the recommendations of the Secretary of the Interior's *Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Structures and/or the Redlands Historic Architectural Design Guidelines*.
Principal 4-P.1 Promote a balanced rate and distribution of development and uses pursuant to the	**Consistent.** Future residential developments within the RHNA Rezone sites would be within the permitted densities of the site. As stated above, the new developments and

General Plan Policy	Proposed Project
standards identified in Measure U and compatible with the fabric of the existing community.	redevelopments would be visually compatible with the surrounding environment.
Principal 4-P.2 Provide for the expansion of housing and employment opportunities while ensuring that a high quality of life is maintained in Redlands.	**Consistent.** As discussed in Section 3.0, *Project Description*, the Project would rezone 23 sites for future residential development. The RHNA Rezone would expand the available housing within the City of Redlands.
Principal 4-P.3 Focus new development in infill areas in order to preserve open space, agriculture, and citrus groves, particularly around the edges of the city. **Action 4-A.1** Promote the orderly development and growth of urban areas in infill areas and the city center while encouraging the ongoing cultivation of agricultural land and the preservation of rural living areas in the canyons, Crafton, and Mentone.	**Consistent.** As discussed in Section 3.0, *Project Description*, the sites within the RHNA Rezone Project are located in infill areas. While some sites contain orange groves, these sites are already designated by the Redlands General Plan for industrial or commercial development. The City has land designated for farming on the fringes of the City but these sites are not within those areas.
Action 4-A.3 Ensure that infill development complements existing development in use, design, and scale, and that it supports the cohesion and integration of the city's development pattern.	**Consistent.** As discussed in the Initial Study, included herein as Appendix A, new development and redevelopment would be visually compatible with the surrounding environment.
Principle 1.A.20 Development within the planning area and sphere of influence of the City of Redlands shall conform to development standards within the City. Development Agreements- All development agreements entered into by the City and developers pursuant to California Government Code Sections 65864 et. seq., - after the Effective Date of this initiative measure as defined in Section 3 hereof, shall conform to the policies contained in the Redlands General Plan. Extension of Public Utilities Outside the City Limits - No extension of City provided utility services to areas outside the City limits shall occur until such areas are properly annexed to the City, except that utility services may be extended to areas outside the City limits without prior annexation if all of the following conditions are met: The area to be served is not contiguous to the City of Redlands; and The City and the land owner have entered into a properly recorded and binding pre-annexation agreement establishing covenants running with the land that assure full compliance with all development standards of the City of Redlands, payment of all capital improvement and other development fees which would be applicable to the property if it were within the City limits at the time of extension of such services, and immediate processing of annexation to the City at the City's request; and; Impacts of New Development on Public Schools Shall Be Mitigated - A mandatory component of the socio-economic cost/benefit studies shall be an analysis of the effect of the proposed development on public schools facilities and resources, and shall include proposed measures to mitigate any identified adverse impacts on school facilities to the greatest extent permitted under California law.	**Consistent.** Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City.

General Plan Policy	Proposed Project
Principle 1.A.30 Land use classifications set forth in the Redlands General Plan provide for an appropriate range of densities for residential development and intensity of commercial and industrial development in the City of Redlands. a) Number of Land Use Classifications and Density Standards Shall Not Be Increased -The density standards set forth in Paragraph 4.40, Residential Land Use Classifications, of Section 4.0, Land Use Element, of the Redlands General Plan shall not be increased, and no new residential land use classification shall be added, without a vote of the people. b) Prohibition on Transfers of Density - In order to assure that development occurs in a rational way, no transfer of residential development rights from lands other than those designated for single family residential shall be permitted, and then such transfers of single family residential density shall only be permitted to create or preserve agricultural, open space, school or park uses.	**Consistent.** The future developments within the Redlands RHNA Rezone area would be consistent with the Redlands General Plan, based on the proposed General Plan Amendment, and all residential developments would be within the appropriate density allowed under the Municipal Code. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Rezone sites and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial and industrial development.
Principle 1.A.40 Agricultural uses of land are important to the culture, economy and stability of the City of Redlands and shall be preserved to the greatest extent possible consistent with the will of the people as expressed in Proposition R and Measure N, and consistent with the policies of the State of California set forth in Government Code Section 51220.	**Consistent.** There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.
Policy 4.40s No land undeveloped as of March 1, 1997 and designated in whole or in part as "Urban Reserve" or "Urban Reserve (Agricultural)" in the Redlands general plan in effect as of June 1, 1987, and/or any land parcel that was in active agricultural production on November 3, 1986 regardless of zoning, shall be re-designated or rezoned to permit residential density greater than the Estate Residential (R-E) classification, as the same existed on June 1, 1987, in the Redlands City Zoning Ordinance, unless the following mandatory findings are made and the re-designation or rezoning is approved by four-fifths (4/5) vote of the total authorized membership of the City Council. Land designated by the General Plan as Urban Reserve as of June 1, 1987, shall not exceed a density higher than permitted by the R-E zone designation unless otherwise approved by a 4/5 vote of the City Council. 1. There are substantial and overriding economic or social benefits to the City and its residents and taxpayers from the proposed density increase. 2. The proposed density increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly. 3. The proposed density increase will not convert viable agricultural land to nonagricultural uses. 4. The proposed density increase will not have a growth-inducing effect on other property.	**Consistent.** None of the Rezone sites are designated as Urban Reserve or Urban Reserve (Agricultural). As certain Rezone sites were in active agricultural production in 1986, the City Council must make the applicable findings to allow the rezone.

General Plan Policy	Proposed Project
5. The resulting use will be compatible with uses on adjacent land. 6. The proposed density increase will not require substantial expansion of public infrastructure, facilities or services.	
Principle 4-P.9 Locate medium- and high-density development near regional access routes, transit stations, employment centers, shopping areas, and public services.	**Consistent.** Future development pursuant to the Project would be urban and of high densities. As stated in Section 5.10, *Transportation*, the Project site is served by Omnitrans and SBCTA, which would allow for high-density development near transit routes. Furthermore, the Rezone sites are located in the vicinity of employment centers, shopping areas, and public services.
Principle 4-P.10 Ensure that the scale and character of new development is appropriate for surrounding terrain and the character of existing development.	**Consistent.** As discussed in the Initial Study (Appendix A), new development and redevelopment would be visually compatible with the surrounding environment.
Principle 4-P.15 Preserve existing residential neighborhoods, particularly older neighborhoods.	
Principle 4-P.16 Promote a variety of housing types to serve the diverse needs of the community.	**Consistent.** Future development pursuant to the Project would develop a variety of different medium to high density housing throughout the City. The Project would provide a variety of housing options to the community of Redlands.
Principle 4-P.17 Limit negative impacts to residential neighborhoods from incompatible uses.	**Consistent.** The RHNA Rezone Project would only rezone sites for residential uses therefore there would be no result in incompatible uses to residential neighborhoods. The proposed General Plan Amendment and zone change would allow for increased compatibility between the Rezone sites and surrounding residential areas compared to buildout of the existing General Plan land use designations, which would result in commercial and industrial development.
Principle 4-P.23 Preserve agricultural land in the Planning Area and protect it from premature development.	**Consistent.** There are sites within the RHNA Rezone that are currently occupied by citrus groves; however, these sites are already zoned for industrial uses. The City has land designated for farming on the fringes of the City but these sites are not within those areas.
Action 4-A.7 Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.	**Consistent.** The Redlands RHNA Rezone would provide additional residential capacity in the City that would be favorable for a variety of different housing types.
Action 4-A.8 Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.	
Action 4-A.10 Promote availability of senior and independent assisted living facilities to meet the needs of the community's aging population, distributed equitably throughout the community.	
Action 4-A.11 Ensure that opportunities exist for the development of housing types that are affordable to all segments of the Redlands community and are distributed equitably throughout the community.	

General Plan Policy	Proposed Project
Action 4-A.13 Permit densities, design, and uses that will help preserve the character and amenities of existing older neighborhoods.	**Consistent.** As discussed in the Initial Study (Appendix A), new development and redevelopment would be visually compatible with the surrounding environment. The future developments would also be within the permitted density for each site.
Action 4-A.14 Discourage changes in residential areas that would disturb the character of or clearly have a destabilizing effect on the neighborhood.	**Consistent.** As discussed above, the new development and redevelopment within the Redlands RHNA Rezone Project would be visually compatible with the surrounding environment.
Action 4-A.34 Preserve agricultural land and protect agricultural operations and soils by identifying and designating these lands as Agriculture.	**Consistent.** The Project site does not include any parcels that are designated for agricultural uses.
Action 4-A.35 Preserve connections between agricultural lands with other agricultural lands and supporting uses.	**Consistent.** The sites within the Project area that currently contain agricultural uses are surrounded by developed areas. These agricultural sites are also zoned for industrial and commercial uses.
Action 4-A.37 Ensure adequate buffers and transitions between agricultural land and non-agricultural development in order to reduce the potential for land use conflicts.	**Consistent.** The Project sites proposed zoning would be consistent with the surrounding area and the site plans would be subject to approval prior to groundbreaking activities.
Principle 4-A.51 Promote the development of land uses that reduce the number and length of vehicle trips in the East Valley Corridor.	**Consistent.** The Project would increase residential development within the East Valley Corridor. As a result, this would increase the walkability within the corridor for these residents. These residential developments could also help attract major business to the area due to the growing population and further the walkability of the community.
Principle 4-A.52 Improve access and movement of all modes of transportation in the East Valley Corridor and enhance linkages to transit.	**Consistent.** As discussed in Section 5.10, *Transportation*, specific infrastructure improvements required to support future residential uses are not known at this time. However, if necessary, potential future projects would fund transit facilities as ensured and verified City during the plan check and permitting process.
Principle 4-A.53 Maintain development standards to implement the goals and policies of the EVCSP.	**Consistent.** All future potential projects within the RHNA Rezone area would be required to be consistent with development standards, which would be verified by the City during the plan check and permitting process prior to obtaining building permits.
Principle 4-A.54 Create a visually aesthetic appearance for the East Valley Corridor from the freeways as well as from the Planning Area.	**Consistent.** The potential infill developments within the Project site would improve the value of the area. These potential developments would make each site more visually consistent with the surrounding uses and provide amenities to the developing area.
Principle 4-A.55 Enhance the beauty of the East Valley Corridor and the overall quality of life for users and residents of the area.	
Principle 4-A.56 Create buffers and appropriate transitions between the East Valley Corridor industrial and commercial areas and adjacent residential neighborhoods.	
Action 4-A.95 Promote infill development to create a continuous corridor of mixed-use and commercial activity.	
Action 4-A.96 Encourage site designs that create an active street frontage and screen parking from the Colton Avenue and Orange Street frontages.	**Consistent.** All future potential projects within the RHNA Rezone area would be required to be consistent with design standards which would be verified by the City during the

General Plan Policy	Proposed Project
	plan check and permitting process prior to obtaining building permits.
Action 4-A.141 Regulate land uses within safety and noise compatibility zones in accordance with the Airport Land Use Compatibility Plan.	**Consistent.** As stated in the Initial Study, included as Appendix A, Site 23 is the only site within an airport compatibility zone; however, it is not within the modeled noise contours of neighboring airport.
Action 4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.	**Consistent.** Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.
Principle 5-P.1 Maintain a cohesive circulation system through a "layered network" approach promoting complete streets and mobility for all modes while emphasizing specific transportation modes for specific corridors and geographic areas.	**Consistent.** As stated in Section 5.10, *Transportation*, future projects under the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices.
Principle 5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.	**Consistent.** Implementing development projects would be required to construct or pay their fair share toward street, pedestrian infrastructure, and bicycle infrastructure improvements upon review of project designs by the City.
Policy 5-A.77 Encourage developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less.	**Consistent.** Future projects within the Project would be required to meet the minimum parking requirements for the lot and would be subject to approval by the City prior to receiving building permits.
Action 6-A.1 Preserve as open space those areas that contain unique habitats, natural resources, and visual amenities such as citrus groves, hillsides, canyons, and waterways. These areas provide natural contrast with the urban cityscape.	**Consistent.** All of the sites that require rezoning within the RHNA Rezone are currently zoned for industrial uses so the proposed Project would not alter any sites that were previously preserved for the protection of natural resources.
Action 6-A.10 Maintain and enhance Redlands' network of urban forest and street trees.	**Consistent.** Future developments within the Project site would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Principle 6-P.7 Protect environmentally sensitive lands, wildlife habitats, and rare, threatened, or endangered plant and animal communities.	**Consistent.** As discussed in the Initial Study, included as Appendix A, future projects would be subject to Mitigation Measure BIO-1 which requires a survey by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur onsite.
Principle 6-P.8 Minimize disruption of wildlife and valued habitat throughout the Planning Area and emphasize that open space is for more than just human use, but also serves as habitat for biological resources.	
Principle 6-P.10 Landscape public areas using native vegetation where practical.	**Consistent.** Future developments within the Project site would be required to include landscaping pursuant to City design standards, which would be subject to approval by the City prior to being granted building permits.
Action 6-A.11 Require a biological assessment of any proposed project site within the Planning Area where species that are State or federally listed as rare, threatened, or endangered are identified as potentially present.	**Consistent.** As discussed in the Initial Study, included as Appendix A, future projects would be subject to Mitigation Measure BIO-1 which requires a survey by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur on-site.

General Plan Policy	Proposed Project
Action 6-A.15 Enhance the Mill Creek Zanja and Morey Arroyo and tributary drainages as riparian corridors, where feasible, to provide habitat as well as recreational and aesthetic value consistent with an overall master plan for habitat preservation.	**Consistent.** As discussed in the Initial Study (Appendix A), there are no sites located within the Mill Creek Zanja. As for the sites located near the Morey Arroyo, if jurisdictional waters are present, the project would be subject to jurisdictional assessment pursuant to Mitigation Measure BIO-2.
Principle 6-P.11 Retain the maximum feasible amount of agricultural land for its contributions to the local economy, lifestyle, air quality, habitat value and sense of Redlands' heritage.	**Consistent.** All of the sites within the Project area are designated for urban uses including industrial, commercial, and residential uses. The rezone would not affect the land that is being preserved for agricultural uses within the city of Redlands.
Action 6-A.23 Permit transfer of development rights (TDR) between agreeable owners to preserve agricultural land and citrus groves. Develop an agricultural land mitigation program to conserve agricultural land through agricultural conservation easements at a ratio of 1:1 or greater.	
Action 6-A.26 Ensure that new development adjacent to an agricultural use is compatible with the continuation of the use by requiring appropriate design criteria, such as site layout, landscaping, and buffer areas.	**Consistent.** Sites that are adjacent to agricultural uses would be properly designed to accommodate the neighboring uses. Potential projects would also be subject to design approval by the City prior to receiving building permits.
Principle 6-P.19 Promote the protection of waterways in Redlands from pollution and degradation as a result of urban activities.	**Consistent.** As discussed in the Initial Study (Appendix A), implementing developments would be required to prepare a Water Quality Management Plan that includes post-development BMPs and a Stormwater Pollution Prevention Plan that includes construction BMPs in order to ensure that implementing projects would not result in any water quality issues.
Principle 6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.	
Action 6-A.35 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.36 Promote the use of Low Impact Development strategies, BMPs, pervious paving materials, and onsite infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	
Action 6-A.37 Protect and, where feasible, enhance or restore the city's waterways, including zanjas and ditches, preventing erosion along the banks, removing litter and debris, and promoting riparian vegetation and buffers.	
Action 6-A.39 Require that new development provides landscaping and re-vegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants.	**Consistent.** All projects within the Project site would be required to landscape and they would be subject to design approval by the City prior to being granted building permits.
Action 6-A.43 Ensure that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate. Dry weather runoff from new development must not exceed the pre-development baseline flow rate to receiving waterbodies.	**Consistent.** As discussed in the Initial Study, included as Appendix A, the Project would not result in increased flows compared to the current potential buildout. Proposed developments would also be required to be consistent with the City's drainage plan. Any increase in onsite runoff flows would be required to be addressed via direct storm drain

General Plan Policy	Proposed Project
	improvements or payment of a storm drain impact development fee.
Action 7-P.1 Promote active lifestyles and community health by furthering access to trails, parks, public open space, and other recreational opportunities.	**Consistent.** As discussed in Section 5.10, *Transportation*, Potential future development facilitated by the Project may include sidewalk improvements. Specific sidewalk improvements required to support residential or school development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits.
Principle 7-P.10 Equitably share the cost of parkland creation and maintenance between existing and new residents, businesses, and property owners	**Consistent.** Implementing projects would be required to pay all development impact fees in order to ensure that the City can continue to provide adequate recreational facilities.
Action 7-A.3 Provide 5 acres of park area for each 1,000 Planning Area residents, and additional parkland for specialized, and low-use park acreage.	
Principle 7-P.16 Ensure that all Redlands residents have access to a variety of transportation and physical activity options that enhance health and that work for diverse lifestyles, incomes, and abilities	**Consistent.** As discussed previously, potential future development facilitated by the Project may include sidewalk improvements. Specific sidewalk improvements required to support residential or school development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits.
Principle 7-P.17 Achieve more walkable, livable neighborhoods by expanding the multimodal transportation system and creating a safe, pedestrian-oriented environment	
Action 7-A.35 Implement street design features that facilitate walking and biking in both new and established areas. Require a minimum standard of these features for all new developments.	
Action 7-A.39 Install appropriate facilities along streets and at roadway intersections to improve and ensure pedestrian safety.	
Action 7-A.89 Require adherence to applicable buildings codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code.	**Consistent.** Implementing projects pursuant to the RHNA Rezone would undergo development review pursuant to the Redlands Municipal Code in order to ensure that the development would adhere to all applicable building codes and standards. Proposed development plans would be reviewed by the City's Fire Department in order to ensure that new development minimizes potential fire hazards through building design.
Action 7-A.93 Require that new development minimizes risks to life and property from fire hazard through: • Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.; • Siting and designing development to avoid hazardous locations; • Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent;	

General Plan Policy	Proposed Project
• Using appropriate building materials and design features to ensure the minimum amount of required fuel modification; and • Using fire-retardant, native plant species in landscaping.	
Action 7-A.95 Coordinate with the Redlands Fire Department and other fire prevention agencies to review all applications for new development. The Fire Department's review should ensure compliance with fire safety regulations and assess potential impacts to existing fire protection services and the need for additional and expanded services	
Principle 7-P.41 Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure as a criterion in land use planning	**Consistent.** As discussed in Section *5.7, Noise*, new development would be required to be compatible with the existing noise environment through implementation of noise Mitigation Measures NOI-1 and NOI-2. Implementing developments within areas where projected noise levels are higher would be required to submit an acoustical analysis demonstrating that the project would meet the applicable noise standards.
Action 7-A.136 Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10.	
Action 7-A.137 For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.	
Action 7-A.138 Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.	**Consistent.** As discussed in Section *5.7, Noise*, new development would be required to be compatible with the existing noise environment through implementation of Mitigation Measures NOI-1 and NOI-2. Implementing non-residential developments would be required to prepare a noise analysis in order to ensure that the proposed project would not result in impacts to sensitive receptors.
Action 9.0w Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary	**Consistent.** As discussed in Section *5.7, Noise*, new development would be constructed pursuant to the Redlands Municipal Code, which limits hours of construction.
Principle 7-P.49 Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.	**Consistent.** As discussed in Section *5.2, Air Quality,* Mitigation Measures AQ-1 and AQ-2 are included, which requires development projects to provide modeling of the regional and the localized emissions (NO_X, CO, PM_{10}, and $PM_{2.5}$) associated with the maximum daily grading activities for the proposed development; and requires grading activity to be limited to ensure that there would be no impacts to sensitive receptors.
Action 8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.	**Consistent.** Implementing projects pursuant to the RHNA Rezone would be required to adhere to the California Building Code.

General Plan Policy	Proposed Project
Action 8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	**Consistent.** The future projects within the RHNA Rezone Project would be required to be in line with City Municipal Code standards and would contain landscaping throughout the sites.
Action 8-A.37 Promote design in new development that incorporates space for recycling containers and other waste diversion facilities	**Consistent.** Implementing projects pursuant to the RHNA Rezone would be required to provide for recycling, in line with City Municipal Code standards.
Action 8-A.39 Continue implementation and enforcement of the California Building and Energy codes to promote energy efficient building design and construction.	**Consistent.** Implementing projects pursuant to the RHNA Rezone would be required to adhere to the California Building Code, Title 24, and the California Energy Code.
Action 8-A.40 Promote the Leadership in Energy and Environmental Design (LEED) certification program for the design, operation, and construction of high-performance green buildings.	

City of Redlands Municipal Code

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

Overall, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts would be less than significant.

5.6.7 CUMULATIVE IMPACTS

The geographic context for this cumulative analysis includes the City of Redlands in relation to the City's General Plan. Cumulative development could result in intensity increases to existing land use patterns through implementation of mixed-use, infill and redevelopment. Cumulative development would also be subject to site-specific environmental and planning reviews that would address consistency with adopted General Plan goals, objectives, and policies, as well as with the City's Zoning Code. As part of environmental review, projects would be required to provide mitigation for any inconsistencies with the General Plan and environmental policies that would result in adverse physical environmental effects. The cumulative projects as a whole, would result in a more intensely developed built environment than currently exists, and would be required to be consistent with local General Plan policies.

While cumulative projects could include General Plan amendments and/or zone changes, modifications to existing land uses that require such amendments do not necessarily represent an inherent negative effect on the environment, particularly if the proposed changes involve changes in types and intensity of uses, rather than eliminating application of policies that were specifically adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would not occur.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- City of Redlands Municipal Code
- City of Redlands General Plan

Plans, Programs, or Policies

None.

5.6.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact LU-2 would be less than significant.

5.6.9 MITIGATION MEASURES

No mitigation measures are required.

5.6.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Existing regulatory programs would reduce potential impacts associated with land use and planning to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to land use and planning would occur.

5.6.11 REFERENCES

City of Redlands. (2017a). *Redlands General Plan 2035*. Retrieved August 8, 2024, from https://www.cityofredlands.org/post/planning-division-general-plan

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5.7 Noise

5.7.1 INTRODUCTION

This Draft Subsequent EIR section evaluates the potential noise and vibration impacts that would result from buildout pursuant to the proposed Project. It discusses the existing noise environment within and around the proposed rezone areas as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during future demolition, construction, and operational activities that would occur from buildout pursuant to the proposed rezoning, and evaluates the proposed Project's noise effects for consistency with relevant local agency noise policies and regulations. This section includes data from the following:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017; and
- City of Redlands Municipal Code.

Noise and Vibration Terminology

Various noise descriptors are utilized in this EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Ambient noise level: the background noise level associated with a given environment at a specified time; usually a composite of sound from many sources from many directions.

Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3 dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over hard surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.7.2 REGULATORY SETTING

5.7.2.1 Federal Regulations

Federal Highway Administration

Proposed federal or federal-aid highway construction projects at a new location, or the physical alteration of an existing highway that significantly changes either the horizontal or vertical alignment, or increases the number of through-traffic lanes, requires an assessment of noise and consideration of noise abatement per 23 CFR Part 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise." The Federal Highway Administration (FHWA) has adopted noise abatement criteria (NAC) for sensitive receivers such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals when "worst-hour" noise levels approach or exceed 67 dBA Leq. Caltrans has further defined approaching the NAC to be 1 dBA below the NAC for noise-sensitive receivers identified as Category B activity areas (i.e., 66 dBA Leq is considered approaching the NAC).

US Environmental Protection Agency

In addition to FHWA standards, the United States Environmental Protection Agency (EPA) has identified the relationship between noise levels and human response. The EPA has determined that over a 24-hour period, an Leq of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at an Leq of 55 dBA and interior levels at or below 45 dBA. While these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community.

The EPA also set 55 dBA Ldn as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well as difficulty of actually achieving a goal of 55 dBA Ldn, have settled on the 65 dBA Ldn level as their standard. At 65 dBA Ldn, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA). Such limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is therefore not addressed further in this analysis.

US Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) has set a goal of 65 dBA Ldn as a desirable maximum exterior standard for residential units developed under HUD funding. (This level is also generally accepted within the State of California.) While HUD does not specify acceptable interior noise levels, standard construction of residential dwellings typically provides in excess of 20 dBA of attenuation with the windows closed. Based on this premise, the interior Ldn should not exceed 45 dBA.

5.7.2.2 State Regulations

Title 24, California Building Code

State regulations related to noise include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

The mandatory measures for non-residential buildings states that new construction shall provide an interior noise level that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation. Title 24 standards are included in the City's Municipal Code in Chapter 15 and are enforced through the City's development permitting process.

5.7.2.3 Local Regulations

City of Redlands 2035 General Plan

The General Plan Healthy Community Element contains the following policies related to noise that are applicable to the Project:

Principle 7-P.40 Protect public health and welfare by eliminating existing noise problems where feasible and by preventing significant degradation of the future acoustic environment.

Principle 7-P.41 Ensure that new development is compatible with the noise environment by continuing to use potential noise exposure as a criterion in land use planning.

Action 7-A.135 Use the noise and land use compatibility matrix (Table 7-10) and Future Noise Contours map (Figure 7-9) as criteria to determine the acceptability of a given land use, including the improvement/construction of streets, railroads, freeways, and highways. Do not permit new noise-sensitive uses—including schools, hospitals, places of worship, and homes—where noise levels are "normally unacceptable" or higher, if alternative locations are available for the uses in the city.

Action 7-A.136 Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10.

Action 7-A.137 For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.

Action 7-A.138 Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.

Action 7-A.141 Require all future developments within the city that fall within the required noise screening distances, as specified in the Federal Transit Authority (FTA) Noise and Vibration Manual, of the Union Pacific railroad in San Timoteo Canyon to conduct a detailed noise analysis.

Table 7-10 of the General Plan Healthy Community Element (included as Table 5.7-1 of this Draft Subsequent EIR) identifies the specific criteria to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Healthy Community Element identifies schools, hospitals, places of worship, and homes as a noise-sensitive land use.

Also, as shown in Table 5.7-2, the City of Redlands General Plan has an exterior (outdoor) noise standard of 60 dBA CNEL related to private yards of single-family residences as measured at the property line; multifamily private patios or balconies which is served by a means of exit from inside; mobile home parks; hospital patios; park picnic areas; school playgrounds; hotel and recreational areas.

Measure U The City of Redlands General Plan incorporates the implementing noise polices from Measure U. Measure U was certified by The City of Redlands in 1997 to address impacts from growth. The measure includes Project applicable provisions related to potential noise impacts and mitigation, as listed below.

Measure U 9.0e Use the criteria specified in General Plan Table 9.1 [Table 5.7-1] to assess the compatibility of proposed land uses with the projected noise environment and apply the noise standards in General Plan Table 9.2 [Table 5.7-2], which prescribe interior and exterior noise standards in relation to specific land uses. Do not approve projects that would not comply with the standards in General Plan Table 9.2 [Table 5.7-2]. These

tables are the primary tools which allow the City to ensure noise-integrated planning for compatibility between land uses and outdoor noise.

Measure U 9.0f Require a noise impact evaluation based on noise measurements at the site for all projects in Noise Referral Zones (B, C, or D) as shown on General Plan Table 9.1 [Table 5.7-1] and on General Plan Figure 9.1 [Table 5.7-2] or as determined from tables in the Appendix, as part of the project review process. Should measurements indicate that unacceptable noise levels will be created or experienced, require mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years' experience in acoustics).

Measure U 9.0i Require construction of barriers to mitigate sound emissions where necessary or where feasible and encourage use of walls and berms to protect residential or other noise sensitive land uses that are adjacent to major roads, commercial, or industrial areas.

Measure U 9.0t Require proposed commercial projects near existing residential land use to demonstrate compliance with the Community Noise Ordinance prior to approval of the project.

Measure U 9.0u Require all new residential projects or replacement dwellings to be constructed near existing sources of non-transportation noise (including but not limited to commercial facilities or public parks with sports activities) to demonstrate via an acoustical study conducted by a Registered Engineer that the indoor noise levels will be consistent with the limits contained in the Community Noise Ordinance.

Measure U 9.0v Consider the following impacts as possibly "significant":

- An increase in exposure of four or more dB if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in General Plan Table 9.1 [Table 5.7-1] and General Plan Table 9.2 [Table 5.7-2];
- Any increase of six dB or more, due to the potential for adverse community response.

Measure U 9.0w Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary.

Measure U 9.0y Minimize impacts of loud trucks by requiring that maximum noise levels due to single events be controlled to 50 dB in bedrooms and 55 dB in other habitable spaces.

Table 5.7-1: City of Redlands General Plan Noise/Land Use Compatibility Matrix

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

Zone A CLEARLY COMPATIBLE	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
ZONE B NORMALLY COMPATIBLE	New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.
ZONE C NORMALLY INCOMPATIBLE	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.
ZONE D CLEARLY INCOMPATIBLE	New construction or development should generally not be undertaken.

Source: City of Redlands General Plan Noise Element, Chapter 7 Healthy Community, Section 7.5 Noise, Table 7-10.

Table 5.7-2: City of Redlands General Plan Interior and Exterior Noise Standards

Land Use Categories	Community Noise Equivalent Level (CNEL) Energy Average CNEL	
Uses	**Interior[1]**	**Exterior[2]**
RESIDENTIAL		
Single Family, Duplex, Multiple Family	45[3]	60
Mobile Home	---	60[4]
COMMERCIAL, INDUSTRIAL, INSTITUTIONAL		
Hotel, Motel, Transient Lodging	45	65[5]
Commercial Retail, Bank Restaurant	55	---
Office Building, Research & Development, Professional Offices, City Office Building	50	---
Amphitheater, Concert Hall, Auditorium, Meeting Hall	45	---
Gymnasium (Multipurpose)	50	---
Sports Club	55	---
Manufacturing, Warehousing, Wholesale, Utilities	60	---
Movie Theaters	45	---
INSTITUTIONAL		
Hospital, Schools classrooms	45	60
OPEN SPACE		
Parks	---	60

Notes:
* CNEL (Community Noise Equivalent Level) - The average equivalent A-weighted sound level during a 24 hour day, obtained after addition of approximately five decibels to sound levels in the evening from 7 pm to 10 pm and ten decibels to sound levels at night after 10 pm and before 7 am.
1. Indoor environment excluding bathrooms, toilets, closets, corridors.
2. Outdoor environment limited to private yard of single family as measured at the property line; multifamily private patio or balcony which is served by a means of exit from inside; mobile home park; hospital patio; park picnic area; school playground; hotel and recreational area.
3. Noise level requirement with open windows, if they are used to meet natural ventilation requirement.
4. Exterior noise level should be such that interior level will not exceed 45 CNEL.
5. Except those areas affected by aircraft noise.

See also Policy 9.0s

Source: Mestre Greve Associates.

Source: City of Redlands General Plan Noise Element, Chapter 7 Healthy Community, Section 7.5 Noise, Table 7-11.

City of Redlands Municipal Code

The City of Redlands Municipal Code Chapter 8.06 establishes noise standards by land use. For the noise-sensitive residential uses, Municipal Code Section 8.06.070[A] identifies the base exterior noise level standard of 60 dBA Leq during the daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dBA Leq during the

nighttime (10:00 p.m. to 7:00 a.m.) hours. As shown in Table 5.7-3, higher noise levels are allowed for shorter periods of time.

Table 5.7-3: City of Redlands Operational Noise Standards

Land Use	Time Period	Exterior Noise Level Standards (dBA)				
		L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (0 min)
Residential	Daytime	60	65	70	75	80
	Nighttime	50	55	60	65	70
Commercial	Daytime	65	70	75	80	85
	Nighttime	60	65	70	75	80
Industrial	Anytime	75	80	85	90	95

Source: City of Redlands Municipal Code, Section 8.06.070 [A]-Table 1. Section 8.06.070[C] states that if the measured ambient level exceeds the allowable noise exposure standard within any of the first four noise limit categories above, the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to encompass or reflect said ambient noise level. The percent noise level is the level exceeded "n" percent of the time during the measurement period. L50 is the noise level exceeded 50% of the time. "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

In addition, Municipal Code Section 8.06.080 identifies the maximum permissible interior noise levels. For noise-sensitive residential uses, Municipal Code Section 8.06.080[B] identifies the interior noise level standard of 45 dBA. For commercial uses, Municipal Code Section 8.06.080[B] identifies the interior noise level standard of 50 dBA.

In addition, Municipal Code Section 8.06.070[B] provides noise standards based on the volume of noise and the period of time of the noise, as listed below:

1. The exterior noise standard of the applicable land use category for a cumulative period of 30 minutes in any hour (L_{50}); or
2. The exterior noise standard of the applicable land use category, plus 5 dBA, for a cumulative period of more than 15 minutes in any hour (L_{25}); or
3. The exterior noise standard of the applicable land use category, plus 10 dBA, for a cumulative period of more than 5 minutes in any hour (L_8); or
4. The exterior noise standard of the applicable land use category, plus 15 dBA, for a cumulative period of more than 1 minute in any hour (L_2).
5. The exterior noise standard for the applicable land use category, plus 20 dBA, or the maximum measured ambient noise level, for any period of time (L_{max}).

In addition, Section 8.06.070[C] states that *if the measured ambient level exceeds the allowable noise exposure standard within any of the first four noise limit categories above, the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to encompass or reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.* In effect, when the ambient noise levels exceed the base exterior noise level limits, the noise level standard shall be adjusted as appropriate to encompass or reflect the ambient noise level.

Municipal Code Section 8.06.090(F) states that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays.

Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS.

5.7.3 ENVIRONMENTAL SETTING

Sensitive Receptors

Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include: residences, schools, and recreation areas. Sensitive receptors are located throughout and adjacent to the Rezone sites.

Existing Noise

Major noise sources within proximity to the Rezone sites include traffic noise and stationary noise. The background ambient noise levels in the areas surrounding the Rezone sites are dominated by the transportation-related noise associated with surface streets. The volume of noise is dependent on the traffic volumes and structures, such as walls, that are located between streets and receptors. Estimated roadway noise volumes are depicted in Figure 3.12-1, *Existing Noise Contours (2017*), of the City of Redlands General Plan EIR (City of Redlands, 2017b, p. 3.12-19).

Airports

The nearest airports to the proposed Project site are San Bernardino International Airport, approximately 2.5 miles to the northwest of Site 17, and Redlands Municipal Airport, approximately 1.85 miles northeast of Site 23. Site 23 is the only Rezone site within airport compatibility Zone D for the Redlands Municipal Airport (City of Redlands, 2017b, p. 3.7-2). None of the proposed sites are within the modeled noise contours for the Redlands Municipal Airport (City of Redlands, 2017b, Figure 3.12-3) or San Bernardino International Airport according to the County of San Bernardino General Plan Figure HZ-9*, Airport Safety and Planning Areas* (San Bernardino County, 2020). Thus, the proposed Rezone sites are not subject to excessive noise levels from airport operations.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the proposed Rezone sites, other sources of groundborne vibration include heavy-duty trucks on area roadways related to the existing urban uses throughout the City. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, construction activity would be required to comply with Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. As discussed in General Plan EIR, buildout of the General Plan would result in a 1.2 dBA increase from roadway noise, which is barely perceptible. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed

General Plan would be subject to the City's noise ordinance. The General Plan EIR determined that compliance with the City's noise ordinance in the Municipal Code in Sections 8.06.070 and 8.06.080.

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in:

NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

NOI-2 Generation of excessive groundborne vibration or groundborne noise levels;

NOI-3 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, expose people residing or working in the project area to excessive noise levels.

The Initial Study established that the proposed Project would result in less-than-significant impacts related to Threshold NOI-3. Thus, no further assessment of this impact is required in this Draft Subsequent EIR.

Construction Noise and Vibration

A significant construction noise or vibration related impact would occur under the following conditions:

- If Project related construction activities:
    - Occur between the hours of 6:00 p.m. and 7:00 a.m. of the next day, on Sundays or federal holidays (Municipal Code Section 8.06.090(F)); or
    - Create noise levels which exceed the 80 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations (FTA, 2006).
- If Project-related construction activities generate vibration levels which exceed the Municipal Code, Section 8.06.020, vibration threshold of 0.1 in/sec RMS at receiver locations.

Operational Noise

A significant operational noise impact would occur under the following conditions:

- If Project related operational increase in ambient noise levels result in:
    - An increase in exposure of 4 or more dB, if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in General Plan Table 9.1 [EIR Table 5.7-1] and General Plan Table 9.2 [EIR Table 5. 7-2];
    - Any increase of 6 dB or more, due to the potential for adverse community response (Measure U Policy 9.0v).

5.7.5 METHODOLOGY

Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed for typical construction

projects were analyzed through comparison of construction noise levels to the thresholds to assess the level of significance associated with temporary construction noise level impacts. The City's Municipal Code limits construction hours to reduce noise. The FTA considers a daytime exterior construction noise level of 80 dBA Leq and a nighttime exterior construction noise level of 70 dBA Leq as a reasonable threshold for noise sensitive residential land use. The construction noise levels are compared against the FTA's threshold to assess the level of significance associated with temporary construction noise level impacts.

Operational Noise

The primary source of noise associated with the operation of buildout pursuant to the Project would be from vehicular trips and new stationary sources (such as heating, ventilation, and air conditioning units) associated with the new site-specific development that would occur under the proposed zoning. The increase in noise levels generated by these activities has been estimated and compared to the applicable noise standards listed previously.

Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of future uses pursuant to the proposed zoning by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the construction sites. The potential ground-borne vibration levels resulting from construction activities were estimated by data published by the FTA. Thus, the groundborne vibration levels generated by these sources have also been estimated and compared to the applicable thresholds of significance listed previously.

5.7.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

Construction Noise. The General Plan EIR describes that the exact location of projects and construction activities that would be implemented under the General Plan are not known, though it is likely that construction activities would take place within the vicinity of sensitive receptors. The City regulates noise associated with construction equipment and activities through its Noise Control Ordinance in the Municipal Code. Thus, compliance with the City's Noise Control Ordinance in the Municipal Code in Section 8.06.090 would be required for any future construction. Therefore, the General Plan EIR determined the noise impact from construction activities associated with implementation of the proposed General Plan would be less than significant (City of Redlands, 2017b, p. 3.12-34).

Traffic Noise. The General Plan EIR describes that buildout of the General Plan update would generate traffic, which would increase traffic noise levels along existing and future roadways. Draft EIR Table 3.12-8 shows that traffic noise would increase by up to 1.2 dBA, which is normally not perceptible by the human ear in an outdoor environment. Therefore, the General Plan EIR determined that potential traffic noise impacts associated with buildout of the General Plan land uses would be less than significant (City of Redlands, 2017b, p. 3.12-35).

Stationary Noise. The General Plan EIR describes that buildout of the General Plan update could expose existing and/or new sensitive uses to stationary noise sources, such as industrial and/or commercial uses. The development of new commercial and industrial uses pursuant to the General Plan may generate noise levels that exceed the City's maximum exterior and interior limit due to the establishment of new stationary noise sources. New projects developed under the proposed General Plan would be subject to the City's noise ordinance. The General Plan EIR determined that compliance with the City's noise ordinance in the Municipal

Code in Sections 8.06.070 and 8.06.080 would result in less than significant noise impact (City of Redlands, 2017 p. 3.12-49).

Vibration. The General Plan EIR describes that during construction activities related to buildout of the General Plan, the use of large bulldozers and trucks would generate the highest groundborne vibration levels of 0.089 PPV in/sec and 0.076 PPV in/sec, respectively, when measured at 25 feet. General Plan EIR Table 3.12-10 shows that for fragile structures located within 19 feet, residential structures constructed with non-engineered timber located within 12 feet, and modern industrial/commercial structures constructed with engineered concrete and masonry located within 8 feet of construction activity, the use of a large bulldozer would potentially damage the structure. The General Plan EIR determined that construction activities with the use of a large bulldozer would not likely occur within the structure type and their corresponding distance mentioned above. Therefore, vibration levels generated during construction were determined to be less than significant. Also, the General Plan EIR determined that groundborne vibration impacts generated by vehicles from buildout of the General Plan land uses would be less than significant (City of Redlands, 2017, p. 3.12-53).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings). As detailed in Section 5.10, *Transportation,* the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily vehicle and truck trips compared to the trips that would result from buildout of the Project site under the existing General Plan land use designations.

IMPACT NOI-1: THE PROJECT WOULD NOT GENERATE A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

Construction

Less than Significant with Mitigation Incorporated. The timing of development and various construction activities pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects. Thus, construction activities associated with buildout of the proposed Project would likely occur sporadically and include different development-specific construction activities.

Noise generated by construction equipment could include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. Construction projects are generally expected to occur in the following stages: demolition, excavation, and grading, building construction, architectural coating, and paving. Combined noise levels generated by heavy construction equipment range from approximately 77 dBA (Lmax) to 83 dBA (Lmax) at 50 feet from the noise source, as shown in Table 5.7-4.

Table 5.7-4: Construction Reference Noise Levels

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L_{eq})[1]	Combined Noise Level (dBA L_{eq})[2]	Combined Sound Power Level (PWL)[3]
Demolition	Demolition Equipment	82	83	115
	Backhoes	74		
	Hauling Trucks	72		
Site Preparation	Crawler Tractors	78	80	112
	Hauling Trucks	72		
	Rubber Tired Dozers	75		
Grading	Graders	81	83	115
	Excavators	77		
	Compactors	76		
Building Construction	Cranes	73	81	113
	Tractors	80		
	Welders	70		
Paving	Pavers	74	83	115
	Paving Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77	109
	Air Compressors	74		
	Generator Sets	70		

[1] FHWA Roadway Construction Noise Model (RCNM).
[2] Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the CadnaA noise model at the reference distance to the noise source.

Hard site conditions are used in this construction noise analysis which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e., construction equipment). For example, a noise level of 83 dBA measured at 50 feet from the noise source to the receiver would be reduced to 77 dBA at 100 feet from the source to the receiver and would be further reduced to 71 dBA at 200 feet from the source to the receiver.

Section 8.06.090(F) of the City's Municipal Code allows construction noise to exceed the City noise standards provided that construction activities occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and not on Sundays and Federal holidays. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and, even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. Therefore, in order to determine if construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria threshold detailed above has been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at a sensitive receiver, such as a residence.

Because buildout pursuant to the proposed Project could result in construction in proximity to existing or future sensitive receptors, temporary intermittent construction noise impacts could occur. Therefore, Mitigation Measures NOI-1 and NOI-2 have been included to provide construction measures to reduce potential construction noise impacts to a less-than-significant level.

Operation

Less than Significant Impact.

Increase in Roadway Noise

Buildout pursuant to the proposed Project would result in new residential development and an overall decrease in nonresidential development compared to buildout under the existing General Plan and zoning designations. The primary source of noise impacts related to the new development would be from traffic-related noise from vehicle and truck trips.

As described in Section 3.0, *Project Description*, the proposed Project would convert approximately 2,057,992.2 SF of planned nonresidential land uses, based on allowed FAR under the General Plan, to residential uses with an allowed additional capacity of 2,325 compared to the existing General Plan land uses. As detailed in Section 5.10, *Transportation,* the proposed Project is anticipated to result in a total reduction of approximately 27,540 daily trips, including a reduction of 1,716 p.m. peak hour trips compared to buildout of the existing zoning. As the Project would result in a reduction in daily trips compared to buildout of the existing General Plan land uses, impacts related to increased traffic noise from implementation of the proposed Project would be less than significant.

Roadway Noise Compatibility

As described previously, the General Plan EIR determined that buildout of the General Plan update would generate traffic, which would increase traffic noise levels by up to 1.2 dBA, which is normally not perceptible by the human ear in an outdoor environment; therefore, it was determined to be less than significant. (City of Redlands, 2017b, p. 3.12-35)

With implementation of the proposed Project, it is possible that new noise sensitive land uses adjacent to arterial roadways could experience future unmitigated exterior noise levels greater than 65 dBA CNEL, which is normally incompatible for residential uses based on the General Plan Noise/Land Use Compatibility Matrix (Table 5.7-1). Therefore, based on the proximity of future noise sensitive land uses, traffic-related noise impacts at future residential uses within the Project area would be potentially significant. However, this would be dependent upon the specific location and design of future projects. Thus, existing General Plan policies would be implemented to protect future uses. As listed previously, General Plan Healthy Community Element Action 7-A.136 requires a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" and Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Likewise, Measure U 9.0e requires noise level compliance for new projects, Measures U 9.0f, U 9.0u, and U 9.0v require noise studies or other verification that impacts would not occur, and Measure U 9.0i requires noise barriers. Therefore, with implementation of existing General Plan policies, impacts related to future residences within traffic noise impacted areas would be less than significant.

Noise from New Land Use Operations

Buildout pursuant to the proposed Project would result in development of new residential and public/institutional uses that would generate a combination of noise sources that include air conditioning units, parking lots, trash enclosures, and outdoor activities in park and recreation areas. These Project-related noise sources are consistent with existing noise sources throughout the City of Redlands and consistent with or less intensive than the noise sources that would occur from development of the existing zoning. Although, operation of new uses developed pursuant to the proposed Project could result in a substantial increase the ambient noise levels at sensitive receptors if not designed appropriately, the City's review and development permitting process ensures future project compliance with Municipal Code Section 8.06.090(F). As described previously, the General Plan Healthy Community Element Action 7-A.137 requires site planning and architecture to incorporate noise-attenuating features. Through implementation of the City's existing General

Plan and Municipal Code regulations that would be verified through the City's development review and permitting process, impacts would be less than significant.

As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to noise would be less than significant.

IMPACT NOI-2: THE PROJECT WOULD NOT GENERATE EXCESSIVE GROUND-BORNE VIBRATION OR GROUNDBORNE NOISE LEVELS.

Construction

Less than Significant with Mitigation Incorporated. Construction activities for the infill and redevelopment projects that would occur pursuant to the proposed Project are anticipated to include demolition, site preparation, grading, building construction, paving, and application of architectural coatings. Vibration impacts from these construction activities would typically be created from the operation of heavy off-road equipment. Because the proposed Project could result in development of residential and public/institutional uses and existing residential units and historic structure that are potentially fragile are located throughout the Project area, construction could occur adjacent to sensitive receptors.

As described previously, Section 8.06.090(F) of the City's Municipal Code limits construction to occur between 7:00 a.m. and 6:00 p.m., Monday through Saturday, which also limits the time that construction vibration could occur. Also, Municipal Code Section 8.06.020 identifies the vibration threshold as 0.01 in/sec RMS.

Ground vibration levels associated with various types of construction equipment are summarized in Table *5.7-5*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate construction vibration levels using the following vibration assessment methods defined by the FTA. To describe the human response (annoyance) associated with vibration impacts, the FTA provides the following equation: PPVequip = PPVref x (25/D).

Table 5.7-5: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

The primary source of vibration during infill and redevelopment construction would be from the operation of a bulldozer. As shown in Table *5.7-5*, a large bulldozer would create a vibration level of 0.089 in/sec PPV at 25 feet. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020), describes that fragile historic buildings have the potential to be impacted at a 0.08 in/sec PPV.

To describe the RMS vibration level and demonstrate compliance with the Municipal Code perceptible vibration threshold of 0.01 in/sec RMS, PPV velocities are converted to RMS vibration levels based on the Caltrans *Transportation and Construction Vibration Guidance Manual* conversion factor of 0.71 and are listed in Table 5.7-6 at distances ranging from 25 to 150 feet from construction activity. As shown, construction vibration levels would range from 0.004 to 0.063 in/sec RMS, and would exceed the perceptible vibration threshold of 0.01 in/sec RMS at distances of 100 feet or less. Therefore, Mitigation Measures NOI-3 is included to ensure that vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses, and that other equipment be used to reduce potential vibration impacts to below the vibration threshold of 0.01 in/sec RMS, which would reduce impacts to a less-than-significant level. In addition, Mitigation Measure NOI-4 is included to require an assessment of fragile historic

buildings within 25 feet of construction to ensure that construction vibration from implementation of the proposed Project would not damage any historic structures. With implementation of these mitigation measures, potential impacts related to construction vibration would be less than significant.

Table 5.7-6: Construction Equipment Vibration Levels

Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV					Velocity Levels (in/sec) RMS	Threshold (in/sec) RMS	Threshold Exceeded?
	Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
25	0.0030	0.0350	0.0760	0.0890	0.0890	0.063	0.01	Yes
50	0.0011	0.0124	0.0269	0.0315	0.0315	0.022	0.01	Yes
100	0.0004	0.0044	0.0095	0.0111	0.0111	0.008	0.01	No
125	0.0003	0.0031	0.0068	0.0080	0.0080	0.006	0.01	No
150	0.0002	0.0024	0.0052	0.0061	0.0061	0.004	0.01	No

Source: Caltrans, 2020

Operation

Less than Significant Impact. The proposed Project would consist of infill and redevelopment of sites with new residential and public/institutional uses instead of commercial and industrial uses as currently planned for under the existing General Plan land use designations. The operation of residential and public/institutional land uses would not include the operation of any vibration sources other than typical onsite vehicle and truck operations, which result in negligible vibration levels. Therefore, impacts related to operational vibration from buildout pursuant to the proposed Project would be less than significant.

As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to vibration would be less than significant.

5.7.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development pursuant to the proposed Project in combination with ambient growth and other development projects within the vicinity of the RHNA Rezone sites. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the activities of future developments pursuant to the proposed Project to result in cumulative noise impacts.

Buildout of the proposed Project in combination with surrounding cumulative projects through the year 2035 would result in an increase in construction-related and traffic-related noise. However, Municipal Code Section 8.06.090(F) requires construction activities to not occur within the hours of 6:00 p.m. and 7:00 a.m. on weekdays or anytime on Sundays and federal holidays. Also, construction noise and vibration are localized in nature and decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise and vibration levels, more than one source emitting high levels of construction noise would need to be in close proximity to the Rezone sites with construction activity. As the timing of development and various construction activities pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects, construction activities associated with buildout pursuant to the rezoning would occur sporadically through the year 2035. Thus, it is currently unknown if future construction projects would occur adjacent to one another. As shown in Figure 5-1, *Cumulative Projects*, there are several existing cumulative projects within the general vicinity of the Rezone sites, which are listed in Table *5.7-7*. As detailed, several projects are completed, entitled, and in planning, and one project is under construction.

Table 5.7-7: Existing Cumulative Projects Related to Noise and Vibration

No.	Cumulative Project	Location/Address	Description	Project Status
City of Redlands				
2.	Liberty Lane Apartments, CUP 1045	SWC Lugonia Ave & Texas Street	80 multi-family residential units	Under Construction
3.	Luxview Apartments, CUP 1108, TTM 20244, SPA 45 & 46	1616 Orange Street	328 multi-family residential units	Completed
4.	Heritage Specific Plan, TTM 20257, SP 62, GPA 141	NWC Texas St & W. San Bernardino Avenue	207 single-family residential units	Completed
25.	Lugonia Village, GPA 143, ZC 469, SPA 48 to EVCSP, TTM 40490 & 40491, TPM 40469, CRAs 940, 941, 942	NEC Tennessee St & W. Lugonia Ave	90 single-family residences, 451 multi-family residences	Entitled
29.	Luxview Phase 2, CRA 958	SWC Alabama St & Orange Ave	164 multi-family residences with affordable housing	In Planning
31.	CRA 912	10797 & 10843 New Jersey St	179,400 SF warehouse building	Completed
36.	CRA 928	10756 Nevada St	88,400 SF warehouse building	Completed
49.	CRA 938, CUP 1187	350 Iowa St	181,100 SF warehouse	Entitled
56.	CRA 952	Alabama St & W Citrus Ave	8,853 SF medical clinic	Entitled
57.	CRA 963	SWC Lugonia Ave & New York St	16,027 SF grocery store	Entitled
61.	CUP 1184 & 1185	SWC Lugonia Ave & New York St	Two fast food restaurants w/ drive-thrus totaling 6,020 SF	Entitled
65.	CRA 959, CUP 1174, & 1175	NEC Lugonia Ave & Tennessee St	Two fast food restaurants with drive-thrus totaling 13,300 SF and 47,085 SF shopping center with four retail buildings	In Planning
66.	Carmax, CRA 962, CUP 1179, SPA 52 to EVCSP	New York St. at Brockton Ave.	4,958 SF used automobile sales building, 47,085 SF automobile repair	In Planning

Source: Section 5.0, Table 5-1.

Due to the unknown timing of future developments under the proposed zoning, it is unknown what construction activities would concurrently within proximity to each other. However, implementation of construction Mitigation Measures NOI-1 and NOI-2 and vibration Mitigation Measures NOI-3 and NOI-4 provided herein would reduce the potential of noise and vibration levels from different construction projects combining to become cumulatively considerable to a less than significant level. Therefore, with implementation of mitigation, cumulative noise and vibration impacts associated with construction activities would be less than significant.

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

5.7.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Code of Regulations, Title 24 included in the City's Municipal Code in Chapter 18.
- City's Municipal Code Section 8.06.090(F), all construction activities shall be limited to the daytime hours of between 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays
- City's Municipal Code Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS.
- City of Redlands General Plan Healthy Community Element Action 7-A.136 and Action 7-A.137.
- City of Redlands Measure U 9.0, et al.

Plans, Programs, or Policies

None.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact NOI-1: Buildout of the proposed zoning could generate of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance.

Impact NOI-2: Buildout of the proposed zoning could generate excessive groundborne vibration or groundborne noise levels.

5.7.10 MITIGATION MEASURES

General Plan EIR Mitigation Measures

None.

Proposed Project Mitigation Measures

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

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

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

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

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

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

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact NOI-1: After implementation of Mitigation Measures NOI-1 and NOI-2, buildout pursuant to the proposed Project would not result in a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. Thus, impacts would be less than significant.

Impact NOI-2: After implementation of Mitigation Measures NOI-3 and NOI-4, buildout pursuant to the proposed Project would not result in excessive groundborne vibration or groundborne noise levels. Thus, impacts would be less than significant.

Therefore, no significant unavoidable adverse impacts related to noise or vibration would occur.

5.7.12 REFERENCES

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Caltrans. (2024). *Standard Environmental Reference Volume 1: Guidance for Compliance*. https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-12-noise

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5.8 Population and Housing

5.8.1 INTRODUCTION

This section examines the existing population, housing, and employment conditions in the City of Redlands and assesses the Project's environmental impacts related to direct and indirect growth. The demographic data and analysis in this section is based, in part, on the following documents and resources:

- *Connect SoCal, The 2020-20545 Regional Transportation Plan/Sustainable Communities Strategy*, SCAG, April 2024
- *Local Profiles Report 2019, Profile of the City of Redlands*, SCAG, May 2019
- *Population Estimates for Cities, Counties, and the State*, California Department of Finance (DOF), 2024
- *City of Redlands General Plan 2035*, December 5, 2017; and
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017.

Although evaluation of population, housing, and employment typically involves economic and social, rather than physical environmental issues, population, housing, and employment growth are often precursors to physical environmental impacts. According to Section 15382 of the CEQA Guidelines, "[a]n economic or social change by itself shall not be considered a significant impact on the environment." Socioeconomic characteristics should be considered in an EIR only to the extent that they create adverse impacts on the physical environment.

5.8.2 REGULATORY SETTING

5.8.2.1 State Regulations

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the State level, the California Department of Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth that would occur in each county based on Department of Finance (DOF) population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, HCD provides the RHNA to the council. Such is the case for the City of Redlands, which is a member of SCAG. The council, in this case Southern California Association of Governments (SCAG), then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the State's projected housing need.

Southern California Association of Governments

SCAG is a council of governments representing Orange, Imperial, Los Angeles, Riverside, San Bernardino, and Ventura counties. It is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. SCAG actions in San Bernardino County are partially the

result of input from the San Bernardino County Council of Governments (SBCOG), which offers recommendations regarding SCAG's initiatives.

Regional Housing Needs Allocation

The Regional Housing Needs Assessment (RHNA) is mandated by the California housing law (described previously) as part of the periodic process of updating housing elements of local general plans. State law requires that housing elements identify RHNA targets set by HCD to encourage each jurisdiction in the State to provide its fair share of very low-, low-, moderate-, and upper-income housing. The RHNA is intended to provide a long-term outline for housing within the context of local and regional trends and housing production goals.

SCAG determines total housing need for each community in southern California based on three general factors: (1) the number of housing units needed to accommodate future population and employment growth; (2) the number of additional units needed to allow for housing vacancies; and (3) the number of very low, low, moderate, and above-moderate income households needed. All cities are required to ensure that sufficient sites are planned and zoned for housing, such that area would be available to accommodate the projected housing needs, and to implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

For the 2021–2029 planning period, SCAG determined that the City of Redlands RHNA allocation is 3,516 housing units (City of Redlands, 2022). As shown in Table 5.8-1, 45 percent are identified for extremely low through low income housing and 55 percent for moderate and above moderate income housing.

Table 5.8-1: City of Redlands SCAG Regional Housing Needs Allocation, 2021-2029

Category	Percent of County Median	2021 Household Income	2021-2029 Housing Need
Extremely Low-Income	Less than 30%	Less than $26,500	483 (14%)
Very Low-Income	30-50%	$26,500 - $39,500	484 (14%)
Low-Income	50-80%	$39,500 - $63,200	615 (17%)
Moderate Income	80-120%	$63,200 - $93,000	652 (19%)
Above Moderate Income	Over 120%	More than $93,000	1,282 (36%)
Total	**--**	**--**	**3,516**

Source: City of Redlands 2021-2029 Housing Element

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is designated by federal law as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops transportation and housing strategies for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), which includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans

for the region. Most of the Plan's goals are related to regional transportation infrastructure and the efficiency of transportation in the region.

On April 4, 2024, SCAG adopted "Connect SoCal," the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The California Air Resources Board (CARB) has yet to approve of the technical methodology contained in the 2024-2050 RTP/SCS. This section will provide analysis showing consistency with both the 2020 and the 2024 SCAG RTP/SCS. Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with State greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. The RTP/SCS is updated every four years as required by federal and State regulations.

According to the RTP/SCS (Connect SoCal 2020), by 2045, the population of Southern California is projected to increase by 3.7 million people, with an increase of 1.6 million housing units and 1.6 million jobs. However, growth is not expected to be uniform across the region's counties or cities. The RTP/SCS states that during that time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. The determination of each city's and county's share of regional housing needs (RHNA as described previously) that is required by law to be reflected in municipal general plan housing elements is based on the growth projections of the RTP/SCS.

SCAG Regional Growth Projections

SCAG is responsible for producing socioeconomic forecasts and developing, refining, and maintaining macro and small-scale forecasting models. The forecasts are developed in five-year increments. The current SCAG projections are provided in the Connect SoCal 2020 through the year 2045. Consistency with the growth forecast, at the sub-regional level, is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans.

2020 SCAG Connect SoCal projects that the number of local employment opportunities in the City of Redlands will increase from 42,600 in 2016 (Based on SCAG's most recent data which is from 2016) to 56,300 in 2045. Additionally, SCAG projects the City's households will increase from 24,400 in 2016 to 30,800 in 2045 (SCAG, 2020).

2024 SCAG Connect SoCal projects that the number of local employment opportunities in the City of Redlands will increase from 49,400 in 2019 (Based on SCAG's most recent data which is from 2019) to 60,100 in 2050. Additionally, SCAG projects the City's households will increase from 25,600 in 2019 to 31,200 in 2050 (SCAG, 2024).

5.8.2.2 Regional/Local Regulations

City of Redlands General Plan

Livable Community Element

The Livable Community Element provides for managed, balanced and quality growth in keeping with the city's scale, services, and environment and include the following policies related to population and housing and the Project:

Policy 4-P.2 Provide for the expansion of housing and employment opportunities while ensuring that a high quality of life is maintained in Redlands.

Policy 4-P.16 Promote a variety of housing types to serve the diverse needs of the community.

Policy 4-A.7 Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.

Policy 4-A.8 Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.

City of Redlands 2021-2029 General Plan Housing Element

The Housing Element include the following policies related to population and housing and the Project:

Policy 1.1 Provide adequate capacity to meet the Sites Inventory for Regional Housing Needs Assessment (RHNA).

Policy 1.3 Provide housing capacity near public services.

Policy 1.6 Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.

Policy 1.7 Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

5.8.3 ENVIRONMENTAL SETTING

The Project site includes approximately 116 acres of land that is divided into two general areas (Sites 1-16A and 24, and Sites 17-23). The City of Redlands General Plan 2035 designates the Project site with a mix of land uses including: Commercial/Industrial (CI), Commercial (C), Medium Density Residential (MDR), and High Density Residential (HDR). Figure 3-4a and 3-4b, *Existing General Plan Land Use*, in Section 3.0, *Project Description*, show the existing General Plan land use designations for the Project site.

Sites 1-16A and 24 consists of non-residential land use designations except for the medium density residential designation for Site 8. Sites 17-23 are also primarily non-residential, with medium and high density residential allowed at sites 20, 21, and 23. There are a number of vacant parcels located within the Project area, including all of Sites 17-23. Figures 3-5a and 3-5b, *Existing Zoning,* in Section 3.0, *Project Description*, show the existing zoning designation of the Project site.

Population

The California Department of Finance (DOF) estimates that as of 2024, the City of Redlands has a population of 72,696, representing approximately 3.3 percent of the County's total population (DOF, 2024). SCAG estimates that the City will have a population increase of 16.2 percent between 2016 and 2045[1], and the County will have population growth rate of 31.5 percent over the same period. Table 5.8-2 provides population figures for the City of Redlands and the County in 2016, and SCAG projections for year 2045

and Table 5.8-3 provides population figures for the City of Redlands and the County in 2019, and SCAG projections for year 2050.

Table 5.8-2: SCAG Population Estimates and Projections, 2016–2045

	2016	2045 Projection	2016-2045 Change
City of Redlands	69,500	80,800	16.2%
San Bernardino County	2,141,000	2,815,000	31.5%

Source: (SCAG, 2020)

Table 5.8-3: SCAG Population Estimates and Projections, 2019–2050

	2019	2050 Projection	2019-2050 Change
City of Redlands	72,800	85,874	18.0%
San Bernardino County	2,175,000	2,623,000	20.6%

Source: (SCAG, 2024)

Housing and Households

The California DOF estimates that there were 28,139 housing units in Redlands in 2024, which is 3.7 percent of the County total. The City's housing stock is about 64 percent single-family residential and is estimated to be 94.9 percent occupied, as shown in Table 5.8-4. The DOF estimates persons per household to be 2.62.

Table 5.8-4: City of Redlands Existing Housing Stock, 2024

Residence Type	Number	Percentage
Single-Family Detached	17,975	63.9%
Single-Family Attached	1,282	4.6%
Two to Four Units	3,122	11.1%
Five Plus	4,411	15.7%
Mobile Homes	1,049	3.7%
Total	**28,139**	**100%**
Occupied	26,693	94.9%
Vacancy	1,446	5.1%

California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2024.

According to SCAG's Connect SoCal 2020-2045 RTP/SCS, the City of Redlands is projected to add approximately 6,400 households by 2045 (Table 5.8-5). This averages approximately 221 new households annually through 2045.

Table 5.8-5: SCAG Household Projections, 2016–2045

	2016 Households	2045 Households	2016-2045 Increase
City of Redlands	24,400	30,800	26.2%
San Bernardino County	630,000	875,000	38.9%

Source: (SCAG, 2024)

According to SCAG's Connect SoCal 2024-2050 RTP/SCS, the City of Redlands is projected to add approximately 5,600 households by 2050 (Table 5.8-6). This averages approximately 224 new households annually through 2050.

Table 5.8-6: SCAG Household Projections, 2019–2050

	2019 Households	2050 Households	2019-2050 Increase
City of Redlands	25,600	31,200	21.9%
San Bernardino County	657,000	953,000	45.1%

Source: (SCAG, 2024)

Employment

According to SCAG's 2020-2045 RTP/SCS, the number of jobs within the City is projected to increase from 42,600 jobs in 2016 to 56,300 jobs in 2045 (Table 5.8-7). This represents an increase of over 32 percent, and an average of 472 jobs annually through the year 2045.

Table 5.8-7: SCAG Projected Employment Trends, 2016-2045

	2016	2045	2016 – 2045 Increase
City of Redlands	42,600	56,300	13,700 (32.2%)
San Bernardino County	791,000	1,064,000	273,000 (34.5%)

Source: (SCAG, 2024)

According to SCAG's 2024-2050 RTP/SCS, the number of jobs within the City is projected to increase from 49,400 jobs in 2019 to 60,100 jobs in 2050 (Table 5.8-8). This represents an increase of over 21 percent, and an average of 345 jobs annually through the year 2050.

Table 5.8-8: SCAG Projected Employment Trends, 2019-2050

	2019	2050	2019 – 2050 Increase
City of Redlands	49,400	60,100	10,700 (21.7%)
San Bernardino County	860,000	1,145,000	285,000 (33.1%)

Source: (SCAG, 2024)

The SCAG 2019 Local Profile for Redlands identifies that 22.5 percent of Redlands residents work and live in the City, while 77.5 percent commute to other places (Southern California Association of Governments, 2019). Of the commuters residing in Redlands, the largest percentage commute to the City of San Bernardino (15.3 percent), Loma Linda (7.5 percent), Riverside (5.6 percent), and Los Angeles (3.8 percent).

Jobs – Housing Balance

The jobs-housing ratio is a general measure of the "balance" between the number of jobs and number of housing units within a geographic area, without regard to economic constraints or individual preferences. The ratio expresses quantitatively the relationship between the number of people working and number of dwelling units housing the people living in a given area. Additionally, a well-balanced ratio of jobs and housing reduces commuting trips because more employment opportunities are closer to residential areas. Such a reduction in vehicle trips lowers air pollutant emissions (including lower greenhouse gas emissions) and

causes less congestion on area roadways and intersections. A major focus of SCAG's regional planning efforts has been to improve this balance. SCAG defines the jobs-housing balance as follows:

> Jobs and housing are in balance when an area has enough employment opportunities for most of the people who live there and enough housing opportunities for most of the people who work there. The region as a whole is, by definition, balanced…. Job-rich subregions have ratios greater than the regional average; housing-rich subregions have ratios lower than the regional average. Ideally, job-housing balance would… assure not only a numerical match of jobs and housing but also an economic match in type of jobs and housing.

There is no ideal ratio adopted in State, regional, or City policies. However, the American Planning Association recommends a target ratio of 1.5 jobs per housing unit; communities with more than 1.5 jobs per dwelling unit are considered "jobs rich," meaning that more employment opportunities are provided that housing in the area, and those with fewer than 1.5 are "housing rich," meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A job-housing imbalance can indicate potential air quality and traffic problems associated with commuting. Table 5.8-9 provides the projected jobs-to-housing ratios for the City, based on SCAG's 2020-2045 RTP/SCS.

As described above and shown in Table 5.8-6, the City had approximately 24,400 households and approximately 42,600 jobs in 2016, which results in a jobs-to-housing ratio of 1.75 jobs per household (SCAG, 2020). SCAG projects a jobs-to-housing ratio of 1.83 in 2045, which indicates that employees would be commuting into the City for employment, and that additional housing would improve the jobs to housing balance within the City. The City is projected to have a higher percentage of jobs to households in comparison to the County, which is projected to have a jobs to housing ratio of 1.22 in 2045. That indicates that since the City of Redlands is a jobs rich community, it is possible that people employed in the City are commuting from elsewhere. Table 5.8-6 provides the existing and projected jobs-to-housing ratios for the City and the County from 2016 and 2045.

Table 5.8-9: Existing and Projected Jobs - Housing Balance in the City and County (2016-2045)

	Year	Employment	Households	Jobs-Housing Ratio
City of Redlands	2016	42,600	24,400	1.75
	2045	56,300	30,800	1.83
San Bernardino County	2016	791,000	630,000	1.26
	2045	1,064,000	875,000	1.22

Source: (SCAG, 2024)

As described above and shown in Table 5.8-10, the City had approximately 25,600 households and approximately 49,400 jobs in 2019, which results in a jobs-to-housing ratio of 1.93 jobs per household (SCAG, 2024). SCAG projects a jobs-to-housing ratio of 1.93 in 2050, which indicates that employees would be commuting into the City for employment, and that additional housing would improve the jobs to housing balance within the City. The City is projected to have a higher percentage of jobs to households in comparison to the County, which is projected to have a jobs to housing ratio of 1.20 in 2050. That indicates that since the City of Redlands is a jobs rich community, it is possible that people employed in the City are commuting from elsewhere. Table 5.8-10 provides the existing and projected jobs-to-housing ratios for the City and the County from 2019 and 2050.

Table 5.8-10: Existing and Projected Jobs - Housing Balance in the City and County (2019-2045)

	Year	Employment	Households	Jobs-Housing Ratio
City of Redlands	2019	49,400	25,600	1.93
	2050	60,100	31,200	1.93
San Bernardino County	2019	860,000	657,000	1.31
	2050	1,145,000	953,000	1.20

Source: (SCAG, 2024)

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. This would result in the generation of 2,263 jobs and 294 residents according to the General Plan EIR growth induction rate shown on Table 2.3-6 (City of Redlands, 2008).

5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

POP-1 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

POP-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Initial Study established that the proposed Project would not result in impacts related to Threshold POP-2; thus, no further assessment of this impact is required in this SEIR.

5.8.5 METHODOLOGY

State CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. Additionally, CEQA Guidelines Appendix G indicates that a project could have a significant effect if it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Therefore, population impacts are considered potentially significant if growth associated with a project would exceed projections for the area and if such an exceedance would have the potential to create a significant adverse physical change to the environment.

The methodology used to determine population, housing, and employment impacts includes data collection of population and housing trends, which was obtained from DOF, the General Plan, and SCAG. The determination of impacts is based on an analysis of the number of residents and employees anticipated at buildout of the proposed Project. The scale of population at buildout is then compared with General Plan buildout and growth forecasts for the Project area. Growth is considered in the context of local and regional plans that include population projections for the City and the County. The SCAG population projections are used to prepare the Connect SoCal 2024 RTP/SCS. If projected growth within the Project area from

implementation of the Project would exceed SCAG growth projections, RHNA housing requirements, and/or the City's General Plan, a significant impact may result.

5.8.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to population and housing in Chapter 3.10. The 20-year buildout projected in the proposed General Plan assumes the majority of development would occur on infill sites within urbanized areas of the city. As infill sites are scattered throughout the city and are generally already served by public services and facilities, there should not be a significant increase in population and business in one particular part of the city. The General Plan EIR determined that redevelopment of existing uses would likely occur; however, such development would take place over time as the market allows and would result in a net increase in residential units. Though it is impossible to guarantee residents would not be displaced as a result of implementation of the General Plan, proposed General Plan policies seek to preserve existing neighborhoods, thus impacts were found to be less than significant (City of Redlands, 2017a, pg. 3.10-11).

Proposed Project

As detailed in Section 3.0, *Project Description*, the proposed Project would rezone 24 sites to allow for the development of a total of 2,436 residential dwelling units and approximately 151,048.46 square feet (SF) of public/institutional development. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development compared to the buildout of the existing General Plan. The timing of development and operation of the development pursuant to the proposed Project would be dependent upon market conditions and development applications for new projects.

IMPACT POP-1: THE PROJECT WOULD NOT INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH IN AN AREA, EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE THROUGH THE EXTENSION OF ROADS OR OTHER INFRASTRUCTURE).

Less Than Significant Impact. The proposed Project provides for infill development, redevelopment, and development of a number of vacant parcels located within the Project area under a different urban zoning designation. The maximum development that would occur from buildout of the proposed Project is 2,436 residential units and 151,048.46 SF of public/institutional development. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development compared to buildout of the existing General Plan.

Using the Redlands General Plan EIR growth induction rate of 2.65 people per household, buildout of the proposed residential units would generate up to 6,456 residents. Employee generation for the proposed Project was calculated using Table 2.3-6, *Projected Non-Residential Buildout (2035)*, from the Redlands General Plan using the projected Public/Institutional square feet of development and projected jobs creation, which results in a generation of 550 jobs.

Table 5.8-11 lays out the growth of buildout of the approved General Plan compared to growth induced from the proposed Project. As shown, compared to the existing General Plan buildout, the proposed Project would result in a reduction of 1,713 employees and an increase of 6,162 residents.

Table 5.8-11: General Plan and Proposed Project Population Growth

	Approved General Plan	Proposed Project	Difference (Proposed Project – approved General Plan)
Employees	2,263	550	-1,713
Residents	294	6,456	6,162

As shown previously in Table 5.8-2, *SCAG Population Estimates and Projections, 2016–45*, population in the City of Redlands is expected to increase by 11,300 persons between 2016 and 2045. As shown previously in Table 5.8-5, *SCAG Household Projections, 2020–2045*, housing stock in the City is expected to increase by 6,400 dwelling units between 2016 and 2045. Based on these growth projections, full buildout of the Project would represent approximately 54.5 percent of the projected population growth and 36.3 percent of the projected housing stock growth in the City if built out and at full capacity in 2045. In addition, according to the population estimates and projections provided in the 2024-2050 SCAG RTP/SCS which has not yet been approved by CARB, the proposed Project would result in approximately 47.1% of the anticipated population growth and approximately 41.5% of the project housing stock growth in the City by 2050 (SCAG, 2024). Thus, while the Project would result in an increase in population and housing units in an area not previously planned for housing, the increase in population and number of housing units that would result from the proposed Project would not exceed projections for the City through the Project and General Plan buildout year of 2035.

Further, as reflected in Table 5.8-1, *City of Redlands SCAG Regional Housing Needs Allocation, 2021-2029*, SCAG determined the City needs to provide a total of 3,516 housing units by 2029 to meet their RHNA. The City's 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of additional housing units for the City to meet its estimated housing growth needs identified in the SCAG's RHNA allocation (Redlands, 2022). Of the Housing Element inventory sites, 23 of them were identified as necessary for rezoning under Housing Element Program 1.1-1 to allow for high and medium density residential development. Thus, while the proposed Project would result in an increase of population, the Project would in part satisfy the State requirements to provide new housing opportunities to increase housing supply. Additionally, the proposed Project supports goals and policies of the Housing Element (see page 5.8-3) aimed to support a variety of housing types and densities. Thus, the proposed Project would not induce substantial unplanned population growth in the area.

Employment Growth: As described in Section 3.0, *Project Description*, the Project anticipates a future nonresidential capacity buildout of 151,048.46 SF within the portion of the Project site that allows non-residential development. However, buildout of the proposed Project would result in the loss of 2,057,992.20 SF of nonresidential development and a reduction of 1,713 employees in the area. Since the Project would result in a net loss of future employment opportunities, the Project would not result in any unplanned employment growth.

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

In addition, because the area is jobs-rich, the addition of residential units in the area would not require additional jobs that could result in growth. Conversely, the new residents would fill the need for employees that are anticipated by SCAG projections. Thus, the additional residential units would not indirectly result in

the need for additional employment opportunities, which could result in growth. Therefore, this indirect impact related to growth would be less than significant.

Construction. A specific development project is not proposed as part of this Project; however, construction of future residential uses from buildout of the proposed RHNA zoning would result in a temporary increased demand for construction workers. Construction workers are anticipated to come from the City and surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be de minimis, relative to the total number of construction workers in the region. According to the U.S. Census Bureau, 1,322 individuals are employed in the construction industry in the City of Redlands and 80,351 individuals are employed in the construction industry in San Berardino County as a whole (United States Census Bureau, 2024). In addition, buildout of the proposed Project would not occur all at one time; developments would occur one project at a time in response to market conditions and would not result in a constraint on the construction workforce. Therefore, implementation of the Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Impacts would be less than significant.

Infrastructure. Future buildout of the proposed zoning may require expansion of infrastructure to serve the proposed uses, including installation of new storm drains, wastewater, water (potable and reclaimed), and dry utilities that would connect to existing facilities. However, as outlined in Section 3.0, *Project Description,* specific infrastructure improvements required to support residential development within the proposed rezone sites are not known at this time and would not be known until development projects are proposed. Future development associated with allowed uses in accordance with the proposed zoning would be required to undergo project-level environmental review under CEQA on a case-by-case basis. As such, future development projects would be required to analyze project-specific needs related to infrastructure improvements. Overall, the Project does not provide for infrastructure improvements that could lead to substantial unplanned growth.

As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to population and housing would be less than significant.

5.8.7 CUMULATIVE IMPACTS

Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As detailed previously, buildout of the proposed zoning would represent approximately 47.1 percent of projected employment growth and 41.5 percent of projected housing growth in the City through 2050, and is consistent with SCAG RHNA allocation needs and the City's Housing Element. Thus, the Project is within the regional and local growth projections, and would not result in an exceedance that could become cumulatively considerable. Therefore, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

5.8.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

California Government Code Sections 65300, 65580–65589

Plans, Programs, or Policies

None.

5.8.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact POP-1 would be less than significant.

5.8.10 MITIGATION MEASURES

No mitigation measures are required.

5.8.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to population and housing would be less than significant.

5.8.12 REFERENCES

California Department of Finance (DOF). (2024). *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2024 with 2020 Benchmark*. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/

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5.9 Public Services

5.9.1 INTRODUCTION

This section of the Draft Subsequent EIR addresses impacts of the Project to public services, including fire protection and emergency services, police protection, and school services. This section addresses whether there would be physical environmental effects of new or expanded public facilities that would necessary to maintain acceptable service levels as a result of the proposed Project. An increase in staffing associated with public services or an increase in calls for services would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

The Initial Study, included in Appendix A, established that the proposed Project would not result in impacts related to parks or other public services; thus, only fire protection, police protection, and school services are evaluated in this section.

5.9.2 REGULATORY SETTING

5.9.2.1 Federal Regulations

There are no Federal regulations pertaining to public services that would be applicable to the Project.

5.9.2.2 State Regulations

California Building Code

The California Building Code (CBC) includes fire safety requirements, including the installation of sprinklers in all commercial and residential buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 (2016 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023)..

The Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended

to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. Development under the Project would be subject to applicable regulations of the California Fire Code.

California Government Code (Section 65995(b)) and Education Code (Section 17620)

California Senate Bill 50 (SB 50), which passed in 1998, amended California Government Code Sections 65995.5 through 65998, which contains limitations on Education Code Section 17620. The statute authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments.

According to California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Mitigation Fee Act (California Government Code Sections 66000 et seq.)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency, such as the City of Redlands to establish, increase, or impose an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development Project on which it is to be levied. This Act became enforceable on January 1, 1989 (California Legislative Information, n.d.).

5.9.2.3 Local Regulations

Fire Protection and Emergency Services

City of Redlands General Plan

The Livable Community Element, Connected City Element, and Healthy Community Element of the General Plan set forth the following actions and principles for fire protection and emergency services:

Principle 4-P.30 Require that new development adheres to safety standards to protect against property damage, injury, or loss of life from fire or geological hazards.

Action 4-A.153 Ensure that the Police and Fire departments have modern facilities and equipment needed to perform their duties.

Action 4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.

Principle 5-P.7 Minimize emergency vehicle response time and improve emergency access.

Action 5-A.3 Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices. This could be accomplished through:

- Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate;

- Short block lengths, reduced street widths, and/or traffic calming measures; and
- Providing pedestrians and bicyclists with options where motorized transportation is prohibited.

Action 5-A.15 Maintain 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.

Policy 7-P.12 Create and maintain a system of trails serving both recreational and emergency access needs.

Action 7-A.89 Require adherence to applicable buildings codes and standards in accordance with Fire Hazard Overlay Districts, California Fire Code, and the California Building Code.

Action 7-A.96 Require that new development minimizes risks to life and property from fire hazard through:

- Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.;
- Siting and designing development to avoid hazardous locations;
- Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent;
- Using appropriate building materials and design features to ensure the minimum amount of required fuel modification; and
- Using fire-retardant, native plant species in landscaping.

Action 7-A.95 Coordinate with the Redlands Fire Department and other fire prevention agencies to review all applications for new development. The Fire Department's review should ensure compliance with fire safety regulations and assess potential impacts to existing fire protection services and the need for additional and expanded services.

Action 7-A.96 Ensure that all-weather access is provided for all new development, with adequate clearance for emergency vehicles, designed in accordance with the California Fire Code, and ensure that all roads, streets, and major public buildings are identified in a manner that is clearly visible to fire protection and other emergency vehicles.

City of Redlands Public Facilities Fees

The Project is required to comply with the provisions of the City of Redlands Public Facility Fee (Municipal Code Chapter 3.60) which requires a fee payment for any developments requiring permitting that the City applies to the funding of such civic center, corporate yard, fire and police required public facilities and related improvements.

Police Services

City of Redlands General Plan

The Livable Community Element of the General Plan sets forth the following actions and principles for police services:

Principle 4-P.60 Locate police and fire resources where they can best serve the community.

Principle 4-P.61 Support community partnership and community-based policing strategies to enhance the relationship between the Redlands Police Department and neighborhoods throughout the city.

Action 4-A.153 Ensure that the Police and Fire departments have modern facilities and equipment needed to perform their duties.

Action 4-A.154 Support and expand neighborhood watch organizations and citizen volunteer patrols to assist the police in deterring crime.

Action 4-A.155 Continue to enact mutual aid agreements with neighboring police and fire jurisdictions as well as state agencies.

Action 4-A.156 Encourage the use of police substations throughout the city to increase the police presence in the neighborhoods.

Action 4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.

School Services

City of Redlands General Plan

The Livable Community Element of the General Plan sets forth the following actions and principles promoting park and recreation facilities and programs:

Principle 4-P.58. Coordinate with the Redlands Unified School District to ensure that facilities and services are provided at a high quality and consistent with the population's needs.

5.9.3 ENVIRONMENTAL SETTING

5.9.3.1 Redlands Fire Department

The Redlands Fire Department (RFD) provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response to the city of Redlands including the Project area.

According to the Redlands General Plan EIR, the RFD recognizes two response time standards. The first is from the National Fire Protection Association (NFPA), which recommends that the first unit arrive within four minutes 90 percent of the time. The second is a more lenient goal of arriving within seven minutes 90 percent of the time, as recommended by the 2008 High-Level Fire Department Review for the RFD. According to the City of Redlands, the current 90 percent response time is eight and a half minutes, which is over twice the NFPA standard and one and a half minutes slower than the more lenient guideline. In 2023, the RFD received 14,757 calls for service and had 71,776 residents, which results in 0.21 calls per resident (California Department of Finance, 2024a).

The Project area would be served by four fire stations as shown in Table 5.9-1 below, and on Figure 5.9-1. The City currently has plans to relocate Station 264 based on the annual increase in calls for service and location of service needed. RFD is also in the beginning stages of a planned capital improvement project that would include the construction of two new fire stations within the City. The specifications and locations of those stations are not known at this time (Appendix I).

Table 5.9-1: Fire Station Serving the Project Sites

Fire Station	Location	Equipment	Staffing
Station 261	525 East Citrus Avenue	Engine 261 Truck 261 Battalion Chief Incident Support Unit	(1) Battalion Chief (2) Fire Captains (3) Engineers (4) Firefighter-Medics
Station 262	1690 Garden Street	Engine 262	(1) Fire Captain (1) Engineer (1) Firefighter-Medic
Station 263	10 West Pennsylvania Avenue	Engine 263	(1) Fire Captain (1) Engineer (1) Firefighter-Medics
Station 264	1270 West Park Avenue	Engine 264 Medic Squad 264	(1) Fire Captain (1) Engineer (3) Firefighter-Medics

Source: (Appendix I)

5.9.3.2 Redlands Police Department

Public safety services in the City, including for the Project sites, are provided by the Redlands Police Department (RPD). The RPD's main police station is located at 1270 West Park Avenue within the boundaries of the New York Street/Esri Transit Village. The RPD personnel is made up of approximately 46 sworn officers and 5 part-time civilians, resulting in a service level of 0.54 officers per 1,000 residents (Appendix I).

Based on existing staffing levels, RPD estimates response times to Sites 1 through 16A and Site 24 are 13 minutes and 47 seconds for Priority 1 police service calls and 9 minutes and 44 seconds for Priority 2 police service calls. The RPD estimates a response time of 11 minutes and 22 seconds for Priority 1 police service calls and 14 minutes and 21 seconds for Priority 2 police service calls for Sites 17 through 23. Although there are no industry standards for response time to emergency calls, according to the RPD, a response time below the national response time average of 8 to 12 minutes for Priority 1 calls is desirable (Appendix I). The location and staffing descriptions of the RPD stations within the City are listed below in Table 5.9-2 and shown in Figure 5.9-1.

Table 5.9-2: Police Stations

Location	Staffing Description
1270 W. Park Avenue	Patrol, Custody, Dispatch Records
30 Cajon Street	Administration, Investigations, MET, Traffic/Special Events, Crime Analysis, Community Policing, Property/Evidence
1150 Brookside Avenue	Records Processing

Source: (Appendix I)

5.9.3.3 School Services

The City, including the Project site, is within the Redlands Unified School District (RUSD). The RUSD has 16 elementary school (grades K-5), four middle schools (grades 6-8), three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, a home education leaning program, and a K-12 online academy (City of Redlands, 2017b, pg. 5.13-9). Current enrollment is approximately 19,773 students with an excess capacity of 1,676 students (RUSD, n.d., a).

Table 5.9-3: RUSD School Serving the Project site

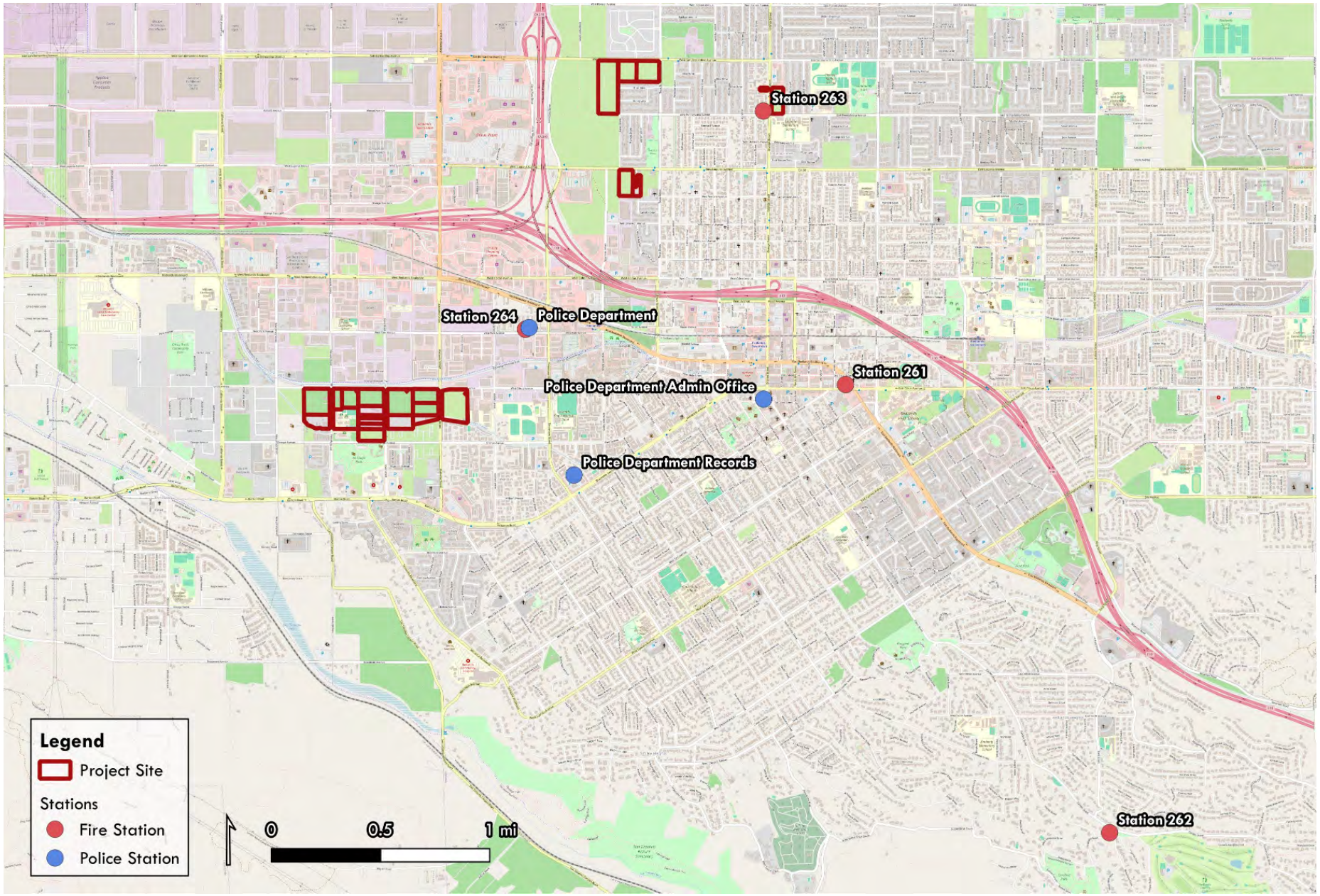
School Type (Grades)	School Name	Location (in Redlands)
Elementary School[1] (K-5)	Lugonia	202 E. Pennsylvania Ave.
	Kingsbury	600 Cajon St.
	Mission	10568 California St
	Smiley	1210 W. Cypress Ave.
Middle School (6-8)[2]	Clement	501 E. Pennsylvania Ave.
	Cope	1000 W. Cypress Ave.
High School (9-12)[3]	Redlands	840 E. Citrus Ave.
	Citrus Valley	800 W. Pioneer Ave.

[1](RUSD, n.d., b)
[2](RUSD, n.d., c)
[3](RUSD, n.d., d)

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. As discussed in Section 5.8, *Population and Housing*, this would result in the generation of 2,263 employees and 294 new residences in the City. Similar to the proposed Project, implementing projects of the General Plan would be required to pay Development Impacts Fees which would go towards the maintenance and expansion of service facilities such as police and fire stations to ensure that acceptable levels of service are met.

City of Redlands Emergency Services Stations



RHNA Rezone Project
City of Redlands

Figure 5.9-1

Redlands Regular Meeting of 06-03-25

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822 of 1245

5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a project could have a significant effect if it were to 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:

PS-1 – Fire protection
PS-2 – Police protection
PS 3 – Schools
PS 4 – Parks
PS 5 – Other public facilities

The Initial Study (see Appendix A) established that the proposed Project would not result in impacts related to Threshold PS-4 and PS-5; and no further assessment of this impact is required in this Draft Subsequent EIR.

5.9.5 METHODOLOGY

The evaluation of impacts to public services is based on whether the existing public services can meet the demands of the Project based on established thresholds, including maintaining acceptable service ratios, staffing levels, adequate equipment, response times, or other performance objectives that may result in the need for new or expanded services and facilities.

5.9.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to public services in Chapter 3.13. The Certified EIR found that implementation of the proposed Project could result in a population increase of up to 16,355 new residents. The General Plan policies that seek to address park, recreation, and safety needs as development occurs, in combination with the City's development impact fees, would serve to ensure the maintenance of existing facilities and the timely provision of new facilities in order to prevent the deterioration of existing and new facilities. Thus, impacts related to public services were determined to be less than significant upon implementation of the General Plan (Redlands, 2017b, pg. 3.13-18).

IMPACT PS-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF FIRE PROTECTION FACILITIES.

Less than Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 square feet (SF) of nonresidential development. While there would be an increase in 6,162 residents compared to the existing General Plan Buildout, which may increase the demand for fire protection and emergency medical services, the Project would also result in a large decrease in non-residential development which would lead to a decrease in demand for fire and emergency services for those uses. Thus, the proposed Project is not expected to result in a large increase in demand for fire and emergency services compared to the buildout of the approved General Plan.

Future development within the Rezone sites would be installed with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent

waterless fire suppression systems pursuant to the California Fire Code, adopted as Chapter 15.20 of the Redlands Municipal Code, the CBC, and other existing regulations regarding fire safety. Site access would be reviewed by City planning and the RFD to ensure that the proposed improvements would have adequate access for large fire trucks and vehicles. The nearest fire station to Sites 1 through 16A and Site 24 would be Station 264, which is located approximately 0.60 miles east of the Rezone sites. The nearest station to Sites 17 through 23 would be Station 263, which is located approximately 0.58 miles east of the sites. Future development within the Project sites would be required to meet fire and life safety standards, including smoke and carbon monoxide detectors, fire alarms, and residential fire sprinklers, among other building requirements. Development plans would be reviewed by the City planning and fire department to ensure that State and local codes and requirements are implemented.

The General Plan EIR described that the RFD has stated the needs for expansion in order to accommodate continued increase in population. The RFD is currently considering relocating Station 264 to the east side of Alabama Street just south of Orange Avenue. This new station would be approximately 0.25 miles south of Site 1 through 16A and 24 and would serve those sites. The Fire Department is also considering the expansion of Station 263 to provide expanded services to the northern portion of the City. Development Impact Fees, included as PPP PS-1 in Section 5.9.8 below, would serve to ensure the maintenance of existing facilities and the timely provision of new facilities as needed. Each implementing project would be required to pay these fees which are proportional to the increased needs for service. Thus, while implementation of the proposed Project would result in increased needs for fire services, the payment of Development Impact Fees would ensure that RFD has adequate facilities to serve the City as the City continues to expand. As stated above, the City is also in the initial stage of a long range capital improvement project that includes the construction of new and expansion of existing fire stations. The specifics about the stations, including the locations, are not known at this time. As discussed above, the City's current response times do not meet the City's requirements, thus the payment of fees would assist RFD in the future expansions and purchasing of additional equipment to improve response times. The fees collected by each implementing project would ensure that fire protection service levels are maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of additional facilities, if needed in the future.

Whether the City chooses to construct new fire stations in the future is too speculative to be considered as a Project-related impact. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Therefore, with the payment of development fees included as PPP PS-1, Project impacts to fire services would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

IMPACT PS-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES.

Less than Significant Impact. The service ratio for the City of Redlands is 0.54 officers per 1,000 residents. According to the RPD, the City would need to hire approximately 10 new officers to maintain the service ratio in the City to accommodate the proposed Project (A. Colerick, Redlands Police Department, email, April 18, 2024). The increased residential population from the buildout of the proposed Project could increase the frequency of emergency and non-emergency calls to the RPD, as compared to existing conditions. However, implementation of the proposed Project would result in a decrease of approximately 2,057,992.20 SF of nonresidential development and would thus result in a decrease in calls related to those types of uses. Thus, compared to the buildout of the existing General Plan which includes significantly more non-residential development, buildout of the proposed Project's residential uses is not expected to generate an increase in the frequency of emergency and non-emergency calls to the RPD. Buildout of the proposed

Project is not expected to increase demand for police protection to the extent that new facilities would be required beyond what has already been planned for. Currently, the RPD is in the development of an additional police station to meet future demand. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Payment of development impact fees included as PPP PS-1 would serve to ensure the maintenance of existing facilities. In addition, property tax revenue generated by development of the Project would provide funding for police services and would help to offset the Project's increase in the demand for services. Therefore, impacts to police protection facilities would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

IMPACT PS-3 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES.

Less than Significant Impact. As discussed in Section 5.8, *Population and Housing,* full buildout of the Project site would result in the generation of up to 6,162 additional residents compared to buildout of the approved General Plan. According to the Department of Finance, San Bernardino's school aged (5-17 years old) population would be 14.7% by 2035 (Department of Finance, 2024b). Thus, the proposed Project is expected to generate 906 school aged children by full buildout in 2035. As discussed above, the Project site is located within the RUSD and is served by four elementary schools, two middle schools, and two high schools. According to the RUSD, the school district currently has an enrollment of 19,773 students with an excess capacity of 1,676 students (RUSD, n.d., a).

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

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

Pursuant to State law, payment of the school fees established by the RUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed Project's impacts on schools' facilities. Therefore, impacts to school facilities would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to public services would be less than significant.

5.9.7 CUMULATIVE IMPACTS

The Project would not significantly increase the need for public services in Redlands, cities surrounding Redlands, or the region. As discussed above, the Project applicant would pay the required City development

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

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies

PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the Project site, and prior to issuance of any building permits for the implementing project, the Project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code Chapter 3.60 and/or adopted fee schedules.

5.9.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts PS-1, PS-2, and PS-3 would be less than significant.

5.9.10 MITIGATION MEASURES

No mitigation measures are required.

5.9.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with regulatory programs would reduce potential impacts related to public services to less than significant.

5.9.12 REFERENCES

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5.10 Transportation

5.10.1 INTRODUCTION

This section addresses potential transportation impacts that may result from implementation of the Redlands RHNA Rezone Project. The following discussion addresses the existing transportation conditions in the Project area, identifies applicable regulations, evaluates the proposed Project's consistency with applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Project. The analysis in this section is based on the following resources:

- *City of Redlands General Plan 2035*, December 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*, July 2017;
- City of Redlands Municipal Code;
- City of Redlands CEQA Assessment VMT Analysis Guidelines; and
- *Redlands RHNA Rezone Project VMT Analysis*, EPD Solutions, July 2024. Included as Appendix F.

Transportation Terminology

- **Traffic Analysis Zone (TAZ).** Traffic Analysis Zone (TAZ) refers to the geographic unit used for traffic analysis within transportation planning models, such as the San Bernardino County Transportation Authority's vehicle miles traveled (VMT) screening tool model. A TAZ is a special area delineated by State and/or local transportation officials for tabulating traffic-related data especially journey-to-work and place-of-work statistics. A TAZ usually consists of one or more census blocks, block groups, or census tracts.
- **Transit Priority Area (TPA).** As defined by SB 743, a Transit Priority Area (TPA) is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in the applicable regional transportation plan.
- **Low VMT Area.** Low VMT areas are defined as TAZs with a total daily VMT/service population (employment plus population) that is 15 percent less than the baseline level for the County.

5.10.2 REGULATORY SETTING

5.10.2.1 State Regulations

Senate Bill 743 (Steinberg, 2013)

On September 27, 2013, Senate Bill (SB) 743 was signed into State law. The California legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

SB 743 requires the California Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation impacts under CEQA. Particularly within areas served by transit, SB 743 requires the alternative criteria to promote the reduction of GHG emissions, development of multimodal transportation networks, and diversity

of land uses. The alternative metric for transportation impacts detailed in the State CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020, to adopt and begin implementing VMT thresholds for traffic analysis.

AB 1358: California Complete Streets Act

The California Complete Streets Act was implemented on January 1, 2011, which required circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must "meet the needs of all users…in a manner suitable to the rural, suburban, or urban context of the general plan." This bill requires a circulation element to plan for all modes of transportation where appropriate—including walking, biking, car travel, and transit. The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and people with disabilities.

5.10.2.2 Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, which was adopted in April 2024. The California Air Resources Board (CARB) has yet to approve of the technical methodology contained in the 2024-2050 RTP/SCS. The RTP/SCS integrates transportation planning with economic development and sustainability planning and aims to comply with State GHG emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates, in the RTP/SCS, that the six-county region will have to accommodate 20,909,000 residents by 2050 while also meeting the GHG emissions reduction targets set by the California Air Resources Board (CARB). SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

5.10.2.3 Local Regulations

City of Redlands General Plan 2035

The General Plan Healthy Community Element contains the following policies related to transportation that are applicable to the Project:

Principle 5-P.1 Maintain a cohesive circulation system through a "layered network" approach promoting complete streets and mobility for all modes while emphasizing specific transportation modes for specific corridors and geographic areas.

Principle 5-P.2 Use the layered network approach to identify, schedule, and implement roadway improvements as development occurs in the future, and as a standard against which to evaluate future development and roadway improvement plans.

Principle 5-P.4 Support transportation infrastructure improvements such as safer street crossings and attractive streetscapes to encourage bicyclists, walkers, and users of mobility devices.

Principle 5-P.5 Manage the city's transportation system to minimize traffic congestion, improve flow, and improve air quality.

Principle 5-P.7 Minimize emergency vehicle response time and improve emergency access.

Principle 5-P.8 Ensure the safety of the transportation network by preventing excessive speeding of vehicular traffic and promoting safe sharing of the network by all transportation modes.

Principle 5-P.10 Require developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network.

Principle 5-P.11 Implement standards for pavement design and roadway and intersection striping so streets are accessible by all users and all modes, and safety is improved.

Principle 5-P.13 Ensure streets are designed to accommodate bicyclists per the Bicycle Master Plan.

Principle 5-P.14 Design streets to accommodate various modes according to roadway classification and reduce conflicts and safety risks between modes per Figure 5-4.

Action 5-A.3 Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices. This could be accomplished through:

- Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate;
- Short block lengths, reduced street widths, and/or traffic calming measures; and
- Providing pedestrians and bicyclists with options where motorized transportation is prohibited.

Action 5-A.6 Add bike and pedestrian facilities on roads with excess capacity where such facilities do not exist, using supporting transportation plans as guidance. Excess capacity includes street right-of-ways or pavement widths beyond the standards, or excess capacity in roadways based on actual vehicular travel versus design capacity.

Action 5-A.15 Maintain 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.

Action 5-A.20 Provide pedestrian routes between offices, neighborhoods, Downtown, and Transit Villages. Plan for direct connections from the interiors of residential tracts to neighboring parks, schools, retail, and other services using sidewalks, trails, and paseos.

Action 5-A.25 Implement bicycle and trail improvements that provide strong east-west connections between Transit Villages and in the city's wider bicycle network. Routes would include the Orange Blossom Trail, the Mission Creek Zanja Trail routes on Colton Avenue and Citrus Avenue, Santa Ana River Trail, and the San Timoteo Canyon Trail.

Action 5-A.26 Implement bicycle and trail improvements that provide strong north-south connections, especially with major east-west trails, including routes on Mountain View Avenue, California Street, Nevada Street, Alabama Street, Texas Street, New York Street, Orange Street, Church Street, Dearborn Street, and Wabash Avenue.

Action 5-A.27 Implement safety improvements in mid-block areas that allow for bicycles to safely cross heavily traveled roads. Improvements can include stop signs for cyclists, warning beacons, and illuminated signs initiated by pedestrians and cyclists.

Action 5-A.68 Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.

5.10.3 ENVIRONMENTAL SETTING

Table 5.10-1, *Existing Major Roadway Characteristics Within the Project Area*, lists the roadway characteristics that are observed within the Project area.

Table 5.10-1: Existing Major Roadway Characteristics Within the Project Area

Roadway	Classification	Number of Lanes	Bike Lane
Citrus Avenue (E/W)	Collector	2-lane divided with painted median east of Alabama Street; 2-lane undivided west of Alabama Street	Existing Class I west of Alabama Street
Nevada Street (N/S)	Minor Arterial	2-lane divided with painted median south of Orange Avenue; 2-lane undivided between Orange Avenue and Citrus Avenue; 2-Lane divided with painted median north of Citrus Avenue	None existing; proposed General Plan bicycle route
Orange Avenue (E/W)	Collector	2-lane divided with painted median east of Nevada Street; 2-lane undivided west of Nevada Street	None existing; proposed General Plan bicycle route
Iowa Street (N/S)	Collector	3-lane divided with painted median south of Orange Avenue; 2-lane undivided north of Orange Avenue	None
Alabama Street (N/S)	Major Arterial	4-lane divided with painted median	Existing Class II
Orange Street (N/S)	Minor Arterial north of West Sun Avenue and south of I-10; Boulevard south of West Sun Avenue to I-10	4-lane divided with painted median directly south of San Bernardino Road; 2-lane divided with painted median between San Bernardino Avenue and Colton Avenue; and 4-lane divided with painted median south of West Colton Avenue	None existing; proposed General Plan bicycle route
Texas Street (N/S)	Minor Arterial	2-lane divided with painted median between I-10 and San Bernardino Avenue; 3-lane divided with painted median north of San Bernardino Avenue	None existing; proposed General Plan bicycle route
New York Street (N/S)	Collector	2-lane divided with painted median	None existing; proposed General Plan bicycle route

Roadway	Classification	Number of Lanes	Bike Lane
Pennsylvania Avenue (E/W)	Collector	2-lane divided with painted median	Existing Class III between North University Street and Judson Street
Lugonia Avenue (E/W)	Major Arterial (between I-210 and Orange Street); Minor Arterial east of Orange Street	3-lane divided with painted median west of Texas Street; 4-Lane divided with painted median between Texas Street and Clay Street; 3-lane divided with painted median between Clay Street and Orange Street; 3-lane divided with raised median east of Orange Street	None existing; proposed General Plan bicycle route
San Bernardino Avenue (E/W)	Major Arterial (between I-210 and Orange Street); Minor Arterial east of Orange Street	2-lane divided with painted median west of Clay Street; 3-lane divided with painted median between Clay Street and Orange Street; 2-lane divided with painted median east of Orange Street	Existing Class II east of Texas Street

Existing Transit Service

The Project area is served by bus service via Omnitrans, which serves the San Bernardino Valley. Omnitrans Route 8 connects the cities of San Bernardino and Yucaipa through the cities of Loma Linda, Redlands (including the Project area), and Mentone, with buses running every 60 minutes Monday through Sunday, and has stops along Redlands Boulevard and Lugonia Avenue. Omnitrans Route 15 connects the cities of Fontana and Redlands (including the Project area) through the cities of San Bernardino and Rialto, with buses running every 60 minutes Monday through Sunday, and has stops along Orange Street, Redlands Boulevard, and Eureka Street. Omnitrans Route 19 provides service between Fontana, the San Bernardino Transit Center, and Yucaipa. Route 19 has stops at the Redlands Mall and has buses running every 60 minutes, Monday through Sunday.

Additionally, the San Bernardino County Transportation Authority's (SBCTA) Arrow line connects the City of Redlands to the City of San Bernardino and provides further direct rail trips once a day to the City of Los Angeles. During morning and afternoon peak commute hours, trains operate every 30 minutes. During non-commute or off-peak hours, trains operate every 60 minutes. Services start at 5 a.m. and run until 10 p.m. In addition to standard passenger rail service, the Metrolink Express train serves the Redlands – Downtown Station with limited stop service from Los Angeles during peak commute hours.

Existing Bicycle and Pedestrian Facilities

As listed in Table 5.10-1, within the Project site area, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue contain bicycle lanes. The Orange Blossom Trail, a paved walking and cycling path, is located approximately 150 feet north of Sites-16 along the northern edge of the drainage channel just north of Citrus Avenue.

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks.

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Buildout according to the General Plan would result in approximately 45,792 trips.

5.10.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

TR-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

TR-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

TR-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

TR-4 Result in inadequate emergency access.

The Initial Study, included in Appendix A, established that the proposed Project would result in less-than-significant impacts related to Thresholds TR-3 and TR-4. No further assessment of these impacts is required in this Draft EIR.

Vehicle Miles Traveled Significance Criteria

State CEQA Guidelines Section 15064.3(b)(1) provides that for land use projects:

> VMT traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The City of Redlands' VMT Guidelines provides VMT screening thresholds to identify projects that would be considered to have a less-than-significant impact on VMT and therefore could be screened out from further analysis. Pursuant to the City VMT Guidelines, if a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. The project is in a Transit Priority Area (TPA).
2. The project is in a low VMT area.
3. The project is one of the following land uses:
    - Local serving K-12 school
    - Local park
    - Daycare center
    - Local-serving gas station
    - Local-serving bank
    - Local-serving hotel (e.g., non-destination hotel)
    - Student housing project on or adjacent to a college campus
    - Local-serving assembly use (place of worship, community organization)
    - Community institution (public library, fire station, local government)

- Local-serving community college that is consistent with the assumptions noted in the RTP/SCS
- Affordable or supportive housing
- Assisted living facility
- Senior housing (as defined by the Federal Department of Housing and Urban Development)

4. The project generates less than 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. This includes:

   - Single family residential – 167 dwelling units (DU) or fewer
   - Multifamily residential (low-rise) – 232 DU or fewer
   - Multifamily residential (mid-rise) – 299 DU or fewer
   - Office – 59,100 square feet (SF) or less
   - Local-serving retail – 112.400 SF or less (no stores larger than 50,000 SF)
   - Warehousing – 463,600 SF or less
   - Light industrial – 74,600 SF or less

With regards to criterion 2, as described in Section 5.10.1, *Introduction*, a low VMT area is defined as a TAZ with a total daily VMT/SP that is 15 percent below the baseline level for the County. Based on the San Bernardino County average VMT/SP, the VMT/SP baseline for Project Base Year 2024 is 35.63 VMT/SP and the 2050 baseline is 39.03 VMT/SP. Therefore, the City's threshold of significance for Baseline 2024 is 30.29 VMT/SP, 15 percent below the 35.63 VMT/SP baseline, and the City's threshold of significance for Cumulative Year 2050 is 33.18 VMT/SP, 15 percent below the 39.03 VMT/SP baseline.

5.10.5 METHODOLOGY

As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, in order to comply with CEQA Guidelines Section 15064.3, impacts associated with automobile delay are not analyzed in this Draft Subsequent EIR.

Vehicle Miles Traveled Analysis Methodology

The applicability of each City of Redlands VMT Guidelines screening criterion was analyzed in relation to the potential land uses, location, and proximity to transit that could occur under buildout pursuant to the Project. If the Project meets one of the screening criteria set forth in the City of Redlands VMT Guidelines, it can be presumed that the Project would result in a less-than-significant impact. As specific future development is unknown at this time, a full VMT analysis was prepared using the San Bernardino Transportation Analysis Model (SBTAM). SBTAM was run for the Base Year 2019 and Cumulative Year 2050 without and with Project conditions. The total Origin-Destination (OD) VMT of each TAZ was evaluated using the SBTAM+ VMT post-processor from the SBTAM Base Year (2019) and Cumulative Year (2050) with-Project Model runs. To determine VMT/SP, the total OD VMT of the TAZs is divided by the service population (SP) of the TAZs. The 2024 VMT/SP was interpolated using linear interpolation between the 2019 and 2050 Model outputs.

The San Bernardino County VMT/SP for Project Baseline Year 2024 was calculated from the SBCTA VMT web map results for Base Year (2019) and Cumulative Year (2050) using linear interpolation.

The VMT/SP within the City of Redlands under the with-Project conditions for Cumulative Year (2050) was obtained using the with-Project model run. The VMT/SP within the City of Redlands under the no Project conditions for Cumulative Year (2050) was obtained using the without-Project Model run. To determine VMT/SP, the total boundary VMT of the City is divided by the SP of the City.

5.10.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan FEIR

The General Plan EIR addressed impacts related to transportation in Chapter 3.15. The General Plan EIR described that implementation of the General Plan was anticipated to increase traffic volumes on intersections, roadway segments, and freeway segments through 2035. The General Plan EIR concluded that buildout pursuant to the General Plan would result in significant and unavoidable impacts related to worsening LOS despite the inclusion of multiple roadway and intersection improvements. The General Plan EIR discussed that the General Plan establishes policies and programs to expand the alternative transportation system and the General Plan would not conflict with the circulation network or policies. In addition, the EIR concluded that transportation policies in the General Plan would reduce design hazards and conflicts between incompatible land uses. Furthermore, the General Plan EIR discussed that implementation of regulations, combined with General Plan policies, would reduce impacts related to emergency access routes and impacts would be less than significant.

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings).

IMPACT TR-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

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

Project Trip Generation

Vehicle trip estimates for buildout of the proposed Project compared to existing General Plan land use designations were generated by using trip rates from the Institute of Transportation Engineers, *Trip Generation 11th Edition*, 2021. Existing General Plan buildout conditions (Baseline) were assessed using trip rates for Land Use Code 150 (Warehouse), 221 (Multi-Family Housing), 820 (Retail), and 710 (Office). Based on the density of the proposed housing, trip rates for Land Use Code 221 (Multifamily Housing (Mid-Rise)) were used.

Table 5.10-2 identifies the trips generated by buildout pursuant to the existing General Plan land use designations of the rezone sites and compares it to the buildout of the proposed Project to determine the net increase in vehicle trips. As detailed, buildout pursuant to the Project is forecasted to generate a net decrease of 27,450 average daily trips, net increase of 1,034 AM trips, and net decrease of 1,716 PM trips. As such, buildout pursuant to the Project would result in decreased daily vehicle trips in the City of Redlands compared to buildout pursuant to the existing General Plan.

Redlands Regular Meeting of 06-03-25

Table 5.10-2: Proposed Project Trip Generation Comparison

Scenario	Land Use	ITE Code	Unit	ITE Daily Trip Rate/Unit	Project Size (KSF or DU)	Project ADTs	ITE AM Trip Rate/Unit	Project AM Trips	ITE PM Trip Rate/Unit	Project PM Trips
Buildout of the Existing General Plan Land Uses	Warehouse (Sites 1-7, 9-16, 24)	150	KSF	1.71	828.34993	1,416	0.17	141	0.18	149
	Retail (Sites 1-7, 9-16, 24)	820	KSF	37.01	828.34993	30,657	0.84	696	3.40	2,816
	Multi-Family Housing (Sites 8, 20-23)	221	DU	4.54	111	504	0.37	41	0.39	43
	Office (Sites 17-19)	710	KSF	10.84	276.1704	2,994	1.52	420	1.44	398
	Retail (Sites 17-19)	820	KSF	37.01	276.1704	10,221	0.84	232	3.40	939
Existing General Plan TOTAL TRIPS						**45,792**		**1,529**		**4,345**
Buildout of the Proposed RHNA Rezoning (Project)	Proposed Multi-Family Housing	221	DU	4.54	2,436	11,059	0.37	901	0.39	950
	Daycare Center[1]	565	KSF	47.62	151.04846	7,193	11.00	1,662	11.12	1,680
Proposed Project TOTAL TRIPS						**18,252**		**2,563**		**2,630**
NET TOTAL TRIPS						**-27,540**		**1,034**		**-1,716**

[1] Site 24 is owned by Montessori and the majority of buildings onsite are operated as a preschool. One building is leased by the Grove School, a high school. Therefore, ITE Code 565 accurately represents the trips from Site 24.

Notes: ADT = Average Daily Trips

DU = Dwelling Unit

ITE = Institute of Transportation Engineers Trip Generation Manual 11th Edition, 2021

KSF = Thousand Square Feet

Retail = Shopping Center greater than 150,000 SF

Source: Appendix F

837 of 1245

Roadway, Transit, Bicycle, and Pedestrian Facilities

Roadway

Regional access to the Project site is provided by I-10 and I-210. Local access to the site is provided via Alabama Street, Nevada Street, Iowa Street, Citrus Avenue, Orange Avenue, Pennsylvania Avenue, San Bernardino Avenue, Texas Street, Lugonia Avenue, and Orange Street. Each roadway is described above and in Table 5.10-1. The proposed Project would continue to provide vehicular access to the proposed rezoning parcels from the adjacent roadways and there would be no changes to the roadway access points. Any future development under the proposed rezoning may include driveway and roadway improvements. Specific roadway improvements required to support future development within the Project site are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with the circulation system standards and to adhere to uniform standards and practices. Compliance with standards for roadway and intersection classifications, right-of-way width, pavement width, design speed, warrant requirements, capacity, maximum grades and associated features such as medians would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. The proposed Project would not conflict with existing facilities and would provide additional facilities as needed. Thus, impacts related to roadway facilities would not occur.

Transit Services

As described previously, the Project vicinity is served by Omnitrans and SBCTA. There are three bus routes that currently serve the Project area, and there are various Omnitrans bus stops throughout the Project area. This existing transit service would continue to serve its ridership and new riders from implementation of future development under the proposed rezoning. Buildout of the proposed rezoning would be incremental in response to market needs and within the area currently served by Omnitrans and SBCTA. Therefore, the proposed Project would not conflict with an existing program related to transit facilities, and impacts would not occur.

Bicycle Facilities

As detailed previously and shown in Table 5.10-1, Citrus Avenue, Alabama Street, East Pennsylvania Avenue, and West San Bernardino Avenue currently contain bicycle lanes. In addition, the City's General Plan Figure 5-3, *Bicycle Facilities*, identifies Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue as planned bicycle routes. This existing bicycle lane infrastructure would be used by future residents and employees of new uses under the proposed RHNA rezone. As no specific development project is proposed, specific bicycle lane improvements required to support future development within the Project site are not known at this time and will not be known until a development project is proposed. However, the General Plan has new facilities along Nevada Street, Orange Avenue, Orange Street, Texas Street, New York Street, and Lugonia Avenue; and future projects would be required, as deemed necessary, to construct these planned bicycle facilities as part of driveway and infrastructure improvements. This would be ensured and verified by the City during the plan check and permitting process, prior to obtaining building permits. Therefore, the proposed Project would not alter or conflict with existing bicycle facilities, and impacts related to bicycle facilities would not occur.

Pedestrian Facilities

Generally, throughout the Project area, sidewalks are provided on both sides of the street. West San Bernardino Avenue currently lacks sidewalks on some segments near I-210. In addition, multiple segments of Texas Street, Orange Street, Citrus Avenue, Nevada Street, Iowa Street, and Alabama Street lack sidewalks. The Project does not propose a specific development or any demolition, including sidewalks; however, future development facilitated by the Project may be required to include sidewalk improvements. Specific sidewalk

improvements required to support development within the Project area are not known at this time and will not be known until a development project is proposed. Future projects under the proposed Project would be required to comply with and adhere to uniform standards and practices, including provision of adequate sidewalk, as ensured and verified by the city during the plan check and permitting process, prior to obtaining building permits. Additionally future development is subject to compliance with applicable accessibility requirements of the American Disabilities Act, Title 24 of the Uniform Building Code as locally amended, and the Department of Housing and Urban Development's Fair Housing Accessibility Guidelines. Therefore, the proposed Project would not conflict with pedestrian facilities. Thus, impacts related to pedestrian facilities would not occur.

Policies

Section 5.6, *Land Use and Planning*, includes a list of applicable goals and policies related to the Project. Tables 5.6-1 and 5.6-2 include analysis of the Project's consistency with the SCAG Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy and City of Redlands General Plan, respectively. As discussed in Section 5.6, the Project would be consistent with all applicable goals and policies. Thus, impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system of the Project site and surrounding area would not occur. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to circulation systems would be less than significant.

IMPACT TR-2: THE PROJECT WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) REGARDING VEHICLE MILES TRAVELED.

Site VMT Screening

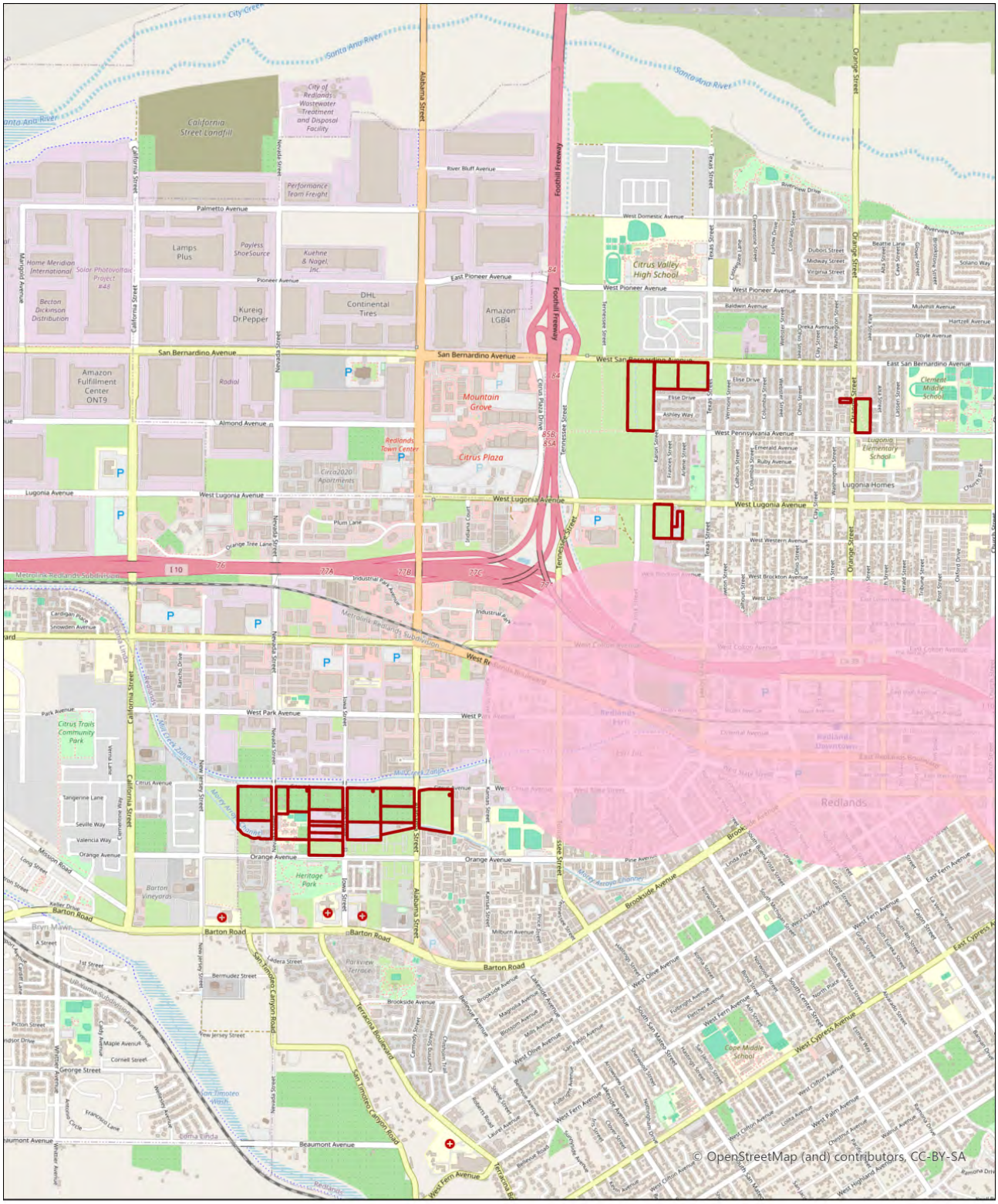
As described previously, State CEQA Guidelines Section 15064.3(b) focus on determining the significance of VMT-related transportation impacts. The proposed Project was analyzed in comparison to the City of Redlands VMT Guidelines. As discussed in the City of Redlands VMT Guidelines, if a project meets the screening criteria set forth in the guidelines, then it would be considered to have a less-than-significant impact on VMT. The applicability of each screening criteria, in comparison to each Site of the proposed Project (Sites 1 through 24) is discussed below. The Project is located within TAZs 53827208 (Sites 1 and 2), 53827403 (Sites 3-15, 24), 53827501 (Site 16), 53836401 (Sites 17-19), 53835402 (Sites 20-21), 53836402 (Site 22), and 53835101(Site 23).

Screening Criterion 1 – TPA

According to the City's guidelines, projects within one-half mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor are within a transit priority area (TPA). The TAZs within the proposed Rezone area and within a TPA may be presumed to have a less-than-significant VMT impact so long as developments have a floor area ratio of 0.75 or more, provide less parking than required by the City of Redlands, are consistent with the applicable Sustainable Communities Strategy, and do not replace affordable units with a smaller number of moderate- or high-income residential units. As shown in Figure 5.10-1, *Transit Priority Areas & Rezone Sites,* none of the proposed Rezone sites are located within a TPA. Therefore, the Project does not meet the requirements of Screening Criterion 1.

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Transit Priority Areas & Rezone Sites



RHNA Rezone Project
City of Redlands

Figure 5.10-1

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Screening Criterion 2 – Low VMT Area

The City's guidelines include a screening threshold for projects located in a low-VMT generating area, which is defined as TAZs with a total daily VMT/SP that is 15 percent less than the baseline level for the county. For projects that are inconsistent with the land use assumptions coded into the projects' TAZ, this screening criteria would not be appropriate, and the project would not satisfy the requirements of Screening Criterion 2.

The proposed zoning designations for 19 of the 24 proposed Rezoning sites are inconsistent with the existing General Plan land use designations and would therefore not satisfy Screening Criteria 2. The proposed zoning designations and buildout of Site 8 and Sites 20 through 23 would be consistent with the existing General Plan land use designations and would meet Screening Criterion 2 if their respective TAZs are 15 percent below the County's OD VMT/SP baseline. Based on the SBCTA VMT Screening Tool, Site 22 is located in a low VMT area and future buildout in Site 22 would satisfy Screening Criterion 2. Therefore, buildout of future projects within Site 22 would result in a less-than-significant impact to VMT.

However, Sites 8, 20, 21, and 23 are not located in a low VMT generating area. Therefore, future development projects within Sites 8, 20, 21, and 23 would not meet Screening Criterion 2.

Screening Criterion 3 – Land Use Type

If any implementing projects within the proposed Rezoning area consist of a local serving K-12 school, local park, daycare center, local-serving gas station, local-serving bank, local-serving hotel, student housing project on or adjacent to a college campus, local-serving assembly use, community institution, local-serving community college, affordable housing, assisted living facility, or senior housing, the implementing projects would screen out of further VMT analysis. Further, if an implementing project generates less than 3,000 $MTCO_2e$, such as a project that proposes 167 single-family dwelling units or fewer, 232 low-rise multi-family dwelling units or fewer, 299 mid-rise multi-family dwelling units or fewer, 59,100 SF or less of office space, 112,400 SF or less (with no stores larger than 50,000 SF) of local-serving retail uses, 463,600 SF or less of warehousing uses, or 74,600 SF or less of light industrial uses, the project would screen out of further VMT analysis. Implementing projects that generate less than 3,000 $MTCO_2e$ per year would be presumed to have a less-than-significant impact on VMT pursuant to Screening Criterion 3.

Implementing projects within Sites 1 through 24 pursuant to the new zoning designations could potentially consist of the type of developments that would screen out via Screening Criteria 3; however, specific implementing developments are unknown at this time. Given the proposed General Plan designation of Public/Institutional for Site 24, future development pursuant to the proposed General Plan and zoning designations would result in a land use that constitutes a local serving use, such as a government office or educational facility. Therefore, future development within Site 24 can be presumed to have a less-than-significant impact on VMT.

Sites 1-23 could propose an individual development that generates less than 3,000 $MTCO_2e$ (299 Multifamily Housing (Mid-Rise) units), propose affordable housing, or propose Senior housing, and could therefore be presumed to have a less-than-significant VMT impact. However, given that the size of residential development resulting from buildout within Sites 1-23 is unknown, it cannot be determined that VMT impacts would be less than significant. Overall, since the totality of the buildout of the proposed zoning does not meet the requirements of Screening Criterion 3, and future development project specifics are not known at this time to determine if the land uses meet the requirements for Screening Criteria 3, it is determined that Screening Criterion 3 has not been met.

VMT Analysis for Sites 1 through 24

As Screening Criteria 1 through 3 would not be met for all Project sites, a full VMT analysis has been prepared for the Project. The VMT analysis results from SBTAM for TAZs 53827208, 53827403, 53827501, 53836401, 53835402, and 53835101 (which encompass Sites 1 through 24) are provided below in Tables 5.10-3 through 5.10-9.

Sites 1 through 19, 22, & 24

Less than Significant Impact. As discussed above, Site 22 is located in a low VMT area and future buildout in Site 22 would satisfy Screening Criterion 2. Therefore, buildout of future projects within Site 22 would result in a less-than-significant impact to VMT.

As shown in Table 5.10-3, the Project VMT/SP for TAZ 53827208 (Sites 1 and 2) would be 39.6 percent below the threshold under Project Baseline 2024 conditions and 22 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 1 and 2 pursuant to the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-3: VMT Analysis of Sites 1-2 (TAZ 53827208)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	13,913	793	17.5	-	-	-
Project Baseline (2024)	14,513	793	18.3	30.29	-39.6%	No
Model Cumulative Year (2050)	17,639	794	22.2	33.18	-33.0%	No

Source: Appendix F

As shown in Table 5.10-4, the Project VMT/SP for TAZ 53827403 (Sites 3-7, 9-15, and 24) would be 23.4 percent below the threshold under Project Baseline 2024 conditions and 25.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 3 through 7, 9 through 15, and 24 under the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-4: VMT Analysis of Sites 3-7, 9-15 and 24 (TAZ 53827403)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	96,137	4,198	22.9	-	-	-
Project Baseline (2024)	97,984	4,223	23.2	30.29	-23.4%	No
Model Cumulative Year (2050)	107,586	4,353	24.7	33.18	-25.5%	No

Source: Appendix F

As shown in Table 5.10-5, the Project VMT/SP for TAZ 53827493 (Site 8) would be 23.4 percent below the threshold under Project Baseline 2024 conditions. Additionally, since the Project is consistent with the General

Plan land use designation, the Project would not require a cumulative year analysis. Therefore, buildout of Site 8 under the proposed Project would result in a less-than-significant VMT impact.

Table 5.10-5: VMT Analysis of Site 8 (TAZ 53827403)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	96,137	4,198	22.9	-	-	-
Project Baseline (2024)	97,984	4,223	23.2	30.29	-23.4%	No
Model Cumulative Year (2050)	107,586	4,353	24.7	-	-	-

Source: Appendix F

As shown in Table 5.10-6, the Project VMT/SP for TAZ 53827501 (Site 16) would be 34.7 percent below the threshold under Project Baseline 2024 conditions and 44.5 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Site 16 pursuant to the proposed zoning designation would result in a less-than-significant VMT impact.

Table 5.10-6: VMT Analysis of Site 16 (TAZ 53827501)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	91,664	4,571	20.1	-	-	-
Project Baseline (2024)	90,786	4,589	19.8	30.29	-34.7%	No
Model Cumulative Year (2050)	86,221	4,682	18.4	33.18	-44.5%	No

Source: Appendix F

As shown in Table 5.10-7, the Project VMT/SP for TAZ 53836401 (Sites 17-19) would be 17.6 percent below the threshold under Project Baseline 2024 conditions and 9.6 percent below the threshold under Cumulative Year 2050 conditions. Therefore, buildout of Sites 17-19 under the proposed zoning designations would result in a less-than-significant VMT impact.

Table 5.10-7: VMT Analysis of Sites 17-19 (TAZ 53836401)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	42,151	1,762	23.9	-	-	-
Project Baseline (2024)	44,527	1,764	25.0	30.29	-17.6%	No

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Cumulative Year (2050)	56,879	1,896	30.0	33.18	-9.6%	No

Source: Appendix F

Sites 20, 21, & 23

Significant and Unavoidable Impact. As shown in Table 5.10-8, the Project VMT/SP for TAZ 53835402 (Sites 20 and 21) would be 85.1 percent above the threshold under Project Baseline 2024 conditions. However, since buildout of the site would be consistent with the existing General Plan land use designation, this site would not require a cumulative year analysis.

Additionally, as shown in Table 5.10-9, the Project VMT/SP for TAZ 53835101 (Site 23) would be 8.1 percent above the threshold under Project Baseline 2024 conditions. Since buildout of the site would be consistent with the existing General Plan land use designation, this site would also not require a cumulative year analysis.

Table 5.10-8: VMT Analysis of Sites 20-21 (TAZ 53835402)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	52,628	945	56.7	-	-	-
Project Baseline (2024)	55,702	993	56.1	30.29	85.1%	Yes
Model Cumulative Year (2050)	66,487	1,245	53.4	-	-	-

Source: Appendix F

Table 5.10-9: VMT Analysis of Site 23 (TAZ 53835101)

Scenario	Project VMT	Project Service Population	Project VMT per Service Population	Threshold	Percent Above Threshold	Impact?
Model Base Year	43,164	1,337	32.3	-	-	-
Project Baseline (2024)	43,760	1,337	32.7	30.29	8.1%	Yes
Model Cumulative Year (2050)	46,859	1,337	35.0	-	-	-

Source: Appendix F

Therefore, buildout of Sites 20, 21, and 23 pursuant to the proposed zoning designations would result in a potentially significant VMT impact. As such, future development projects within Sites 20, 21, and 23 would be required to conduct a Project-specific VMT screening analysis to determine whether the future proposed development would screen out of a full VMT analysis pursuant to Mitigation Measure T-1. Should the future

proposed development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project-level VMT impact. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which did not analyze VMT impacts.

5.10.7 CUMULATIVE IMPACTS

Roadway, Transit, Bicycle, and Pedestrian Networks

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

Vehicle Miles Traveled

The cumulative traffic study area for the proposed Project includes the City of Redlands. As discussed in the City of Redlands CEQA Assessment VMT Analysis Guidelines, projects that are inconsistent with the Redlands General Plan 2035 would not have a cumulative impact so long as the project's citywide boundary VMT/SP is lower than the no project scenario under cumulative conditions. As shown in Table 5.10-10, with buildout of the Project, the cumulative Redlands Citywide boundary VMT/SP would be 3.1 percent lower than cumulative VMT without the Project. As such, the Project's impact on citywide VMT would be less than significant and cumulative impacts related to VMT would be less than significant.

Table 5.10-10: Project's Effect on Citywide VMT

	Cumulative 2050
Citywide Boundary VMT with Project	3,268,701
Citywide Service Population with Project	147,175
With Project Citywide Boundary VMT/SP	**22.21**
Citywide Boundary VMT No Project	3,238,348
Citywide Service Population No Project	141,337
No Project Citywide Boundary VMT/SP	**22.91**
Percent Above/Below Threshold	-3.1%
Impact?	**No**

5.10.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

SCAG 2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy

Plans, Programs, or Policies

None.

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact TR-1 would be **less than significant**.

Regarding Impact TR-2, implementing projects within Sites 1-19, 22, and 24 would result in a **less-than-significant** VMT impact.

Implementing projects within Sites 20, 21, and 23 would be **potentially significant**.

5.10.10 MITIGATION MEASURES

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

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

- *Increase Residential Density*: Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT.
- *Integrate Affordable and Below Market Rate Housing*: Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project.
- *Implement Commute Trip Reduction Marketing*: Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA).
- *Provide Ridesharing Program*: Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA.
- *Implement Subsidized or Discounted Transit Program*: Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA.
- *Limit Residential Parking Supply*: The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional

time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project.

- *Unbundle Residential Parking Costs from Property Cost*: Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT.
- *Provide Pedestrian Network Improvement*: Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.
- *Construct or Improve Bike Facility*: Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT.
- *Construct or Improve Bike Boulevard*: Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT.
- *Expand Bikeway Network*: Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT.
- *Implement Conventional Carshare Program*: Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT.
- *Implement Electric Carshare Program*: Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions.
- *Implement Pedal (Non-Electric) Bikeshare Program*: Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT.
- *Implement Electric Bikeshare Program*: Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT.
- *Implement Scooter Share Program*: Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT.
- *Provide Community-Based Travel Planning (CBTP)*: CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA.
- *Implement Market Price Public Parking (On-Street)*: Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas.
- *Implement Transit-Supportive Roadway Treatments*: Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.

5.10.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact TR-2: Implementing projects within Sites 20, 21, and 23 have the potential to result in significant VMT impacts after implementation of Mitigation Measure TR-1. Implementing projects within the sites that do not meet Screening Criterion 1, 2, 3, or 4 could result in VMT levels where potential VMT reductions associated

with TDM measures would not be large enough to guarantee that significant impacts could be fully mitigated. Therefore, Impact TR-2 for Sites 20, 21, and 23 would be significant and unavoidable.

5.10.12 REFERENCES

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5.11 Tribal Cultural Resources

5.11.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources (TCRs) associated with implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017; and
- City of Redlands Municipal Code.

Additionally, part of this analysis is based upon Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project site.

5.11.2 REGULATORY SETTING

5.11.2.1 Federal Regulations

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; and required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources (NPS, 2018).

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated tribes.

5.11.2.2 State Regulations

California Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with California Native American tribes identified by the California Native American Heritage Commission (NAHC) to aid in the protection of TCRs. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning to protect, or mitigate impacts on, TCRs. The *Tribal Consultation Guidelines: Supplement to General Plan Guidelines* (OPR, 2005), identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land

within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).

- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Because the proposed Project includes a General Plan Amendment, it is subject to the statutory requirements of SB 18 Tribal Consultation Guidelines.

California Assembly Bill 52

Assembly Bill 52 (AB 52) established a requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Public Resources Code (PRC) Section 21074(a) defines "tribal cultural resources" (TCRs) as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either "[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources" or "in a local register of historical resources." Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered TCRs. PRC Section 21074(b), (c). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a notice of preparation for a Draft EIR was filed on or after July 1, 2015, are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section 21080.3.1(b) defines "consultation" as "the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement." Consultation must "be conducted in a way that is mutually respectful of each party's sovereignty [and] recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance." The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.
2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency's determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe's request for consultation on a project.
5. Consultations are complete when the lead agencies and California Native tribes participating have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC Sections 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

California Public Resources Code, Sections 5097.9 to 5097.991

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the NAHC. These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

5.11.2.3 Local Regulations

City of Redlands General Plan 2035

The General Plan 2035 Distinctive City Element contains the following policies and actions related to TCRs that are applicable to the proposed Project:

Action 2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.

East Valley Corridor Specific Plan Preservation Overlay District

The East Valley Corridor Specific Plan provides for a Preservation – Historical/Archaeological Overlay District ("Preservation Overlay District") in Division 5 of the Specific Plan, which is intended to preserve and protect historical and archaeological resources. The Preservation Overlay District provides development standards for developments within the district that are in addition to those required by the Specific Plan. Within the East Valley Corridor Specific Plan, the Preservation Overlay District is applied to areas approximately 600 feet on either side of the historic alignment of the Mission Zanja irrigation canal and to potential historic structures. The development standards set forth within the Preservation Overlay District set forth requirements for investigation, data recovery, and preservation of archaeological and historic resources (County of San Bernardino, 1988).

5.11.3 ENVIRONMENTAL SETTING

Native American Tribes

The Project site is within a region where the traditional use territories of the Serrano, Cahuilla, and Gabrieleño tribes meet. These three cultural groups spoke languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock.

Serrano

Since time immemorial, Native people have lived and gathered in the mountains, valley, and foothills of the San Gabriel and San Bernardino Mountains. This area provided plentiful resources to the Native communities whose ancestral lands encompass the Redlands area, such as the Maara'yam (Serrano) people.

Archaeological evidence of the Serrano people has been found in and around Redlands. Grinding holes provide proof of resource processing and communal living; non-local shells and obsidian tools reflect a healthy trade and well-traveled culture. The Serrano people were renowned for their sophisticated basketry made of grasses and fibers that illustrate practical yet artistic designs.

The Serrano lived in dome-shaped structures called kiič. They were generally made of willow poles and long sticks to create a frame, then covered with brush and yucca fiber. They were often dug about two feet into the ground to combat extreme temperatures. The homes of several families, along with granaries, sweathouses, and ceremonial buildings, were clustered together, forming communities.

Historical evidence of Serrano people inhabiting the Redlands area comes from the San Gabriel Missions, specifically the mission's *estancia*, known as the Asistencia today, which was established in 1819. The Asistencia held many Serrano people as well as other indigenous people from nearby regions, using them as labor for mission support. One notable feat was the building of the Mill Creek Zanja, a massive irrigation system that extends from the base of the San Bernardino Mountains through Mentone, Redlands, and Loma Linda. This feature supported agriculture across the region and is listed on the National Register of Historic Places with the notation that it was built by Serrano men.

From the Mission Era onward, Native people have been forcibly removed from their traditional homelands. Despite these hardships, the Serrano people were able to maintain their identity as sovereign nations, including the San Manuel Band of Mission Indians. Tribes maintain a connection to their ancestral lands by stewarding cultural and natural resources.

Cahuilla

The eastern portion of the Valley Region, the southeastern part of the Mountain Region, and the southern portion of the East Desert Region of San Bernardino County were once home to the Cahuilla people. It is thought that the Cahuilla migrated to southern California approximately 2,000 to 3,000 years ago with related sociolinguistic groups, most likely from the southern Sierra Nevada Mountain ranges. The Cahuilla settled in a territory that extended from the present-day city of Riverside to the central portion of the Salton Sea in the Colorado Desert, and from the San Jacinto Valley to the San Bernardino Mountains (City of Redlands, 2017b).

Gabrieleño

The Gabrieleño historically occupied the southwestern portion of San Bernardino County, including the Valley Region. The name Gabrieleño denotes the people who were under the control of the Spanish from Mission San Gabriel, which included people from the Gabrieleño proper as well as other social groups. Many contemporary Gabrieleño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and use the native term Tongva. Historic-era Tongva settlements in the San Bernardino Valley were primarily located at the base of the foothills and along perennial watercourses (City of Redlands, 2017b).

Approved General Plan 2035 Buildout

Buildout of the approved General Plan would result in the development of 1,656,699.86 SF of commercial/industrial uses, 552,340.90 SF of commercial uses, and 111 multi-family dwellings. Similar to the proposed Project, future development pursuant to the General Plan could involve grading, excavation, and other ground disturbing activities to previously undisturbed depths, which could result in inadvertent discovery of buried tribal cultural resources.

5.11.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to 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:

TCR-1 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

TCR-2 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.11.5 METHODOLOGY

The analysis within this Draft Subsequent EIR section is based on the sacred lands record search from the NAHC requested by the City. The NAHC responded on January 19, 2024, that there are known sacred lands within one-half mile of the Project boundaries.

In compliance with SB 18 and AB 52, on January 29, 2024, the City sent letters to Native American groups or individuals that may have knowledge regarding tribal cultural places in the Project area. Responses were received from two tribes. The Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) responded on February 5, 2024, and the Yuhaaviatam of San Manuel Nation (San Manuel) responded on March 5, 2024.

An AB 52/SB 18 consultation was requested by San Manuel. San Manuel considers the Project area sensitive for TCRs. Additionally, SB 18 consultation was requested by the Kizh Nation, which consulted with the City and considers the area sensitive for cultural resources. Furthermore, due to the presence of tribal cultural resources within the Project area, the Kizh Nation described that there is a potential of encountering historic and prehistoric resources. As such, the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented TCRs during construction.

5.11.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The General Plan EIR addressed impacts related to TCRs in Chapter 3.8. The Certified EIR found that there are no known TCRs in the Planning Area. However, future development allowed under the proposed General Plan could result in direct or indirect impacts through grading, overland vehicle travel, or other ground-

disturbing activities, or through facilitation of access to archaeological sites by the public. Policies in the General Plan were determined to minimize or avoid potential impacts to any resources not known at this time that may be encountered in future and would promote consultation with local Native American tribal groups during future projects to ensure the protection of TCRs. Thus, implementation of the General Plan was determined to result in less-than-significant impacts to TCRs (City of Redlands, 2017b, p. 3.8-17).

IMPACT TCR-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE THAT IS LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K).

Less than Significant with Mitigation Incorporated. SB 18 and AB 52 require meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs. As described above, TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (PRC Section 21074). As outlined above, the NAHC's Sacred Lands File search was positive for sacred lands within one-half mile of the Project area, and the City sent letters to Native American Tribes notifying them of the proposed Project in accordance with SB 18 and AB 52. In response, the Kizh Nation and San Manuel requested consultation and met with the City. The Morrey Arroyo was identified as a potential site for TCRs. Due to the presence of portions of the Morrey Arroyo within the Project site, the Kizh Nation described that there is a potential of encountering historic and prehistoric resources during ground disturbing activities. No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for Tribal Cultural Resources to occur in the Project area (other than the known Morrey Arroyo), and therefore, impacts are expected to be less than significant. However, the City has agreed to implement Mitigation Measure TCR-1 in the event of any inadvertent discovery of TCRs

Implementation of the proposed Project would not directly result in physical construction that could impact TCRs. However, development and redevelopment projects pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb unknown buried TCRs. Thus, Initial Study Mitigation Measures CUL-3, CUL-4, and DSEIR Mitigation Measure TCR-1 are required for implementing projects and would reduce the potential for TCRs to be impacted during earthmoving activities and provides for preservation of any identified resources.

With implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to tribal cultural resources would be less than significant.

IMPACT TCR-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL 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 THE PUBLIC RESOURCES CODE SECTION 5024.1.

Less than Significant with Mitigation Incorporated. As described in Section 5.3, *Cultural Resources*, the Project site is located in an urbanized area; however, future site-specific development projects pursuant to the proposed Project could involve grading and excavation to greater depths than previously undertaken that could disturb buried archaeological resources, including TCRs. No information or evidence has been disclosed to the City by any Native American Tribes regarding the potential for Tribal Cultural Resources to occur in the Project area (other than the known Morrey Arroyo), and therefore, impacts are expected to be

less than significant. However, the City has agreed to implement mitigation measures in the event of any inadvertent discovery of TCRs. Thus, Mitigation Measures CUL-3 and CUL-4 are included to reduce the potential for archaeological resources, including TCRs, to be impacted during earthmoving activities and provides for preservation of any identified resources. Furthermore, as a result of SB 18 and AB 52 tribal consultation, Mitigation Measure TCR-1 is included in the case if an incidental discovery of a TCR during ground disturbing activity. With implementation of Mitigation Measures CUL-3, CUL-4, and TCR-1, impacts related to a substantial adverse change in the significance of a TCR would be less than significant. As such, Project impacts would be greater than the impact conclusions set forth in the General Plan EIR, which determined that impacts related to tribal cultural resources would be less than significant.

5.11.7 CUMULATIVE IMPACTS

The cumulative study area for TCRs includes the Southern California region, which contains the same general tribal historic setting of the Gabrieleño, Cahuilla, and Serrano, as detailed previously in Section 5.11.3, *Environmental Setting*.

Similar to future projects implemented pursuant to the proposed Project, other projects in the vicinity of the Project site could involve ground-disturbing activities in native soils that may uncover or disturb unknown TCRs. However, the Project has included Mitigation Measure CUL-1, CUL-2, and TCR-1 that would reduce the potential impact to unknown resources. Cumulative development would also be required to undergo environmental review to establish requirements for avoidance or mitigation of impacts to potential resources. Thus, the Project would not contribute to cumulative impacts, and cumulative effects of development on TCRs from implementation of the proposed Project in combination with other projects would be less than significant.

5.11.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5
- California Public Resources Code Sections 21073 et seq. (AB 52)

Plans, Programs, or Policies

None.

5.11.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts TCR-1 and TCR-2 would be **potentially significant.**

5.11.10 MITIGATION MEASURES

Mitigation Measure CUL-3 and **Mitigation Measure CUL-4** related to archaeological resources and human remains discussed in Section 5.3, *Cultural Resources,* apply. In addition, the following mitigation measure would apply to all future implementing projects. Other mitigation may also be required for future projects as determined through the tribal consultation process.

Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall

have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

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

A. Full avoidance.
B. If avoidance is not feasible, Preservation in place.
C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

5.11.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts TCR-1 and TCR-2 would be less than significant after mitigation.

5.11.12 REFERENCES

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5.12 Utilities and Service Systems

5.12.1 INTRODUCTION

This section of the Draft Subsequent EIR evaluates the potential effects on utilities and service systems from implementation of the proposed Project, identifying anticipated demand and existing and planned utility availability. This includes water supply and infrastructure, wastewater, and stormwater drainage. Electric power, natural gas, telecommunications, and renewable energy resources are described in Section 5.4, *Energy*. The Initial Study (included as EIR Appendix A) established that the proposed Project would not result in potentially significant impacts to solid waste, so solid waste utilities are not discussed further in this section.

Information in this section is based on the following documents and resources:

- *City of Redlands General Plan 2035*, December 5, 2017;
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report* (General Plan EIR), July 2017;
- City of Redlands Municipal Code;
- *Upper Santa Ana River Watershed Integrated Regional Water Management Plan* (IRUWMP), San Bernardino Valley Water Conservation District, May 2021;
- *Redlands RHNA Rezone Water Supply Assessment*, Fuscoe Engineering, Inc., July 19, 2024, Appendix G; and
- *Redlands RHNA Rezone Proposed Conditions Infrastructure Report for Water and Sewer*, Fuscoe Engineering, Inc., July 19, 2024, Appendix H.

Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand for water, wastewater, and stormwater utilities would result from implementation of the proposed Project that would result in significant adverse physical environmental effects. For example, an increase in wastewater generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact under CEQA.

5.12.2 REGULATORY SETTING

5.12.2.1 Federal Regulation

Clean Water Act

The Clean Water Act (CWA) was enacted by Congress in 1972 and is the primary federal law regulating water quality in the United States. The objective of the CWA is to reduce or eliminate water pollution in the nation's rivers, streams, lakes, and coastal waters. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint source discharge programs, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of CWA portions to State and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with

the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

5.12.2.2 State Regulations

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies (Urban Water Management Plans [UWMPs]) to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents that should be contained in the UWMPs as well as methods for urban water suppliers to adopt and implement the plans.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. It further requires the public water system to prepare a specified Water Supply Assessment (WSA) for projects that meet the following criteria:

a) A proposed residential development of more than 500 dwelling units;
b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 square feet (SF) of floor space;
c) A commercial office building employing more than 1,000 persons or having more than 250,000 SF of floor space;
d) A hotel or motel, or both, with more than 500 rooms;
e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 SF of floor area; and
f) A mixed-use project that includes one or more of the projects above.

The components of a WSA include existing water demand, future water demand by the project, and must ensure that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The WSA must also describe whether the project's water demand is accounted for in the water supplier's UWMP. Supplies of water for future water supply must be documented in the WSA.

CALGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Standards (CALGreen). The CALGreen Code is updated every three years. It was recently updated in 2022, effective January 1, 2023. CALGreen sets forth water efficiency standards (e.g., maximum flow rates) for all new plumbing and irrigation fittings and fixtures

5.12.2.3 Local and Regional Regulations

City of Redlands Drainage Master Plan

In June 2014, the City of Redlands adopted a Drainage Master Plan specifically devoted to its storm drain system. The Master Plan consolidates studies from multiple local and regional agencies, identifies infrastructure necessary to help protect the city from a major storm, provides long-range planning for the implementation and development of citywide drainage facilities, and determines the cost of implementing the facilities to add capacity to the existing stormwater drainage infrastructure. The Plan proposes improvements for each of the city's drainage areas, including replacement of existing storm drainage facilities, and provides cost estimates for each.

City of Redlands 2035 General Plan

The following goals and policies from the Livable Community and Vital Environment chapters of the City of Redlands General Plan 2035, adopted December 2017, are relevant to the proposed Project:

Livable Community Element

Principle 4-P.56 Ensure that public facilities and services are provided in a timely manner to adequately serve new and existing development.

Action 4-A.145 Coordinate future development with the City's Capital Improvement Program to ensure adequate funding and planning for needed public services and facilities.

Action 4-A.146 Encourage the development of programs that enable concurrent provision of necessary public services and facilities prior to the approval of development projects that would require those services.

Action 4-A.148 Ensure that all utilities and public facilities are designed and constructed to preserve and enhance the perceived natural and historic character of the area, particularly on hillsides and in the canyon areas.

Vital Environment Element

Policy 6-P.20 Pursue creative, innovative, and environmentally sound methods to capture and use stormwater and urban runoff for beneficial purposes.

Policy 6-P.21 Work with regional organizations to manage groundwater resources of the Bunker Hill Basin.

Policy 6-A.38 Encourage development that reflects an integrated approach to building design, civil engineering, and landscape architecture that maximizes rainwater harvesting and stormwater retention for landscape irrigation.

Policy 6-A.39 Require that new development provides landscaping and re-vegetation of graded or disturbed areas with drought-tolerant native or non-invasive plants.

City of Redlands Municipal Code Requirements

City of Redlands Water Efficient Landscape Requirements

Chapter 15.54 of the Redlands Municipal Code establishes the City's Water Efficient Landscape Requirements to promote the benefits provided by landscapes while recognizing the need to use water as

efficiently as possible. The chapter requires applicable landscaping projects to submit a landscape documentation package that contains project information, hydrozone information table, water budget calculations, soil management report, and landscape, irrigation, and grading design plans. The chapter establishes requirements for irrigation scheduling, maintenance, and audits to ensure efficient use of water. The requirements also include provisions for non-potable water irrigation systems and encourage stormwater best management practices to increase onsite retention and infiltration.

Section 13.54, *Storm Drains*, of the City's Municipal Code provides regulation of discharges into the Redlands storm drain system. This is achieved by elimination of all nonpermitted discharges to Redlands separate storm sewers; control discharges to the Redlands separate storm sewers through prohibition of spills, dumping, or disposal of materials other than stormwater; and reduction of pollutants in stormwater discharges to the maximum extent practicable. City dischargers are required to comply with the applicable NPDES permit and follow the City's standard best management practices.

Additionally, the City's Pretreatment and Regulation of Wastes Ordinance, codified under Section 13.52 of the City Municipal Code, further protects water quality in the City through uniform requirements for all users of the City's publicly owned treatment works. The ordinance enables the City to comply with all applicable State and federal laws, including the Clean Water Act (33 United States Code [USC] Section 1251 et seq.) and the general pretreatment regulations (40 Code of Federal Regulations [CFR] part 403).

5.12.3 ENVIRONMENTAL SETTING

5.12.3.1 Water

The Project site is located within the water service area of the City of Redlands Municipal Utilities and Engineering Department (MUED), which provides retail water service to the majority of the City of Redlands, a portion of the City of Loma Linda, and unincorporated areas of the Donut Hole (an area in unincorporated San Bernardino County surrounded by Redlands), Mentone, and most of Crafton.

The City of Redlands participates in the Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (IRUWMP). This IRUWMP is a tool that provides a summary of anticipated supplies and demands for the years 2020 to 2045 within the Valley Region of San Bernardino County, including various incorporated cities such as the City of Redlands.

MUED Water Supply and Demand

The MUED utilizes four primary sources for water supply: groundwater, surface water, imported water, and recycled water. The MUED's water supply is a combination of groundwater from the Bunker Hill Subbasin; groundwater from the Yucaipa Subbasin; surface water from the Santa Ana River; surface water from Mill Creek; imported water from the State Water Project (SWP); and recycled water. As shown on Table 5.12-1, in 2020, the MUED obtained the greatest percentage of its water supply from the Bunker Hill Subbasin.

Table 5.12-1: MUED Water Supply 2020

Water Supply	Source	Water Quality	Volume (acre-feet)	Percentage
Groundwater	Bunker Hill	Drinking Water	12,088	43%
Groundwater	Bunker Hill	Non-Potable	1,531	5.4%
Groundwater	Yucaipa	Non-Potable	297	1.1%
Surface Water	Santa Ana River	Drinking Water	5,796	20.6%

Water Supply	Source	Water Quality	Volume (acre-feet)	Percentage
Surface Water	Mill Creek	Drinking Water	6,045	21.5%
Purchased or Imported Water	SWP-Direct Deliveries	Drinking Water	535	1.9%
Recycled	Recycled Water-Direct	Recycled Water	1,806	6.5%
		Total	**28,098**	**100%**

Source: San Bernardino Valley Water Conservation District, 2021.

As shown in Table 5.12-2, the 2020 IRUWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of surface water, groundwater, and purchased or imported water. The 2020 IRUWMP anticipates that the MUED's water supply will increase from 31,039 acre feet (AF) in 2025 to 35,544 AF in 2045 (increase of 4,505 AF) to meet MUED's anticipated growth in water demands.

Table 5.12-2: MUED Projected Water Supply (AF)

Water Supply	Source	2025	2030	2035	2040	2045	2035 Percentage
Groundwater	Bunker Hill	12,973	13,922	14,861	15,677	16,484	46.4%
Groundwater	Bunker Hill	3,766	4,015	4,275	4,513	4,760	13.4%
Groundwater	Yucaipa	1,000	1,000	1,000	1,000	1,000	2.8%
Surface Water	Santa Ana River	5,000	5,000	5,000	5,000	5,000	14.1%
Surface Water	Mill Creek	5,500	5,500	5,500	5,500	5,500	15.5%
Purchased or Imported Water	SWP-Direct Deliveries	700	700	700	700	700	1.9%
Recycled	Recycled Water-Direct	2,100	2,100	2,100	2,100	2,100	5.9%
	Total	**31,039**	**32,238**	**33,436**	**34,490**	**35,544**	**100%**

Source: San Bernardino Valley Water Conservation District, 2021

The 2035 projections anticipate that 62.6 percent of supply would be from the groundwater sources, 29.6 percent from surface water, 1.9 percent from imported/purchased sources, and 5.9 percent from recycled water. The IRUWMP also describes that there has been a historical trend associated with drier years and an increase in water use among agencies. Conservation efforts have proven to be effective in decreasing water use in dry years. Additionally, according to the IRUWMP, MUED has adequate supplies to serve 100 percent of its customers during normal, dry year, and multiple dry year demand through 2045 with projected population increases and accompanying increases in water demand San Bernardino Valley Water Conservation District, 2021).

Groundwater: Redlands MUED extracts groundwater from the Bunker Hill Subbasin (also known as San Bernardino Basin or SBB) and Yucaipa Subbasin. Extractions from both basins include potable and non-potable water. In 2020, Redlands MUED extracted 13,619 AF of groundwater from the Bunker Hill Subbasin and 297 AF from the Yucaipa Subbasin. The City of Redlands uses 15 wells to obtain water from these sources that pump directly into the water system or into reservoirs (San Bernardino Valley Water Conservation District, 2021).

Purchased or Imported Water: Imported water from the SWP is available for the MUED to purchase from Valley District when needed. The MUED has purchased supplemental water from the SWP only in years when surface water flows have not been able to meet demands and on occasion when surface water supplies are turbid and require blending or for other operational purposes. The MUED contributes to regional efforts to

recharge the Bunker Hill groundwater basin with SWP water and local surface water in wet years when available so that storage is available for use in dry years when other supplies may be limited (San Bernardino Valley Water Conservation District, 2021).

Surface Water: The MUED receives water from the Mill Creek watershed and the Santa Ana River watershed. Water from the Mill Creek watershed is treated at Henry Tate Surface Water Treatment Plant. Water from the Santa Ana River watershed is treated at the Horace P. Hinckley Surface Water Treatment Plant. The MUED has ownership in a variety of private and mutual water companies to supply water to the City's Tate and Hinckley Surface Water Treatment Plants (San Bernardino Valley Water Conservation District, 2021).

Recycled Water: The City's Wastewater Treatment Plant has the capability of treating 7.2 million gallons per day (mgd) of wastewater to a Title 22 Recycled Water level (San Bernardino Valley Water Conservation District, 2021). The City's recycled water customers include Southern California Edison, a landfill, and recycled/non-potable water customers. Southern California Edison uses recycled water for its Mountain View Power Plant and recycled water customers use recycled water for irrigation.

Water Infrastructure

The City's water treatment plants include the Henry Tate Water Treatment Plant and the Horace Hinckley Surface Water Treatment Plant. The Henry Tate Water Treatment Plant is a conventional water treatment plant built in 1967. These facilities treat surface water and groundwater to meet drinking water standards. The design capacity of the Tate plant is 20 mgd. The City added enhancements to the Tate WTP to provide more water supply reliability by allowing State Water Project water to be mixed with Mill Creek water for treatment. The Horace Hinckley Surface Water Treatment Plant started operation in 1987 and has a permitted capacity of 14.5 mgd. The 10-year average flow (up to and including 2016) is 6,363 AF at the Henry Tate Plant, and 6,697 AF at the Horace Hinckley Plant. Roads adjacent to the Project site contain a network of water lines from 1 to 36-inches in diameter, which operate within capacity for existing development within the Project area. The City of Redlands maintains approximately 400 miles of pipeline with over 21,500 metered connections that serve potable water (MUED, 2022).

Approved General Plan Buildout Water Demand

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Residential uses comprise approximately 29 percent of the water demand in the Project area and non-residential uses comprise approximately 71 percent of the water demand. Buildout of the Project area according to the current General Plan would have an annual water usage of approximately 211 AF (Appendix G).

5.12.3.2 Wastewater

Wastewater Infrastructure

Sewer service on the Project site is provided by the City of Redlands. The City's Wastewater Treatment Plant (WWTP) is located on the south side of the Santa Ana River Wash at Nevada Street. The City's WWTP has the capacity to treat up to 9.5 mgd. The City's WWTP includes two treatment systems: a membrane bioreactor with a capacity of 6.0 mgd for producing recycled water, and an activated sludge process with a capacity of 3.5 mgd. The WWTP's total permitted annual average flow is 9.5 mgd and it has an average daily flow around 6 mgd. (Appendix H).

In 2020, 6,620 AF of wastewater was treated at the City's WWTP. In 2020, 3,813 AF were treated to a secondary level and released to spreading basins east of the City's WWTP for percolation into the Bunker

Hill groundwater basin, while 1,806 AF were treated to a tertiary level and distributed as recycled water (San Bernardino Valley Water Conservation District, 2021).

The wastewater system has one lift station that serves the western-most portion of the city, south of Interstate 10 (I-10). The collections system in the City of Redlands consists of approximately 245 miles of pipelines. Wastewater pipelines range from 6-inches to 48-inches in diameter (Appendix H).

Approved General Plan Buildout Wastewater Generation

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Buildout of the Project area according to the current General Plan would have an annual wastewater generation of approximately 358 AFY (Appendix H).

5.12.3.3 Stormwater

Stormwater Infrastructure

The City of Redlands' stormwater drainage system serves an area of approximately 37 square miles. Stormwater runoff from the City's drainage systems flows by gravity into the Mission Channel, Morrey Arroyo Creek, and San Timoteo Canyon, and discharges to the Santa Ana River (City of Redlands, 2017a).

Drainage throughout the City is generally from east to west to one of two main existing major stormwater drainage facilities. The City is divided into five main watersheds: Mission Zanja, Reservoir Canyon, Downtown, North Redlands along the Santa Ana River, and South Redlands along the San Timoteo Channel. Sites 1-16A and 24 are located within the South City subwatershed and Sites 17-23 are located within the North City subwatershed. The North City subwatershed contains both open channel and subsurface storm drain facilities. The facilities located within the North City generally drain to the Santa Ana River. The South City subwatershed contains both open channel and subsurface storm drain facilities. The facilities generally drain to Mission Creek, south of Citrus Avenue/West State Street (RBF Consulting, 2014).

Approved General Plan Buildout Stormwater Drainage

Within the Project site, there are currently 111 planned dwelling units and approximately 2,209,041 SF of planned non-residential development. Similar to the proposed Project, buildout of the approved General Plan would result in an increase in impervious surface area. Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the General Plan. Implementation of development projects pursuant to the General Plan would increase the intensity of development within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system.

5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

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

UT-2 Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

UT-3 Result in a determination by the wastewater treatment provider that would serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

UT-4 Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

UT-5 Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The Initial Study (included as EIR Appendix A) established that the proposed Project would not result in potentially significant impacts related to Thresholds UT-4 and UT-5; therefore, no further assessment of these thresholds is required in this Draft EIR. As discussed at the beginning of this section, energy related facilities such as electric power, natural gas, and telecommunications facilities are evaluated in Section 5.4, *Energy*, of this Draft SEIR; therefore, Impact UT-1 in this section evaluates water, wastewater treatment, and stormwater drainage facilities.

5.12.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the demand for utilities and services due to implementation of the proposed Project, based on comparison of the maximum development assumptions from buildout of the approved General Plan land uses and from buildout of the proposed Project, as outlined in Section 3.0, *Project Description*. The WSA prepared for the proposed Project estimated the Project's water demands using the developed acreage attributed to each use type (including landscape irrigation and parking area requirements). The total developed area was prorated based on the building square footage for each use type. Water demands were then estimated for the Project using land use-based water demand factors from the City of Redlands' "Water and Sewer Demands Spreadsheet." The land use demand factors are applied to gross estimated acreage for each land use. The evaluation of utilities identifies if utility demand from the proposed Project would be accommodated via existing utility infrastructure available to the proposed Project. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.12.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the General Plan EIR

The Certified General Plan EIR addressed impacts related to utilities and service systems in Chapter 3.14. The Certified EIR found that while buildout of the General Plan would result in increased demand for public utility services, compliance with federal, State, and local water and wastewater regulations and the proposed General Plan policies would reduce potential impacts on water and wastewater service needs and infrastructure needs to less-than-significant levels. The General Plan EIR concluded that compliance with the City's current grading, drainage, and stormwater regulations would ensure that any new facilities required to manage stormwater in the Planning Area would have a less-than-significant impact on the environment (City of Redlands, 2017b, pg. 3.14-19).

Proposed Project

The proposed Project would rezone 24 sites for the purpose of increasing residential development capacity. Buildout of the proposed Project would change the maximum buildout of the Project area from 828,349.93 SF of warehouse (commercial/industrial), 828,349.93 SF of retail (commercial/industrial), 111 multi-family dwelling units, 276,170.4 SF of office (commercial), and 276,170.4 SF of retail (commercial) uses to

residential uses with an allowed capacity of 2,436 units and approximately 151,048.46 SF of Public/Institutional uses. Housing types may include detached single-family dwellings with one or more dwellings per lot, two-family dwellings (two attached dwellings), and multi-family dwellings (three or more attached dwellings).

IMPACT UT-1: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT, OR STORM WATER DRAINAGE FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact.

Water

The proposed Project would rezone the approximately 116-acre Project site with residential and public/institutional uses, on sites which are currently served by MUED's water infrastructure. As discussed above, roadways surrounding the Rezone sites contain multiple water pipelines ranging in size from 1 inch to 36 inches in diameter. These water pipelines currently provide water supplies to the Project site and surrounding adjacent areas.

As discussed below under impact UT-2, the water facilities currently serving the Rezone sites would likely be sufficient to accommodate the additional residential development proposed by the Project. However, future developments proposed under the Project could necessitate further water infrastructure, including new water connections, water pumps, and other improvements to water utilities within the Rezone sites and within adjacent utility rights-of-way. Local improvements are anticipated; however, extensive offsite utility improvements are not anticipated to be required for buildout pursuant to the proposed Project.

The new onsite water systems would convey potable and non-potable water supplies to the proposed residential uses, public/institutional uses, and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Plumbing Code for efficient use of water and with Municipal Code Chapter 15.54.

Implementation of development projects pursuant to the proposed Project would increase the intensity of residential land uses within the Project area, and future site-specific development projects would install on-site water infrastructure and new connections to the water system that could include improvements to aged water pipelines and other connecting infrastructure. Such improvements would be required to be sized to accommodate the water demand of such new developments.

Under the City's development review procedures for site-specific development projects, the City determines water system design requirements and the needs for any improvements to existing infrastructure that would be required by the General Plan and Water Master Plans. Needed improvements would be referenced directly in the design plans for the proposed development to assure adequate capacity. The water design specifications for each site-specific development project would be required to comply with City standards (per the California Building Code) regarding requirements for design and operation of water distribution facilities.

The construction of any needed water system improvements as part of future site-specific development projects under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures listed throughout this document. These requirements would ensure that construction related impacts remain less than significant. As a result, buildout of the proposed Project would not result in construction of new or expanded wastewater facilities that could result in a significant environmental effect, and impacts would be less than significant. As such, Project impacts would be consistent

with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

Wastewater

The proposed Project would rezone the approximately 116-acre Project site with residential and public/institutional uses, on sites which are currently served by the City's WWTP. As discussed above, the collections system in the City of Redlands consists of approximately 245 miles of pipelines with pipes ranging from 6-inches to 48-inches in diameter (Appendix H). These sewer pipelines currently provide sewer services to the Project site and surrounding adjacent areas.

As compared to the existing General Plan buildout, the proposed development of the proposed Project would result in minor increases in the wastewater amount to the City's existing sewer systems, as shown below on Table 5.12-3. As shown, buildout pursuant to the proposed Project would result in an increase in wastewater generation of approximately 0.172, which is equivalent to 0.32 cubic feet per second (cfs). Further, using the peaking factor of the City's Sewer System Standard Plans the net peak flow would be 0.27 x 3.2, which is 1.0 cfs (Appendix H).

Table 5.12-3: Net Change in Wastewater Generation for Project Site

	Gallons per Day	Million Gallons per Day	Acre Feet per Year
Proposed Project Demand	339,938	0.34	381
Existing GPU Buildout Demand	167,708	0.17	188
Net Change	**30,585**	**0.172**	**193**

Source: Appendix H

Based on the sewer systems standards, sewer pipes larger than 12-inches in diameter are designed to flow up to 75%-full. Therefore, since most of the existing sewer systems are flowing at or less than 50%-full, there is additional capacity to handle an increase in wastewater (Appendix H). Table 5.12-4 below shows the City's available wastewater capacity and illustrates that the existing wastewater infrastructure would be sufficient to serve the proposed Project.

Table 5.12-4: Available Wastewater Capacity in the City of Redlands

Existing Sewer Reach	Additional Peak Capacity
21-Inch VCP (Nevada Street, San Bernardino Avenue)	2.29 CFS
24-inch VCP (Nevada Street)	2.99 CFS
30-inch VCP (Nevada Street)	4.55 CFS
Net Increase in Peak Flow	**1.0 CFS (0.54 mgd)**

Therefore, based on the nominal net increase in average sewer flow of 0.172 mgd, and increase in peak sewer flow of 0.54 mgd (1.0 cfs), it is expected that the proposed Project would not adversely affect the City's WWTP.

Further, under the City's development review procedures for site-specific development projects, the City determines sewer system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity. The sewer design specifications for each site-specific development project would be required to comply with City standards (per the California Building Code) regarding requirements for design and operation of sewer collection facilities.

The construction of any needed wastewater system improvements as part of future site-specific developments under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way and would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures throughout this document. These requirements would ensure that construction related impacts remain less than significant. As a result, potential impacts related to the buildout of the proposed Project would not result in construction of new or expanded wastewater facilities that could result in a significant environmental effect, and impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

Stormwater

Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units and a decrease of 2,057,992.20 SF of nonresidential development. As the individual RHNA Rezone sites are already slated for urban development, buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout.

Stormwater drainage improvements would be evaluated on a project-by-project basis as development occurs pursuant to the proposed Project. Implementation of development projects pursuant to the proposed Project would increase the intensity of residential land uses within the City, and future site-specific development projects would install onsite stormwater drainage infrastructure and new connections to the existing stormwater drainage system. Such improvements would be required to be sized to accommodate the stormwater generation of such new development.

Under the City's development review procedures for site-specific development projects, the City determines stormwater system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity. The stormwater system design specifications for each site-specific development project would be required to comply with City standards and implementing projects would be required to prepare a Water Quality Management Plan (WQMP).

The construction of any needed drainage system improvements as part of future site-specific development projects under the proposed Project would generally occur from project sites to existing connection points in roadway rights-of-way. Additional, large-scale stormwater drainage improvements pursuant to the 2017 Redlands Master Plan of Drainage and implementing project site-specific stormwater drainage improvements would be required to comply with all Redlands Municipal Code standards and Draft Subsequent EIR mitigation measures, which would ensure that impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

IMPACT UT-2: THE PROJECT WOULD HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE DEVELOPMENT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS.

Less than Significant Impact. Buildout pursuant to the proposed Project would result in an increase in 2,325 residential units (approximately 6,162 residents) and a decrease of 2,057,992.20 SF of nonresidential development. As shown in Table 5.12-5 the proposed Project would result in a total demand of 457 AFY, which would be a 231 AFY increase in comparison to water demands associated with the buildout of the approved General Plan within the Project area.

Table 5.12-5: Net Change in Water Demands for Project Site

	Gallons per Day	Acre Feet per year
Proposed Project Demand	407,817	457
Existing GPU Buildout Demand	201,249	225
Net Change	**206,568**	**231**

Source: Appendix G

The MUED's 2020 IRUWMP assumed that the MUED's total water supply would increase from 28,098 AF in 2020 to 33,436 AF in 2035, which constitutes an increase of 5,338 AF. Additionally, as shown in Table 5.12-6, the projected MUED normal year water demand would increase from 26,866 AF in 2020 to 29,075 AF in 2035.

Table 5.12-6: Projected MUED Water Demand (AF)

	2020	2025	2030	2035	2040	2045
Potable and Raw Water	25,892	25,818	26,860	27,902	28,818	29,735
Recycled Water	994	1,173	1,173	1,173	1,173	1,173
Total Water Demand	26,866	26,991	28,033	29,075	29,991	30,908

Source: San Bernardino Valley Water Conservation District, 2021

The IRUWMP assessed the projected water demand and supply in the service area and concluded that MUED has an adequate water supply to meet all demands within its service area to 2045 under varying drought conditions. The Project's additional demands of 231 AFY, as listed in Table 5.12-5, is less than the assumed increase in demands in the IRUWMP; therefore, the Project's relatively small increase in water demand would not cause demand to exceed the 2035 or 2045 projected demands for the MUED. Additionally, implementing projects would be required to implement California Green Building Code policies regarding water efficiency standards for all new plumbing and irrigation fittings and fixtures.

Based on the above, it is anticipated that existing and future water entitlements from groundwater, surface water, purchased or imported water sources, and recycled water would be sufficient to meet the Project's demand at buildout, in addition to forecast demand for MUED's entire service area. Thus, impacts related to the need for new or expanded water supplies and entitlements would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

IMPACT UT-3: THE PROJECT WOULD NOT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER THAT WOULD SERVE THE PROJECT THAT IT DOES NOT HAVE ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS.

Less than Significant Impact. Future buildout of the proposed Project would result in increased wastewater generation from Rezone sites. Based on Table 5.12-3, *Net Change in Wastewater Generation for Project Site*, above, the proposed Project would result in a net increase of 30,585 gallons per day (0.031 mgd) or 34 AFY compared to the buildout of the existing General Plan.

Wastewater from the Project Site is treated at the WWTP, which has a treatment capacity of 9.5 mgd (City of Redlands, 2017a). In 2020, the WWTP collected 6,620 AF (5.8 mgd) for treatment (San Bernardino Valley Water Conservation District, 2021). Therefore, the WWTP has a residual capacity of 3.7 mgd.

The amount of additional wastewater that would be generated by the proposed Project is less than one percent of WWTP's total remaining daily treatment capacity. As a result, the WWTP serving the Project

would have adequate capacity to serve the demand resulting from buildout pursuant to the proposed Project in addition to existing service commitments, and impacts would be less than significant. As such, Project impacts would be consistent with the impact conclusions set forth in the General Plan EIR, which determined that impacts related to utilities would be less than significant.

5.12.7 CUMULATIVE IMPACTS

Water

Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary sources of water that include groundwater, surface water, purchased or imported water, and recycled water.

As described previously, during buildout of the proposed Project, water lines would be installed as needed to serve implemented projects. The continued regular assessment, maintenance, and upgrades of the water system by the Redlands MUED pursuant to the City's Water Master Plans would reduce the potential of development projects to result in a cumulatively substantial increase in water such that new or expanded facilities would be required.

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

Wastewater

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes the City's WWTP and sewer system that serves the Project site.

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

Stormwater

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. Unless a project is within a hydromodification exemption area, State and regional regulations require development projects to maintain pre-project hydrology, such that no net increase of off-site stormwater flows would occur. Santa Ana RWQCB permit conditions require a hydrology/drainage study to demonstrate that proposed storm drain systems are able to detain a minimum "Design Capture Volume," which is dependent on the specific characteristics of each site. As a result, increases in runoff from cumulative projects that could combine to impact stormwater drainage capacity would be minimized, and cumulative impacts related to drainage infrastructure would be less than significant.

5.12.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

The following standard regulations would reduce potential impacts related to water supplies:

- California Code of Regulations Title 24, Part 11; the California Green Building Code
- Chapter 15.54 of the Redlands Municipal Code

Plans, Programs, or Policies

None.

5.12.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts UT-1, UT-2 and UT-3 would be less than significant.

5.12.10 MITIGATION MEASURES

None.

5.12.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to utilities and service systems would be less than significant.

5.12.12 REFERENCES

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City of Redlands. (2017b). *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*. Retrieved July 2, 2024, from https://www.cityofredlands.org/sites/main/files/file-attachments/redlands_deir_compiled_lo_071917_0.pdf?1554321669

City of Redlands. (2024a). *City of Redlands Municipal Code*. Retrieved July 2, 2024, from https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1

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RBF Consulting. (2014). *City of Redlands Drainage Master Plan*. Accessed: https://www.cityofredlands.org/sites/main/files/file-attachments/drainage_master_plan_2014.pdf?1584549796

San Bernardino Valley Water Conservation District (May 2021). *2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.* https://www.cityofredlands.org/sites/main/files/file-attachments/part_2_chapter_4_redlands_2020_uwmp.pdf?1622145365

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5.13 Mandatory Findings of Significance

5.13.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As described in detail in Section 5.0 of this Draft EIR, implementation of the Project would result in environmental impacts that cannot be reduced to a level below significance after implementation of project design features, regulatory requirements, Plans, Programs, and Policies (PPPs), and feasible mitigation measures for the below topics.

Agriculture and Forestry

Impact AG-1, Conversion of Significant Farmland. The Project site contains approximately 44.67 acres of Prime Farmland. The Project would result in conversion of the Prime Farmland to non-agricultural uses. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Impact AG-5, Other Changes Resulting in Conversion of Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural use. Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas to the north, east, and west are proposed to be developed with uses other than for agricultural purposes. Nevertheless, the areas currently under agricultural production are privately owned and development of the site could result in an increased development pressure on the surrounding agricultural sites. Therefore, the Project would indirectly cause changes in the environment that would convert Farmland not within the Project site to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Air Quality

Impact AQ-1, Conflict with AQMP (Project, Cumulative). As detailed in Section 5.2, *Air Quality*, due to the uncertainty of the timing and methods of construction activities related to RHNA Rezone development projects, a significant impact could occur related to construction emissions of VOCs and NOx, despite implementation of South Coast Air Quality Management District (SCAQMD) rules and mitigation measures. In addition, operation of the proposed Project at buildout would result in exceedance of the applicable SCAQMD thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ after implementation of mitigation. There is no guarantee that emissions for construction and operation would be mitigated below SCAQMD thresholds, therefore, emissions generated from implementation of the proposed RHNA Rezone would be significant and unavoidable. Also, because the emissions would exceed thresholds, the Project would result in a conflict with implementation of the AQMP and impacts related to the AQMP would also be significant and unavoidable.

Impact AQ-2, Regional Construction & Operational Emissions (Project, Cumulative). Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1. Emissions from operation of the proposed Project at buildout would exceed SCAQMD's thresholds for CO, VOC, and NOx after implementation of regulations and Mitigation Measure AQ-2 because a majority of operational-source CO and NOx emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NOx emissions from implementation of the

proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Impact AQ-3, Localized Construction Emissions (Project, Cumulative). Implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to localized significance thresholds (LSTs). As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_X, CO, PM_{10}, and $PM_{2.5}$) associated with the maximum daily grading activities for the proposed development; and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1.

Greenhouse Gas Emissions

Impact GHG-1, Greenhouse Gas Emissions (Project, Cumulative). As described in Section 5.5, *Greenhouse Gas Emissions*, operation of the Project at buildout and full occupancy would generate 23,660.41 $MTCO_2e$ per year, which equates to a CO_2e per service population of 3.56. This would be substantially less than the emissions generated from buildout of the existing General Plan land uses, but would continue to exceed the threshold of 3.0. Thus, operational impacts would be significant. Even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions would continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

Impact GHG-2, Conflict with GHG Reduction Plan (Project, Cumulative). The proposed Project would have the potential to be inconsistent with key project attributes from the 2022 Scoping Plan Appendix D, *Local Actions*, which could combine with potential inconsistencies from other/future projects. Thus, impacts related to conflict with a policy, plan, or regulation adopted for the purpose of reducing GHG emissions would be significant and unavoidable and cumulatively considerable.

Transportation

Impact TR-2, Vehicle Miles Traveled (Project). As detailed in Section 5.10, *Transportation*, all TAZs within the Project Site are either within a TPA or a low-VMT area or would meet Criteria 3 based on local serving uses, except for TAZs 53835402 and 53835101, which include Sites 20, 21, and 23. As such, implementing development pursuant to the proposed Project in all TAZs except Sites 20, 21, and 23 would be less than significant. However, future development projects within Sites 20, 21, and 23 would be required to conduct a project-specific VMT screening analysis to determine whether the development would screen out of a further VMT analysis pursuant to Mitigation Measure T-1. Should the development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement further VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project level VMT impact.

5.13.2 GROWTH INDUCEMENT

This section analyzes the growth inducement potential of the proposed Project and the associated secondary effects of growth the Project might permit. As required by CEQA Guidelines Section 15126.2(d), an EIR must:

> "Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

> Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

Thus, based on CEQA, a project could have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities;
- Remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or would add substantial capacity that could accommodate additional unplanned growth;
- Remove obstacles to growth through changes in existing regulations pertaining to land development;
- Result in the need to expand one or more public service facilities to maintain desired levels of service; or
- Involve some other action that could encourage and facilitate other activities that could significantly affect the environment.

As CEQA Guidelines Section 15126.2(d) states that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment, the following information is provided as additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of developing the land use concepts examined in the preceding sections of this Draft Subsequent EIR.

Establish substantial new permanent employment opportunities or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities

The proposed RHNA Rezone Project would rezone 23 sites within the City to allow for increased residential development, Site 24 would be rezoned to Public/Institutional zoning in order to achieve compatibility with the sites existing uses. SCAG estimates that employment in the City will increase from 49,900 jobs in 2019 to 60,100 in 2050, which is an increase of over 21 percent (SCAG, 2024b). The employment anticipated by the proposed Project would generate approximately 550 new employees (see Section 5.8, *Population and Housing*), which represents about 5 percent of the estimated job growth by 2050. The 550 jobs expected in the Project area are included in SCAG projections because the employment-generating land uses within the Project area is existing pursuant to current General Plan land use designations and is decreasing with implementation of the Project. Thus, the employment that would occur within the Project area would be less than significant.

The new Project would accommodate the forecasted employment in an environmentally sustainable manner by providing for additional housing to maintain the jobs to housing balance, which would reduce citywide VMT. Also, as listed below, the City of Redlands has had recent unemployment rates ranging between 3.1 and 7.6 percent (EDD, 2024).

Table 5.13-1: City of Redlands Unemployment Rates

Date	Unemployment Rate Percent
June 2024	4.0 percent
2023 Annual Average	4.4. percent
2022 Annual Average	3.1 percent
2021 Annual Average	5.5 percent
2020 Annual Average	7.6 percent
2019 Annual Average	3.1 percent

Source: EDD, 2024

The City of Redlands is estimated by SCAG to have a population increase of 18.0 percent between 2019 and 2050[1], and San Bernardino County is estimated to have a population growth rate of 20.6 percent over the same period of time (SCAG, 2024b). Buildout of the proposed Project would contribute to approximately 49.4 percent of the projected population growth, approximately 79.96 percent of the projected housing stock growth, and approximately 5 percent of the projected employment growth in the City. Thus, while the Project would result in an increase in population and housing units in an area not previously planned for housing, the increase in population and number of housing units that would result from the proposed Project would not exceed projections for the City. Additionally, the projected employment growth that would occur from buildout of the Project would not exceed employment growth projections for the City.

Further, SCAG determined the City needs to provide a total of 3,516 housing units to meet their RHNA. Thus, the Project would contribute to the City's fair share of housing and, in part, satisfy the State requirements to provide new housing opportunities to increase housing supply. Additionally, the proposed Project implements goals and policies of the Redlands Housing Element that support a variety of housing types and densities. Therefore, the economic effects of the proposed Project would not result in the need for additional development to support the proposed Project and would not result in a substantial impact on the environment.

Remove Obstacles to Growth, e.g., Through the Construction or Extension of Major Infrastructure Facilities that do not Presently Exist in the Project Area or Would Add Substantial Capacity that Could Accommodate Additional Unplanned Growth.

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

The RHNA Rezone area is a developed urban area that is connected to the City's existing infrastructure system. Water, sewer, drainage, and roadway infrastructure currently provides service to all of the areas within the Project. As described in Section 5.12, *Utilities and Service Systems*, development projects pursuant to the RHNA Rezone would include potential installation of onsite infrastructure and new connections to the existing infrastructure systems, which include improvements to existing aged infrastructure such as increasing the size of water and sewer lines. However, these improvements would be sized to accommodate individual developments and would not provide excess capacity. As described in Section 5.12, *Utilities and Service Systems*, future projects pursuant to the RHNA Rezone Project would not require extension of utilities into undeveloped areas. Furthermore, buildout pursuant to the Project would not result in the extension of any

[1] The 2050 population estimate was derived using the methodology presented in Section 4.5 of the SCAG Demographics & Growth Forecast which states an estimate of the future City-level population based on Connect SoCal's household forecast can be derived using a county-level Population:Housing ratio from Table 12 and applying it to the City's future household growth (SCAG, 2024b).

roadways into undeveloped areas as the rezone sites are surrounded by existing roadways. Therefore, the infrastructure improvements implemented by the Project would not result in unplanned growth.

Remove Obstacles to Growth Through Changes in Existing Regulations Pertaining to Land Development

A project could directly induce growth if it would remove barriers to population growth such as changes to a jurisdiction's general plan and zoning code, which allows new development to occur in underutilized areas. The proposed Project includes amending the City of Redlands General Plan to change the land use designations of 23 sites to allow for additional residential development and a Specific Plan Amendment to remove 15 of the Rezone sites out of the East Valley Corridor Specific Plan (EVCSP). However, pursuant to the RHNA prepared by the California Department of Housing and Community Development (HCD), the City of Redlands must increase their residential zoning capacity to accommodate their 0.26% share that is 3,516 units of the RHNA (City of Redlands, 2022, P.2).

Additionally, SCAG household growth projections estimate that between 2019 and 2050 the number of housing units within the City will grow by 17.9 percent (5,600 units). Assuming that the maximum number of residential units allowed by the proposed Project are developed and occupied (no vacancy), the 2,325 additional housing units in the Project area would consist of a 9.1 percent increase of housing units citywide, which is within the SCAG anticipated growth of both the City and the County (SCAG, 2020b). Therefore, impacts related to growth from changes in existing regulations pertaining to land development would not occur.

Result in the Need to Expand One or More Public Service Facilities to Maintain Desired Levels of Service

The proposed Project is expected to incrementally increase the demand for fire protection and emergency response, police protection, and school services. However, as detailed in Section 5.9, *Public Services*, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service. Based on service ratios and buildout projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities or plans. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not result in significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Involve Some Other Action that Could Encourage and Facilitate Other Activities that Could Significantly Affect the Environment

The proposed Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The development implemented pursuant to the proposed Project would be required to comply with all applicable City plans, policies, and ordinances. In addition, mitigation measures have been identified within this Draft EIR to ensure that the Project minimizes environmental impacts. The Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

Environmental Impacts of Induced Growth

All physical environmental effects from construction of buildout pursuant to the proposed Project have been analyzed in the technical sections of this Draft Subsequent EIR and the Initial Study prepared for this Project (included as Appendix A). For example, activities such as excavation, grading, and construction as required for the buildout of the Project have been evaluated herein. Also, all operational aspects of future development pursuant to the Project have been analyzed in this Draft Subsequent EIR and through implementation of existing regulations, including the General Plan and zoning ordinance, would not create an environmental impact of induced growth.

5.13.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely…. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." (CEQA Guidelines Section 15126.2(c)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

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

Agriculture

The Project site contains approximately 44.67 acres of Prime Farmland. The Project could result in conversion of the Prime Farmland to non-agricultural uses with buildout pursuant to the proposed rezoning. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion of this farmland to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

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

Construction Impacts

Construction of implementing development projects pursuant to the proposed Project would result in the consumption of building materials, including lumber, sand, and gravel for construction. Depletion of non-renewable resources that supply building materials would represent an irreversible environmental change.

5.13.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15126.2(a) states that "[a]n EIR shall identify and focus on the significant effects on the environment." However, CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The following environmental issue areas would not be potentially impacted by the proposed Project, as detailed below and in the Initial Study prepared for the Project, which is included as Draft EIR Appendix A.

Aesthetics

The Rezone sites are in developed areas and are not designated as having a Resource Preservation land use category and are not located within a Historic or Scenic Preservation District. The Project area does not contain scenic vistas and potential future developments would be within the heights of existing developed areas to be consistent with views presently found in the area.

Additionally, there are currently no designated State scenic highways within the vicinity of the Project site. Future projects would also include specific setbacks, lighting standards, and building materials that would ensure the avoidance of potential lighting impacts. Further, all future projects would be required to comply with the City's General Plan Policy 2-A.35 which develops standards for exterior lighting for new developments and would be verified through plan check prior to project approval.

Biological Resources

Implementation of the Project would implement infill development within an already highly disturbed urban environment and would not result in any direct impacts to special status species, nor involve or result in any existing habitat modifications that could indirectly result in a substantial adverse effect on any special status species. Furthermore, while it is not expected that the Rezone sites would support suitable habitat for rare plant and animal species, General Biological Surveys would be performed for future development projects within the proposed Project site to confirm whether suitable habitat exists, as outlined in Initial Study Mitigation Measure BIO-1 (included as Appendix A to this DSEIR). If rare plants/wildlife are identified and cannot be avoided, the project-level biological survey report shall justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less-than-significant level.

Several Project sites are located near the Morey Arroyo riverine, which is a riparian habitat according to the USFWS National Wetland Inventory. Therefore, future developments related to the proposed Project within the Rezone sites shall require a biological survey for jurisdictional features prior to the approval of any development applications, as outlined in Initial Study Mitigation Measure BIO-2 (included as Appendix A to this DSEIR). If resources under CDFW, USACE, and/or RWQCB jurisdiction are identified, impacts should be avoided where feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources would be mitigated by federal and State regulators via the applicable consulting and permitting process. With implementation of Initial Study Mitigation Measure BIO-2 (included as Appendix A to this DSEIR), impacts to federally protected wetlands would be less than significant.

No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located within the Project site or in the surrounding area. However, mature trees are scattered throughout the area. Although the trees are mainly ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. The City requires that all projects comply with the Migratory Bird Treaty Act of 1918 (MBTA) by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. Projects implemented under the Project would be required to comply with the provisions of the MBTA. With adherence to the MBTA requirements, less than significant impacts would occur.

Implementation of the Project is not anticipated to conflict with the provisions of Redland's Street Tree Policy and Protection Guidelines Manual and the tree protection ordinance codified as Redlands Municipal Chapter 12.52. Future development and/or redevelopment activities that would be permitted under the Project would be required to be reviewed by the City for consistency with the existing tree policies and guidelines. Therefore, implementation of the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant. Furthermore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan.

Geology and Soils

No known fault lines or Alquist-Priolo Fault Zones traverse the proposed Rezone sites or are within 500 feet of any potential future development as part of the proposed Project (City of Redlands, 2017b, Figure 3.6-2). The nearest fault line to the proposed Project is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue/Fifth Avenue (approximately 2.25 miles from Site 24). Therefore, future development projects constructed under the proposed Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map.

The proposed Project would increase the potential residential buildout within the City; however, the Project site and the immediate surrounding areas are not located in an area that is susceptible to liquefaction (City of Redlands, 2017b). Impacts from seismic ground shaking, including liquefaction, associated with future development pursuant to the proposed Project would be addressed through site specific geotechnical investigations prepared in accordance with the CBC requirements, adopted by the City of Redlands Municipal Code Chapter 15.04. Development projects would also be required to adhere to local policies in the Redlands Municipal Code that contain seismic safety requirements. Therefore, the potential impact related to seismically related ground failure including liquefaction would be less than significant.

The Rezone sites and the surrounding areas consist of relatively flat terrain. Additionally, the sites are not located in an area susceptible to landslides as mapped in Figure 3.6-3 of the General Plan EIR and are not in the path of any potential landslides. Further, the proposed Project does not propose substantial alteration to the existing topography and would not directly or indirectly exacerbate existing environmental conditions related to landslides. Therefore, no impacts would occur related to landslides.

The proposed Project would increase the potential residential buildout within the City; however, the proposed Project area is in an urbanized environment and in an area that is relatively level, with minimal rises or changes in elevation Generally, earthwork and ground-disturbing activities, unless below minimum requirements, 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. In addition, individual development projects that disturb more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit and the implementation of a stormwater pollution prevention plan (SWPPP) (and included as PPP HYD-1). Therefore, the potential for adverse soil erosion and topsoil loss would be less than significant

The proposed sites are within a generally flat area that are not subject to landslides, and due to the flat topography, the potential for lateral spreading is also considered very low. The proposed Project area is also not identified as being located on a geologic unit or soil that is unstable, or that would become unstable because of development activities. The soil types within the proposed Project site include Hanford Sandy Loam (HaC), Hanford Coarse Sany Loam (HaC, HaD), and Tujunga Loamy Sand (TuB), as shown in GP EIR Figure 3.6-1. None of these soils are clay based and are not prone to expansion.

The proposed Project area is currently served by existing sewer and wastewater treatment systems. Future development projects would include connection to existing sewer mainlines and service lines. Future development under the proposed Project would not include the use of septic systems. Therefore, no impact would occur related to unstable geologic units or soil.

Any potential hazards related to unstable soils would be addressed through the integration of geotechnical information and design recommendations in the design and construction process for future individual development projects in accordance with the California Building Code (CBC) requirements which minimize the risk associated with soils hazards. Therefore, compliance with the requirements of the CBC would reduce potential impacts related to expansive soil to a less than significant level.

Future projects would be required to adhere to Initial Study Mitigation Measure PAL-1 (included as Appendix A to this DSEIR), which would require future project applicants to provide an assessment of whether grading would impact any underlying soil units or geologic formations that have potential to yield fossiliferous materials. Initial Study Mitigation Measure PAL-2 (included as Appendix A to this DSEIR) would establish a procedure for the management of paleontological materials on sites with potential to yield paleontological resources. Therefore, with implementation of the proposed mitigation measures, impacts related to paleontological resources would be less than significant.

Hazards and Hazardous Materials

Future construction activities could involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials could be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements that are implemented by the City during building permitting for construction activities. As a result, routine transport and use of hazardous materials during construction would be consistent with applicable regulations and impacts would be less than significant.

The Project would involve routinely using household hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. However, the Project would result in an overall decrease of nonresidential uses within the City. The normal routine use of these products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project site. Therefore, buildout pursuant to the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant. All future development which would disturb more than 1-acre resulting from the implementation of proposed Project would be required to develop and implement a SWPPP with best management practices (BMPs) as required by NPDES regulations. Depending on the age of the structure that would be demolished, asbestos-containing materials (ACMs) and lead-based paints (LBPs) may be present in the existing buildings. However, demolition activities would be required to implement SCAG Rule 1403, CalOSHA, and the sections of the California Health and Safety Code Additionally, the Project would decrease nonresidential development. Therefore, construction and operation of future development would result in a less-than-significant impact relating to foreseeable upset and accident conditions involving the release of hazardous materials into the environment and a less-than-significant impact related to accidental release near a school.

None of the Rezone sites are located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control, 2023). Therefore, buildout pursuant to the Project would result in no impact. Future development pursuant to the proposed Project would be developed pursuant to the City's and applicable Airport Land Use Compatibility Plan development guidelines to ensure that future development would not pose a hazard to airport operations, flight patterns, or otherwise result in substantial aviation-related safety risks. Therefore, impacts would be less than significant related to applicable Airport Land Use Compatibility Plans. Relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan, the City's Hazard Mitigation Plan (HMP), and the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Physical development pursuant to the proposed Project is not expected to create obstacles to the implementation of emergency response or evacuation plans adopted for the City. Emergency access and circulation during construction and operation of individual development projects under the proposed Project would be part of each project's review and approval by the City. Therefore, as existing City development standards would require new development within the proposed Project to be designed so as to not interfere with an adopted emergency response plan or emergency evacuation plan, impacts from implementation of the proposed Project would be less than significant. The proposed sites are located in an urbanized environment that does

not contain wildlands. The Rezone sites would comply with Chapter 15.04 of the Redlands Municipal Code that requires all development to adhere to safety standards provided in the CBC as well as Chapter 15.20 which adopts the California Fire Code. The close coordination of the Redlands Fire Department with the fire services of neighboring jurisdictions ensures the safety of new development from wildland fires. Therefore, impacts would be less than significant.

Hydrology and Water Quality

As discussed in the Initial Study, included as Appendix A, demolition of existing structures, grading, stockpiling or materials, excavation, the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/ or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality. However, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES General Construction Permit and included as PPP HYD-1of the Initial Study, included as Appendix A to the Draft Subsequent EIR. (NPDES/SWPPP) would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a qualified SWPPP developer (QSD) is required to be included in the SWPPP for the Project. Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, included as PPP HYD-1, which would be verified during the County's construction permitting process, would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

The proposed Project would result in the operation of additional residential uses on the site that could generate pollutants such as, suspended solids, nutrients, bacteria/viruses/pathogens, pesticides, oil and grease, trash and debris. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the Project would be required to comply with the NPDES permit requirements, that would limit the potential for pollutants to discharge from the site. In compliance with the NPDES Permit, development projects are required to prepare a Low Impact Development (LID) report, included as PPP HYD-2. The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit. In addition, the County's permitting process would ensure that all BMPs in the LID report would be implemented during construction and operation. Overall, implementation of the LID report pursuant to the existing regulations (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

As discussed in the Initial Study, included as Appendix A, the City is in the Upper Santa Ana Valley Groundwater Basin. The City's domestic water wells constitute approximately 50 percent of the water supply. According to the City of Redlands Urban Water Management Plan (UWMP). The supply of water would be sufficient during both normal years and multiple dry year conditions to meet all of the service area's estimated needs, including the proposed Project. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. Furthermore, as discussed

previously, the project would comply with required LID standards, which would ensure the Project would not significantly decrease groundwater infiltration onsite. Thus, impacts related to groundwater supplies would be less than significant.

The Project site does not include, and is not adjacent to, a stream or river, or within a floodplain. The Project site and surrounding area is urban and developed. The Project would implement existing regulations and BMPs that would reduce any potential erosion or siltation. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in substantial erosion or siltation would be less than significant.

Buildout pursuant to the Project would not result in increase of impervious area compared to buildout pursuant to the existing General Plan designations. As a result, the Project would not result in increased flows compared to current potential buildout. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in the substantial increase or depth of surface runoff resulting in flooding would be less than significant.

As discussed in the Initial Study, Included as Appendix A, according to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency, the Project area contains areas of flood risk, Proposed developments pursuant to the proposed Project would be required to be consistent with the City's drainage plans and incorporate the Redlands Flood Danage Prevention Measures. Drainage improvements would be implemented by the City as regional drainage improvements and future developments would be required to manage any increase of onsite runoff flows through storm drain improvements or payment of storm drain management fees. Additionally, as part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, the proposed drainage system and adherence to the existing NPDES permit regulations would ensure that future development impacts related to alteration of a drainage pattern or flooding from operation and construction would be less than significant.

The City is approximately 50 miles inland from the Pacific Ocean; therefore, the proposed Project is not at risk of inundation from a tsunami. Also, the proposed Project is not located adjacent to any water retention facilities, lakes, or other bodies of water. Therefore, the Project would have a less than significant impact related to tsunamis and seiching. Development of the proposed Project would comply with applicable NPDES permits as well as the Municipal Code therefore the implementation of the Project would not conflict with or obstruct implementation of a water quality control plan.

Mineral Resources

The Project area has not historically included mineral extraction, nor does the Project area currently support mineral extraction or have identified mineral resources. Thus, implementation of the Project would not result in the loss of availability of a known mineral resource of value to the region and State or delineated on the General Plan, a specific plan, or other land use plan, and no impacts would occur.

Recreation

Individual future development projects under the proposed Project would be subject to the payment of development impact fees to the City. The addition of 6,162 new residents would increase the use of recreational facilities and would require approximately 30.81 acres of new parkland based on the City's parkland/recreational space standard of 5.0 acres per 1000 residents. However, with a total of 79,152 residents upon buildout of the Project, the City of Redlands would need 391.53 acres of parkland based on

this standard, which is exceeded by the already existing 424.2 acres. Thus, the Project would not significantly increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated, and impacts would be less than significant.

The development of future parkland and recreational facilities would be subject to existing building and construction regulations and environmental review that would ensure that future construction activities have a minimal effect on the surrounding environment. Furthermore, individual recreational facility projects within the Project site would be subject to the mitigation measures included throughout the Initial Study and this Subsequent EIR. Adherence to existing regulations and mitigation measures included in the Initial Study and this Subsequent EIR would ensure that the Project would not result in construction or expansion of recreational facilities which might have an adverse impact on the environment, and impacts would be less than significant.

Wildfire

The Project area is an urbanized environment with moderate fire threat level and does not include, nor is it around, wildlands or areas of high fire hazard terrain or vegetation. Implementation of the Project would not exacerbate wildfire risks nor expose occupants to risk of pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. The Project area is also not located in or near a state responsibility area, and the Project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. The project would not require installation of infrastructure that could exacerbate fire risks and would not expose people to downstream flooding related to post fire slope instability. Therefore, implementation of the Project would not result in any impacts related to wildfire.

5.13.5 REFERENCES

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6. Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the Draft Subsequent EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

6.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to *CEQA Guidelines* Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the Project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. *CEQA Guidelines* Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, *CEQA Guidelines* Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to *CEQA Guidelines* Section 15126.6(d), discussion of each alternative presented in this Draft Subsequent EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the Draft Subsequent EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (*CEQA Guidelines* Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (*CEQA Guidelines* Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this Draft Subsequent EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of the *CEQA Guidelines* to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute, the *CEQA Guidelines*, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (*CEQA Guidelines* 15126(f)).

6.2 ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures.

The analysis in Section 5.0 of this Draft Subsequent EIR determined that buildout of the proposed Project would result in the following significant and unavoidable impacts.

Agricultural and Forestry Resources

Impact AG-1, Conversion of Significant Farmland. The Project site contains approximately 44.67 acres of Prime Farmland. The Project would result in the conversion of the Prime Farmland to non-agricultural uses. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Impact AG-5, Other Changes Resulting in Conversion of Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural use. Although implementation of the Project would result in the conversion of agricultural use on the site, the surrounding areas to the north, east, and west are proposed to be developed with uses other than for agricultural purposes. Nevertheless, the areas currently under agricultural production are privately owned and development of the site could result in increased development pressure on the surrounding agricultural sites. Therefore, the Project would indirectly cause changes in the environment that would convert Farmland not within the Project site to nonagricultural use. There are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Therefore, impacts would be significant and unavoidable.

Air Quality

Impact AQ-1, Conflict with AQMP (Project, Cumulative). As detailed in Section 5.2, *Air Quality*, due to the uncertainty of the timing and methods of construction activities related to RHNA Rezone development projects, a significant impact could occur related to construction emissions of VOCs and NOx, despite implementation of South Coast Air Quality Management District (SCAQMD) rules and mitigation measures. In addition, operation of the proposed Project at buildout would result in exceedance of the applicable SCAQMD thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ after implementation of mitigation. There is no guarantee that emissions for construction and operation would be mitigated below SCAQMD thresholds, therefore, emissions generated from implementation of the proposed RHNA Rezone would be significant and unavoidable. Also, because the emissions would exceed thresholds, the Project would result in a conflict with implementation of the AQMP and impacts related to the AQMP would also be significant and unavoidable.

Impact AQ-2, Regional Construction & Operational Emissions (Project, Cumulative). Emissions from the construction of the implementing projects have the potential to overlap, which could result in a significant impact after implementation of SCAQMD rules and Mitigation Measure AQ-1. Emissions from operation of

the proposed Project at buildout would exceed SCAQMD's thresholds for CO, VOC, and NOx after implementation of regulations and Mitigation Measure AQ-2 because a majority of operational-source CO and NOx emissions (by weight) would be generated by vehicle trips, and the VOC emissions would be generated by consumer products that neither future Project applicants nor the City have the ability to reduce emissions of. Therefore, operational-source CO, VOC, and NOx emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Impact AQ-3, Localized Construction Emissions (Project, Cumulative). Implementation of developments pursuant to the Project could result in localized emissions that exceed air quality standards. Thus, implementation of the Project could result in a significant impact related to localized significance thresholds (LSTs). As a result, Mitigation Measure AQ-1 is included, which requires development projects to provide modeling of localized emissions (NO_X, CO, PM_{10}, and $PM_{2.5}$) associated with the maximum daily grading activities for the proposed development; and requires use of Tier 3 or Tier 4 construction equipment. However, future project specific construction activities are currently unknown, and therefore, impacts were determined to be potentially significant. Impacts related to localized construction air quality impacts would be significant and unavoidable despite implementation of Mitigation Measure AQ-1.

Greenhouse Gas Emissions

Impact GHG-1, Greenhouse Gas Emissions (Project, Cumulative). As described in Section 5.5, *Greenhouse Gas Emissions*, operation of the Project at buildout and full occupancy would generate 23,660.41 $MTCO_2e$ per year, which equates to a CO_2e per service population of 3.56. This would be substantially less than the emissions generated from buildout of the existing General Plan land uses, but would continue to exceed the threshold of 3.0. Thus, operational impacts would be significant. Even with implementation of Mitigation Measures AQ-1 and AQ-2, emissions would continue to exceed regional thresholds of significance established by the SCAQMD, and impacts would be significant and unavoidable.

Impact GHG-2, Conflict with GHG Reduction Plan (Project, Cumulative). The proposed Project would have the potential to be inconsistent with key project attributes from the 2022 Scoping Plan Appendix D, *Local Actions*, which could combine with potential inconsistencies from other/future projects. Thus, impacts related to conflict with a policy, plan, or regulation adopted for the purpose of reducing GHG emissions would be significant and unavoidable and cumulatively considerable.

Transportation

Impact TR-2, Vehicle Miles Traveled (Project). As detailed in Section 5.10, *Transportation*, all TAZs within the Project Site are either within a TPA or a low-VMT area or would meet Criteria 3 based on local serving uses, except for TAZs 53835402 and 53835101, which include Sites 20, 21, and 23. As such, implementing development pursuant to the proposed Project in all TAZs except Sites 20, 21, and 23 would be less than significant. However, future development projects within Sites 20, 21, and 23 would be required to conduct a project-specific VMT screening analysis to determine whether the development would screen out of a further VMT analysis pursuant to Mitigation Measure T-1. Should the development not screen out of a VMT analysis, the project would be required to conduct a full VMT analysis and implement further VMT-reduction measures as outlined in Mitigation Measure T-1. However, given that future development of Sites 20, 21, and 23 is unknown, the applicability of specific VMT measures and resulting reduction in VMT cannot be determined and no credit is taken for future implementation of VMT reduction measures. As such, the Project would result in a significant and unavoidable project level VMT impact.

6.3 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

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

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft Subsequent EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

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

6.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Four alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a planning and development perspective. These alternatives have been developed based on the criteria identified in Section 6.1, and are described below:

Alternative 1: No Project/No Development Alternative. This alternative consists of the Project not being approved, and the Project site would remain in the conditions that existed at the time the Notice of Preparation was published with no additional development occurring within the Rezone sites (July 1, 2024).

Alternative 2: No Project/Buildout of Existing Land Use Alternative. Under this alternative, buildout of the residential and nonresidential uses would occur as permitted under the existing General Plan land use

designations, and the Project site would not be rezoned to allow for additional residential uses. Buildout of this Alternative would result in up to 2,209,040.26 square feet of non-residential uses and 111 units of residential development.

Alternative 3: Reduced Project Site Alternative. The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the allowed area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located on the Morrey Arroyo Creek (Sites 2, 7, 8, 11,12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24[1]. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

Alternative 4: Reduced Project Development Intensity Alternative. The Reduced Project Development Intensity Alternative would redesignate the Rezone sites to allow for development of future residential and additional square footage of nonresidential development, similar to the proposed Project. However, potential buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. This alternative would still require approval of the GPA, adoption of a zone change, and adoption of an SPA to the EVCSP. Furthermore, under this alternative, only 1,948 dwelling units would be allowed to be constructed and the City would have a 1,315 dwelling-unit deficit in meeting their State mandated RHNA fair share.

6.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft EIR is required to "discuss the existing conditions at the time the Notice of Preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services […] In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the Project site were to be left in its existing conditions for the foreseeable future. Under the existing conditions, Rezone sites are either currently vacant or developed with single-family residences, agricultural uses, and industrial storage facilities. See Section 4.0, *Environmental Setting*, for additional details and figures regarding the existing conditions of the Rezone sites.

6.6.1 Environmental Impacts

Aesthetics

Under this alternative, the Project site would remain in its existing condition, which includes undeveloped, disturbed, and some developed conditions. The visual character and quality of the site would be maintained, and no new structures or landscaping would be introduced. This alternative would not result in a change in

[1] While full buildout of Site 24 under the proposed Public/Institutional Land Use was analyzed for this Draft SEIR, no development is or would be proposed as an implementing project.

the visual height, scale, and mass of development on the sites. This alternative would not create new sources of light and glare. However, landscaping would not be added to the sites and landscaping and screening along the roadways would not be improved. Overall, the No Project/No Development Alternative would result in no impacts to aesthetics, less than the proposed Project.

Agriculture and Forestry

Under this alternative no new development would occur in the Project site, and as such, development would not impact the Farmland onsite. Sites 1, 3, 9, 10, 13, 14, 15, and 15A would continue to be used for agricultural purposes and no rezoning would occur which could put development pressure on surrounding agricultural uses. This Alternative would avoid the significant and unavoidable impact to Farmland from the Project. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Air Quality

Under this alternative no new development would occur in the Project site, and as such, no new stationary or mobile sources of air pollution would be introduced. Since buildout pursuant to the proposed Project would result in an exceedance of 2022 AQMP thresholds, this Alternative's emissions would be greatly reduced with no construction or additional trips introduced to the Project site. In addition, the Alternative would result in no increase in emissions of criteria pollutants or diesel particulate matter (DPM) over existing conditions. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Biological Resources

Under this alternative, periodic disturbances related to discing fallow fields for weed abatement are expected to occur at the Project site, as well as other routine maintenance activities for property upkeep. While periodic disturbances could potentially impact biological resources, no grading would occur and there would be no potential impacts to special status plants, animals, or sensitive vegetation communities in the Project site. As such, existing vegetation communities within the Project site would remain in their existing conditions minus impacts related to periodic disturbances. Although mitigation measures required of the Project would reduce biological resource impacts to less than significant levels, this alternative would generate less impacts to biological resources as compared with the Project and would not require mitigation.

Cultural Resources

Under this alternative, no disturbances would occur to the Rezone sites due to buildout based on the proposed rezoning. No grading for construction would occur and there would be no potential impacts to historical resources or to archaeological resources that may be buried below ground, as the current environment would remain. No historical structures would be removed or altered as well. Although mitigation measures required for the Project would reduce cultural resource impacts to less-than-significant levels, this alternative would avoid impacts to cultural resources associated with the Project and would result in less impacts than the proposed Project.

Energy

No construction activities would occur at the Project site or operation of new structures that would increase consumption of energy sources under this alternative. Existing agricultural, single-family residences, and industrial storage yards within the Rezone sites would continue standard operation. Electricity, gasoline, and diesel fuel usage would all be lower for the existing uses than for the Project. While this Draft Subsequent EIR determined the Project's impacts to energy would be less than significant, energy use associated with this

alternative would be less. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Geology and Soils

No new construction activities, including grading, would occur under this alternative. Thus, there would be no potential for additional workers, buildings, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site. Additionally, as no grading activities would occur under this alternative, potential impacts from erosion, loss of topsoil, or to paleontological resources would not occur. While the Project's impacts would be less than significant with mitigation incorporated, this alternative would result in less impacts and no mitigation measures are required.

Greenhouse Gas Emissions

No new construction activities would occur at the Project site or operation of new structures that would generate GHGs under this alternative. Under this alternative, no additional vehicle trips would be introduced to the Project site, which is the source of most of the greenhouse gas emissions of the proposed Project, as discussed in Section *5.5, Greenhouse Gases*. This alternative would be consistent with all applicable GHG reduction plans and would avoid the Project's significant and unavoidable impact regarding the generation of greenhouse gas emissions. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Hazards and Hazardous Materials

No new construction activities would occur at the Project site or any new residences that result in transport of hazardous materials. There would be no new operation onsite that would generate hazardous materials. The No Project/No Development Alternative would not include major construction activities that would use typical construction-related hazardous materials. Thus, potential impacts related to use, disposal, and transport of hazardous materials would be avoided by this alternative. While the Initial Study, included as Appendix A, determined that the Project's impacts related to hazards and hazardous materials would be less than significant, this alternative would result in less impacts since no grading or construction would occur.

Hydrology and Water Quality

No changes to existing hydrology and drainage conditions would occur under this alternative. There are currently no existing stormwater drainage facilities within the Project site and no stormwater improvements would be constructed. Additionally, under this alternative, the stormwater leaving the Rezone sites would not be treated to minimize waterborne pollutants and would continue to contain sediment and other potential pollutants, as occurs under existing conditions. However, this alternative would generate fewer sources of potential water-borne pollutants due to lack of onsite buildings and number of vehicles onsite. Overall, hydrology and water quality impacts of the No Project/No Build Alternative would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

This alternative would not result in new development, and as such, there would be no potential for land uses to be introduced that would indirectly result in environmental impacts due to a conflict with an existing land use plan. While the current agricultural and residential uses do not align with the Commercial/Industrial designation for sites 1-16A (excluding site 8), the existing uses would continue to be allowed to operate, and no new land uses would be introduced to the site. Under this alternative no General Plan Amendment

would be required. Overall, this alternative would result in no impacts to land use and planning, and therefore, would be less than the Project's impacts.

Noise

Under this alternative, no development would occur onsite, and no new sources of noise would be introduced at the Rezone sites. Since no new development would occur and no traffic trips would be generated, this alternative would not contribute to any increase in existing area-wide traffic noise levels. In addition, this alternative would not result in construction onsite and no construction noise or vibration would occur. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Population and Housing

This alternative would not result in new development, and as such, would not result in induced growth or displacement affecting population and housing. However, this alternative would also not result in the benefit of adding new housing opportunities and the City would not reach their RHNA goals. Therefore, the No Project/Development Alternative's impacts would be neutral compared to the proposed Project.

Public Services

This alternative would not result in new development, and as such, would not result in increased demand for public services such as fire and sheriff services, school services, library services, or health services that require the new construction of public facilities. However, this alternative would also not result in the payment of the City's development impact fees. Therefore, while the Project's impacts would be less than significant through compliance with regulatory programs, this alternative would result in less impacts.

Recreation

This alternative would not result in new development, and as such would not result in any new residences that would potentially impact nearby parks or require the development of additional park resources. However, this alternative would also not result in the payment of the City's development impact fees. Therefore, the No Project/Development Alternative's impacts would be neutral compared to the proposed Project.

Transportation

This alternative would not result in new development, and as such, would not result in any trips, traffic, or Vehicle Miles Traveled (VMT) related to operation of the Project site beyond existing vehicle trips associated with agricultural, residential, and industrial storage operations. This alternative would not impact existing transit service and alternative transportation facilities within the Project site. The proposed Project would result in less-than-significant impacts related to geometric hazards and emergency access; however, the Project would result in significant and unavoidable impacts related to VMT. As the Rezone sites would not be developed and trips would not be generated, the No Project/No Development Alternative would result in no impact on transportation. As such, this alternative would avoid the Project's significant and unavoidable VMT impact. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. No grading would occur and there would be no potential impacts to tribal cultural resources that may be buried below ground. Although the Project would result in less-than-significant impacts on tribal cultural resources with

incorporation of mitigation, this alternative would avoid all potential impacts to tribal cultural resources. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, or telecommunication facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. Selection of this alternative would result in no impact on utilities and service system providers. While the Project would result in less than significant impacts, this alternative would result in less impacts due to no change in demand of these service systems. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

Wildfire

Under this alternative, existing conditions would remain, and no new development would occur. There would be no construction or operation activities that would exacerbate the potential fire risks at the site or obstruct any evacuation routes. The Project site would continue to not be located near Moderate to Very High Fire Hazard Safety Zones. However, with this alternative there would be no additional occupants onsite that would be exposed to any fire hazards. Therefore, the No Project/No Development alternative would result in less impacts than the proposed Project.

6.6.2 Conclusion

Ability to Reduce Impacts

The No Project/No Development Alternative would result in continuation of the existing uses within the Rezone sites, and the potential buildout of additional residential units based on the proposed rezoning would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5.0 of this Draft Subsequent EIR, which include measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, and VMT. This alternative would result in lessened impacts to all 20 of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3).

However, the environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands. Further, the alternative would not meet the required additional residential units, which are legally required under the City's Housing Element pursuant to State housing regulations.

Ability to Achieve Project Objectives

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

6.7 ALTERNATIVE 2: NO PROJECT/BUILDOUT OF EXISTING LAND USE ALTERNATIVE

Under this alternative, buildout of residential and nonresidential uses would occur as permitted under the existing General Plan land use designations, and the Project site would not be rezoned to allow for additional residential uses. All 24 sites would be built according to their existing General Plan land use designation. Existing General Plan land use designations within the site include Commercial/Industrial uses, Commercial/Administrative Professional, Medium Density Residential, and High Density Residential. Buildout would result in up to 2,209,040.26 square feet of non-residential uses and 111 units of residential development.

6.7.1 Environmental Impacts

Aesthetics

Under this alternative, the Project site would be developed according to the existing General Plan land use designation for each parcel. Development under the No Project/Build out of Existing Land Use Alternative would result in more industrial density throughout the Rezone sites as opposed to residential development This alternative would introduce new buildings and landscaping into the Rezone sites. The alternative would result in increased parking areas and setbacks and a smaller percentage of landscaped areas than what would be developed under implementing developments under the RHNA Rezone Project. This alternative would introduce new sources of light and glare as increased industrial and commercial development would occur but would be similarly subject to the Redlands Municipal Code. Overall, this alternative would result in similar less than significant impacts related to aesthetics.

Agriculture and Forestry

Under this alternative, the Rezone sites would be developed according to the existing General Plan land use designation for each parcel. Development under the No Project/Buildout of Existing General Plan Land Use Alternative would result in the same loss of Prime Farmland as would occur under the proposed Project and would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in the same significant and unavoidable impacts related to agriculture resources as the proposed Project.

Air Quality

Under this alternative, the Project site would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Since the buildout pursuant to the proposed Project would result in an exceedance of 2022 AQMP thresholds, this alternative's emissions would result in similar impacts related to construction emissions. As discussed in the VMT Screening Analysis included as Appendix F, buildout pursuant to the existing General Plan would result in 45,792 trips compared to the proposed Project which would result in 18,252 trips. Due to the increase in trips generated by the existing General Plan Buildout, impacts would remain significant and unavoidable and would be increased compared to the proposed Project. In addition, the alternative would result in an increase in emissions of criteria pollutants or diesel particulate matter (DPM) as it would result in significantly more truck trips. As shown below on Table 6-1, operation of this alternative would result in the exceedance of five different criteria pollutants. Therefore, the No Project/No Development Alternative would result in more severe impacts than the proposed Project, and would remain significant and unavoidable.

Table 6-1: Existing General Plan Buildout Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	221.10	201.66	1,439.33	3.32	258.06	67.62
Area Source	72.21	2.71	103.10	0.02	0.32	0.28
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	**293.77**	**212.70**	**1,549.29**	**3.38**	**259.01**	**68.54**
SCAQMD Regional Threshold	*55*	*55*	*550*	150	150	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Winter						
Mobile Source	203.24	215.05	1,255.01	3.13	258.06	67.63
Area Source	55.88	1.84	0.78	0.01	0.15	0.15
Energy Source	0.46	8.32	6.86	0.05	0.63	0.63
Total Maximum Daily Emissions	**259.58**	**225.21**	**1,262.66**	**3.19**	**258.84**	**68.41**
SCAQMD Regional Threshold	*55*	*55*	*550*	150	150	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: Appendix C

Biological Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project and require the same mitigation measures. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less than significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. As such, the No Project/Buildout of Existing Land Use Alternative would result in the same potential to adversely affect any historic or undiscovered archeological resources as the proposed Project as this alternative would redevelop the same area as the proposed Project and would require the implementation of Mitigation Measures CUL-3 and CUL-4. This alternative would have a similar impact on historic structures within the Project site. Similar to the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less than significant level. Therefore, impacts to cultural resources from the No Project/Buildout of Existing Land Use Alternative would be the same as those associated with the proposed Project.

Energy

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, a similar volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing

projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the No Project/Buildout of Existing Land Use Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Potential impacts related to the potential for additional workers, buildings, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project; however, fewer residents would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative as the same area would be redeveloped. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, a similar volume of construction activities and the related greenhouse gas production would occur. As stated above, buildout of this alternative would result in an increase in 27,540 trips compared to the proposed Project. Further, given that this alternative would include industrial development, a larger percentage of the trips occurring would include truck trips. As shown below on Table 6-2, total CO_2 emissions per service population (CO_2e/SP) from this alternative would be 18.16, while the proposed Project would result in 3.56 CO_2e/SP. Thus, operational greenhouse gas emissions are expected to increase and would remain significant and unavoidable with implementation of the proposed mitigation measures.

Table 6-2: Existing General Plan Buildout Operational GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Mobile Source	39,117.93	2.76	2.67	67.32	40,049.49
Area Source	73.21	0.00	0.00	0.00	73.41
Energy Source	4,790.37	0.44	0.04	0.00	4,813.13
Water Usage	455.87	10.67	0.26	0.00	799.25
Waste	203.19	20.31	0.00	0.00	710.90
Refrigerants	0.00	0.00	0.00	0.59	0.59
Total CO_2e (All Sources)	**46,446.76**				
Service Population (SP)	**2,557.00**				
Total CO_2e/SP	**18.16**				

Source: Appendix E

Hazards and Hazardous Materials

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous

materials. While the operation of this alternative would require a higher volume of hazardous materials, use of such materials would similarly be required to adhere to state and local guidelines regarding the handling of hazardous materials. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in residents onsite, the alternative would not pose a safety hazard to the people residing in the area. This alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Due to the likely increase in parking surfaces required for this alternative, it is anticipated that development of this alternative would result in an increase in impermeable surfaces compared to those required for development pursuant to the Project. Construction of the alternative would still be required to implement drainage infrastructure improvements. In addition, preparation of a SWPPP and WQMP would be required for future development under this alternative. Therefore, this alternative would result in similar less than significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Under this alternative, no General Plan Amendment would be required. The No Project/Build out of Existing Land Use Alternative would be consistent with goals and policies of the Redlands General Plan and the SCAG 2020-2045 RTP/SCS. With implementation of measures to address other environmental issues (e.g., biological resources, cultural resources, etc.), potential impacts due to land use compatibility under both the Project and this alternative would remain less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the No Project/Buildout of Existing Land Use Alternative would be less than significant, and therefore, would be consistent with the Project's impacts.

Noise

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at similar intensity. Construction noise impacts would remain less than significant, similar to the proposed Project and would also be required to implement the same mitigation measures due to the proximity to nearby sensitive receptors. Operational impacts would result in an increase in trips as well as an increase in heavy trucks trips which would result in higher roadway volumes. Buildout of this alternative would result in industrial uses, which would result in a greater increase in onsite operational noise levels in proximity to sensitive receptors compared to the proposed Project. Due to the increase in vehicle trips going to and from the site under this alternative, and the buildout of industrial uses near sensitive receptors, impacts would be greater under the No Project/Buildout of Existing Land Use Alternative as compared to the Project and would require implementation of the same mitigation measures and General Plan policies in order to reduce impacts to a less than significant level.

Population and Housing

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. This would reduce the number of residents at buildout from 6,456 to 294 and would increase the number of employees from 550 to 2,263. The decrease in population that

would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The No Project/Buildout of Existing Land Use Alternative and the proposed Project would result in similar less than significant impacts related to population and housing.

Public Services

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. The No Project/Buildout of Existing Land Use Alternative would result in fewer residents at full buildout of the alterative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services, would be slightly reduced compared to the proposed Project. Like the proposed Project, the No Project/Buildout of Existing Land Use Alternative would contribute development impact fees to the City which would result in a less than significant impact and would be similar to those associated with the proposed Project.

Recreation

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Construction of this alternative would result in generally similar impacts, if not a slightly decreased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. As discussed in the VMT Screening Analysis, included as Appendix F, buildout pursuant to the existing General Plan would result in 45,792 trips compared to the proposed Project which would result in 18,252 trips. As discussed in Section 5.10, *Transportation,* all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the No Project/Buildout of Existing Land Use Alternative, the same sites would not screen out from further VMT analysis. Because this alternative would result in an overall increase in trips, impacts would remain significant and unavoidable. Thus, the alternative would be required to include the same mitigation included for the proposed Project. As such, impacts would increase in comparison to the proposed Project under the No Project/Buildout of Existing Land Use Alternative, and impacts would remain significant and unavoidable.

Tribal Cultural Resources

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. A similar amount of ground disturbance is proposed under this alternative compared to the proposed Project. Thus, the No Project/Buildout of Existing Land Use Alternative would result in a similar potential to adversely affect any historic or undiscovered archeological resources as the proposed Project. Similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the No Project/Buildout of Existing Land Use Alternative would be consistent with those associated with the proposed Project.

Utilities and Service Systems

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Similar to the proposed Project, under this alternative, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future development. As discussed in Section 5.12, *Utilities and Service Systems*, buildout of the existing General Plan land uses would result in a slight decrease in water use and wastewater generation compared to the proposed Project. Therefore, the No Project/Buildout of Existing Land Use Alternative would result in similar impacts as the proposed Project.

Wildfire

Under this alternative, the Rezone sites would be developed with 2,209,040.26 square feet on non-residential uses and 111 residential units. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the No Project/Build out of Existing Land Use Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Overall, this alternative would also result in less than significant impacts related to wildfires, similar to the proposed Project.

6.7.2 Conclusion

Ability to Reduce Impacts

The No Project/Buildout of Existing Land Use Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. This alternative would not result in lessened impacts to any of the 20 environmental topics analyzed in this Draft Subsequent EIR and Initial Study (see Table 6-3).

The environmental benefits of the proposed Project would also not be realized, including providing housing onsite that would result in a better jobs-housing balance in Redlands. Further, the alternative would not meet the required additional residential units, which are legally required under the City's Housing Element pursuant to State housing regulations.

Ability to Achieve Project Objectives

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

6.8 ALTERNATIVE 3: REDUCED PROJECT SITE ALTERNATIVE

The Reduced Project Site Alternative would allow for a similar future development to occur as proposed by the Project, but the area where the future rezone and potential development would be allowed to occur would be limited to only a portion of the existing Project site. Under this alternative, the parcels which are located adjacent to the Morrey Arroyo Creek (Sites 2, 7, 8, 11,12, 16, 16A, and 24) would not be rezoned. All parcels under this alternative (1, 3, 4, 5, 6, 9, 10, 10A, 13, 14, 15, 15A, and 17-23) would be rezoned the R-3 zoning designation, with a maximum density of 30 dwelling units/acre. The Reduced Project Site

Alternative would allow for the potential future development of 2,439 residential units but would limit the potential future development to just 81.32 acres and would no longer propose any Public/Institutional land uses on Site 24. This alternative would still require an SPA to the EVCSP, a GPA, and zone change.

Alternative 3 Area



RHNA Rezone Project
City of Redlands

Figure 6-1a

Redlands Regular Meeting of 06-03-25

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906 of 1245

Alternative 3 Area



RHNA Rezone Project
City of Redlands

Figure 6-1b

Redlands Regular Meeting of 06-03-25

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908 of 1245

6.8.1 Environmental Impacts

Aesthetics

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. This alternative would lead to increased density within the proposed sites which would result in a decrease in landscaping and decreased setbacks. However, the visual character and quality of sites located along the Morey Arroyo would be maintained, and no new structures or landscaping would be introduced. This alternative would introduce new sources of light and glare but would be similarly subject to the Redlands Municipal Code. Therefore, aesthetic impacts would be neutral compared to the proposed Project.

Agriculture and Forestry

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Development under the Reduced Project Site Alternative would result in the loss of 40.6 acres of Prime Farmland. While this alternative would avoid impacting the 4.07-acres of Prime Farmland located on Site 8, it would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in the same significant and unavoidable impacts related to agriculture and forest resources.

Air Quality

The Reduced Project Site Alternative would result in a potential future buildout of three additional dwelling units, and none of the 151,048.46 square feet of Public/Institutional land compared to the Project. Therefore, a slightly reduced overall volume of construction activities and the related emissions would occur. Under the Reduced Project Site Alternative, it is possible that a combination of developments could occur, such that daily construction emissions would still exceed this threshold. Thus, construction air quality impacts would remain significant and unavoidable.

In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment and less traffic associated air emissions than the proposed Project. Therefore, overall air quality impacts would be reduced in comparison to the proposed Project. However, the volume of VOC, NOx, and CO emissions from operational vehicular emissions generated by the Reduced Project Site Alternative would remain significant and unavoidable due to the volume of vehicular trips that would occur from operation of the alternative. As described in Section 5.2, *Air Quality*, operations from implementing projects under the proposed Project would generate up to 121.01 lbs/day of VOC emissions, which is substantially above the threshold of 55 lbs/day; 89.74 lbs/day of NOx, which is above the threshold of 55 lbs/day; and 608.04 lbs/day of CO, which is above the threshold of 550 lbs/day during peak summer operations. Under the Reduced Project Site Alternative, the daily VOC, NOx, and CO emissions related to residential operations would be similar to the proposed Project, but overall emissions would be slightly reduced as it would not include the additional emissions from the proposed Public/Institutional land use on Site 24. Therefore, although less emissions would occur, significant and unavoidable impacts would still occur from the Reduced Project Site Alternative.

Biological Resources

Under this alternative, a 81.32-acre portion of the Project site would be developed with residential units and off-site improvements. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project

and require the same mitigation measures, however a smaller area would be impacted. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less-than-significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under the Reduced Project Site Alternative, a slightly increased density of development would occur within a reduced Project site. As such, the Reduced Project Site Alternative would result in a decreased potential to adversely affect any historic or undiscovered archeological resources as the proposed Project, as this alterative would avoid development near the Morey Arroyo, which has a greater potential to contain buried archeological resources. However, mitigation measures CUL-3 and CUL-4 would still be applicable to any ground disturbing activities related to this alternative. This alternative would have a similar impact on historic structures within the Project site. However, like the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less than significant level. Therefore, impacts to cultural resources from the Reduced Project Site Alternative would be less than those associated with the proposed Project.

Energy

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Under this alternative, a slightly reduced overall volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the Reduced Project Site Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under the Reduced Project Site Alternative, buildout of Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would result in a potential future buildout of three additional dwelling units, and none of the 151,048.46 square feet of Public/Institutional land compared to the Project. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project, however fewer people would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Therefore, a slightly reduced volume of construction activities and related production of GHG emissions would occur. In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment onsite, and less traffic-associated GHG emissions than the proposed Project with the exclusion of the Public/Institutional uses on Site 24. However, development and operation of 2,439 multifamily dwelling units would result in significant GHG emissions and would require the implementation of the same mitigation measures that are

required for the proposed Project. Therefore, although the Reduced Project Site Alternative would result in a slight decrease in GHG emissions, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this alternative would likely require the same utilization of hazardous materials during operation as the proposed Project. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in building square footage and employees and students onsite, the alternative would not pose a safety hazard to the people working in the area. This alternative would result in less-than-significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units which would result in three additional dwelling units but would not include the development of Site 24. Due to the increased density of development on a smaller site, it is likely that development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would still construct the identified stormwater drainage system as the Project but would likely require a smaller sized basin. In addition, preparation of a Stormwater Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) would be required for development of this alternative. Therefore, this alternative would result in similar less-than-significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under the Reduced Project Site Alternative, a GPA, SPA and Zone Change would still be required to accommodate residential uses within the Alternative site and increase allowed density within the General Plan. This alternative would be similar in that it would be consistent with all applicable plans and policies and would result in similar development as the Project and meet all applicable Project initiatives. The Reduced Project Site Alternative would be subject to the same goals, policies, programs, and regulations as the Project. Therefore, the Reduced Project Site Alternative would result in similar less than significant impacts as the proposed Project.

Noise

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. However, this alternative would not include development of Site 24. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at a greater density. Construction activities under this alternative would be required to implement the same mitigation measures as the proposed Project and construction noise impacts would remain less than significant.

Operational noise would be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the removal of public/institutional uses on Site 24. Additionally, the Reduced Project Site Alternative would result in slightly fewer surrounding residents that could be exposed to noise

from surrounding development and roadways. Overall, operational noise impacts from the Reduced Project Site Alternative would be similar to the impacts associated with the proposed Project and would likely require the same mitigation.

Population and Housing

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. This would increase the number of residents at buildout from 6,456 to 6,464 and would no longer provide 550 employment opportunities within the public/institutional designation. The increase in population that would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The Reduced Project Site Alternative and the proposed Project would result in similar less-than-significant impacts related to population and housing.

Public Services

The Reduced Project Site Alternative would result in a slight increase of development within the Project site over a slightly reduced area. As such, the Reduced Project Site Alternative would result in eight additional residents and 550 fewer employees at full buildout of the Alterative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services would be slightly reduced compared to the proposed Project. However, like the proposed Project, the Reduced Project Site Alternative would contribute development impact fees to the City which would result in a less than significant impact and would be similar to those associated with the proposed Project.

Recreation

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Construction of this alternative would result in generally similar impacts, if not a slightly increased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. As discussed in Section 5.10, *Transportation,* all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the Reduced Project Site Alternative, the same sites would not screen out from further VMT analysis as they would be developed with increased intensity. Because Sites 20 and 21 are more than 80 percent over the threshold for the proposed Project, it is expected that the Reduced Site Alternative would also result in significant and unavoidable impacts at those sites. Thus, the alternative would be required to include the mitigation included for the proposed Project. As such, impacts would be similar in comparison to the proposed project under the Reduced Project Site Alternative, and impacts would be significant and unavoidable.

Tribal Cultural Resources

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. As such, the Reduced Project Site Alternative would result in a decreased potential to adversely affect any historic or undiscovered archeological resources as the

proposed Project, as this alterative would avoid development near the Morey Arroyo, which has a greater potential to contain buried tribal cultural resources. However, like the proposed Project, similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the Reduced Project Site Alternative would consistent with those associated with the proposed Project.

Utilities and Service Systems

Under the Reduced Project Site Alternative, Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 would be developed with 2,439 multifamily residential units. Similar to the proposed Project, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future residential development under this alternative. Additionally, this alternative would result in increased demand for solid waste collection and disposal and electricity, natural gas and telecommunication services. Therefore, the Reduced Project Site Alternative would result in similar impacts as the proposed Project.

Wildfire

The level of development onsite would be decreased under this alternative as compared to the proposed Project as buildout of Site 24 would not occur. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the Reduced Project Site Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Sites 2, 7, 8 11, 12, and 16 would remain undeveloped and would not expose any additional occupants to fire hazards. Overall, this alternative would also result in less-than-significant impacts related to wildfires and would result in similar impacts in comparison to the proposed Project.

6.8.2 Conclusion

Ability to Reduce Impacts

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

Overall, although the volume of impacts would be less under the Reduced Project Site Alternative, the Reduced Project Site Alternative would not eliminate any of the significant and unavoidable impacts that would result from buildout of the proposed Project.

Ability to Achieve Project Objectives

Implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4 as it would introduce additional residential units in the City to help reach the City's RHNA goals. The Reduced Project Site Alternative would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses to allow for less intense development more similar to its surrounding proposed residential uses.

6.9 ALTERNATIVE 4: REDUCED PROJECT DEVELOPMENT ALTERNATIVE

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

6.9.1 Environmental Impacts

Aesthetics

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF of nonresidential uses. This alternative would lead to decreased density within the proposed Rezone sites which would result in an increase in landscaping and setbacks. This alternative would introduce new sources of light and glare but would be similarly subject to the requirements of the Redlands Municipal Code. Therefore, aesthetic impacts would be neutral compared to the proposed Project.

Agriculture and Forestry

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Development under the Reduced Project Site Alternative would result in the same loss of Prime Farmland as with the proposed Project and would not avoid the significant and unavoidable impact of converting Farmland to non-agricultural uses. Overall, this alternative would result in significant and unavoidable impacts related to agriculture resources similar to the proposed Project.

Air Quality

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Therefore, a reduced overall volume of construction activities and the related emissions would occur. Under the Reduced Project Development Alternative, it is possible that a combination of developments could occur, such that daily construction emissions would still exceed this threshold. Thus, construction air quality impacts would remain significant and unavoidable.

In addition, the reduced amount of development by this alternative would result in less stationary source emissions from equipment and less traffic associated air emissions than the proposed Project. Therefore, overall air quality impacts would be reduced in comparison to the proposed Project. The volume of VOC, NOx, and CO emissions from operational vehicular emissions generated by the Reduced Project Development Alternative would be reduced to a less-than-significant level due to the 55 percent decrease in volume of vehicular trips that would occur from operation of the alternative. As described in Section 5.2, *Air Quality*, operations from implementing projects under the proposed Project would generate up to 121.01 lbs/day of VOC emissions, which is substantially above the threshold of 55 lbs/day; 89.74 lbs/day of NOx, which is above the threshold of 55 lbs/day; and 608.04 lbs/day of CO, which is above the threshold of 550 lbs/day during peak summer operations. Under the Reduced Project Development Alternative, the maximum daily VOC, NOx, and CO emissions related to residential operations would similarly be reduced

by 55 percent, resulting in 54 lbs/day of VOC emissions, 41 lbs/day of NOx emissions, and 274 lbs/day of CO emissions. Therefore, although significant and unavoidable construction impacts may still occur with this Alternative, impacts related to operational emissions would be reduced to a less-than-significant level.

Biological Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Development of this alternative would require removal of existing vegetation in open areas and vacant lots and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, the impacts to biological resources on the Project site would be similar to the Project and require the same mitigation measures. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. This alternative would result in less-than-significant impacts to biological resources, and therefore, would be consistent with the Project's impact.

Cultural Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses As such, the Reduced Project Development Alternative would result in the same potential to adversely affect any historic or undiscovered archeological resources as the proposed Project as this alternative would redevelop the same area as the proposed Project, just with less density and would require the implementation of Mitigation Measures CUL-3 and CUL-4. This alternative would have a similar impact on historic structures within the Project site. Similar to the proposed Project, Mitigation Measures CUL-1 and CUL-2 would be implemented and compliance with applicable City of Redlands Municipal Code provisions, including Redlands Historic Architectural Design Guidelines, would be required to reduce potential impacts to a less-than-significant level. Therefore, impacts to cultural resources from the Reduced Project Development Alternative would be the same as those associated with the proposed Project.

Energy

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Under this alternative, a slightly reduced overall volume of construction activities and the related energy demand would occur, which was determined to be less than significant. Implementing projects under this alternative would be compliant with Title 24 requirements. Therefore, impacts to energy from the Reduced Project Site Alternative would be slightly less than those associated with the proposed Project, but still less than significant.

Geology and Soils

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project, however fewer people would be exposed. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Therefore, a slightly reduced volume of construction activities and related production of GHG emissions would occur. In addition, the slightly reduced amount of development by this alternative would result in less stationary source emissions from equipment onsite, and less traffic-associated GHG emissions than the proposed Project with the exclusion of the Public/Institutional uses on Site 24. However, because the Draft EIR utilizes a total CO_2 per service population threshold, the reduction in development would equal the reduction in population resulting from the alternative and result in similar emissions per service population as the proposed Project. Thus, the Reduced Project Development Alternative would require the implementation of the same mitigation measures that are required for the proposed Project and impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this alternative would likely require the same utilization of hazardous materials during operation as the proposed Project. Like the proposed Project, this alternative would not require mitigation. In addition, as this alternative would result in a decrease in building square footage and residents onsite, the alternative would not pose a safety hazard to the people working in the area. This alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Due to the decrease in units and parking spaces needed, it is likely that development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would still be required to implement drainage infrastructure improvements. In addition, preparation of a SWPPP and WQMP would be required for future development under this alternative. Therefore, this alternative would result in similar less-than-significant impacts as the Project, and therefore, would be consistent with the Project's impact.

Land Use and Planning

Under the Reduced Project Development Alternative, a GPA, SPA and Zone Change would still be required to accommodate residential uses within the Alternative site. This alternative would be similar in that it would be consistent with all applicable plans and policies and would result in similar development as the Project and meet all applicable Project initiatives. The Reduced Project Development Alternative would be subject to the same goals, policies, programs, and regulations as the Project. Therefore, the Reduced Project Development Alternative would result in similar less-than-significant impacts as the proposed Project.

Noise

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of

67,971.81 SF nonresidential uses. The construction of this alternative would require site clearing, grading, and construction activities similar to the proposed Project at similar intensity. Construction noise impacts would remain less than significant, similar to the proposed Project and would also be required to implement the same mitigation measures due to the proximity to nearby sensitive receptors.

Operational noise would be slightly reduced under this alternative due to the decrease in residents and associated traffic. Similar to the proposed Project, impacts would be reduced to a less-than-significant impact with the implementation of mitigation measures.

Population and Housing

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. This would reduce the number of residents at buildout from 6,456 to 2,905. The decrease in population that would be generated by this alternative would be consistent with SCAG forecasts and would not induce substantial population growth in the Project area. The Reduced Project Development Alternative and the proposed Project would result in similar less-than-significant impacts related to population and housing.

Public Services

The Reduced Project Development Alternative would result in a 55 percent decrease of development over the same area as the Project. As such, the Reduced Project Development Alternative would result in fewer residents at full buildout of the Alterative compared to the proposed Project. Thus, demand for public services, including fire protection, police protection, school services, and library services would be slightly reduced compared to the proposed Project. The Reduced Project Development Alternative would result in a less-than-significant impact and would be similar to those associated with the proposed Project.

Recreation

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Construction of this alternative would result in generally similar impacts, if not a slightly decreased demand for park and recreation facilities. In addition, this alternative would also require the payment of development impact fees imposed by the City of Redlands. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the Project.

Transportation

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. As discussed in Section 5.10, *Transportation,* all TAZs within the Project site satisfy the City's screening criteria, except for TAZ 53835402 and TAZ 53835101 which include sites 20, 21, and 23. As such, under the Reduced Project Development Alternative, the same sites would not screen out from further VMT analysis. Because Sites 20 and 21 are more than 80 percent over the threshold for the proposed Project, it is expected that even with the Reduced Development Alternative, impacts would remain significant and unavoidable. Thus, the alternative would be required to include the mitigation included for the proposed Project. As such, impacts would be similar in comparison to the proposed Project under the Reduced Project Development Alternative, and impacts would be significant and unavoidable.

Tribal Cultural Resources

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. As such, the Reduced Project Development Alternative would result in a similar potential to adversely affect any historic or undiscovered archeological resources as the proposed Project. However, like the proposed Project, similar mitigation to the Project's mitigation measures would be required to reduce potential impacts to a less than significant level. Therefore, impacts to tribal cultural resources from the Reduced Project Site Alternative would be consistent with those associated with the proposed Project.

Utilities and Service Systems

Under the Reduced Project Development Alternative, Project buildout would be reduced by 55 percent, thereby limiting the overall future buildout to a maximum of 1,096 residential units and a buildout of 67,971.81 SF nonresidential uses. Similar to the proposed Project, under this alternative, additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities could be needed with future residential development. Additionally, this alternative would result in increased demand for solid waste collection and disposal and electricity, natural gas and telecommunication services. Therefore, the Reduced Project Development Alternative would result in similar impacts as the proposed Project.

Wildfire

The level of development onsite would be decreased under this alternative as compared to the proposed Project. Both the Project and this alternative would be required to comply with the California Building Code and California Fire Code requirements. Development under the Reduced Project Development Alternative would reduce the number of units developed and would also reduce the number of occupants onsite. Overall, this alternative would also result in less-than-significant impacts related to wildfires and would result in similar impacts in comparison to the proposed Project.

6.9.2 Conclusion

Ability to Reduce Impacts

The Reduced Project Development Alternative would not eliminate the significant and unavoidable impacts related to agricultural resources, construction air quality emissions, GHG emissions, and VMT that would occur from implementation of the proposed Project. In addition, this alternative would require most of the same mitigation to ensure less than significant impacts related to historical resources, biological resources, cultural resources, paleontological resources, and noise. However, this alternative would avoid the significant and unavoidable impact related to operation air quality emissions.

Overall, although the volume of impacts would be less under the Reduced Project Development Alternative, the Reduced Project Development Alternative would not eliminate most of the significant and unavoidable impacts that would result from buildout of the proposed Project.

Ability to Achieve Project Objectives

The Reduced Project Development Alternative would meet Objective 4, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would be rezoned to Public/Institutional uses to allow for less intense development more similar to

its surrounding proposed residential uses. The Alternative would not meet Objectives 1, 2, or 3 as the amount of housing proposed by this Alternative would not be enough for the City to meet their RHNA goals as discussed in the certified Housing Element for the 2021-2029 housing cycle and would not provide enough housing to accommodate all income groups as allocated by RHNA.

6.10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for this Project would be Alternative 1, No Project/No Development. The No Project/No Development Alternative would avoid the implementation of the mitigation measures that are identified in Section 5.0 of this Draft Subsequent EIR that are related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, transportation, and tribal cultural resources.

Additionally, State CEQA Guidelines Section 15126.6(3)(1) states:

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Emphasis added.)*

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be Alternative 3, Reduced Project Site Alternative, which would involve rezoning Sites 1, 3, 4, 5, 6, 9, 10, 13, 14, 15, 15A, and 17-23 to be developed with 2,439 multifamily residential units. This alternative would result in lessened impacts on five of the environmental topics. However, this alternative would be required to implement applicable mitigation measures regarding air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, noise, transportation, and tribal cultural resources, similar to the Project. Moreover, implementation of the Reduced Project Site Alternative would achieve Objectives 1, 2, and 4, but would not meet Objective 3, to minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning as Site 24 would not be rezoned to Public/Institutional uses from Commercial/Industrial to allow for less intense development more similar to its surrounding proposed residential uses.

Table 6-3: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
Aesthetics	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Agricultural Resources	Significant and Unavoidable	Less than proposed Project, no impact	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable
Air Quality	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Less than proposed Project, significant and unavoidable	Less than proposed Project, significant and unavoidable
Biological Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Cultural Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Less than proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Energy	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Less than proposed Project, less than significant	Less than proposed Project, less than significant
Geology and Soils	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Greenhouse Gas Emissions	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Less than proposed Project, significant and unavoidable	Less than Project, significant and unavoidable
Hazards and Hazardous Materials	Less than significant	Less than proposed Project, no impact	Same as proposed Project;	Same as proposed Project; less than significant	Same as proposed Project;

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
			less than significant		less than significant
Hydrology and Water Quality	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Land Use and Planning	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Noise	Less than significant with mitigation	Less than proposed Project, no impact	More than proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Population and Housing	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Public Services	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Recreation	Less than significant	Less than proposed Project, no impact	Same as proposed Project, less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Transportation	Significant and Unavoidable	Less than proposed Project, no impact	More than proposed Project, Significant and Unavoidable	Same as proposed Project, significant and unavoidable	Same as proposed Project, significant and unavoidable
Tribal Cultural Resources	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project, less than significant with mitigation	Less than proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Utilities and Service Systems	Less than significant with mitigation	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant

	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
Wildfire	Less than significant	Less than proposed Project, no impact	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Reduce Impacts of the Project?		Yes	No	Yes	Yes
Areas of Reduced Impacts Compared to the Project		19	0	5	3

Table 6-4: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives

	Proposed Project	Alternative 1: No Project/ No Development	Alternative 2: No Project/Building out of General Plan Land Use	Alternative 3: Reduced Project Site	Alternative 4: Reduced Project Development
1. Implement Program 1.1-1 of the 6th Cycle 2021-2029 Housing Element to provide adequate capacity for at least 4,219 units on suitable sites.	Yes	No	No	Yes	No
2. Maintain adequate housing sites for all income groups throughout the eight-year planning period.	Yes	No	No	Yes	No
3. Minimize potential land use compatibility conflicts associated with the proposed change to existing land use designations and zoning.	Yes	No	No	No	Yes
4. Increase the City's overall housing capacity and capability to accommodate housing as required per the certified Housing Element for the 2021-2029 housing cycle.	Yes	No	No	Yes	No

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7. EIR Preparers and Persons Contacted

7.1 EIR PREPARERS

City of Redlands

Kevin Beery, Senior Planner
Brian Foote, AICP, Planning Manager
Brian Desatnik, Development Services Department Director

EPD Solutions, Inc.

Jeremy Krout, AICP
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Meghan Macias, TE
Alex Garber
Renee Escario
Meaghan Truman
Brady Connolly
Lauren Battle

Fuscoe Engineering, Water Supply Assessment and Water & Sewer Demand Study

Ian Adam, QSD/QSP
Danielle Adili

Urban Crossroads, Air Quality, Energy, and Greenhouse Gas Analyses

Haseeb Qureshi
Alyssa Barnett
Ali Dadabhoy

7.2 ORGANIZATIONS AND PERSONS CONTACTED

City of Redlands Fire Department
City of Redlands Police Department

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RESOLUTION NO. 8687

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS ADOPTING FINDINGS OF FACT, A STATEMENT OF OVERRIDING CONSIDERATIONS, A MITIGATION MONITORING & REPORTING PROGRAM, AND CERTIFYING THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE 2021–2029 HOUSING ELEMENT REZONING PROJECT.

WHEREAS, the City of Redlands ("City") has initiated General Plan Amendment No. 149, Amendment No. 1 to Concept Plan No. 4, Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan), and Zone Change No. 479, to amend the General Plan and Specific Plan land use maps as well as the City Zoning Map to rezone 27 parcels for the regional housing needs allocation ("RHNA") rezoning project (collectively herein referred to as "Project") as required by the City's certified 2021–2029 Housing Element; and

WHEREAS, on June 27, 2024, the City, acting as the Lead Agency under the California Environmental Quality Act ("CEQA"), published a notice of preparation and initiated work on a Draft Subsequent Environmental Impact Report ("Draft SEIR") for the Project; and

WHEREAS, on July 18, 2024, a public scoping meeting was conducted to receive input on the preparation of the Draft SEIR; and

WHEREAS, on January 21, 2025, the Draft SEIR was circulated for public review with a 45-day public review and comment period beginning on January 22, 2025, and ending on March 7, 2025; and

WHEREAS, on April 9, 2025, the City prepared the Final Subsequent Environmental Impact Report ("Final SEIR") for the Project by incorporating therein the Draft SEIR; comments received about the Draft SEIR and responses to those comments; and changes, clarifications, and corrections to the Draft SEIR; and

WHEREAS, on April 9, 2025, the Final SEIR was made available to those public agencies that commented on the Draft SEIR as well as all other commenters; and

WHEREAS, the Environmental Impact Report, comprising the Draft SEIR and the Final SEIR, is a program EIR that examines the potential effects resulting from implementing the Project; and

WHEREAS, on April 22, 2025, the Planning Commission reviewed the Final SEIR comprising the Draft SEIR dated January 2025, comments received on the Draft SEIR, and the Response to Comments Document dated April 2025 (collectively, the "CEQA Documentation"); and reviewed the Findings of Fact and Statement of Overriding Considerations; and

WHEREAS, April 22, 2025, the Planning Commission held a public hearing and considered the City staff's verbal and written reports, and the written and verbal testimony submitted by members of the general public; and

WHEREAS, on April 22, 2025, the Planning Commission recommended that the City Council adopts the Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program, and certifies the Final SEIR prepared for the Project; and

WHEREAS, on June 3, 2025, the City Council reviewed the CEQA Documentation for the Project; and

WHEREAS, on June 3, 2025, the City Council considered the recommendation of the Planning Commission, City staff's verbal and written reports, and the written and verbal testimony submitted by members of the general public.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. California Environmental Quality Act. The City Council has received, reviewed and considered the CEQA Documentation and other substantive and procedural components of CEQA compliance for the Project. The CEQA Documentation prepared for the Project has been completed, and review procedures as required by CEQA for a Lead Agency have been completed in conformance with CEQA as set forth in the recitals to this resolution.

Pursuant to CEQA, including without limitation, CEQA Guidelines section 15090, the City Council further finds and determines that: the City has complied with its duties as Lead Agency for the Project, the CEQA Documentation was presented to the City Council, and the City Council has reviewed and considered the information contained therein. Further, the City Council finds that the CEQA Documentation was prepared in compliance with CEQA, specifically:

1. That a Notice of Preparation was published on June 27, 2024, giving public agencies and members of the public until thirty (30) days after their receipt of the Notice of Preparation to review and respond to the proposed scope of the Project; a copy of such notice was mailed to interested parties, all affected property owners of record for the 27 subject parcels, all property owners within a 300-foot radius of the 27 subject parcels, surrounding cities and other public agencies; and a duly noticed public scoping meeting was held on July 18, 2024.

2. That the Draft SEIR was prepared in compliance with CEQA Guidelines sections 15120 through 15132.

3. That the Draft SEIR was published on January 21, 2025, and circulated for public review and comment from January 22, 2025, through March 7, 2025, thus complying with the 45-day review period; and as part of this review period, a Notice of Availability was posted and mailed to interested parties, all affected property owners of record for the 27 subject

parcels, all property owners within a 300-foot radius of the 27 subject parcels, surrounding cities and other public agencies.

4. That the Final SEIR has been prepared consisting of: the Draft SEIR, the comments and recommendations received on the Draft SEIR, and the response of the City to the written comments received.

5. That the CEQA Documentation (incorporated herein by reference) was prepared in accordance with the applicable provisions of the CEQA Guidelines.

Section 2. Certification of Subsequent Environmental Impact Report. The City Council finds that the Final SEIR reflects the independent judgment and analysis of the City. The City Council specifically finds that the Final SEIR for the Project accurately and completely presents adequate information upon about the broad effects of implementing the Project. The City Council finds that the proposed Project may result in significant environmental effects (e.g., agricultural resources, air quality, greenhouse gases, and transportation) and such effects were analyzed in the Draft SEIR and disclosed during the public comment period as required by CEQA. The City Council also finds that the Findings of Facts and Statement of Overriding Considerations provide sufficient justification for approving the proposed Project, even though there may be significant environmental effects to agricultural resources, air quality, greenhouse gases, or transportation.

The City Council hereby adopts the Findings of Facts and Statement of Overriding Considerations, as well as the Mitigation Monitoring & Reporting Program (attached hereto as Exhibits "A" and "B," respectively), and certifies the Final SEIR pursuant to section 15090 of the CEQA Guidelines.

Section 3. Custodian of Records. The custodian of documents and other materials which constitute the record of proceedings upon which this determination is based is the Development Services Director or designee, and all records are located in the City Development Services Department.

Section 4. Effective Date. This Resolution shall become effective upon adoption.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof, held on the 3rd day of June, 2025, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

_____
Jeanne Donaldson, City Clerk

EXHIBIT A
FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS

[Attached]

EXHIBIT B
MITIGATION MONITORING & REPORTING PROGRAM

[Attached]

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

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

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

- The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (State CEQA Guidelines § 15091, subd. (a)(1).)
- The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding" and that "[s]uch changes have been adopted by such other agency or can and should be adopted by such other agency." (State CEQA Guidelines § 15091, subd. (a)(2).)
- The third potential conclusion is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (State CEQA Guidelines § 15091, subd. (a)(3).)

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

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

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

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

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

SECTION I

ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

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

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

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SECTION II

ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

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

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

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

A. Aesthetics

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

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

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

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

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

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

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

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

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

Facts in Support of Finding:

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

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

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

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

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

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

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

B. Agriculture and Forestry Resources

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

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

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

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

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

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

C. Air Quality

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

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

D. Biological Resources

Impact BIO-4 Finding: The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites (Initial Study at p. 51). Impacts would be less than significant.

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

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

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

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

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

E. Cultural Resources

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

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

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

F. Energy

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

Facts in Support of Finding:

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

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

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

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

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

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

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

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

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

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

G. Geology and Soils

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

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

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

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

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

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

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

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

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

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

Impact GEO-3 Finding: The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (Initial Study at p. 62). Impacts would be less than significant.

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

Impact GEO-4 Finding: The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (Initial Study at p. 62). Impacts would be less than significant.

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

Impact GEO-5 Finding: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (Initial Study at p. 63). No impact would occur.

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

Plans, Policies and Programs (PPP)

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

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

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

Facts in Support of Finding:

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

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

Impact HAZ-2 Finding: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (Initial Study p. 68). Impacts would be less than significant.

Facts in Support of Finding:

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

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

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

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

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

Impact HAZ-4 Finding: The Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. (Initial Study at p. 70). No impacts would occur.

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

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

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

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

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

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

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

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

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

Plans, Policies and Programs (PPP)

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

I. Hydrology and Water Quality

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

Facts in Support of Finding:

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

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

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

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

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

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

Facts in Support of Finding:

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

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

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

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

Facts in Support of Finding:

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

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

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

Facts in Support of Finding:

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

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

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

Facts in Support of Finding:

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

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

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

Facts in Support of Finding:

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

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

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

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

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

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

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

Facts in Support of Finding:

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

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

Plans, Policies and Programs (PPP)

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

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

J. Land Use and Planning

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

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

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

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

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

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

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

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

K. Mineral Resources

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

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

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

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

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

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

L. Noise

Impact N-3 Finding: The Project would not expose people residing or working in the Project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use

plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport (Initial Study at p. 85). Impacts would be less than significant.

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

M. Population and Housing

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

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

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

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

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

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

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

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

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

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

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

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

N. Public Services

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Plans, Policies and Programs (PPP)

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

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

O. Recreation

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

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

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

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

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

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

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

Plans, Policies and Programs (PPP)

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

P. <u>Transportation</u>

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

Facts in Support of Finding:

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

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

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

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

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

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

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

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

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

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

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

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

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

Facts in Support of Finding:

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

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

Q. Utilities and Service Systems

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

Facts in Support of Finding:

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

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

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

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

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

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

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

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

Impact UT-4 Finding: The Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals (Initial Study at p. 98). Impacts would be less than significant.

Facts in Support of Finding:

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

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

Impact UT-5 Finding: The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (Initial Study at p. 99). Impacts would be less than significant.

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

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

Facts in Support of Finding:

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

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

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

R. Wildfires

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

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

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

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

Impact WF-3 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (Initial Study at p. 101). No impacts would occur.

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

Impact WF-4 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (Initial Study at p. 101). Impacts would be less than significant.

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

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

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

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SECTION III

IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

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

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

A. Biological Resources

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

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

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

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

Impact BIO-3 Finding: The Project would not have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Initial Study at p. 50). Impacts would be less than significant with mitigation incorporated.

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

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

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

Mitigation Measures

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

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

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

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

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

B. Cultural Resources

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

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

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

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

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

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

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

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

Plans, Policies and Programs (PPP)

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

Mitigation Measures

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

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

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

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

MM CUL-4: Archeological Monitoring/Preservation.

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

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

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

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

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

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

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

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

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

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

C. Geology and Soil

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

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

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

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

Mitigation Measures

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

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

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

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

D. Noise

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

Facts in Support of Finding:

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

Operation:

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

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

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

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

Facts in Support of Finding:

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

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

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

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

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

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

Mitigation Measures

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

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

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

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

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

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

E. Tribal Cultural Resources

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

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

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

Impact TCR-2 Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Draft Subsequent EIR at p. 5.11-6). Impacts would be less than significant with mitigation incorporated.

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

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

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

Mitigation Measures

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

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

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

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

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

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

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

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SECTION IV

RESOLUTION REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

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

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

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

A. Agriculture and Forestry

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

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

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

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

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

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

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

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

B. Air Quality

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

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

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

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

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

Facts in Support of Finding:

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

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

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

Facts in Support of Finding:

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

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

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

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

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

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

Mitigation Measures

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

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

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

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

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

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

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

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

C. Greenhouse Gas Emissions

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

Facts in Support of Findings:

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

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

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

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

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

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

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

Mitigation Measures

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

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

D. <u>Transportation</u>

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

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

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

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

Mitigation Measures

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

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

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

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

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

SECTION V

GROWTH-INDUCING IMPACTS AND COMMITMENT OF RESOURCES

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

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

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

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

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

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

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

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

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

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

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

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

SECTION VI

SIGNIFICANT IRREVERSIBLE EFFECTS

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

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

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

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

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

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

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SECTION VII

ALTERNATIVES

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

Objectives

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

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

Alternatives

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

- The discussion of alternatives shall focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more-costly.
- The "No Project" alternative shall be evaluated along with its impact. The "No Project" analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved.
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

Rationale for Selecting Potentially Feasible Alternatives

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

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

. . . set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

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

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

Alternatives Not Selected for Analysis

Alternate Site Alternative

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

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

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

Alternatives Selected for Further Analysis

Alternative 1: No Project/No Development Alternative

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

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

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

Alternative 3: Reduced Project Site Alternative

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

Alternative 4: Reduced Project Development Intensity Alternative

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

Findings for Alternatives

Alternative 1: No Project/No Development Alternative

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

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

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

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

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

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

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

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

Alternative 3: Reduced Project Site Alternative

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

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

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

Alternative 4: Reduced Project Development Alternative

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

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

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

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

Environmentally Superior Alternative

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

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

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

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SECTION VII

STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

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

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

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

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

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

Overriding Considerations

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

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

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

SECTION VIII

CERTIFICATION OF THE EIR

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

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

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

Findings

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

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

Conclusions

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

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SECTION IX

MITIGATION MONITORING AND REPORTING PLAN

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

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SECTION X

CONTENTS AND CUSTODIAN OF RECORDS

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

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

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

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

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

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Table 3-1: Mitigation Monitoring and Reporting Program
Redlands RHNA Rezone Project

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AIR QUALITY			
Mitigation Measure AQ-1: Construction Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate feasible mitigation measures to reduce air pollutant emissions during construction activities to below applicable significance thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions are dependent upon the activity causing the impact and could include, but are not limited to: • Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards. • Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes. • Require the use of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings. • The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.	Prior to grading permit and building permit	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), including all off-road and portable diesel-powered equipment. • The Construction Contractor shall require that construction equipment be maintained in pursuant to manufacturer specifications to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification.			
Mitigation Measure AQ-2: Operational Emissions. Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) and greenhouse gas impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality and greenhouse gas impacts. If operation-related emissions are determined to have the potential to exceed the SCAQMD's most recent adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air quality and/or greenhouse gas emissions during operational activities to below the applicable significance thresholds. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following: • Installation of modestly enhanced insulation (walls R-13; roof/attic R-38) such that heat transfer and thermal bridging is minimized; • Installation of modestly enhanced window insulation (0.4 U-Factor, 0.32 SHGC); • Installation of a heating/cooling distribution system with modest duct insulation (R-6) or enhanced duct insultation (R-8); • Use of high efficiency HVAC (SEER 15/72% AFUE or 8.5 HSPF); • Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. • Landscaping palette of drought tolerant plants exceeding City requirements; • Use of weather-based irrigation control systems or moisture sensors (demonstrate 20% reduced water use); • U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.			
Mitigation Measure AQ-3: Toxic Air Contaminants. Applicants for residential within 1,000 feet of a major sources of Toxic Air Contaminants (TACs) (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Redlands prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM_{10} concentrations exceed 2.5 microgram per cubic meter ($\mu g/m^3$), $PM_{2.5}$ concentrations exceed 2.5 $\mu g/m^3$, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:	Prior to issuance of development permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better).			
BIOLOGICAL RESOURCES			
Mitigation Measure BIO-1: Biological Assessment. Future projects proposed within the proposed Project site shall be surveyed by a qualified biologist to determine if any special-status plant or wildlife species have the potential to occur or if any riparian habitats, jurisdictional drainages, or wetlands are present onsite. If suitable habitat is present, a qualified biologist shall survey for special-status species during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating any ground disturbing activities in a given area. The focused surveys shall be conducted in accordance with CDFW guidelines. If special-status species are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.	Prior to the issuance of grading permits	City of Redlands Planning Division	
Mitigation Measure BIO-2: Jurisdictional Resources: If potential jurisdictional waters are determined to be present onsite through the biological assessment require by MM BIO-1 above, a jurisdictional assessment shall be conducted for future projects within Sites 1 through 24. Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW. Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction are subject to approval by permitting agencies and shall include, but are not limited to, the following:	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Construction-related equipment shall be stored in developed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage. • Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants. • Substances harmful to aquatic life shall not be discharged into the drainage. All hazardous substances shall be properly handled and stored. • A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction. • To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. • Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. • Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.			
CULTURAL RESOURCES			
PPP CUL-1: Municipal Code Chapter 2.62. The City of Redlands Historic Architectural Design Guidelines shall apply to all future projects within the proposed Project. The Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* may also be applicable to properties or projects that may affect historic buildings and resources.	Prior to issuance of demolition permits	City of Redlands Building & Safety Division	
Mitigation Measure CUL-1. Demolition or alteration of a building or structure that is at least 50 years old at the time of permit application and has not previously been evaluated for demolition or renovation within the last five years from the time demolition or alternation is proposed shall be subject to review at the request of the City by a qualified architectural historian who meets the	Prior to issuance of demolition permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify if the building or structure proposed for demolition or alteration qualifies as a historical resource under CEQA guidelines. Buildings and structures shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the City for review and approval prior to the issuance of a building permit. If no historic resources are identified, no further analysis is warranted. If historic resources are identified, the applicant shall be required to implement Mitigation Measure CR-2.			
Mitigation Measure CUL-2. For renovations involving historical resources identified through the process described in the architectural history evaluation mitigation measure (MM CUL-2), project activities shall comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. The memorandum should recommend design modifications necessary to bring projects into compliance with the Standards for Rehabilitation, which shall be incorporated into project designs to ensure compliance with the Standards. The memorandum shall be submitted to the City for review and approval prior to the issuance of a building permit.	Prior to issuance of building permits	City of Redlands Planning Division	
Mitigation Measure CUL-3: Archeological Resources Assessment. Prior to the issuance of a grading permit for developments within the Sites 1, 3 through 6, 9, 10, 13 through 15, and 17 through 23 shall be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G.	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology. The archaeological resources assessment shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present, and records search from the California Historical Resources Information System (CHRIS). The assessment shall be submitted to the City of Redlands prior to issuance of any demolition or grading permits. If an area identified as having a moderate to high potential for archaeological resources identified by the archaeological resource assessment, Mitigation Measure CUL-4 shall apply.			
Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. *Highly Sensitive Sites:* Prior to development within Sites 2, 7, 8, 11, 12, and 16 or where the Archaeological Resources Assessment conducted pursuant to Mitigation Measure CUL-3 finds the site to be highly sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall monitor all ground-disturbing pre-construction and construction activities in areas of high sensitivity. Prior to issuance of grading permits, the qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site and ensure that any discovered resources are avoided and preserved in place. The Cultural Resources Management Plan shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with implementing projects. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The Archaeologist shall conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the	Prior to the issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
procedures to be followed in such an event. The Cultural Resources Management Plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. In case of disagreements on the terms and procedures set forth in the Cultural Resources Management Plan, the City of Redlands Director of Development Services shall have the ultimate authority for approving or revising the Cultural Resources Management Plan. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods: • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report. • Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required. *Moderately Sensitive Sites:* If the Archaeological Resources Assessment conducted under Mitigation Measure CUL-3 finds the site to be moderately sensitive for archaeological resources, a Secretary of the Interior (SOI) qualified archaeologist with at least 3 years of regional experience in archaeology shall be retained on-call. Prior to the start of construction activities, the archaeologist shall inform all construction personnel about the proper procedures to follow in the event of an inadvertent archaeological discovery. In the event that archaeological resources are discovered during ground-disturbing activities, construction activities in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall be contacted to assess the find. Work on other portions of the project outside the buffered area may continue during the assessment period. The Cultural Resources Management Plan shall stipulate that the landowner(s) and/or project applicant shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the City of Redlands Director of Development Services that all archaeological materials recovered during the archaeological investigations have been handled through one of the following methods: • Avoidance and preservation in place or reburial onsite. This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis, and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in a Monitoring Report.			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Curation at a San Bernardino County curation facility that meets federal standards per 36 CFR (Code of Federal Regulations) Part 79 and, therefore, will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. In addition, the project would be required to adhere to Mitigation Measure TCR-1. Consulting Tribe(s) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the Consulting Tribe(s) and archaeologist disagree on preferred treatment, the ultimate authority shall be the City of Redlands Director of Development Services. If human remains or funerary/burial objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. A Monitoring Report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City of Redlands Development Services Department prior to issuance of certificate of occupancy. The report will include DPR Primary and Archaeological Site Forms if any are required.			
GEOLOGY AND SOILS			
Mitigation Measure PAL-1: Paleontological Resources. Future project applicants within the Project sites shall provide a paleontological assessment by a qualified paleontologist meeting the standards of the Society of Vertebrate Paleontology (SVP) to determine whether grading for the project could impact underlying soil units or geologic formations that have a low to high potential to yield fossiliferous materials, prior to project approval. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and shall recommend a project-specific paleontological	Prior to issuance of grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
resources monitoring and mitigation plan (PRMMP), if warranted, based on paleontological sensitivity. This plan will address specifics of monitoring and mitigation for the development project, and will take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. This PRMMP must meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity: • High- All projects involving ground disturbances in previously undisturbed areas sediments mapped as having high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist and shall be monitored by a qualified paleontological monitor on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be of scientific significance, professionally and efficiently recover the fossil specimens and collect associated data pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010). Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities. • Low to High- All projects involving ground disturbance in previously undisturbed areas mapped with low-to-high paleontological sensitivity shall require preparation of a PRMMP by a qualified paleontologist. The PRMMP shall specify that monitoring shall only be required when construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units shall require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account: a) the most recent local geologic mapping, b) depths at which fossils have been found			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
in the vicinity of the project area, as revealed by the museum records search, and c) geotechnical studies of the project area, if available. • Low- All projects involving ground disturbance in previously undisturbed areas mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found. Paleontological monitoring is usually not required for sediments with low paleontological sensitivity. • None- Projects determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological mitigation measures, but shall implement MM PAL-2, if incidental discoveries occur.			
Mitigation Measure PAL-2: Fossil Discovery. In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50 foot radius of the find until its significance can be determined by a Qualified Paleontologist. Scientifically significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP. A repository shall be identified and a curatorial arrangement will be signed prior to collection of the fossils. Any accredited institution may serve as a repository.	During grading activities	City of Redlands Planning Division	
GREENHOUSE GAS EMISSIONS			
Mitigation Measure AQ-1: Construction Emissions. As listed previously.	Prior to grading permit and building permit	City of Redlands Planning Division	
Mitigation Measure AQ-2: Operational Emissions. As listed previously.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
HAZARDS AND HAZARDOUS MATERIALS			
Plan, Program, or Policy PPP HYD-1: SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			
HYDROLOGY AND WATER QUALITY			
Plan, Program, or Policy PPP HYD-1: SWPPP. As listed previously.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
Plan, Program, or Policy PPP HYD-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be prepared by the Project applicant and submitted to and approved by the City Public Works Department. The WQMP shall identify all Post-Construction, Site Design. Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of a grading permit	City of Redlands Building & Safety Division	
NOISE			
Mitigation Measure NOI-1: Construction Noise Levels. Prior to the issuance of a demolition, grading, or building permit for new development, the project plans and specifications shall demonstrate that all construction activity shall satisfy the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas) and include the following measures to reduce construction related noise at sensitive receptors: • Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity. • Construction contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Mitigation Measure NOI-2: Construction Noise Barriers. Prior to the issuance of a demolition, grading, or construction permit for new development that could exceed the exterior construction noise level of 80 dBA L_{eq} at a sensitive receiver (defined as residences, schools, and recreation areas), the project plans and specifications shall detail the installation of temporary construction noise barriers for occupied noise-sensitive uses for the duration of construction activities that could exceed the construction noise level thresholds. The noise control barrier(s) must provide a solid face from top to bottom and shall: • Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts; • Be maintained and any damage be repaired within 24-hours. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be repaired within 24-hours; and • Be removed and the site appropriately restored upon the conclusion of the construction activity.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	
Mitigation Measure NOI-3: Construction Vibration. Prior to approval of a demolition permit, grading plans, and/or issuance of building permits for construction activities within 100 feet of existing residential structures that require the use of large bulldozers, large loaded trucks, jackhammers, pile drivers, and/or caisson drills, the City of Redlands Building and Safety Division shall ensure that construction plans and specifications state that the use of such vibratory equipment shall be prohibited within 100 feet of existing residential structures or occupied noise-sensitive uses. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	
Mitigation Measure NOI-4: Construction Vibration Near Fragile Historic. Any site-specific development project within 25 feet of an extremely fragile historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence to the City of Redlands Building and Safety Division detailing that the operation of vibration-generating equipment associated with the new development would be below the vibration threshold of 0.01 inches per second (in/sec) RMS, and would not result in structural damage to the adjacent	Prior to issuance of demolition and/or grading permits	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.			
PUBLIC SERVICES			
Plans, Program, or Policy PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the Project site, and prior to issuance of any building permits for the implementing project, the Project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code Chapter 3.60 and/or adopted fee schedules.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
Plans, Program, or Policy PPP PS-2: As a Condition of Approval for implementing projects within the proposed Project, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
RECREATION			
Plans, Program, or Policy PPP PS-2: As listed previously.	Prior to issuance of certificates of occupancy	City of Redlands Planning Division	
TRANSPORTATION			
Mitigation Measure TR-1: VMT Screening & Analysis. Prior to approval of any site plan, any applicant for an implementing project fully within or partially within Site 20, 21, or 23 shall prepare a VMT Screening Analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines and provide this Analysis to the City of Redlands Planning Division and Engineering Division. The VMT Screening Analysis shall demonstrate that the implementing project meets the screening criteria set forth in in the City of Redlands CEQA Assessment VMT Analysis Guidelines. If the implementing project does not meet the screening criteria set forth in Screening Criteria 1, 2, 3, or 4, the implementing project applicant shall prepare a full VMT analysis pursuant to the City of Redlands CEQA Assessment VMT Analysis Guidelines. For projects with VMT per Service Population exceeding the City's significance threshold, a mitigation plan shall be developed and implemented. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with the California Air Pollution Control Officers Association's (CAPCOA) Final	Prior to issuance of building permits	City of Redlands Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) and approved by the City of Redlands. Examples of measures include but are not limited to: • *Increase Residential Density*: Higher residential density encourages mixed-use development and reduces sprawl. Placing more people closer to amenities, workplaces, and public transit decreases the distance people need to travel for daily activities, thereby reducing overall VMT. • *Integrate Affordable and Below Market Rate Housing*: Below market rate housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit and can decrease the VMT generated by the project. • *Implement Commute Trip Reduction Marketing*: Information sharing and marketing promote and educate workers about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. This could be implemented through a home owners association (HOA). • *Provide Ridesharing Program*: Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT. This could be implemented through an HOA. • *Implement Subsidized or Discounted Transit Program*: Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. This could be implemented through an HOA. • *Limit Residential Parking Supply*: The reduction in VMT that can be achieved by limiting the total parking supply available at a residential project. When parking is limited, scarcity is created, and additional time and inconvenience is added to trips made by private auto. The reduction in the convenience of driving results in a shift to other modes and can decrease the VMT generated by the project. • *Unbundle Residential Parking Costs from Property Cost*: Parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces,			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
this measure results in decreased vehicle ownership and, therefore, a reduction in VMT. • *Provide Pedestrian Network Improvement*: Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT. • C*onstruct or Improve Bike Facility*: Building or enhancing bike facilities such as dedicated bike lanes, secure parking, and bike-sharing programs promotes cycling as a convenient and safe transportation option. This reduces the number of short-distance car trips, contributing to lower VMT. • C*onstruct or Improve Bike Boulevard*: Bike boulevards are designed to prioritize cyclists by providing dedicated lanes and traffic calming measures. By creating safer and more attractive cycling routes, bike boulevards encourage residents to use bicycles for commuting and local trips, thereby reducing VMT. • *Expand Bikeway Network*: Expanding the bikeway network connects different parts of the community with safe and accessible bike routes. This infrastructure improvement makes cycling a more practical choice for daily transportation needs, reducing reliance on motor vehicles and lowering VMT. • *Implement Conventional Carshare Program*: Conventional carshare programs provide access to vehicles on a short-term basis. By promoting shared vehicle usage, particularly for occasional trips, they reduce the need for individual car ownership and decrease VMT. • *Implement Electric Carshare Program*: Electric carshare programs offer access to EVs for shared use. Providing convenient access to environmentally friendly transportation options encourages residents and employees to choose EVs over traditional vehicles, thus lowering VMT and emissions. • *Implement Pedal (Non-Electric) Bikeshare Program*: Pedal bikeshare programs make bicycles readily available for short trips. Offering an alternative to driving for local transportation needs reduces congestion and lowers VMT. • *Implement Electric Bikeshare Program*: Electric bikeshare programs provide access to electric-assisted bicycles. These bikes make cycling more accessible			

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
to a broader range of users and encourage more trips to be taken by bike instead of by car, contributing to reduced VMT. • *Implement Scooter Share Program*: Scooter share programs offer electric scooters for short-distance trips. By providing a convenient alternative to driving for short trips within the community, scooter share programs reduce the number of car trips and help decrease VMT. • *Provide Community-Based Travel Planning (CBTP)*: CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. This could be implemented through an HOA. • *Implement Market Price Public Parking (On-Street)*: Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. • *Implement Transit-Supportive Roadway Treatments*: Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.			
TRIBAL CULTURAL RESOURCES			
Mitigation Measure TCR-1: Inadvertent Discovery of Tribal Cultural Resources. In the event that previously unidentified tribal cultural resources are unearthed during construction, the Qualified Archaeologist shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed. If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation	Prior to issuance of grading permit	City of Redlands Planning Division	

Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
with the Lead Agency, the consulting Tribe[s], and any Tribal Monitor[s], shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and any Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference: A. Full avoidance. B. If avoidance is not feasible, Preservation in place. C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction. D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)			
Mitigation Measure CUL-3: Archeological Resources Assessment. As listed previously.	Prior to the issuance of grading permits	City of Redlands Planning Division	
Mitigation Measure CUL-4: Archaeological Monitoring/Preservation. As listed previously.	Prior to the issuance of grading permits	City of Redlands Planning Division	

RESOLUTION NO. 8688

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AMENDING THE 2035 GENERAL PLAN LAND USE MAP IN ACCORDANCE WITH PROGRAM 1.1-1 ('RHNA REZONING') OF THE SIXTH CYCLE 2021–2029 HOUSING ELEMENT.

WHEREAS, the City of Redlands ("City") has initiated General Plan Amendment No. 149, Amendment No. 1 to Concept Plan No. 4, Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan), and Zone Change No. 479, to amend the General Plan and Specific Plan land use maps and the City Zoning Map to rezone twenty-seven (27) parcels for the regional housing needs allocation ("RHNA") rezoning project (collectively herein referred to as "Project") as required by the City's certified 2021–2029 Housing Element ("Housing Element"); and

WHEREAS, the Planning Division conducted an extensive public outreach effort during preparation of the Housing Element and, furthermore, the Project actions are identified in the Housing Element work program, particularly Program 1.1-1 entitled, "RHNA Rezoning"; and

WHEREAS, the City and the Southern California region faces a serious housing shortage, and a lack of access to housing directly affects the health, safety and welfare of City residents; and

WHEREAS, the state legislature has consistently recognized the continuing need for affordable housing in California and, in Government Code section 65580, states, "the availability of housing is of vital statewide importance, and the early attainment of decent housing… is a priority of the highest order" and, further, that, "local… governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community"; and

WHEREAS, affordable housing is regulated by a variety of state and local laws, ordinances, and policies, and the RHNA requires the City to provide for the development of a specified number of housing units; the City's housing production allocation for the current cycle calls for 2,234 new affordable housing units as follows: 652 units are needed for moderate-income households, 615 units are needed for low-income households and 967 units are needed for very low- and extremely low-income households; and

WHEREAS, the City desires to explore and, to the extent feasible, use all available tools to meet its assigned regional housing production target; and

WHEREAS, state law requires each city to develop a general plan establishing policies for future development. As specified in the Government Code, the general plan must, among other objectives: (i) encourage the development of a variety of housing types for all income levels; and (ii) assist in the development of adequate housing to meet the needs of low and moderate-income households; and

WHEREAS, according to City Council Resolution No. 5473, the provision in Measure "U" requiring preparation of a socio-economic cost/benefit study does not apply to City-initiated

general plan, specific plan or zoning amendments that are not associated with a specific development project; and

WHEREAS, in accordance with the California Environmental Quality Act ("CEQA"), a Draft Subsequent Environmental Impact Report ("Draft SEIR") for the Project was published on January 21, 2025, and circulated for a 45-day public review and comment period beginning on January 22, 2025, and ending on March 7, 2025; and

WHEREAS, a Final Subsequent Environmental Impact Report ("Final SEIR") was published on April 9, 2025, including a response to comments received on the Draft SEIR; and

WHEREAS on April 2, 2025, notice of the Planning Commission's public hearing for the Project was caused to be published by a display ad in a newspaper of general circulation by the Secretary to the Planning Commission; and

WHEREAS, on April 22, 2025, the Planning Commission held a noticed public hearing on the Project and considered the staff written and oral reports, written public comments, and testimony from members of the public; and

WHEREAS, on April 22, 2025, the Planning Commission recommended that the City Council approves the Project; and

WHEREAS, on May 13, 2025, notice of the City Council's public hearing for the Project was published in a newspaper of general circulation by the City Clerk; and

WHEREAS, on June 3, 2025, the City Council held a public hearing and considered the staff written and oral reports, the recommendation of the Planning Commission, written public comments, and testimony by members of the public; and

WHEREAS, following the public hearing on the proposed General Plan amendment and the Project, the City Council determined that adoption of the amendment is in the best interests of the public health, safety and general welfare.

NOW, THEREFORE, RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS THAT:

Section 1. General Plan Consistency and Validity. General Plan Amendment No. 149 is necessary to make the 2035 General Plan internally consistent and compatible by integrating its land use and housing policies which identify and mandate specific parcels of land to be rezoned for medium- and high-density residential use. The proposed amendment is consistent with several 2035 General Plan policies and programs, and the amendment would not otherwise result in inconsistencies with the 2035 General Plan.

Section 2. California Environmental Quality Act. As adopted and certified by City Council Resolution No. 8687, the Final SEIR prepared for the Project has been prepared in compliance with CEQA in accordance with the applicable sections under Articles 7, 8, 9 and 10 of the CEQA Guidelines.

Section 3. Adoption of Amendment. Amendment to the Land Use Map (Figure 4-1) included in the adopted 2035 General Plan is necessary to accommodate the rezoning actions required by Program 1.1-1 (RHNA Rezoning) as listed in the City's certified 2021-2029 Housing Element. General Plan Amendment No. 149 is hereby adopted, as described below and as shown in Exhibit "A" attached hereto, and, with regard to Sites 1, 2, 3, 6, 7, 8, 13, 14, 15, 16, 18, 19 and 21, based on the following findings in accordance with Measure U Policy 4.40s.

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

   There are substantial and overriding economic or social benefits to the City and its residents and taxpayers from the proposed density increase because the increased residential density would help meet housing demand, improve housing affordability and generate property tax revenue, all of which support economic resilience and social well-being.

2. *The proposed density increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly.*

   The proposed density increase would not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly, that were not previously accounted for as part of the certified Environmental Impact Report prepared for the 2035 General Plan. Implementation of the General Plan as amended would continue to cause potentially significant adverse environmental impacts on agricultural resources, air quality, greenhouse gas emissions, and transportation impacts within the planning area. However, because the project sites are located within already infill areas, where development can take advantage of existing infrastructure, the redesignation would reduce the need for new construction in undeveloped areas and avoid the loss of open space and resource lands. While the redesignation may allow the future conversion of existing farmland resources to residential development, the land is presently designated for urban use, including commercial and residential. The conversion of this land to medium- and high-density residential use would not result in substantially worse direct environmental impacts beyond the types of urban development that are consistent with the current land use classifications designated by the general plan.

3. *The proposed density increase will not convert viable agricultural land to non-agricultural uses.*

   The proposed density increase would not convert viable agricultural land to non-agricultural uses because, although some of the sites are currently being used for farming, the sites are presently designated and zoned for commercial and residential uses and are planned for urban development. Redesignation of the sites to residential use does not change the status of the site as designated for urban uses and, therefore, this finding does not apply.

4. *The proposed density increase will not have a growth-inducing effect on other property.*

   The proposed density increase would not have a growth-inducing effect on other property because it is limited to specific in-fill sites, thereby containing growth within existing developed areas and reducing pressure to develop surrounding or undeveloped areas.

5. *The resulting uses will be compatible with uses on adjacent land.*

   The future resulting residential uses will be compatible with uses on adjacent land because the proposed residential parcels are located in an urbanized area that already includes a mix of uses, including residential, commercial and industrial. Buffer zones, development standards, and appropriate land use planning will ensure that future residential uses can coexist with nearby uses without conflict. No existing or reasonably foreseeable inharmonious uses are located in the vicinity of the subject parcels.

6. *The proposed density increase will not require substantial expansion of public infrastructure, facilities or services.*

   The proposed density increase would not require substantial expansion of public infrastructure, facilities or services because the sites are already zoned for commercial and residential uses within largely developed in-fill areas which are served by and are readily accessible to infrastructure and services. Infill development on the project site would avoid the pressure to develop new housing in outer areas, which would necessitate higher expenditure for capital improvements. The cost of serving new development with public services, including police and fire, would be offset by the payment of development impact fees.

General Plan Amendment No. 149

Change the land use designations of the following twenty-two (22) parcels:

APN	*Existing Designation*	*Proposed Designation*
0292-163-02-0000	Commercial/Industrial	Medium Density Residential
0292-163-03-0000	Commercial/Industrial	Medium Density Residential
0292-165-05-0000	Commercial/Industrial	High Density Residential
0292-165-06-0000	Commercial/Industrial	High Density Residential
0292-165-07-0000	Commercial/Industrial	High Density Residential
0292-165-08-0000	Commercial/Industrial	High Density Residential
0292-165-09-0000	Commercial/Industrial	High Density Residential
0292-165-16-0000	Commercial/Industrial	High Density Residential
0292-165-17-0000	Commercial/Industrial	High Density Residential
0292-165-04-0000	Commercial/Industrial	High Density Residential
0292-167-02-0000	Commercial/Industrial	Medium Density Residential
0292-167-07-0000	Commercial/Industrial	Medium Density Residential
0292-167-28-0000	Commercial/Industrial	High Density Residential
0292-167-29-0000	Commercial/Industrial	High Density Residential
0292-167-30-0000	Commercial/Industrial	High Density Residential

0292-167-17-0000	Commercial/Industrial	High Density Residential
0292-201-20-0000	Commercial/Industrial	Medium Density Residential
0292-201-14-0000	Commercial/Industrial	Medium Density Residential
0167-141-04-0000	Commercial	Medium Density Residential
0167-141-05-0000	Commercial Medium Density	High Density Residential
0167-141-06-0000	Commercial Medium Density	High Density Residential
0292-165-15-0000*	Commercial/Industrial	Public/Institutional

*area north of Morrey Arroyo only

Section 4. Effective Date. This Resolution shall take effect upon adoption.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

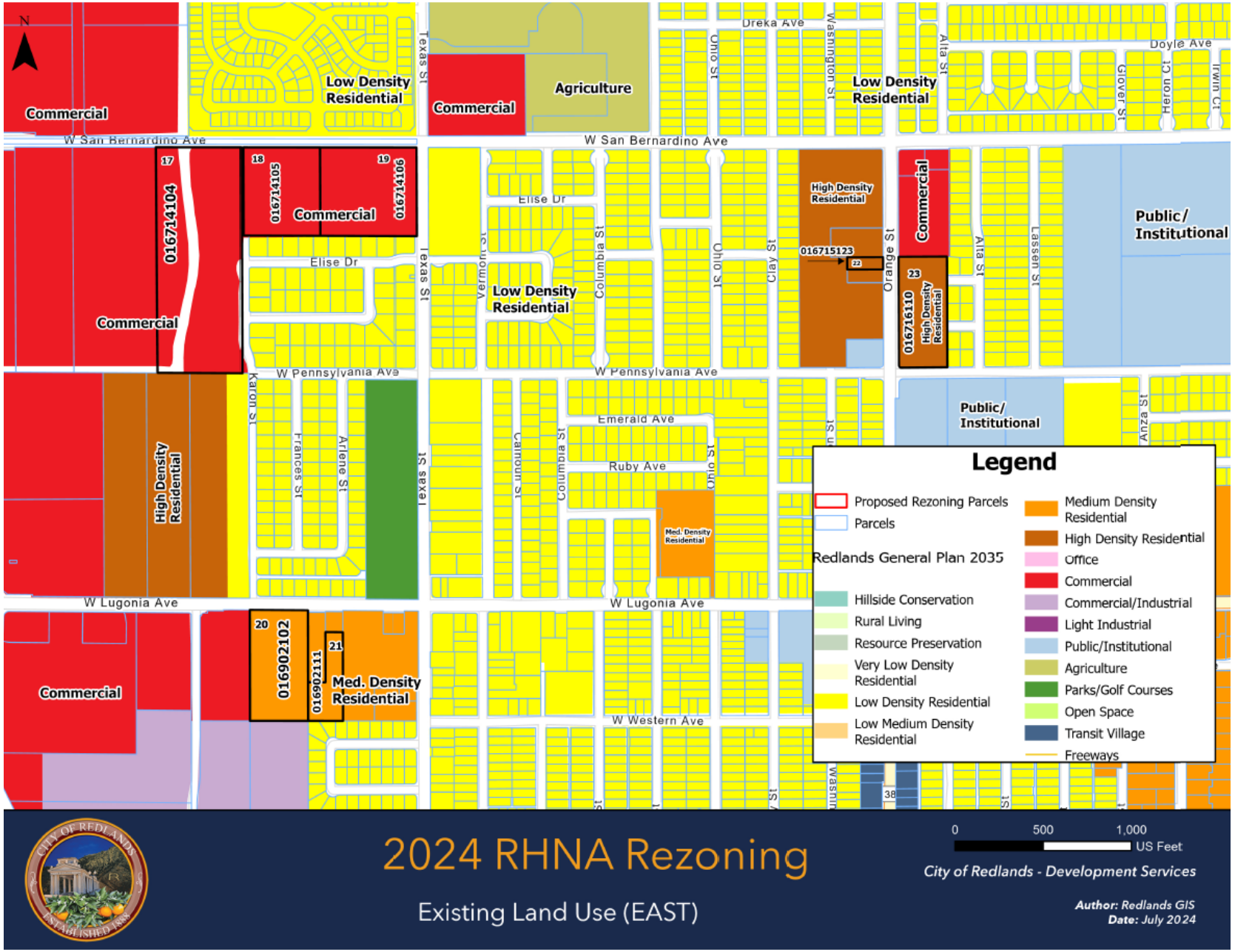
I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing ordinance was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025.

AYES:
NOES:
ABSTAIN:
ABSENT:

_____
Jeanne Donaldson, City Clerk

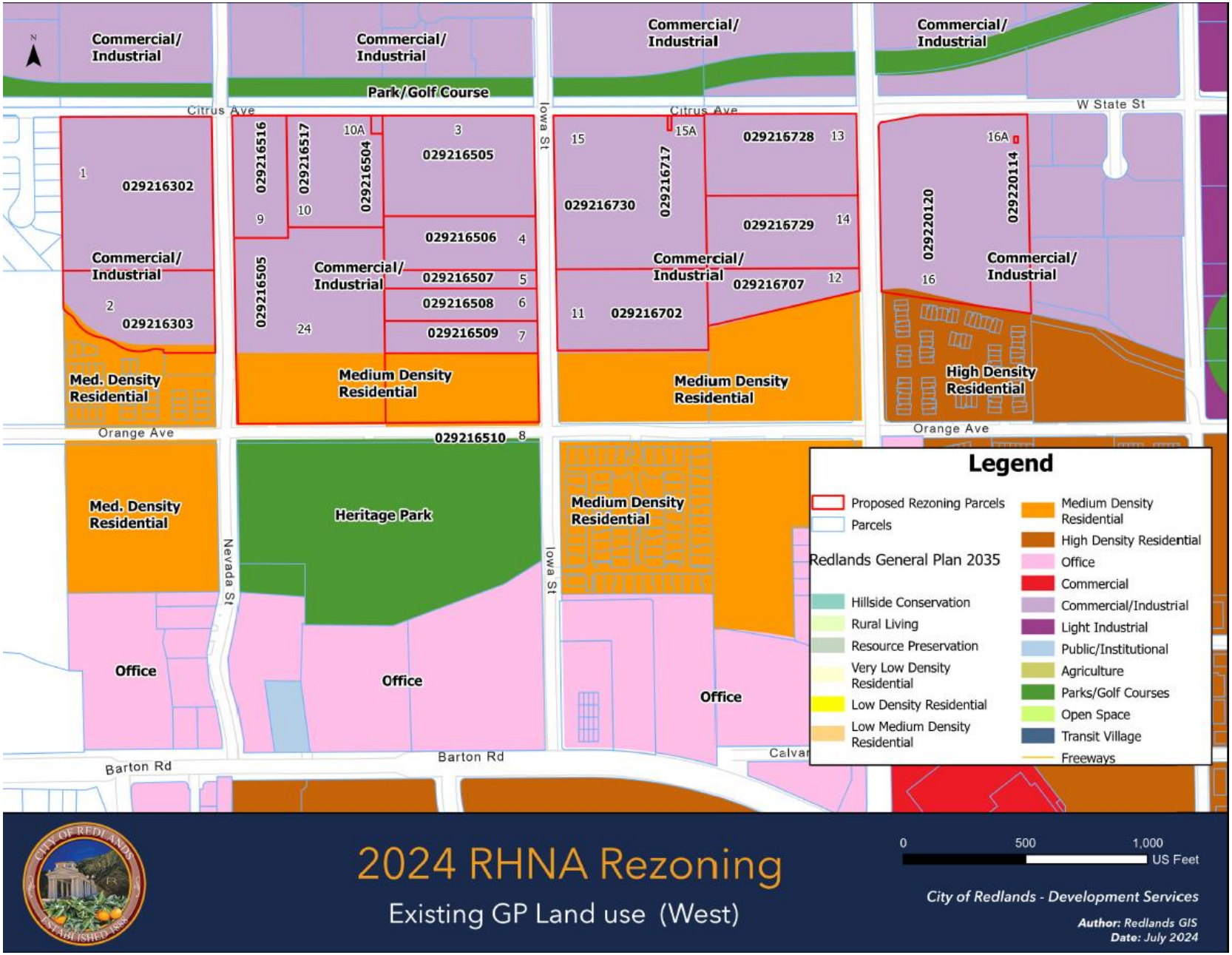
GENERAL PLAN AMENDMENT No. 149 – EXHIBIT A-1.1

GENERAL PLAN FIGURE 4-1, EXISTING LAND USE MAP (EAST)



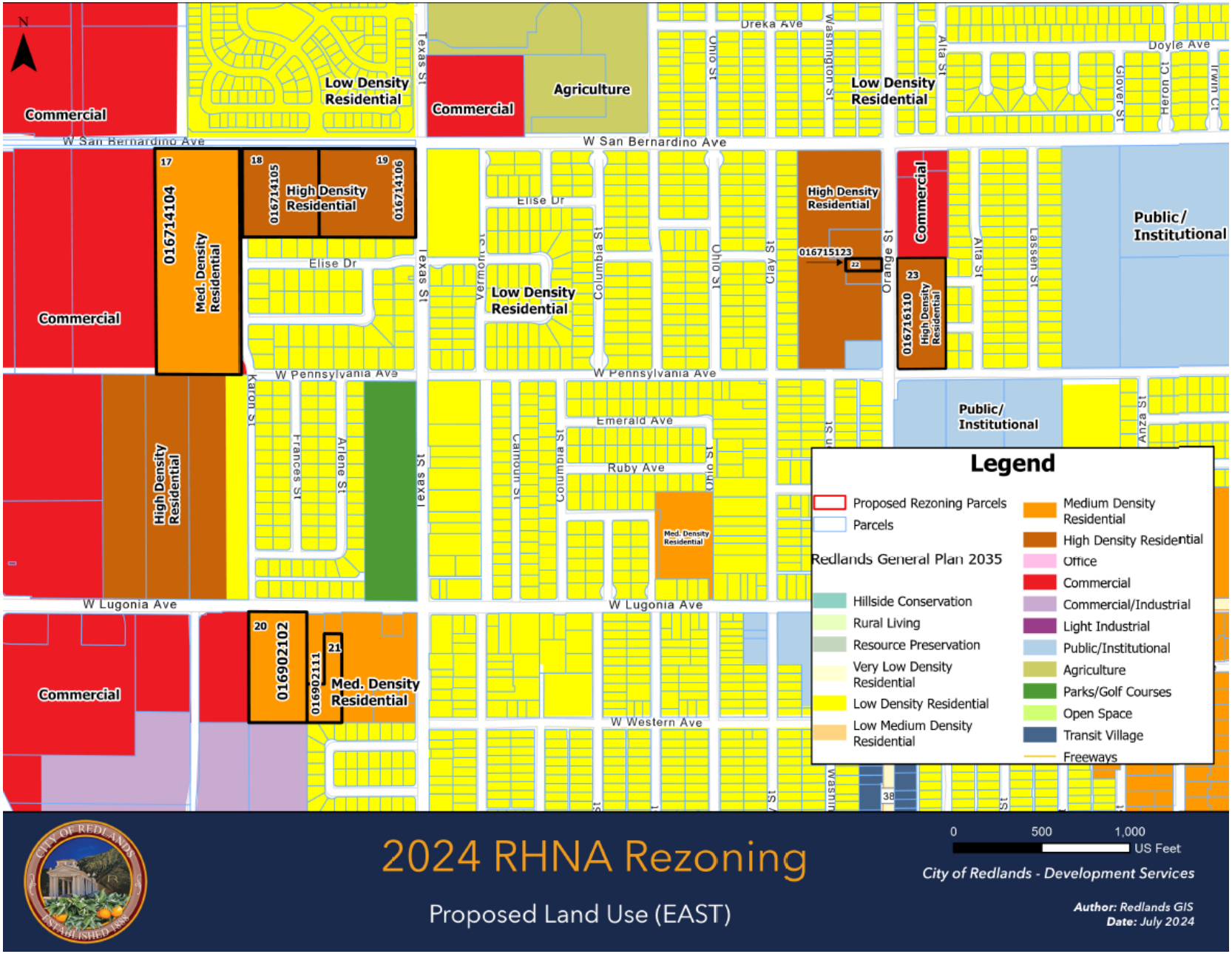
GENERAL PLAN AMENDMENT No. 149 – EXHIBIT A-1.2

GENERAL PLAN FIGURE 4-1, EXISTING LAND USE MAP (WEST)



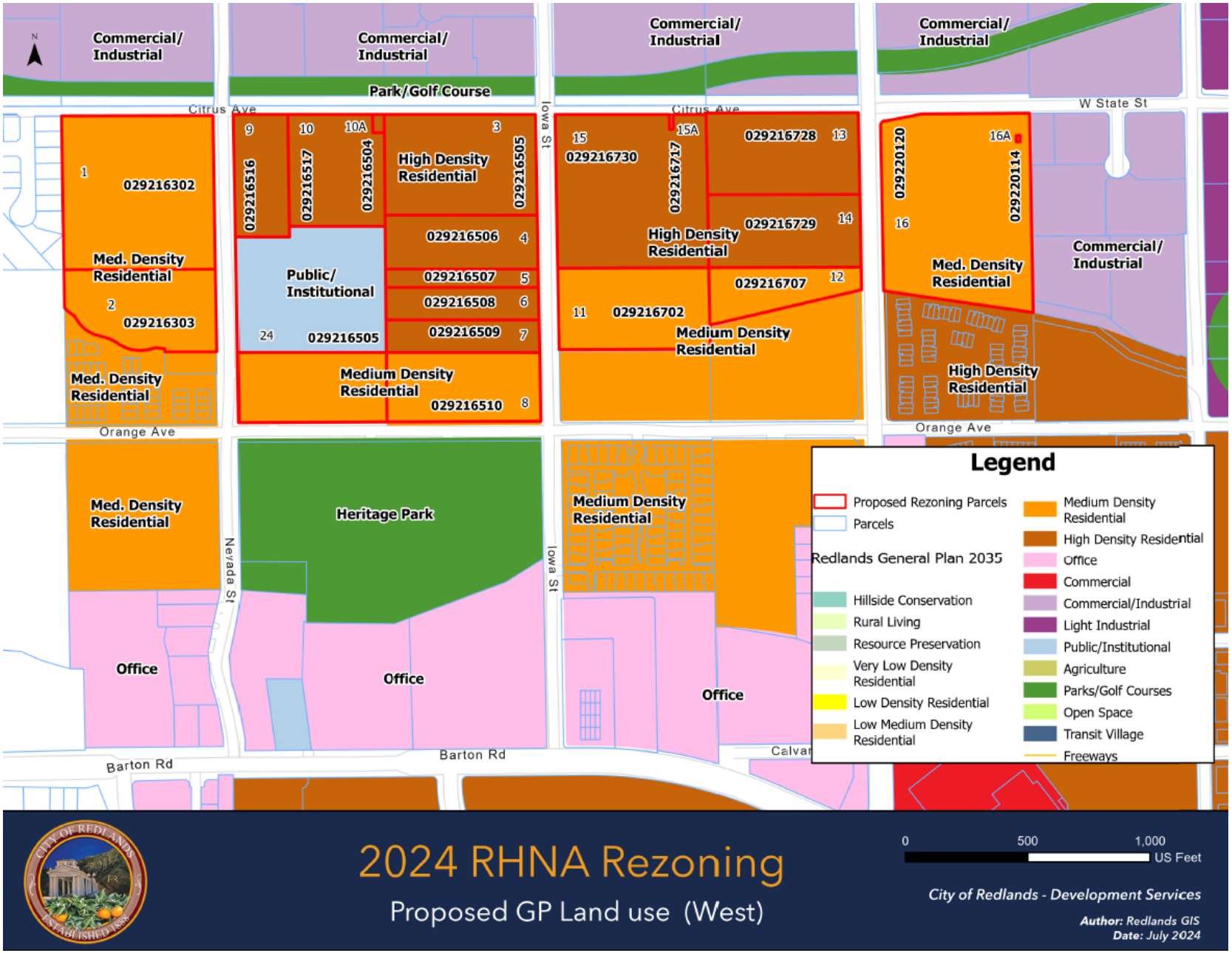
GENERAL PLAN AMENDMENT No. 149 – EXHIBIT A-2.1

GENERAL PLAN FIGURE 4-1, PROPOSED LAND USE MAP (EAST)



GENERAL PLAN AMENDMENT No. 149 – EXHIBIT A-2.2

GENERAL PLAN FIGURE 4-1, PROPOSED LAND USE MAP (WEST)



RESOLUTION NO. 8689

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AMENDING CONCEPT PLAN NO. 4 (THE CITIES PAVILLION CONCEPT PLAN).

WHEREAS, the City of Redlands ("City") has initiated General Plan Amendment No. 149, Amendment No. 1 to Concept Plan No. 4, Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan), and Zone Change No. 479, to amend the General Plan and Specific Plan land use maps and the City Zoning Map to rezone twenty-seven (27) parcels for the regional housing needs allocation ("RHNA") rezoning project (collectively herein referred to as "Project") as required by the City's certified 2021–2029 Housing Element ("Housing Element"); and

WHEREAS, the Planning Division conducted an extensive public outreach effort during preparation of the Housing Element and, furthermore, the Project actions are identified in the Housing Element work program, particularly Program 1.1-1 entitled, "RHNA Rezoning"; and

WHEREAS, the City and the Southern California region faces a serious housing shortage, and a lack of access to housing directly affects the health, safety and welfare of City residents; and

WHEREAS, the state legislature has consistently recognized the continuing need for affordable housing in California and, in Government Code section 65580, states, "the availability of housing is of vital statewide importance, and the early attainment of decent housing… is a priority of the highest order" and, further, that, "local… governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community"; and

WHEREAS, affordable housing is regulated by a variety of state and local laws, ordinances, and policies, and the RHNA requires the City to provide for the development of a specified number of housing units; the City's housing production allocation for the current cycle calls for 2,234 new affordable housing units as follows: 652 units are needed for moderate-income households, 615 units are needed for low-income households and 967 units are needed for very low- and extremely low-income households; and

WHEREAS, the City desires to explore and, to the extent feasible, use all available tools to meet its assigned regional housing production target; and

WHEREAS, state law requires each city to develop a general plan establishing policies for future development. As specified in the Government Code, the general plan must, among other objectives: (i) encourage the development of a variety of housing types for all income levels; and (ii) assist in the development of adequate housing to meet the needs of low and moderate-income households; and

WHEREAS, according to City Council Resolution No. 5473, the provision in Measure "U" requiring preparation of a socio-economic cost/benefit study does not apply to City-initiated general plan, specific plan or zoning amendments that are not associated with a specific development project; and

WHEREAS, in accordance with the California Environmental Quality Act ("CEQA"), a Draft Subsequent Environmental Impact Report ("Draft SEIR") for the Project was published on January 21, 2025, and circulated for a 45-day public review and comment period beginning on January 22, 2025, and ending on March 7, 2025; and

WHEREAS, a Final Subsequent Environmental Impact Report ("Final SEIR") was published on April 9, 2025, including a response to comments received on the Draft SEIR; and

WHEREAS on April 2, 2025, notice of the Planning Commission's public hearing for the Project was caused to be published by a display ad in a newspaper of general circulation by the Secretary to the Planning Commission; and

WHEREAS, on April 22, 2025, the Planning Commission held a noticed public hearing on the Project and considered the staff written and oral reports, written public comments, and testimony from members of the public; and

WHEREAS, on April 22, 2025, the Planning Commission recommended that the City Council approves the Project; and

WHEREAS, on May 13, 2025, notice of the City Council's public hearing for the Project was published in a newspaper of general circulation by the City Clerk; and

WHEREAS, on June 3, 2025, the City Council held a public hearing and considered the staff written and oral reports, the recommendation of the Planning Commission, written public comments, and testimony by members of the public; and

WHEREAS, following the public hearing on the proposed Concept Plan No. 4 amendment and the Project, the City Council determined that adoption of the amendment is in the best interests of the public health, safety and general welfare.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS THAT:

Section 1. California Environmental Quality Act. As adopted and certified by City Council Resolution No. 8687, the Final SEIR prepared for the Project has been prepared in compliance with CEQA in accordance with the applicable sections under Articles 7, 8, 9 and 10 of the CEQA Guidelines.

Section 2. Amendment to Concept Plan. Concept Plan No. 4 is hereby amended to remove three (3) parcels, APNs: 0167-141-04-0000, 0167-141-05-0000, and 0167-141-06-0000, from the concept plan boundaries as shown in Exhibit "A" attached hereto.

Section 3. Effective Date. This Resolution shall take effect upon adoption.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025

Mario Saucedo, Mayor

ATTEST:

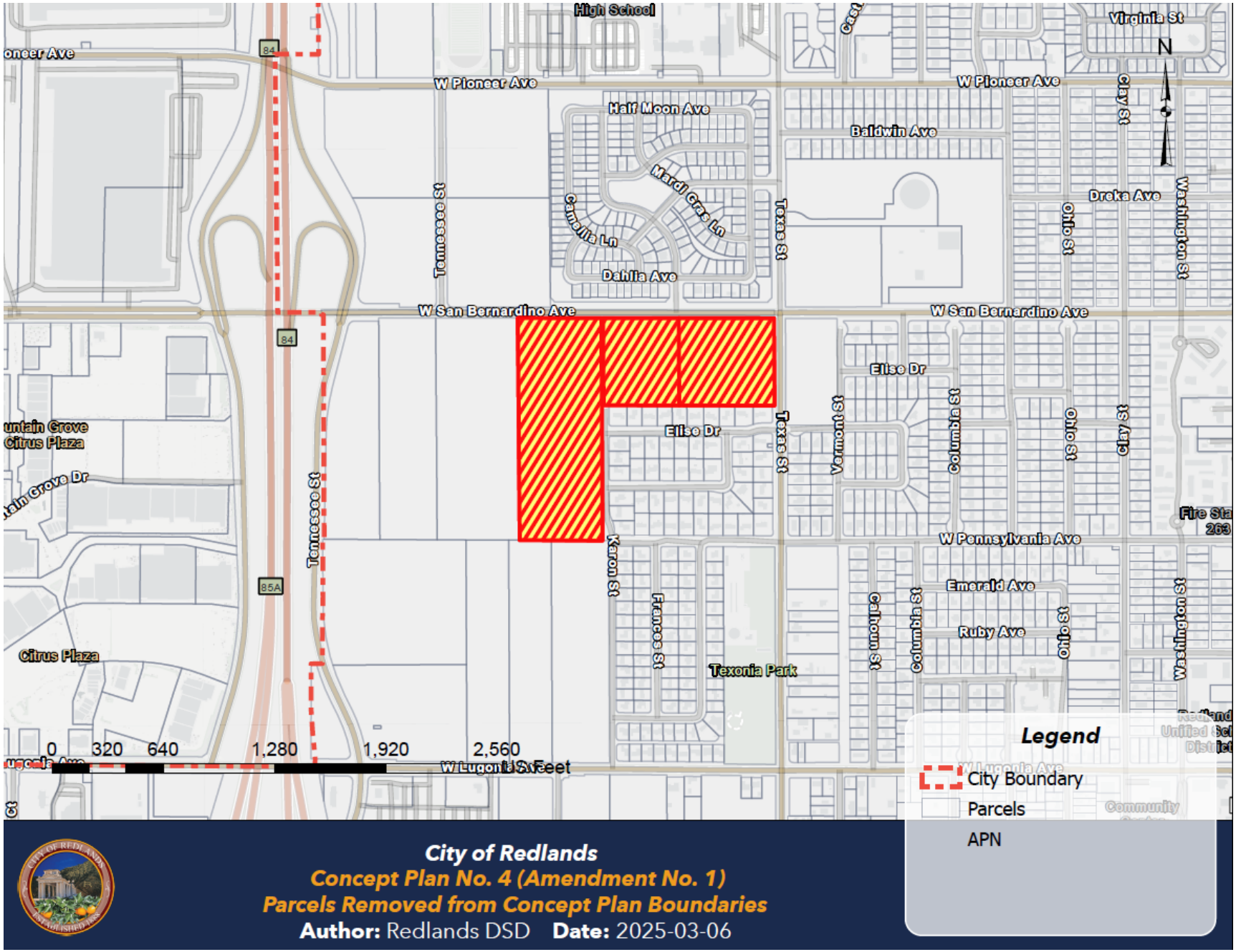
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025.

AYES:
NOES:
ABSTAIN:
ABSENT:

Jeanne Donaldson, City Clerk

CONCEPT PLAN 4, AMENDMENT No. 1 – EXHIBIT A



I:\cmo\Resolutions\8689 Amending CP No. 4.docx-ms

RESOLUTION NO. 8690

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AMENDING SPECIFIC PLAN NO. 40 (EAST VALLEY CORRIDOR SPECIFIC PLAN)

WHEREAS, the City of Redlands ("City") has initiated General Plan Amendment No. 149, Amendment No. 1 to Concept Plan No. 4, Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan), and Zone Change No. 479, to amend the General Plan and Specific Plan land use maps and the City Zoning Map to rezone twenty-seven (27) parcels for the regional housing needs allocation ("RHNA") rezoning project (collectively herein referred to as "Project") as required by the City's certified 2021–2029 Housing Element ("Housing Element"); and

WHEREAS, the Planning Division conducted an extensive public outreach effort during preparation of the Housing Element and, furthermore, the Project actions are identified in the Housing Element work program, particularly Program 1.1-1 entitled, "RHNA Rezoning"; and

WHEREAS, the City and the Southern California region faces a serious housing shortage, and a lack of access to housing directly affects the health, safety and welfare of City residents; and

WHEREAS, the state legislature has consistently recognized the continuing need for affordable housing in California and, in Government Code section 65580, states, "the availability of housing is of vital statewide importance, and the early attainment of decent housing… is a priority of the highest order" and, further, that, "local… governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community"; and

WHEREAS, affordable housing is regulated by a variety of state and local laws, ordinances, and policies, and the RHNA requires the City to provide for the development of a specified number of housing units; the City's housing production allocation for the current cycle calls for 2,234 new affordable housing units as follows: 652 units are needed for moderate-income households, 615 units are needed for low-income households and 967 units are needed for very low- and extremely low-income households; and

WHEREAS, the City desires to explore and, to the extent feasible, use all available tools to meet its assigned regional housing production target; and

WHEREAS, state law requires each city to develop a general plan establishing policies for future development. As specified in the Government Code, the general plan must, among other objectives: (i) encourage the development of a variety of housing types for all income levels; and (ii) assist in the development of adequate housing to meet the needs of low and moderate-income households; and

WHEREAS, according to City Council Resolution No. 5473, the provision in Measure "U" requiring preparation of a socio-economic cost/benefit study does not apply to City-initiated general plan, specific plan or zoning amendments that are not associated with a specific development project; and

WHEREAS, in accordance with the California Environmental Quality Act ("CEQA"), a Draft Subsequent Environmental Impact Report ("Draft SEIR") for the Project was published on January 21, 2025, and circulated for a 45-day public review and comment period beginning on January 22, 2025, and ending on March 7, 2025; and

WHEREAS, a Final Subsequent Environmental Impact Report ("Final SEIR") was published on April 9, 2025, including a response to comments received on the Draft SEIR; and

WHEREAS on April 2, 2025, notice of the Planning Commission's public hearing for the Project was caused to be published by a display ad in a newspaper of general circulation by the Secretary to the Planning Commission; and

WHEREAS, on April 22, 2025, the Planning Commission held a noticed public hearing on the Project and considered the staff written and oral reports, written public comments, and testimony from members of the public; and

WHEREAS, on April 22, 2025, the Planning Commission recommended that the City Council approves the Project; and

WHEREAS, on May 13, 2025, notice of the City Council's public hearing for the Project was published in a newspaper of general circulation by the City Clerk; and

WHEREAS, on June 3, 2025, the City Council held a public hearing and considered the staff written and oral reports, the recommendation of the Planning Commission, written public comments, and testimony by members of the public; and

WHEREAS, following the public hearing on the proposed Specific Plan No. 40 amendment and the Project, the City Council determined that adoption of the amendment is in the best interests of the public health, safety and general welfare.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS THAT:

Section 1. California Environmental Quality Act. As adopted and certified by City Council Resolution No. 8687, the Final SEIR prepared for the Project has been prepared in compliance with CEQA in accordance with the applicable sections under Articles 7, 8, 9 and 10 of the CEQA Guidelines.

Section 2. Amendment to Specific Plan. Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan) is hereby adopted, as described below and as shown in Exhibits "A" and "B" attached hereto.

Specific Plan No. 40 Amendment No. 54

Remove the following twenty-one (21) parcels from the specific plan boundaries as shown in Exhibit "A".

APNs:

0292-163-02-0000	0292-163-03-0000	0292-165-05-0000
0292-165-06-0000	0292-165-07-0000	0292-165-08-0000
0292-165-09-0000	0292-165-16-0000	0292-165-17-0000
0292-165-04-0000	0292-167-02-0000	0292-167-07-0000
0292-167-28-0000	0292-167-29-0000	0292-167-30-0000
0292-167-17-0000	0292-201-20-0000	0292-201-14-0000
0167-141-04-0000	0167-141-05-0000	0167-141-06-0000

Change the specific plan district designations of the following two (2) parcels as shown in Exhibit "B":

APN	*Existing Designation*	*Proposed Designation*
0292-165-10-0000	EV/3000RM	EV/2500RM
0292-165-15-0000*	EV/IC	EV/PI

*area north of Morrey Arroyo only

Section 3. Effective Date. This resolution shall take effect upon adoption.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

Mario Saucedo, Mayor

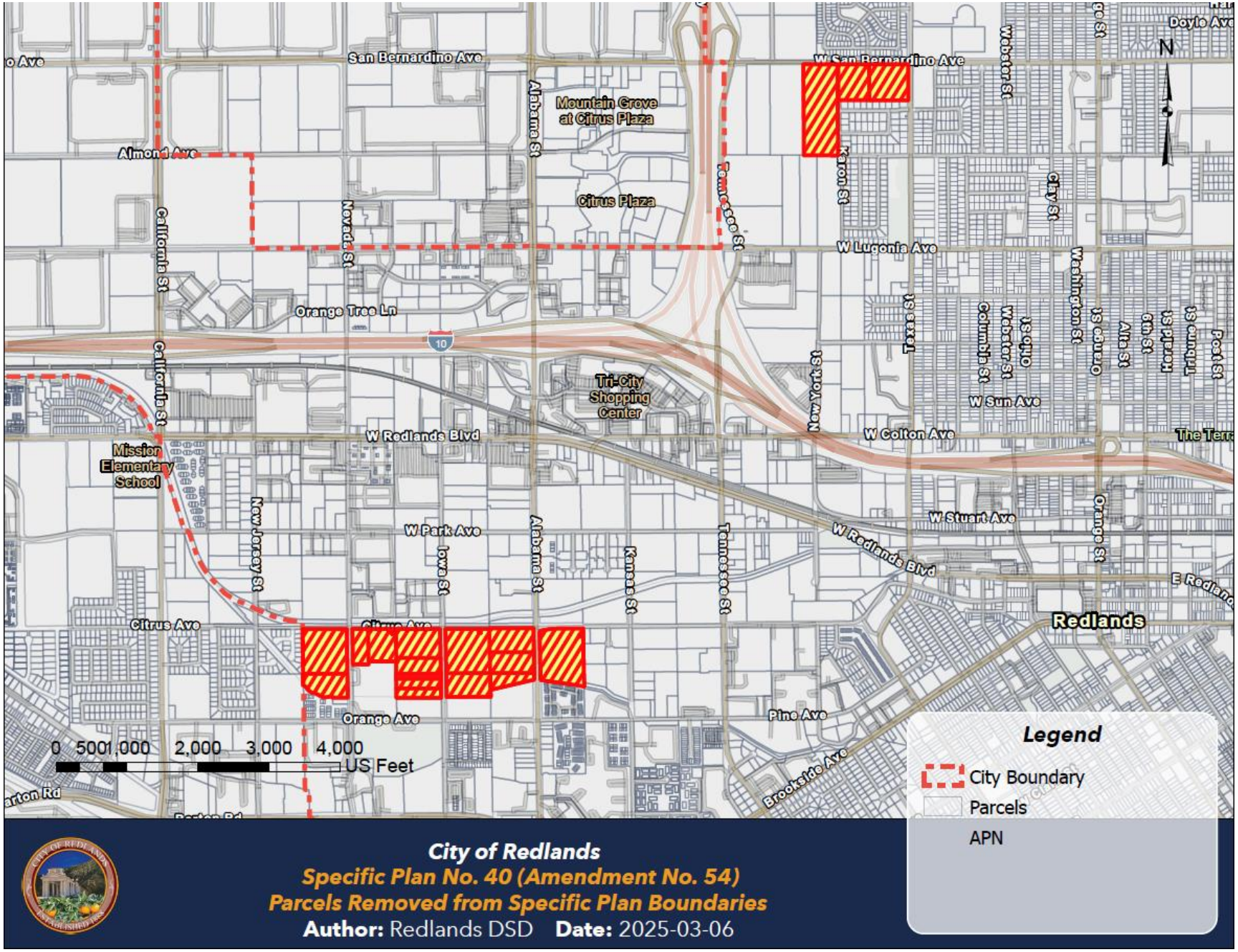
ATTEST:

Jeanne Donaldson, City Clerk

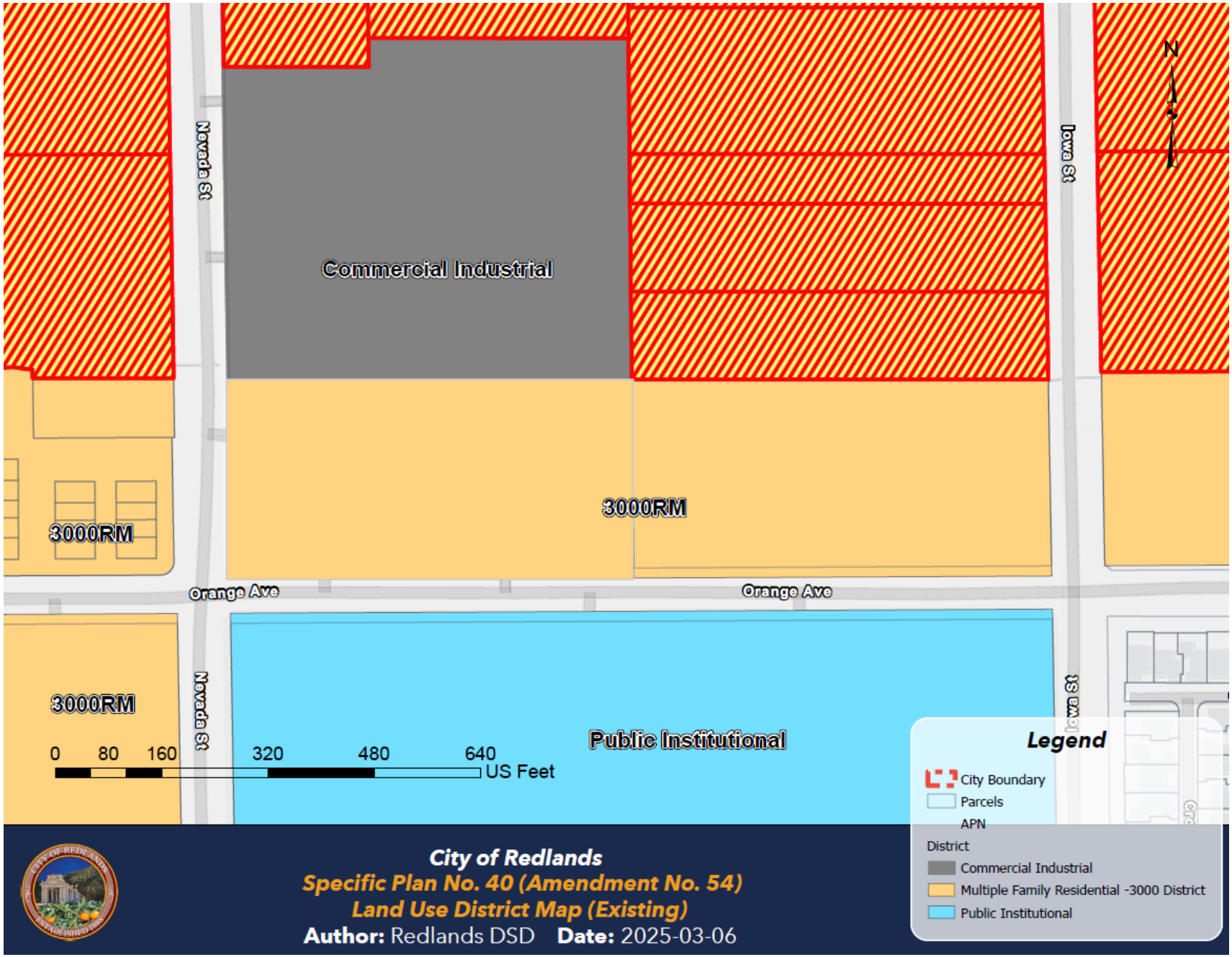
I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June, 2025.

AYES:
NOES:
ABSTAIN:
ABSENT:

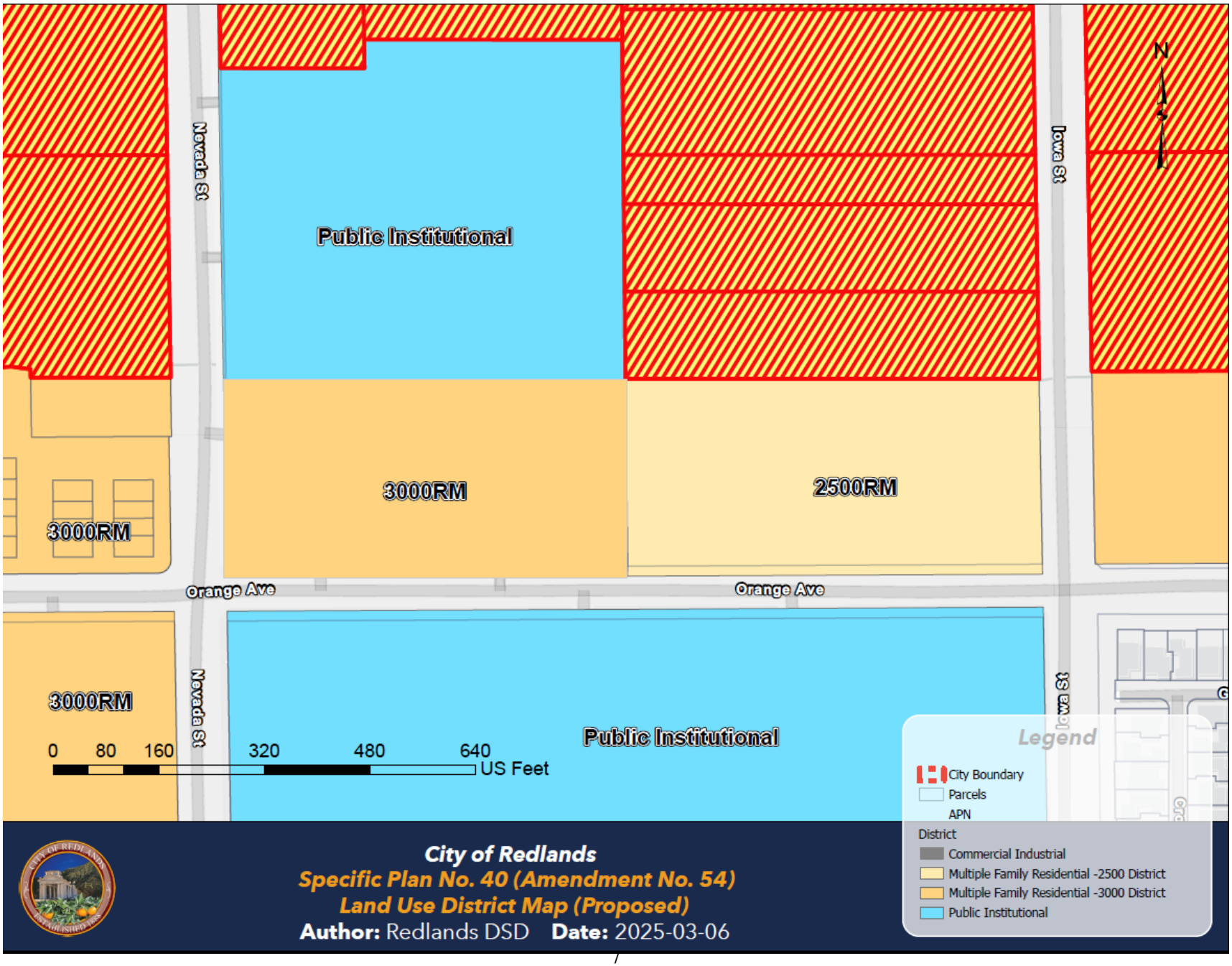
Jeanne Donaldson, City Clerk


San Bernardino Ave
W San Bernardino Ave
Mountain Grove at Citrus Plaza
Almond Ave
Citrus Plaza
Alabama St
Tennessee St
Nevada St
California St
Orange Tree Ln
W Lugonia Ave
Tri-City Shopping Center
W Redlands Blvd
W Colton Ave
W Sun Ave
Mission Elementary School
New Jersey St
W Park Ave
Iowa St
Kansas St
W Stuart Ave
Orange St
Citrus Ave
Orange Ave
Pine Ave
Redlands
Brookside Ave
N
0 500 1,000 2,000 3,000 4,000
US Feet
Legend
City Boundary
Parcels
APN
City of Redlands
Specific Plan No. 40 (Amendment No. 54)
Parcels Removed from Specific Plan Boundaries
Author: Redlands DSD Date: 2025-03-06

AMENDMENT No. 54 to SPECIFIC PLAN 40 – EXHIBIT B-1



AMENDMENT No. 54 to SPECIFIC PLAN 40 – EXHIBIT B-2



ORDINANCE NO. 2983

AN ORDINANCE OF THE CITY OF REDLANDS AMENDING TITLE 18 OF THE REDLANDS MUNICIPAL CODE BY ADOPTING A REVISED LAND USE ZONING MAP IN ACCORDANCE WITH PROGRAM 1.1-1 ('RHNA REZONING') OF THE SIXTH CYCLE 2021–2029 HOUSING ELEMENT

WHEREAS, the City of Redlands ("City") has initiated General Plan Amendment No. 149, Amendment No. 1 to Concept Plan No. 4, Amendment No. 54 to Specific Plan No. 40 (East Valley Corridor Specific Plan), and Zone Change No. 479, to amend the General Plan and Specific Plan land use maps and the City Zoning Map to rezone twenty-seven (27) parcels for the regional housing needs allocation ("RHNA") rezoning project (collectively herein referred to as "Project") as required by the City's certified 2021–2029 Housing Element ("Housing Element"); and

WHEREAS, the Planning Division conducted an extensive public outreach effort during preparation of the Housing Element and, furthermore, the Project actions are identified in the Housing Element work program, particularly Program 1.1-1 entitled, "RHNA Rezoning"; and

WHEREAS, the City and the Southern California region faces a serious housing shortage, and a lack of access to housing directly affects the health, safety and welfare of City residents; and

WHEREAS, the state legislature has consistently recognized the continuing need for affordable housing in California and, in Government Code section 65580, states, "the availability of housing is of vital statewide importance, and the early attainment of decent housing… is a priority of the highest order" and, further, that, "local… governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community"; and

WHEREAS, affordable housing is regulated by a variety of state and local laws, ordinances, and policies, and the RHNA requires the City to provide for the development of a specified number of housing units; the City's housing production allocation for the current cycle calls for 2,234 new affordable housing units as follows: 652 units are needed for moderate-income households, 615 units are needed for low-income households and 967 units are needed for very low- and extremely low-income households; and

WHEREAS, the City desires to explore and, to the extent feasible, use all available tools to meet its assigned regional housing production target; and

WHEREAS, state law requires each city to develop a general plan establishing policies for future development. As specified in the Government Code, the general plan

must, among other objectives: (i) encourage the development of a variety of housing types for all income levels; and (ii) assist in the development of adequate housing to meet the needs of low and moderate-income households; and

WHEREAS, according to City Council Resolution No. 5473, the provision in Measure "U" requiring preparation of a socio-economic cost/benefit study does not apply to City-initiated general plan, specific plan or zoning amendments that are not associated with a specific development project; and

WHEREAS, in accordance with the California Environmental Quality Act ("CEQA"), a Draft Subsequent Environmental Impact Report ("Draft SEIR") for the Project was published on January 21, 2025, and circulated for a 45-day public review and comment period beginning on January 22, 2025, and ending on March 7, 2025; and

WHEREAS, a Final Subsequent Environmental Impact Report ("Final SEIR") was published on April 9, 2025, including a response to comments received on the Draft SEIR; and

WHEREAS on April 2, 2025, notice of the Planning Commission's public hearing for the Project was caused to be published by a display ad in a newspaper of general circulation by the Secretary to the Planning Commission; and

WHEREAS, on April 22, 2025, the Planning Commission held a noticed public hearing on the Project and considered the staff written and oral reports, written public comments, and testimony from members of the public; and

WHEREAS, on April 22, 2025, the Planning Commission recommended that the City Council approves the Project; and

WHEREAS, on May 13, 2025, notice of the City Council's public hearing for the Project was published in a newspaper of general circulation by the City Clerk; and

WHEREAS, on June 3, 2025, the City Council held a public hearing and considered the staff written and oral reports, the recommendation of the Planning Commission, written public comments, and testimony by members of the public; and

WHEREAS, on June 3, 2025, the City Council adopted Resolution No. 8687 adopting Findings of Fact, a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program, and certifying the Final SEIR prepared for the Project; and

WHEREAS, following the public hearing on the proposed General Plan amendment and the Project, the City Council determined that adoption of the amendment is in the best interests of the public health, safety and general welfare.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDLANDS ORDAINS AS FOLLOWS:

Section 1. The zoning district boundaries on the City's Zoning Map are hereby amended for the properties listed below and shown in Exhibit "A."

Ref. No.	*Assessor's Parcel Number (A.P.N.)*	*Zoning Designation (New)*
1	0292-163-02-0000	R-2, Multiple Family Residential
2	0292-163-03-0000	R-2, Multiple Family Residential
3	0292-165-05-0000	R-3, Multiple Family Residential
4	0292-165-06-0000	R-3, Multiple Family Residential
5	0292-165-07-0000	R-3, Multiple Family Residential
6	0292-165-08-0000	R-3, Multiple Family Residential
7	0292-165-09-0000	R-3, Multiple Family Residential
8	0292-165-10-0000	EV/2500RM (in SP No. 40)
9	0292-165-16-0000	R-3, Multiple Family Residential
10	0292-165-17-0000	R-3, Multiple Family Residential
10A	0292-165-04-0000	R-3, Multiple Family Residential
11	0292-167-02-0000	R-2, Multiple Family Residential
12	0292-167-07-0000	R-2, Multiple Family Residential
13	0292-167-28-0000	R-3, Multiple Family Residential
14	0292-167-29-0000	R-3, Multiple Family Residential
15	0292-167-30-0000	R-3, Multiple Family Residential
15A	0292-167-17-0000	R-3, Multiple Family Residential
16	0292-201-20-0000	R-2, Multiple Family Residential
16A	0292-201-14-0000	R-2, Multiple Family Residential
17	0167-141-04-0000	R-2, Multiple Family Residential
18	0167-141-05-0000	R-3, Multiple Family Residential
19	0167-141-06-0000	R-3, Multiple Family Residential
20	0169-021-02-0000	R-2, Multiple Family Residential
21	0169-021-11-0000	R-2, Multiple Family Residential
22	0167-151-23-0000	R-3, Multiple Family Residential
23	0167-161-10-0000	R-3, Multiple Family Residential
24	0292-165-15-0000 *area north of Morrey Arroyo only	EV/PI (in SP No. 40)

Section 2. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect in accordance with law.

Mario Saucedo, Mayor

ATTEST:

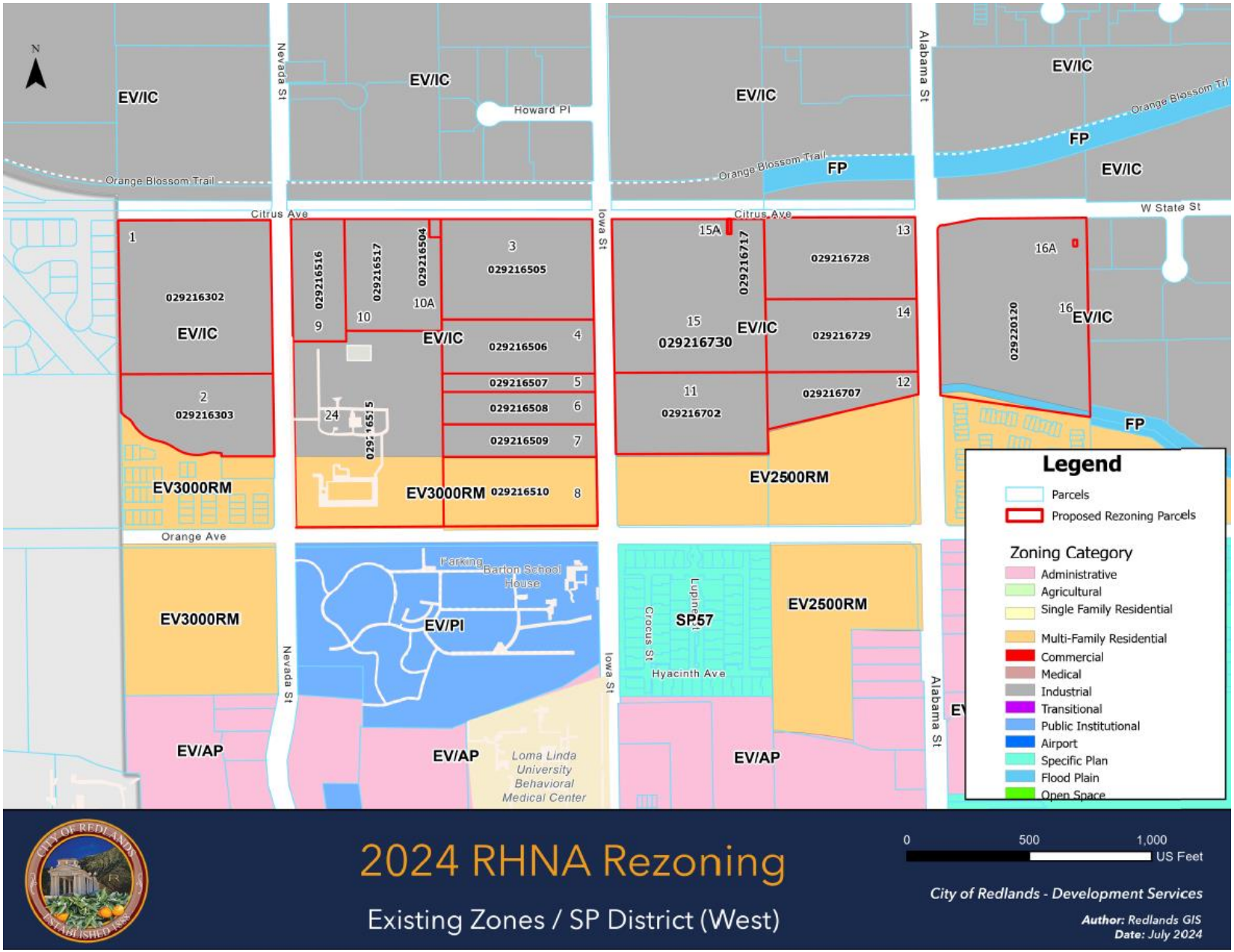
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing ordinance was duly introduced by the City Council at a regular meeting thereof held on the 3rd day of June, 2025.

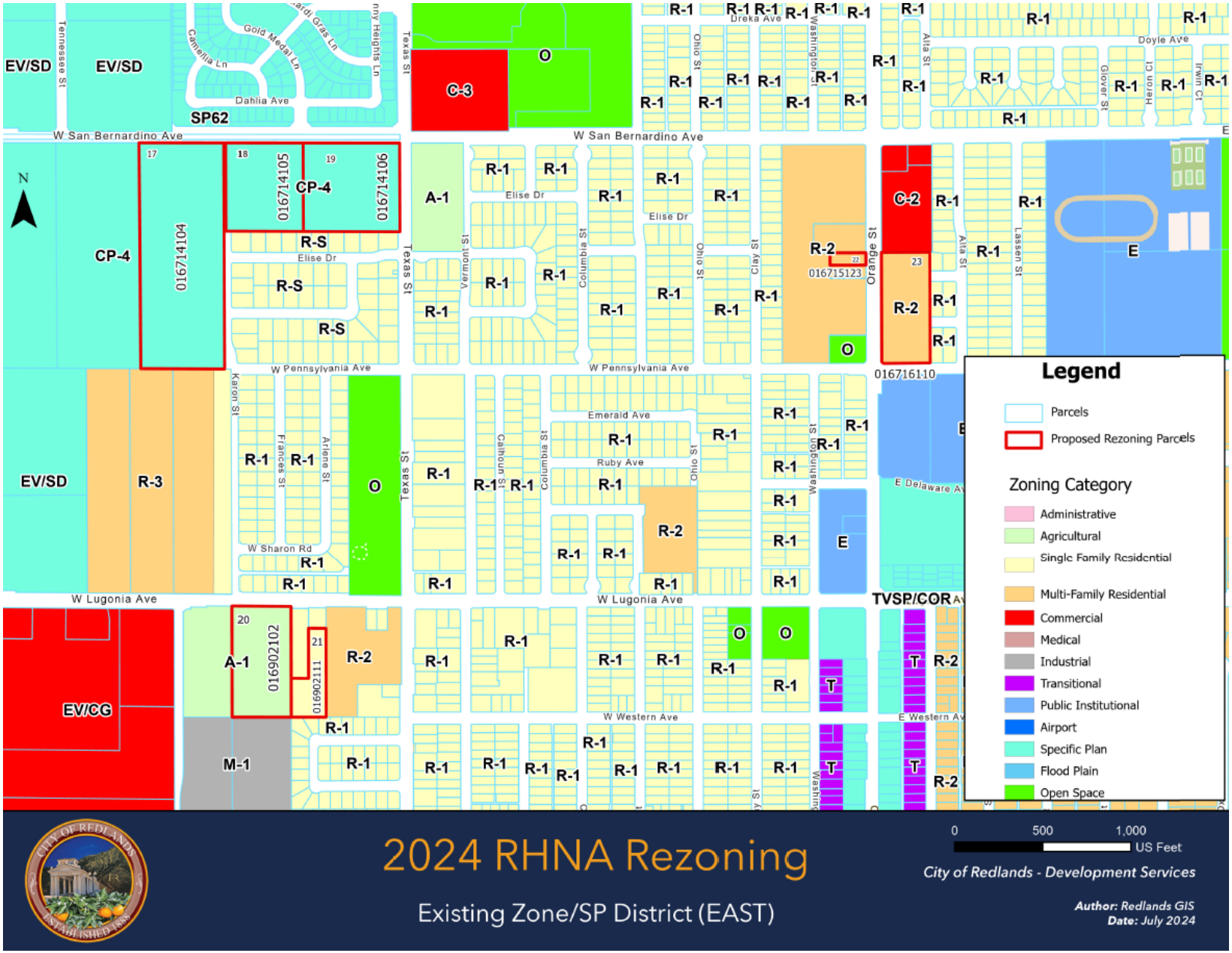
AYES:
NOES:
ABSTAIN:
ABSENT:

Jeanne Donaldson, City Clerk

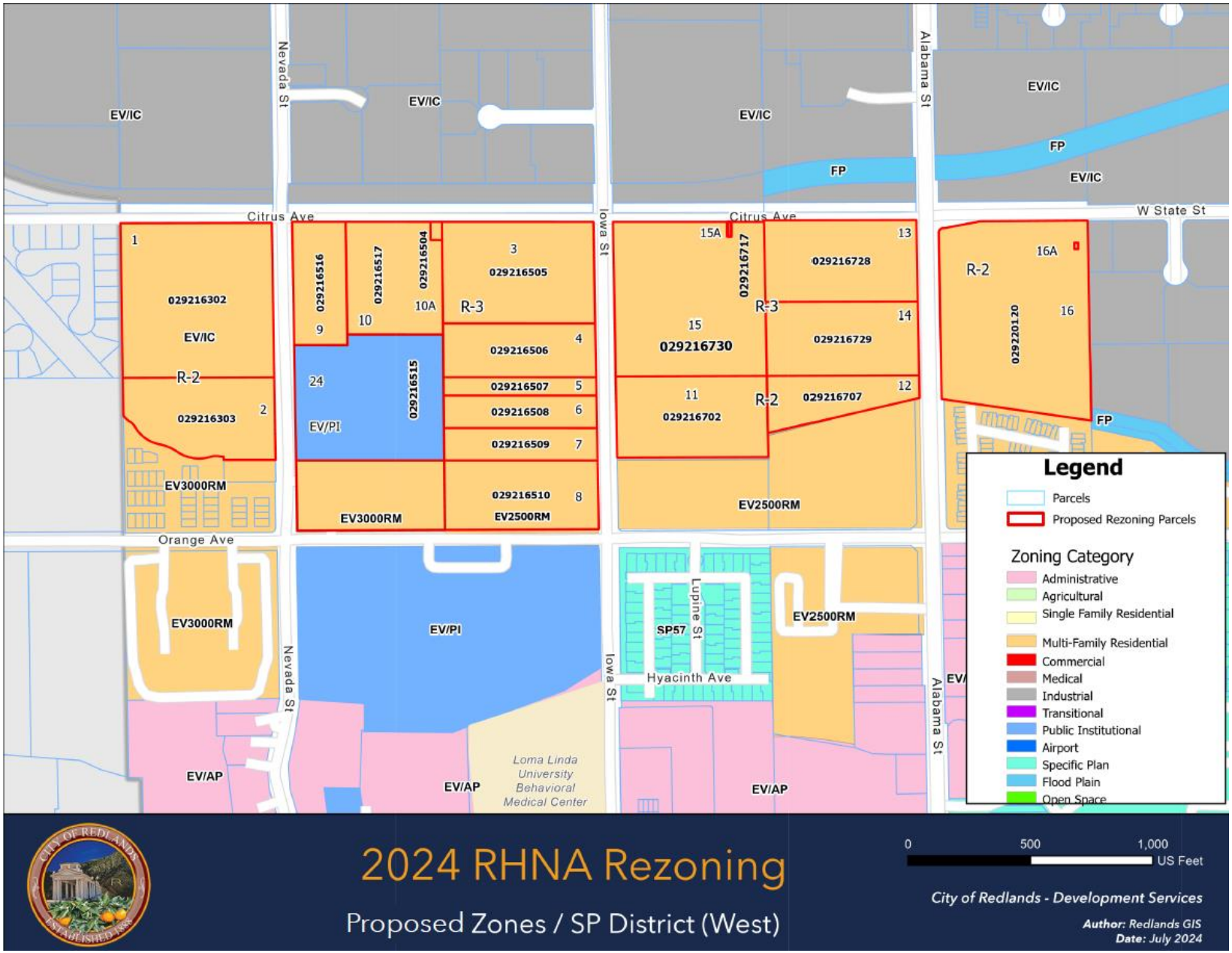
ZONE CHANGE NO. 479 – EXHIBIT A-1.1
EXISTING ZONING MAP (WEST)



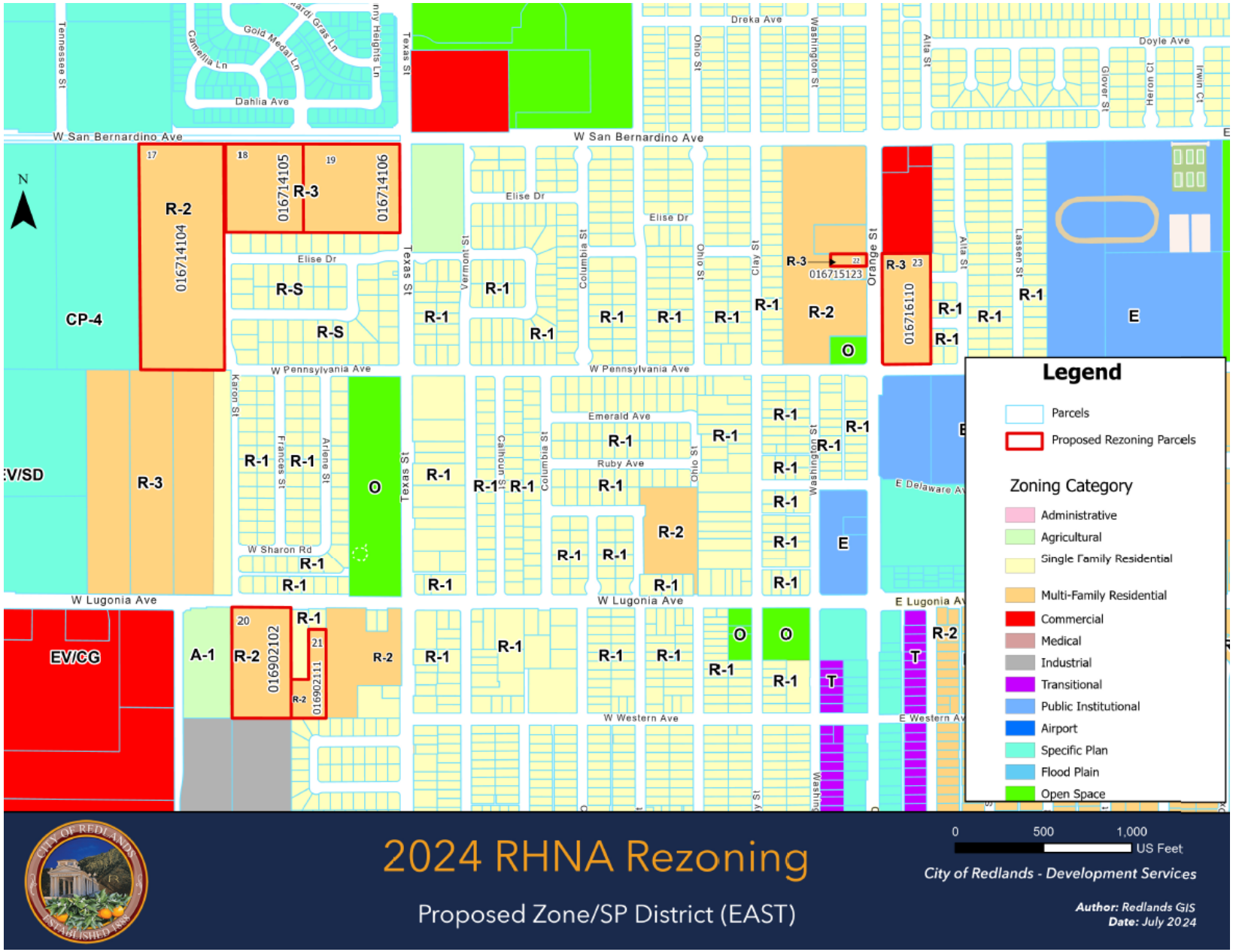
ZONE CHANGE NO. 479 – EXHIBIT A-1.2
EXISTING ZONING MAP (EAST)



ZONE CHANGE NO. 479 – EXHIBIT A-2.1
PROPOSED ZONING MAP (WEST)



ZONE CHANGE NO. 479 – EXHIBIT A-2.2
PROPOSED ZONING MAP (EAST)



City Council Meeting **K. 2.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Public Hearing to consider Resolution No. 8685 - Approving the Issuance of the California Municipal Finance Authority Revenue Bonds, Series 2025 (HumanGood)
(Mayor to declare meeting open as a public hearing)

(Management Services/Finance Director Garcia)

PROCEDURE FOR PUBLIC HEARING:

1. Mayor to declare TEFRA (Tax Equity and Fiscal Responsibility Act) Hearing open as a public hearing and calls upon Department Head for report.
2. Mayor calls for questions/comments from members of the City Council.
3. Mayor calls for comments/questions/testimony from members of the public (3 minutes per speaker).
4. Mayor calls upon City Clerk to note any written comments received.
5. Mayor closes the public hearing.
6. City Council considers the motion and votes.

MOTION(S):

I move to adopt Resolution No. 8685.

RECOMMENDATION:

Not Applicable.

DISCUSSION:

The HumanGood affiliated group of companies (the "Borrower") owns and operates various continuing care communities throughout the region. As such, they have requested that the California Municipal Finance Authority ("CMFA") serve as the municipal issuer of an aggregate principal amount of tax-exempt revenue bonds not to exceed $205,000,000 (the "Bonds"). The proceeds of the Bonds will be used to finance expenditures for various renovations to existing infrastructure and upgrades to housing units and amenities at continuing care communities throughout the state of California owned and operated by HumanGood ("the Project"), one of which is located in the City of Redlands: Plymouth Village, 900 Salem Drive, Redlands, California, 92373. This is the same property site as was included in the California Municipal Finance Authority Revenue Bonds, Series 2019 and Series 2021 (HumanGood).

In order for all or a portion of the Bonds to qualify as tax-exempt bonds, the City of Redlands must conduct a public hearing (the "TEFRA Hearing") providing members of the community with an opportunity to speak in favor of or against the use of tax-exempt bonds for the financing of the Project. Prior to such TEFRA Hearing, reasonable notice must be provided to the members of the community. The City shall publish a notice of this public hearing at least seven (7) days prior to the hearing. Notice of this hearing was published on May 23, 2025. Following the close of the TEFRA Hearing, an "applicable elected representative" of the governmental unit hosting the Project must provide its approval of the issuance of the Bonds for the financing of the Project.

The CMFA was created on January 1, 2004 pursuant to a joint exercise of powers agreement (JPA). It was formed to assist local governments, non-profit organizations and businesses with the issuance of taxable and tax-exempt bonds aimed financing economic development and charitable activities. The City signed onto this JPA in 2019.

The Joint Exercise of Powers Agreement provides that the CMFA is a public entity, separate and apart from each member executing such agreement. The debts, liabilities and obligations of the CMFA do not constitute debts, liabilities or obligations of the members - in this case, the City.

The Bonds to be issued by the CMFA for the Project will be the sole responsibility of the Borrower, and the City will have no financial, legal, moral obligation, liability or responsibility for the Project or the repayment of the Bonds for the financing of the Project. All financing documents with respect to the issuance of the Bonds will contain clear disclaimers that the Bonds are not obligations of the City or the State of California but are to be paid for solely from funds provided by the Borrower.

Outside of holding the TEFRA hearing, no other participation or activity of the City or the City Council with respect to the issuance of the Bonds will be required.

In order to satisfy the requirements of the Agreement and of the Internal Revenue Code, the City must (1) hold a public hearing and (2) adopt the TEFRA Resolution approving the financing to be undertaken through CMFA.

Each financing completed by CMFA is structured so the **local agency** completing the TEFRA hearing process **has no liability with respect to the issuance of bonds or the repayment of any debt service relating to such bonds.** In addition, the local agency completing the TEFRA hearing process is not a party to any of the financing documents relating to the issuance of the bonds nor is it named in any of the disclosure documents describing the bonds or the proposed financing.

ALTERNATIVES:

The City Council may elect to deny its approval for the issuance of tax-exempt bonds by the California Municipal Finance Authority (CMFA).

STRATEGIC PLAN:
Not Applicable

SUBMITTED BY:
Danielle Garcia, Management Services /Finance Director

RECOMMENDED BY:
Charles M. Duggan, Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager

Fiscal Impact

Discussion:

No expenditure of financial or staff resources is anticipated as a result of approving Resolution No. 8258. Further, as a matter of policy, the CMFA will grant a portion of the issuance fees that it assesses HumanGood to the City's general fund. This amount is estimated to be $2,000. This will offset the staff time involved for this hearing and cover the costs of the public hearing notice.

Attachments

Joint Powers Authority - Agmt. with CMFA dated July 22, 2019
HumanGood 2025 - TEFRA Resolution No. 8685

JOINT EXERCISE OF POWERS AGREEMENT
RELATING TO THE CALIFORNIA MUNICIPAL FINANCE AUTHORITY

THIS AGREEMENT, dated as of January 1, 2004, among the parties executing this Agreement (all such parties, except those which have withdrawn as provided herein, are referred to as the "Members" and those parties initially executing this Agreement are referred to as the "Initial Members"):

WITNESSETH

WHEREAS, pursuant to Title 1, Division 7, Chapter 5 of the California Government Code (in effect as of the date hereof and as the same may from time to time be amended or supplemented, the "Joint Exercise of Powers Act"), two or more public agencies may by agreement jointly exercise any power common to the contracting parties; and

WHEREAS, each of the Members is a "public agency" as that term is defined in Section 6500 of the Joint Exercise of Powers Act; and

WHEREAS, each of the Members is empowered by law to promote economic, cultural and community development, including, without limitation, the promotion of opportunities for the creation or retention of employment, the stimulation of economic activity, the increase of the tax base, and the promotion of opportunities for education, cultural improvement and public health, safety and general welfare; and

WHEREAS, each of the Members may accomplish the purposes and objectives described in the preceding preamble by various means, including through making grants, loans or providing other financial assistance to governmental and nonprofit organizations; and

WHEREAS, each Member is also empowered by law to acquire and dispose of real property for a public purpose; and

WHEREAS, the Joint Exercise of Powers Act authorizes the Members to create a joint exercise of powers entity with the authority to exercise any powers common to the Members, as specified in this Agreement and to exercise the additional powers granted to it in the Joint Exercise of Powers Act and any other applicable provisions of the laws of the State of California; and

WHEREAS, a public entity established pursuant to the Joint Exercise of Powers Act is empowered to issue or execute bonds, notes, commercial paper or any other evidences of indebtedness, including leases or installment sale agreements or certificates of participation therein (herein "Bonds"), and to otherwise undertake financing programs under the Joint Exercise of Powers Act or other applicable provisions of the laws of the State of California to accomplish its public purposes; and

WHEREAS, the Members have determined to specifically authorize a public entity authorized pursuant to the Joint Exercise of Powers Act to issue Bonds pursuant to the Joint Exercise of Powers Act or other applicable provisions of the laws of the State of California; and

WHEREAS, it is the desire of the Members to use a public entity established pursuant to the Joint Exercise of Powers Act to undertake the financing and/or refinancing of projects of any nature, including, but not limited to, capital or working capital projects, insurance, liability or retirement programs or facilitating Members use of existing or new financial instruments and mechanisms; and

WHEREAS, it is further the intention of the Members that the projects undertaken will result in significant public benefits to the inhabitants of the jurisdictions of the Members; and

WHEREAS, by this Agreement, each Member desires to create and establish the "California Municipal Finance Authority" for the purposes set forth herein and to exercise the powers provided herein;

NOW, THEREFORE, the Members, for and in consideration of the mutual promises and agreements herein contained, do agree as follows:

Section 1. Purpose.

This Agreement is made pursuant to the provisions of the Joint Exercise of Powers Act. The purpose of this Agreement is to establish a public entity for the joint exercise of powers common to the Members and for the exercise of additional powers given to a joint powers entity under the Joint Powers Act or any other applicable law, including, but not limited to, the issuance of Bonds for any purpose or activity permitted under the Joint Exercise of Powers Act or any other applicable law. Such purpose will be accomplished and said power exercised in the manner hereinafter set forth.

Section 2. Term.

This Agreement shall become effective in accordance with Section 17 as of the date hereof and shall continue in full force and effect until such time as it is terminated in writing by all the Members; provided, however, that this Agreement shall not terminate or be terminated until all Bonds issued or caused to be issued by the Authority (defined below) shall no longer be outstanding under the terms of the indenture, trust agreement or other instrument pursuant to which such Bonds are issued, or unless a successor to the Authority assumes all of the Authority's debts, liabilities and obligastions.

Section 3. Authority.

A. CREATION AND POWERS OF AUTHORITY.

Pursuant to the Joint Exercise of Powers Act, there is hereby created a public entity to be known as the "California Municipal Finance Authority" (the "Authority"), and said Authority shall be a public entity separate and apart from the Members. Its

debts, liabilities and obligations do not constitute debts, liabilities or obligations of any Members.

B. BOARD.

The Authority shall be administered by the Board of Directors (the "Board," or the "Directors" and each a "Director") of the California Foundation for Stronger Communities, a nonprofit public benefit corporation organized under the laws of the State of California (the "Foundation"), with each such Director serving in his or her individual capacity as a Director of the Board. The Board shall be the administering agency of this Agreement and, as such, shall be vested with the powers set forth herein, and shall administer this Agreement in accordance with the purposes and functions provided herein. The number of Directors, the appointment of Directors, alternates and successors, their respective terms of office, and all other provisions relating to the qualification and office of the Directors shall be as provided in the Articles and Bylaws of the Foundation, or by resolution of the Board adopted in accordance with the Bylaws of the Foundation.

All references in this Agreement to any Director shall be deemed to refer to and include the applicable alternate Director, if any, when so acting in place of a regularly appointed Director.

Directors may receive reasonable compensation for serving as such, and shall be entitled to reimbursement for any expenses actually incurred in connection with serving as a Director, if the Board shall determine that such expenses shall be reimbursed and there are unencumbered funds available for such purpose.

The Foundation may be removed as administering agent hereunder and replaced at any time by amendment of this Agreement approved as provided in Section 16; provided that a successor administering agent of this Agreement has been appointed and accepted its duties and responsibilities under this Agreement.

C. OFFICERS; DUTIES; OFFICIAL BONDS.

The officers of the Authority shall be the Chair, Vice-Chair, Secretary and Treasurer (defined below). The Board, in its capacity as administering agent of this Agreement, shall elect a Chair, a Vice-Chair, and a Secretary of the Authority from among Directors to serve until such officer is re-elected or a successor to such office is elected by the Board. The Board shall appoint one or more of its officers or employees to serve as treasurer, auditor, and controller of the Authority (the "Treasurer") pursuant to Section 6505.6 of the Joint Exercise of Powers Act to serve until such officer is re-elected or a successor to such office is elected by the Board.

Subject to the applicable provisions of any resolution, indenture, trust agreement or other instrument or proceeding authorizing or securing Bonds (each such resolution, indenture, trust agreement, instrument and proceeding being herein referred to as an "Indenture") providing for a trustee or other fiscal agent, and except as may otherwise be

specified by resolution of the Board, the Treasurer is designated as the depositary of the Authority to have custody of all money of the Authority, from whatever source derived and shall have the powers, duties and responsibilities specified in Sections 6505, 6505.5 and 6509.5 of the Joint Exercise of Powers Act.

The Treasurer of the Authority is designated as the public officer or person who has charge of, handles, or has access to any property of the Authority, and such officer shall file an official bond with the Secretary of the Authority in the amount specified by resolution of the Board but in no event less than $1,000.

The Board shall have the power to appoint such other officers and employees as it may deem necessary and to retain independent counsel, consultants and accountants.

The Board shall have the power, by resolution, to the extent permitted by the Joint Exercise of Power Act or any other applicable law, to delegate any of its functions to one or more of the Directors or officers, employees or agents of the Authority and to cause any of said Directors, officers, employees or agents to take any actions and execute any documents or instruments for and in the name and on behalf of the Board or the Authority.

D. MEETINGS OF THE BOARD.

(1) Ralph M. Brown Act.

All meetings of the Board, including, without limitation, regular, adjourned regular, special, and adjourned special meetings shall be called, noticed, held and conducted in accordance with the provisions of the Ralph M. Brown Act (commencing with Section 54950 of the Government Code of the State of California), or any successor legislation hereinafter enacted (the "Brown Act").

(2) Regular Meetings.

The Board shall provide for its regular meetings; provided, however, it shall hold at least one regular meeting each year. The date, hour and place of the holding of the regular meetings shall be fixed by resolution of the Board. To the extent permitted by the Brown Act, such meetings may be held by telephone conference.

(3) Special Meetings.

Special meetings of the Board may be called in accordance with the provisions of Section 54956 of the Government Code of the State of California. To the extent permitted by the Brown Act, such meetings may be held by telephone conference.

(4) Minutes.

The Secretary of the Authority shall cause to be kept minutes of the regular, adjourned regular, special, and adjourned special meetings of the Board and shall, as soon as possible after each meeting, cause a copy of the minutes to be forwarded to each Director.

(5) Quorum.

A majority of the Board shall constitute a quorum for the transaction of business. No action may be taken by the Board except upon the affirmative vote of a majority of the Directors constituting a quorum, except that less than a quorum may adjourn a meeting to another time and place.

E. RULES AND REGULATIONS.

The Authority may adopt, from time to time, by resolution of the Board such rules and regulations for the conduct of its meetings and affairs as may be required.

Section 4. Powers.

The Authority shall have the power, in its own name, to exercise the common powers of the Members and to exercise all additional powers given to a joint powers entity under any of the laws of the State of California, including, but not limited to, the Joint Exercise of Powers Act, for any purpose authorized under this Agreement. Such powers shall include the common powers specified in this Agreement and may be exercised in the manner and according to the method provided in this Agreement. The Authority is hereby authorized to do all acts necessary for the exercise of such power, including, but not limited to, any of all of the following: to make and enter into contracts; to employ agents and employees; to acquire, construct, provide for maintenance and operation of, or maintain and operate, any buildings, works or improvements; to acquire, hold or dispose of property wherever located; to incur debts, liabilities or obligations; to receive gifts, contributions and donations of property, funds, services, and other forms of assistance from person, firms, corporations and any governmental entity; to sue and be sued in its own name; to make grants, loans or provide other financial assistance to governmental and nonprofit organizations (e.g., the Members or the Foundation) to accomplish any of its purposes; and generally to do any and all things necessary or convenient to accomplish its purposes.

Without limiting the generality of the foregoing, the Authority may issue or cause to be issued Bonds, and pledge any property or revenues as security to the extent permitted under the Joint Exercise of Powers Act, or any other applicable provision of law; provided, however, the Authority shall not issue Bonds with respect to any project located in the jurisdiction of one or more Members unless the governing body of any such Member, or its duly authorized representative, shall approve, conditionally or unconditionally, the project, including the issuance of Bonds therefor. Such approval may be evidenced by resolution, certificate, order, report or such other means of written approval of such project as may be selected by the Member (or its authorized representative) whose approval is required. No such approval shall be required in

connection with Bonds that refund Bonds previously issued by the Authority and approved by the governing board of a Member.

The manner in which the Authority shall exercise its powers and perform its duties is and shall be subject to the restrictions upon the manner in which a California general law city could exercise such powers and perform such duties. The manner in which the Authority shall exercise its powers and perform its duties shall not be subject to any restrictions applicable to the manner in which any other public agency could exercise such powers or perform such duties, whether such agency is a party to this Agreement or not.

Section 5. Fiscal Year.

For the purposes of this Agreement, the term "Fiscal Year" shall mean the fiscal year as established from time to time by resolution of the Board, being, at the date of this Agreement, the period from July 1 to and including the following June 30, except for the first Fiscal Year which shall be the period from the date of this Agreement to June 30, 2004.

Section 6. Disposition of Assets.

At the end of the term hereof or upon the earlier termination of this Agreement as set forth in Section 2, after payment of all expenses and liabilities of the Authority, all property of the Authority both real and personal shall automatically vest in the Members in the manner and amount determined by the Board in its sole discretion and shall thereafter remain the sole property of the Members; provided, however, that any surplus money on hand shall be returned in proportion to the contributions made by the Members.

Section 7. Bonds.

From time to time the Authority shall issue Bonds, in one or more series, for the purpose of exercising its powers and raising the funds necessary to carry out its purposes under this Agreement.

The services of bond counsel, financing consultants and other consultants and advisors working on the projects and/or their financing shall be used by the Authority. The expenses of the Board shall be paid from the proceeds of the Bonds or any other unencumbered funds of the Authority available for such purpose.

Section 8. Bonds Only Limited and Special Obligations of Authority.

The Bonds, together with the interest and premium, if any, thereon, shall not be deemed to constitute a debt of any Member or pledge of the faith and credit of the Members or the Authority. The Bonds shall be only special obligations of the Authority, and the Authority shall under no circumstances be obligated to pay the Bonds except from revenues and other funds pledged therefor. Neither the Members nor the Authority shall be obligated to pay the principal of, premium, if any, or interest on the Bonds, or other costs incidental thereto, except from the revenues and funds pledged therefor, and neither the faith and credit nor the taxing power of the Members nor the faith and credit of the Authority shall be pledged to the payment of the

principal of, premium, if any, or interest on the Bonds nor shall the Members or the Authority in any manner be obligated to make any appropriation for such payment.

No covenant or agreement contained in any Bond or related document shall be deemed to be a covenant or agreement of any Director, or any officer, employee or agent of the Authority in his or her individual capacity and neither the Board of the Authority nor any Director or officer thereof executing the Bonds shall be liable personally on any Bond or be subject to any personal liability or accountability by reason of the issuance of any Bonds.

Section 9. Accounts and Reports.

All funds of the Authority shall be strictly accounted for. The Authority shall establish and maintain such funds and accounts as may be required by good accounting practice and by any provision of any Indenture (to the extent such duties are not assigned to a trustee of Bonds). The books and records of the Authority shall be open to inspection at all reasonable times by each Member.

The Treasurer of the Authority shall cause an independent audit to be made of the books of accounts and financial records of the Authority by a certified public accountant or public accountant in compliance with the provisions of Section 6505 of the Joint Exercise of Powers Act. In each case the minimum requirements of the audit shall be those prescribed by the State Controller for special districts under Section 26909 of the Government Code of the State of California and shall conform to generally accepted auditing standards. When such an audit of accounts and records is made by a certified public accountant or public accountant, a report thereof shall be filed as a public record with each Member and also with the county auditor of each county in which a Member is located; provided, however, that to the extent permitted by law, the Authority may, instead of filing such report with each Member and such county auditor, elect to post such report as a public record electronically on a website designated by the Authority. Such report if made shall be filed within 12 months of the end of the Fiscal Year or Years under examination.

The Treasurer is hereby directed to report in writing on the first day of July, October, January, and April of each year to the Board and the Members which report shall describe the amount of money held by the Treasurer for the Authority, the amount of receipts since the last such report, and the amount paid out since the last such report (which may exclude amounts held by a trustee or other fiduciary in connection with any Bonds to the extent that such trustee or other fiduciary provided regular reports covering such amounts.)

Any costs of the audit, including contracts with, or employment of, certified public accountants or public accountants in making an audit pursuant to this Section, shall be borne by the Authority and shall be a charge against any unencumbered funds of the Authority available for that purpose.

In any Fiscal Year the Board may, by resolution adopted by unanimous vote, replace the annual special audit with an audit covering a two-year period.

Section 10. Funds.

Subject to the applicable provisions of any Indenture, which may provide for a trustee or other fiduciary to receive, have custody of and disburse Authority funds, the Treasurer of the Authority shall receive, have the custody of and disburse Authority funds pursuant to the accounting procedures developed under Sections 3.C and 9, and shall make the disbursements required by this Agreement or otherwise necessary to carry out any of the provisions of purposes of this Agreement.

Section 11. Notices.

Notices and other communications hereunder to the Members shall be sufficient if delivered to the clerk of the governing body of each Member; provided, however, that to the extent permitted by law, the Authority may, provide notices and other communications and postings electronically (including, without limitation, through email or by posting to a website).

Section 12. Additional Members/Withdrawal of Members.

Qualifying public agencies may be added as parties to this Agreement and become Members upon: (1) the filing by such public agency with the Authority of an executed counterpart of this Agreement, together with a copy of the resolution of the governing body of such public agency approving this Agreement and the execution and delivery hereof; and (2) adoption of a resolution of the Board approving the addition of such public agency as a Member. Upon satisfaction of such conditions, the Board shall file such executed counterpart of this Agreement as an amendment hereto, effective upon such filing.

A Member may withdraw from this Agreement upon written notice to the Board; provided, however, that no such withdrawal shall result in the dissolution of the Authority so long as any Bonds remain outstanding. Any such withdrawal shall be effective only upon receipt of the notice of withdrawal by the Board which shall acknowledge receipt of such notice of withdrawal in writing and shall file such notice as an amendment to this Agreement effective upon such filing.

Section 13. Indemnification.

To the full extent permitted by law, the Board may authorize indemnification by the Authority of any person who is or was a Director or an officer, employee of other agent of the Authority, and who was or is a party or is threatened to be made a party to a proceeding by reason of the fact that such person is or was such a Director or an officer, employee or other agent of the Authority, against expenses, including attorneys fees, judgments, fines, settlements and other amounts actually and reasonably incurred in connection with such proceeding, if such person acted in good faith in a manner such person reasonably believed to be in the best interests of the Authority and, in the case of a criminal proceeding, had no reasonable cause to believe the conduct of such person was unlawful and, in the case of an action by or in the right of the Authority, acted with such care, including reasonable inquiry, as an ordinarily prudent person in a like position would use under similar circumstances.

Section 14. Contributions and Advances.

Contributions or advances of public funds and of the use of personnel, equipment or property may be made to the Authority by the Members for any of the purposes of this Agreement. Payment of public funds may be made to defray the cost of any such contribution or advance. Any such advance may be made subject to repayment, and in such case shall be repaid, in the manner agreed upon by the Authority and the Member making such advance at the time of such advance. It is mutually understood and agreed to that no Member has any obligation to make advances or contributions to the Authority to provide for the costs and expenses of administration of the Authority, even though any Member may do so. The Members understand and agree that a portion of the funds of the Authority that otherwise may be allocated or distributed to the Members may instead be used to make grants, loans or provide other financial assistance to governmental units and nonprofit organizations (e.g., the Foundation) to accomplish any of the governmental unit's or nonprofit organization's purposes.

Section 15. Immunities.

All of the privileges and immunities from liabilities, exemptions from laws, ordinances and rules, and other benefits which apply to the activity of officers, agents or employees of Members when performing their respective functions within the territorial limits of their respective public agencies, shall apply to the same degree and extent to the Directors, officers, employees, agents or other representatives of the Authority while engaged in the performance of any of their functions or duties under the provisions of this Agreement.

Section 16. Amendments.

Except as provided in Section 12 above, this Agreement shall not be amended, modified, or altered, unless the negative consent of each of the Members is obtained. To obtain the negative consent of each of the Members, the following negative consent procedure shall be followed: (a) the Authority shall provide each Member with a notice at least sixty (60) days prior to the date such proposed amendment is to become effective explaining the nature of such proposed amendment and this negative consent procedure; (b) the Authority shall provide each Member who did not respond a reminder notice with a notice at least thirty (30) days prior to the date such proposed amendment is to become effective; and (c) if no Member objects to the proposed amendment in writing within sixty (60) days after the initial notice, the proposed amendment shall become effective with respect to all Members.

Section 17. Effectiveness.

This Agreement shall become effective and be in full force and effect and a legal, valid and binding obligation of each of the Members on the date that the Board shall have received from two of the Initial Members an executed counterpart of this Agreement, together with a certified copy of a resolution of the governing body of each such Initial Member approving this Agreement and the execution and delivery hereof.

Section 18. Partial Invalidity.

If any one or more of the terms, provisions, promises, covenants or conditions of this Agreement shall to any extent be adjudged invalid, unenforceable, void or voidable for any reason whatsoever by a court of competent jurisdiction, each and all of the remaining terms, provisions, promises, covenants and conditions of this Agreement shall not be affected thereby, and shall be valid and enforceable to the fullest extent permitted by law.

Section 19. Successors.

This Agreement shall be binding upon and shall inure to the benefit of the successors of the parties hereto. Except to the extent expressly provided herein, no Member may assign any right or obligation hereunder without the consent of the other Members.

Section 20. Miscellaneous.

This Agreement may be executed in several counterparts, each of which shall be an original and all of which shall constitute but one and the same instrument.

The section headings herein are for convenience only and are not to be construed as modifying or governing the language in the section referred to.

Wherever in this Agreement any consent or approval is required, the same shall not be unreasonably withheld.

This Agreement shall be governed under the laws of the State of California.

This Agreement is the complete and exclusive statement of the agreement among the Members, which supercedes and merges all prior proposals, understandings, and other agreements, whether oral, written, or implied in conduct, between and among the Members relating to the subject matter of this Agreement.

IN WITNESS WHEREOF, the City of Redlands has caused this Agreement to be executed and attested by its duly authorized representatives as of the 22 day of JULY, 2019.

Member:

CITY OF REDLANDS

By _____
Name: Janice McConnell
Title: Assistant City Manager

ATTEST:

By _____
Name: Jeanne Donaldson
Title: City Clerk

RESOLUTION NO. 7988

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS APPROVING, AUTHORIZING AND DIRECTING EXECUTION OF A JOINT EXERCISE OF POWERS AGREEMENT RELATING TO THE CALIFORNIA MUNICIPAL FINANCE AUTHORITY AND APPROVING THE ISSUANCE OF THE CALIFORNIA MUNICIPAL FINANCE AUTHORITY REVENUE BONDS, SERIES 2019 (HUMANGOOD) IN AN AGGREGATE PRINCIPAL AMOUNT NOT TO EXCEED $180,000,000 FOR THE PURPOSE OF FINANCING AND REFINANCING THE ACQUISITION, CONSTRUCTION, FURNISHING AND EQUIPPING OF PLYMOUTH VILLAGE AND CERTAIN OTHER MATTERS RELATING THERETO

WHEREAS, pursuant to Chapter 5 of Division 7 of Title 1 of the Government Code of the State of California (the "*Act*"), certain public agencies (the "*Members*") have entered into a Joint Exercise of Powers Agreement Relating to the California Municipal Finance Authority, dated as of January 1, 2004 (the "*Agreement*") in order to form the California Municipal Finance Authority (the "*Authority*"), for the purpose of promoting economic, cultural and community development, and in order to exercise any powers common to the Members, including the issuance of bonds, notes or other evidences of indebtedness; and

WHEREAS, the City of Redlands, California (the "*City*") has determined that it is in the public interest and for the public benefit that the City become a Member of the Authority in order to facilitate the promotion of economic, cultural and community development activities in the City, including the financing of projects therefor by the Authority; and

WHEREAS, there is now before this City Council of the City (the "*Council*") the form of the Agreement; and

WHEREAS, the Agreement has been filed with the City, and the members of the Council, with the assistance of its staff, have reviewed said document; and

WHEREAS, the Authority is authorized to issue and sell revenue bonds for the purpose, among others, of financing or refinancing the construction of capital projects; and

WHEREAS, HumanGood, HumanGood NorCal (formerly known as American Baptist Homes of the West), HumanGood SoCal (formerly known as Southern California Presbyterian Homes), HumanGood Fresno (formerly known as The Terraces at San Joaquin Gardens), Redwood Senior Homes and Services and Westminster Gardens, each a California nonprofit public benefit corporation (collectively, the "*Corporation*"), has requested that the Authority issue bonds in one or more series in an aggregate principal amount not to exceed $180,000,000 (the "*Bonds*"), the proceeds of which will be used, among other things, (a) in a principal amount not to exceed $65,000,000, to refund all or a portion of the outstanding $77,805,000 original principal amount California Statewide Communities Development Authority Senior Living Revenue Bonds, Series 2009 (Southern California Presbyterian Homes) (the "*Series 2009 Bonds*"), (b) in a principal amount not to exceed $95,000,000, to refund all or a portion of the outstanding $106,580,000 original principal amount California Statewide Communities Development Authority Revenue Bonds, Series 2010 (American Baptist Homes of the West) (the "*Series 2010 Bonds*"), (c) in a principal amount not to exceed $35,000,000, to finance or reimburse the cost of remodeling, renovating, furnishing and equipping certain of the Corporation's continuing care

Section 4. The issuance of the Bonds shall be subject to the approval of the Authority of all financing documents relating thereto to which the Authority is a party. The City shall have no responsibility or liability whatsoever with respect to the Bonds.

Section 5. The adoption of this Resolution shall not obligate the City or any department thereof to (i) provide any financing to acquire or construct the Project or any refinancing of the Project; (ii) approve any application or request for or take any other action in connection with any planning approval, permit or other action necessary for the acquisition, construction, rehabilitation or operation of the Project; (iii) make any contribution or advance any funds whatsoever to the Authority; or (iv) take any further action with respect to the Authority or its membership therein.

Section 6. The officers and employees of the City are hereby authorized and directed, jointly and severally, to do any and all things and to execute and deliver any and all documents which they deem necessary or advisable in order to carry out, give effect to and comply with the terms and intent of this Resolution and the financing transaction approved hereby.

Section 7. The Council expressly conditions its approval of this Resolution on its understanding that the City shall have no obligation whatsoever to pay any principal, interest, fees or other costs associated with the Authority's issuance of the Bonds.

Section 8. The Clerk shall forward a certified copy of this Resolution and an originally executed Agreement to the Authority in care of its counsel:

Ronald E. Lee, Esq.
Jones Hall, APLC
475 Sansome Street, Suite 1700
San Francisco, CA 94111

Section 9. This Resolution shall take effect immediately upon its adoption.

ADOPTED, SIGNED AND APPROVED this 2nd day of July, 2019.

Paul W. Foster, Mayor

Attest:

Joanne Donaldson, City Clerk

RESOLUTION NO. 8685

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS APPROVING THE ISSUANCE OF THE CALIFORNIA MUNICIPAL FINANCE AUTHORITY REVENUE AND REFUNDING BONDS, SERIES 2025 (HUMANGOOD – CALIFORNIA OBLIGATED GROUP) IN AN AGGREGATE PRINCIPAL AMOUNT NOT TO EXCEED $205,000,000 FOR THE PURPOSE OF FINANCING OR REFINANCING THE CONSTRUCTION, FURNISHING AND EQUIPPING OF PLYMOUTH VILLAGE AND CERTAIN OTHER MATTERS RELATING THERETO

WHEREAS, HumanGood, HumanGood NorCal, HumanGood SoCal or HumanGood Fresno, each a California nonprofit public benefit corporation (collectively, the "Corporation"), has requested that the California Municipal Finance Authority (the "Authority") participate in the issuance of one or more series of revenue bonds in an aggregate principal amount not to exceed $205,000,000 (the "Bonds"), the proceeds of which will be used, among other things, (a) in a principal amount not to exceed $35,000,000, to refund all or a portion of the outstanding $52,080,000 original principal amount California Statewide Communities Development Authority Revenue Bonds, Series 2015 (American Baptist Homes of the West) (the "Series 2015 NorCal Bonds"), (b) in a principal amount not to exceed $40,000,000, to refund all or a portion of the outstanding $47,900,000 original principal amount California Municipal Finance Authority Senior Living Revenue Bonds (Southern California Presbyterian Homes) Series 2015 (the "Series 2015 SoCal Bonds"), (c) in a principal amount not to exceed $15,000,000, to refund all or a portion of the outstanding $15,480,000 original principal amount California Municipal Finance Authority Revenue and Refunding Bonds, Series 2020A (HumanGood – California Obligated Group) (the "Series 2020A Bonds"), (d) in a principal amount not to exceed $60,000,000, to refund all or a portion of the outstanding $64,765,000 original principal amount California Municipal Finance Authority Revenue and Refunding Bonds, Series 2020B (HumanGood – California Obligated Group) (the "Series 2020B Bonds"), (e) in a principal amount not to exceed $55,000,000, to finance or reimburse the cost of constructing, building, remodeling, renovating, rehabilitating, upgrading, furnishing and equipping certain of the Corporation's continuing care retirement communities located in several jurisdictions throughout the state of California, including in the City of Redlands, (f) to pay a portion of the interest on the Bonds, if deemed necessary or advisable by the Authority or the Corporation, (g) to provide working capital to the Corporation, if deemed necessary or advisable by the Authority or the Corporation, (h) to fund a debt service reserve fund, if deemed necessary or advisable by the Authority or the Corporation, and (i) to pay certain expenses incurred in connection with the issuance of the Bonds (collectively, the "Project"); and

WHEREAS, a portion of the proceeds of the Bonds in a principal amount not to exceed $20,000,000 will be used to finance expenditures for various renovations to existing infrastructure and upgrades to housing units and amenities at the following continuing care community owned and operated by the Corporation and located in the City of Redlands (the "City"): Plymouth Village located at 900 Salem Drive, Redlands, California, 92373 (the

"Community"); and

WHEREAS, the proceeds of the Series 2015 NorCal Bonds were used, among other things, to (1) refund all or a portion of the $50,000,000 original principal amount California Statewide Communities Development Authority Variable Rate Demand Revenue Bonds, Series 2006 (American Baptist Homes of the West) (the "*Series 2006 Bonds*"), (2) finance or reimburse the cost of the remodeling, renovation, furnishing and equipping of the Corporation's continuing care facilities located in several jurisdictions, including at the Community in the City, (3) pay a portion of the interest on the Series 2015 NorCal Bonds, (4) provide working capital to the Corporation, (5) fund a debt service reserve fund, and (6) pay certain expenses incurred in connection with the issuance of the Series 2015 NorCal Bonds; and

WHEREAS, pursuant to Section 147(f) of the Internal Revenue Code of 1986 (the "Code"), in order for the interest on the Bonds to be tax-exempt, the issuance of the Bonds by the Authority must be approved by the City because the Community is located within the territorial limits of the City; and

WHEREAS, the Council is the elected legislative body of the City and is one of the applicable elected representatives required to approve the issuance of the Bonds under Section 147(f) of the Code; and

WHEREAS, the Council understands that its actions in holding the public hearing and in adopting this Resolution do not obligate the City in any manner for payment of the principal, interest, fees or any other costs associated with the issuance of the Bonds, and the Council expressly conditions its approval of the issuance of the Bonds by the Authority by the adoption of this Resolution on this understanding; and

WHEREAS, the Authority has requested that the Council approve the issuance of the Bonds by the Authority in order to satisfy the public approval requirement of Section 147(f) of the Code and the requirements of Section 4 of the Joint Exercise of Powers Agreement relating to the California Municipal Finance Authority, dated as of January 1, 2004 (the "Agreement"), among certain local agencies, including the City; and

WHEREAS, pursuant to Section 147(f) of the Code, the Council has, following notice duly given, held a public hearing regarding the issuance of the Bonds, and now desires to approve the issuance of the Bonds by the Authority;

NOW, THEREFORE, BEIT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The Council accepts the above recitals as true and correct.

Section 2. The Council hereby approves the issuance of the Bonds by the Authority. It is the purpose and intent of the Council that this Resolution constitute approval of the issuance of the Bonds by the Authority for the purposes of (a) Section 147(f) of the Code by the applicable elected

representative of the governmental unit having jurisdiction over the area in which the Community is located, in accordance with said Section 147(f) and (b) Section 4 of the Agreement.

Section 3. The issuance of the Bonds shall be subject to the approval of the Authority of all financing documents relating thereto to which the Authority is a party. The City shall have no responsibility or liability whatsoever with respect to the Bonds.

Section 4. The adoption of this Resolution shall not obligate the City or any department thereof to (i) provide any financing to acquire or construct the Project or any refinancing of the Project; (ii) approve any application or request for or take any other action in connection with any planning approval, permit or other action necessary for the acquisition, construction, rehabilitation or operation of the Project; (iii) make any contribution or advance any funds whatsoever to the Authority; or (iv) take any further action with respect to the Authority or its membership therein.

Section 5. The officers and employees of the City are hereby authorized and directed, jointly and severally, to do any and all things and to execute and deliver any and all documents which they deem necessary or advisable in order to carry out, give effect to and comply with the terms and intent of this Resolution and the financing transaction approved hereby.

Section 6. The Council expressly conditions its approval of this Resolution on its understanding that the City shall have no obligation whatsoever to pay any principal, interest, fees or other costs associated with the Authority's issuance of the Bonds.

Section 7. This Resolution shall take effect immediately upon its adoption.

ADOPTED, SIGNED AND APPROVED this 3rd day of June, 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June 2025, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

_____
Jeanne Donaldson, City Clerk

City Council Meeting **L. 1.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of Resolution No. 8692 authorizing the City Manager, or designee, to execute the Subrecipient Agreements, any amendments and all other related documents associated with the Encampment Resolution Funding (ERF-3-R) Program for an amount not-to-exceed $4,155,600 (Assistant City Manager Boatman)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motions are provided:

1. I move that the City Council adopt Resolution No. 8692; and
2. I further move that the City Council approve the subrecipients as further detailed in the staff report as single/sole source providers for the ERF-3-R Program.

RECOMMENDATION:

Staff recommends that City Council adopt Resolution No. 8692 authorizing the City Manager, or designee, to execute subrecipient agreements, any amendments and all other related documents associated with the Encampment Resolution Funding (ERF-3-R) Program for an amount not-to-exceed $4,155,600.

DISCUSSION:

On November 27, 2023, the California Interagency Council on Homelessness announced a Notice of Funding Availability (NOFA) for the Encampment Resolution Funding Round Three (ERF-3-R) Program, which seeks to fund actionable, person-centered local proposals that resolve the experience of unsheltered homelessness for individuals residing in encampments.

On April 30, 2024, the Homeless Solutions Division Program Manager of the Facilities and Community Services Department submitted an ERF-3-R Program grant application in response to the Notice of Funding Availibilty for a comprehensive plan to implement a multi-faceted approach addressing ongoing homelessness challenges in the City.

On September 27, 2024, the City received confirmation from the State of California Department of Housing and Community Development (HCD) of their intent to award a grant to the City for the ERF-3-R Program. On December 17, 2024 (Item No. L.4.), City Council accepted the HCD ERF-3-R grant for the amount of $5,341,800.

On February 25, 2025, the City received the funds from the HCD for the ERF-3-R Program and of that amount, $4,155,600 will be allocated to local non-profit service providers (subrecipients) in order to meet the project's proposed outcomes. Funding for the Homeless Resource Services Program Agreements will be for a 24-month period beginning June 4, 2025.

The subrecipients will provide a range of supportive services through a multi-faceted approach geared towards the specific needs of the homeless populations in Redlands, including temporary and transitional housing as well as securing housing for up to 100 individuals. Additional services include mental and substance-use treatment, employment assistance, and specialized care for those with chronic health and physical disabilities.

The City of Redlands has existing partnerships with key community organizations to facilitate these services and were selected as subrecipients as part of the grant application process. Key partnerships include several nonprofit organizations leveraging their unique areas of expertise and resources. Step Up on Second Street, Inc., with over 35 years of experience, will provide outreach services and connect individuals to available resources, including permanent housing at the Step Up in Redlands site. Youth Hope focuses on unhoused youth, offering outreach, case management, and supportive services.

Family Service Association, Building a Generation, and the Salvation Army have over 10 years of experience and will leverage their community relationships to support permanent housing placements. Rehabilitation Services, Salvation Army, and Central for Spiritual Living each have over 5 years of experience serving diverse populations and will provide interim shelter beds. The Super 8 motel currently works with the city and will provide emergency shelter. Leveraging over 5 years of experience in career development and job search assistance, Building a Generation, Goodwill Career Services, and Redlands Chamber of Commerce will provide job placement assistance. Each partner’s prior experience in managing complex homelessness projects informs this proposal, ensuring that the roles assigned are backed by a proven track record of success. While no formal procurement process was required by the ERF-3-R

grant application, the Single/Sole Source providers listed below have met City Procurement requirements as well as the qualifications and experience required as part of the grant application process. Additionally, the Program subrecipients have assisted the City with housing 350 homeless individuals exceeding the expected target of 200.

Subrecipient funding awards are outlined as follows:

Subrecipients	**Services**	**Amount**
Center for Spiritual Living	Temporary Shelter Beds	$337,500
Rehabilitation Services	Temporary Shelter Beds	$337,500
Salvation Army	Temporary Shelter Beds	$337,500
SB Express	Temporary Hotel Rooms	$264,000
Step Up	Outreach	$306,250
Youth Hope	Outreach	$100,000
Salvation Army	Outreach	$306,250
Salvation Army	Outreach and Mobile Shelter	$300,000
Building a Generation	Rapid Rehousing	$456,200
Family Service Association of Redlands	Rapid Rehousing	$456,200
Salvation Army	Rapid Rehousing	$456,200
Building a Generation	Employment Services	$150,000
The Goodwill	Employment Services	$150,000
The Redlands Chamber of Commerce	Employment Services	$150,000
StepUp	Project Homekey Operating Support	$ 48,000

Resolution No. 8692 authorizes the City Manager, or designee, to execute the Subrecipient Agreements, any amendments and all other related documents associated with the subrecipient services related to the Encampment Resolution Funding (ERF-3-R) Program Grant for an amount not-to-exceed $4,155,600.

ALTERNATIVES:

City Council may elect not to approve Resolution No. 8692 and provide alternative direction to staff. However, electing not to approve this item could result in the loss of grant funding by not meeting the expenditure deadline.

STRATEGIC PLAN:

Supports Priority B: Public Health and Safety, Objective 4: Homelessness

SUBMITTED BY:
Christopher Boatman, Assistant City Manager

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Tricia Munoz, Development Services Management Analyst

Fiscal Impact

Fiscal Year:	FY2025-26
Revenue Generating:	N
Appropriation Required Y/N:	N
Amount:	$4,155,600
Budgeted Y/N:	Y
Account No.:	various

Discussion:

There will be no impact on the General Fund as sufficient appropriation exists in the Facilities & Community Services Department Budget under Project Ledger S120006 and was approved by Council on December 17, 2024, (Item. No. L.4.). Funds for the ERF-3 Grant Award Agreement No. 24-ERF-3-R-100029-RFF#1 were received on February 21, 2025, for the services outlined in the staff report.

Attachments

ERF-3-R Resolution

RESOLUTION NO. 8692

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AUTHORIZING THE CITY MANAGER, OR DESIGNEE, TO EXECUTE SUBRECEIPIENT AGREEMENTS FOR THE ENCAMPMENT RESOLUTION FUNDING ROUND THREE GRANT AWARD FROM THE STATE OF CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT TO FUND UNSHELTERED HOMELESSNESS OUTREACH AND HOUSING OPTIONS AND TO NEGOTIATE AND EXECUTE RELATED DOCUMENTS ASSOCIATED WITH THE SUBRECEIPIENT AGREEMENTS

WHEREAS, on November 27, 2023, the California Interagency Council on Homelessness announced a Notice of Funding Availability for the Encampment Resolution Funding Round Three ("ERF-3-R") Program, which seeks to fund actionable, person-centered local proposals that resolve the experience of unsheltered homelessness for individuals residing in encampments; and

WHEREAS, on April 30, 2024, the Homeless Solutions Division Program Manager of the Facilities and Community Services Department submitted an ERF-3-R Program grant application; and

WHEREAS, on September 27, 2024, the Homeless Solutions Division of the Facilities and Community Services Department received confirmation from the State of California Department of Housing and Community Development ("HCD") of their intent to award the City's proposed ERF-3-R Program in the amount of $5,341,800; and

WHEREAS, on December 17, 2024, City Council accepted the ERF-3-R grant funding award and funds were received by the City on February 25, 2025, in the amount of $5,341,800 of which $4,155,600 is allocated to subrecipient agreements; and

WHEREAS, the subrecipients will provide a range of supportive services through a multi-faceted approach geared towards the specific needs of the homeless populations in Redlands, including temporary and transitional housing as well as securing housing for up to 100 individuals. Additional services include mental and substance-use treatment, employment assistance, and specialized care for those with chronic health and physical disabilities; and

WHEREAS, the City Council has considered all information related to this matter, as presented at the public meetings of the City Council identified herein, including any supporting reports by City Staff, and any information provided during public meetings.

NOW, THEREFORE, BE IT RESOLVED by the City of Redlands, as follows:

Section 1. The City Council hereby finds that the facts set forth in the recitals to this Resolution are true and correct and establish the factual basis for the City Council's adoption of this Resolution.

Section 2. The City Manager of the City of Redlands, or designee, is hereby authorized and directed to execute ERF-3-R Program subrecipient agreements and any subrecipient agreement amendments thereto.

Section 3. This Resolution shall become effective immediately.

ADOPTED, SIGNED AND APPROVED this 3rd day of June 2025.

_____
Mario Saucedo, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, hereby certify that the foregoing Resolution No. 8692 was duly adopted by the City Council at a regular meeting thereof held on the 3rd day of June 2025, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

City Council Meeting **L. 2.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: A Public Hearing regarding a report on city vacancies and the status of recruitment and retention efforts as required by Assembly Bill 2561 (Government Code Section 3502.3) (Human Resources/Risk Management Director Meteau)

(Mayor to declare meeting open as a public hearing)

PROCEDURE FOR PUBLIC HEARING:

1. Mayor declares the meeting open as a public hearing.
2. Mayor calls upon Department Director for report.
3. Mayor calls for questions/comments from members of the City Council.
4. Mayor calls for comments/questions/testimony from the labor group that made a request to speak.
5. Mayor calls on members of the public (3 minutes per speaker).
6. Mayor calls upon City Clerk to note any written comments received.
7. Mayor closes the public hearing.
8. City Council considers the motion and votes.

MOTION(S):

I move to receive and file the vacancy report and status of recruitment and retention efforts as required by Assembly Bill 2561 (Government Code Section 3502.3).

DISCUSSION:

In September 2024, Assembly Bill (AB) 2561 (Gov. Code 3502.3) was signed by the Governor of California. AB 2561 requires a public agency to present the status of vacancies and recruitment and retention efforts at a public hearing at least once per fiscal year, allowing recognized employee organizations to present at the hearing. This report outlines the City of Redlands' legal obligation

under the new law, effective January 1, 2025.

In compliance with AB 2561, the City of Redlands is required to undertake the following actions:

1. Hold a Public Hearing: At least once each fiscal year, at a public hearing before the City Council, the City shall present information regarding the status of vacancies and recruitment and retention efforts (Gov. Code § 3502.3(a)(1)) and identify any necessary changes to policies, procedures, and recruitment activities that may lead to obstacles in the hiring process (Gov. Code § 3502.3(a)(3)).

2. Hearing Before Final Budget: If the City Council adopts an annual budget during the fiscal year, the presentation must occur before the adoption of the final budget. (Gov. Code § 3502.3(a)(2)).

3. Employee Organization Participation: Allow the recognized employee organization for each bargaining unit at the City to make presentations during the public hearing concerning vacancies and recruitment and retention efforts. (Gov. Code § 3502.3(b)).

POSITION DATA:

The passage of AB 2561 recognizes the following challenges in local government employment:

1. Job vacancies in local government are widespread and significantly impact public sector service delivery.
2. High vacancy rates contribute to increased workloads for existing employees, leading to burnout and higher turnover.
3. There is a statewide interest in ensuring that public agencies are adequately staffed to support public service functions.

In 2024, the City of Redlands was budgeted for 595 full-time employees who are represented by a bargaining unit.

- 96 full-time employees separated from employment.
- 110 full-time employees were hired.

In 2024, the City enhanced recruitment efforts, including:

- Social media: Leveraged LinkedIn Recruiting and other platforms to promote the City, broaden candidate outreach, and support direct sourcing efforts.
- Career Fairs: Attended career fairs to connect with a diverse pool of candidates, promote the City, and identify potential talent for current and future job opportunities.
- Reduce Time to Fill: Streamlined the hiring process through effective collaboration with department heads on the recruitment timeline.
- Hiring incentives: Utilized hiring incentives for hard-to-fill positions and

prominently featured them in job postings to attract candidates.
- Continuous recruitment efforts for hard-to-fill positions.
- Competitive benefits: Developed a benefits guide to highlight benefit offerings to candidates.

The City also implemented strategies to improve retention, including:

- Enhanced onboarding: Strengthened the onboarding experience to better integrate new hires and align them with organizational values, and launched an onboarding video showcasing the City, its workforce, culture, mission, and values.
- Wellness initiatives: Promoted a positive work environment and helped reduce burnout through programs like fitness challenges, mental health resources, and wellness and financial workshops.
- Employee engagement: Strengthened employee engagement by cultivating a culture of connection and involvement through targeted employee engagement initiatives.
- Training and Development: Launched Management and Leadership Workshops to equip current and emerging leaders with key skills in communication, decision-making, team building, and strategic thinking, fostering organizational success and a culture of continuous growth.

By enhancing recruitment and retention efforts and ensuring transparent reporting, the City is committed to maintaining a strong and effective workforce.

VACANCY RATE:

All bargaining units maintained vacancy rates below 20% as follows:

- The Redlands Association of Department Directors (RADD) had a 0% vacancy rate.
- The Redlands Association of Management Employees (RAME) had a 5.3% vacancy rate.
- The Redlands Association of Mid-Management Employees (RAMME) had a 6.4% vacancy rate.
- The Redlands Association of Safety Management Employees (RASME) had a 0% vacancy rate.
- The Redlands Association of Fire Management Employees (RAFME) had a 0% vacancy rate.
- The Redlands Association of Civilian Safety Employees (RCSEA) had a12.7% vacancy rate.
- The Redlands Profession Firefighters Association (RPFA) had a 7.4% vacancy rate.
- The Redlands Police Officers Association (RPOA) had a 19.8% vacancy rate.
- The TEAMSTERS Local #1932 had an 8.6% vacancy rate.

As permitted under Government Code Section 3502.3(b) and city policy, recognized employee organizations shall have the right to present information, concerns, and recommendations at the public hearing. The Redlands Police Officers Association (RPOA) has requested to make a presentation to the City Council.

ALTERNATIVES:
N/A

STRATEGIC PLAN:

N/A

SUBMITTED BY:
Robert Meteau Jr., Director, Human Resources/Risk Management

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Kisha McDonald, Human Resources Manager

Fiscal Impact

Discussion:
There is no direct fiscal impact associated with conducting the public hearing required under Government Code section 3205.3. However, addressing recruitment and retention issues may involve future budget and bargaining considerations, which will be presented to the City Council as necessary.

Attachments

AB2561 Legislation
Redlands AB2561 - 2024 Vacancy Report
RPOA Staffing Report

AB-2561 Local public employees: vacant positions. (2023-2024)

SHARE THIS:

Date Published: 09/23/2024 09:00 PM

Assembly Bill No. 2561

CHAPTER 409

An act to add Section 3502.3 to the Government Code, relating to public employment.

[Approved by Governor September 22, 2024. Filed with Secretary of State September 22, 2024.]

LEGISLATIVE COUNSEL'S DIGEST

AB 2561, McKinnor. Local public employees: vacant positions.

Existing law, the Meyers-Milias-Brown Act (act), authorizes local public employees, as defined, to form, join, and participate in the activities of employee organizations of their own choosing for the purpose of representation on matters of labor relations. The act requires the governing body of a public agency to meet and confer in good faith regarding wages, hours, and other terms and conditions of employment with representatives of recognized employee organizations and to consider fully presentations that are made by the employee organization on behalf of its members before arriving at a determination of policy or course of action.

This bill would, as specified, require a public agency to present the status of vacancies and recruitment and retention efforts at a public hearing at least once per fiscal year, and would entitle the recognized employee organization to present at the hearing. If the number of job vacancies within a single bargaining unit meets or exceeds 20% of the total number of authorized full-time positions, the bill would require the public agency, upon request of the recognized employee organization, to include specified information during the public hearing. By imposing new duties on local public agencies, the bill would impose a state-mandated local program. The bill would also include related legislative findings.

The California Constitution requires local agencies, for the purpose of ensuring public access to the meetings of public bodies and the writings of public officials and agencies, to comply with a statutory enactment that amends or enacts laws relating to public records or open meetings and contains findings demonstrating that the enactment furthers the constitutional requirements relating to this purpose.

This bill would make legislative findings to that effect.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement shall be made pursuant to these statutory provisions for costs mandated by the state pursuant to this act, but would recognize that a local agency or school district may pursue any available remedies to seek reimbursement for these costs.

Vote: majority Appropriation: no Fiscal Committee: yes Local Program: yes

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1. The Legislature finds and declares as follows:

(a) Job vacancies in local government are a widespread and significant problem for the public sector affecting occupations across wage levels and educational requirements.

(b) High job vacancies impact public service delivery and the workers who are forced to handle heavier workloads, with understaffing leading to burnout and increased turnover that further exacerbate staffing challenges.

(c) There is a statewide interest in ensuring that public agency operations are appropriately staffed and that high vacancy rates do not undermine public employee labor relations.

SEC. 2. Section 3502.3 is added to the Government Code, to read:

3502.3. (a) (1) A public agency shall present the status of vacancies and recruitment and retention efforts during a public hearing before the governing board at least once per fiscal year.

(2) If the governing board will be adopting an annual or multiyear budget during the fiscal year, the presentation shall be made prior to the adoption of the final budget.

(3) During the hearing, the public agency shall identify any necessary changes to policies, procedures, and recruitment activities that may lead to obstacles in the hiring process.

(b) The recognized employee organization for a bargaining unit shall be entitled to make a presentation at the public hearing at which the public agency presents the status of vacancies and recruitment and retention efforts for positions within that bargaining unit.

(c) If the number of job vacancies within a single bargaining unit meets or exceeds 20 percent of the total number of authorized full-time positions, the public agency shall, upon request of the recognized employee organization, include all of the following information during the public hearing:

(1) The total number of job vacancies within the bargaining unit.

(2) The total number of applicants for vacant positions within the bargaining unit.

(3) The average number of days to complete the hiring process from when a position is posted.

(4) Opportunities to improve compensation and other working conditions.

(d) This section shall not prevent the governing board from holding additional public hearings about vacancies.

(e) The provisions of this section are severable. If any provision of this section or its application is held invalid, the invalidity shall not affect other provisions or applications that can be given effect without the invalid provision or application.

(f) For purposes of this section, "recognized employee organization" has the same meaning as defined in subdivision (a) of Section 3501.

SEC. 3. The Legislature finds and declares that Section 2 of this act, which adds Section 3502.3 to the Government Code, furthers, within the meaning of paragraph (7) of subdivision (b) of Section 3 of Article I of the California Constitution, the purposes of that constitutional section as it relates to the right of public access to the meetings of local public bodies or the writings of local public officials and local agencies. Pursuant to paragraph (7) of subdivision (b) of Section 3 of Article I of the California Constitution, the Legislature makes the following findings:

It is in the public interest, and it furthers the purposes of paragraph (7) of subdivision (b) of Section (3) of Article I of the California Constitution, to ensure that information concerning public agency employment is available to the public.

SEC. 4. No reimbursement shall be made pursuant to Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code for costs mandated by the state pursuant to this act. It is recognized, however, that a local agency or school district may pursue any remedies to obtain reimbursement available to it under Part 7 (commencing with Section 17500) and any other law.

City of REDLANDS

AB2561

2024 VACANCY RATE INFORMATION

Presented By: Kisha McDonald, Human Resources Manager

JUNE 3, 2025

AB 2561

- Effective January 1, 2025, AB 2561 mandates that California public agencies present updates on job vacancies, recruitment, and retention efforts during a public hearing before their governing body at least once per fiscal year.
- The goal is to enhance transparency regarding staffing issues and to address vacancies and provide a forum for employee organizations and the public to engage in addressing ongoing staffing challenges.

City of REDLANDS

LOCAL GOVERNMENT STAFFING CHALLENGES

1. Job Vacancies

   Job vacancies in local government are a widespread and significant problem for the public sector affecting occupations across wage levels and educational requirements. Many local government positions remain unfilled due to a limited pool of qualified candidates, increased competition from the private sector, and evolving job expectations.

2. High Vacancy Rates

   High job vacancies impact public service delivery and the workers who are forced to handle heavier workloads, with understaffing leading to burnout and increased turnover that further exacerbate staffing challenges.

3. Public Agency Operations

   There is a statewide interest in ensuring that public agency operations are appropriately staffed and that high vacancy rates do not undermine public employee labor relations.

City of REDLANDS

POSITION DATA

As of December 2024, the City of Redlands had a total of 595 budgeted full-time positions.

- 110 full-time employees were hired in 2024
- 96 full-time employees separated from employment in 2024

HIGH VACANCY RATE REPORTING

If the number of job vacancies within a single bargaining unit meets or exceeds 20% of the total number of authorized full-time positions, the public agency shall, upon request of the recognized employee organization, include all of the following information during the public hearing:

- Total Number of vacancies
- Number of applicants
- Average time to fill positions
- Opportunities to improve compensation and working conditions

City of REDLANDS

VACANCY RATES

As of December 2024, all bargaining units had a vacancy rate below 20%.

2024 Bargaining Unit Vacancy Rates

- RADD Redlands Association of Department Directors: 0%
- RAME Redlands Association of Management Employees: 5.3%
- RAMME Redlands Association of Middle Management Employees: 6.4%
- RAFME Redlands Association of Fire Management Employees: 0%
- RASME Redlands Association of Safety Management Employees: 0%
- RCSEA Redlands Civil Service Employee Association: 12.7%
- RPFA Redlands Professional Firefighters Association: 7.4%
- RPOA Redlands Police Officers Association: 19.8%
- Teamsters Local #1932: 8.6%

City of REDLANDS

RECRUITMENT STRATEGIES

- Social Media – Leveraged LinkedIn Recruiting, Instagram, and other platforms to promote the city, broaden candidate outreach, and support direct sourcing efforts.
- Career Fairs – Attend career fairs to connect with a diverse pool of candidates, promote the City, and identify potential talent for current and future job opportunities.
- Reduce Time to Fill – Streamlining hiring process through effective collaboration with department heads on the recruitment timeline.
- Hiring Incentives – Utilizing hiring incentives for hard-to-fill positions and prominently featuring them in job postings to attract candidates.
- Continuous Recruitments – Utilized for hard to fill positions to establish a pool of qualified candidates for current and future vacancies.
- City Benefits – Developed benefits guide to highlight benefit offerings to candidates.

City of REDLANDS

RETENTION STRATEGIES

- Enhanced Onboarding Strategy – Strengthened the onboarding experience to better integrate new hires and align them with organizational values, and launched an onboarding video showcasing the City, its workforce, culture, mission, and values.
- Training and Development strategy - Launched Management and Leadership Workshops to equip current and emerging leaders with key skills in communication, decision-making, team building, and strategic thinking, fostering organizational success and a culture of continuous growth.
- Tuition Reimbursement – Supports employee career development and succession planning.
- Wellness Initiatives – Promoted a positive work environment and helped reduce burnout through programs like fitness challenges, mental health resources, and wellness and financial workshops.
- Employee Engagement – Strengthened employee engagement by cultivating a culture of connection and involvement through targeted employee engagement initiatives.
- Promotional Opportunities – Showcasing promotional and transfer opportunities through internal communication monitors, and city-wide notifications.

City of REDLANDS

QUESTIONS

RPD Staffing

Data Collected May 12th – 16th from local Police Associations

98 authorized sworn officer positions of all ranks

75 positions are filled

23 officer vacancies, (25%) vacancy rate

1 academy trainee graduates June 2025

Lateral applications are closed

Patrol Staffing (Active)

Minimum staffing is 1 Supervisor and 6 Officers/Corporals

Team 1: Sergeant, 2 Corporals, 5 Officers

Team 2: Sergeant, 2 Corporals, 5 Officers

Team 3: Sergeant, 2 Corporals, 5 Officers

Team 4: Sergeant, 1 Corporal, 6 Officers

Team 5: Sergeant, 2 Corporals, 4 Officers (At minimum)

Multiple Enforcement Team

Sergeant: Injured

Corporal: Vacant

Officer: FLMA

Officer: Vacant

Officer: Vacant

Officer: Vacant

Community Engagement Team

Sergeant: Filled

Corporal: Filled

Officer: Filled

Officer: Filled

Officer: Filled

Officer: Vacant

Homeless Outreach

Additional positions approved by council effective 7/1/2024

Sergeant: Vacant

Officer: Vacant

Officer: Vacant

Officer: Vacant

Officer: Vacant

Community Policing

Officer: Filled (K9)

Officer: Vacant

Traffic

Corporal: Filled

Officer: Vacant

Officer: Vacant

Investigations

Officer: Vacant (3 year assignment)

Officer: Filled (1 year assignment)

School Resource Officers

CVHS Officer: Filled

RHS Officer: Filled

Middle Schools: Filled

Ongoing Overtime

Traffic enforcement: 2 positions Mon-Fri.

Swing Shift: 2 positions Friday and Saturday nights.

Patrol shift coverage.

Custody services, 10 hours on Sunday through July 1st.

Special events.

Grants.

Agency Vacancy Rates

(Redlands Police: 98 Sworn, 23 vacancies, 25% rate, Lateral applications are closed)

San Bernardino Sheriff: 2,007 Sworn, 127 vacancies, 6% rate, Lateral applications are open.

San Bernardino Police: 319 Sworn, 17 vacancies, 5% rate, Lateral applications are open.

Fontana Police:188 Sworn, 20 vacancies, 10% rate, Lateral applications are open.

Colton Police: 63 Sworn, 8 vacancies, 12% rate, Lateral applications are open.

Ontario Police: 307 Sworn, 0 vacancies, 0% rate, Lateral applications are open.

Beaumont Police: 63 Sworn, 4 vacancies, 6% rate, Lateral applications are open.

Rialto Police: 160 Sworn, no response, Lateral applications are open.

Upland Police: 81 Sworn, 7 vacancies(7 Trainees June 2025), 8%, Lateral applications are open.

Hemet Police: 98 Sworn, 8 vacancies(8 Trainees June 2025), Lateral applications are open.

Background Failures

High degree of background failure rate either from a failed background or withdraw for various reasons.

Hired since January 2024:

51 entered into backgrounds

5 Lateral Officers, 2 Academy Trainees (1 Failed), 1 Lateral failed field training.

What do we need?

Continuous Lateral Officer recruitment.

Speed of the entire process needs to be 90 days.

Backgrounds done in 30-45 days.

Retired Annuitant Background Investigators.

Recruitment budget.

More autonomy by Police Department Training division.

Match starting wages and time banks when appropriate.

City Council Meeting **L. 3.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of a Professional Services Agreement with Carl Warren & Company, LLC., for Third-Party Liability Claims Administration for an amount not-to-exceed $663,735 (Human Resources/Risk Management Director Meteau)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion(s) is provided:

I move to approve the Professional Services Agreement with Carl Warren & Company, LLC for Third-Party Liability Claims Administration.

RECOMMENDATION:

Staff recommends that City Council approve the Professional Services Agreement with Carl Warren & Company, LLC, as the City's Third-Party Administrator for liability claims management services effective July 1, 2025.

DISCUSSION:

In July 2022, the City entered into a professional services agreement with George Hills & Company for Third-Party Administrator (TPA) services at an initial fixed annual fee of $81,000. The contract included a clause to re-evaluate fees in the event of a significant increase in claims volume.

Due to a rise in claims, actual costs for FY 2022/23 reached $108,000, exceeding the original fee. In April 2024, the City amended the agreement to a time-and-expense-based model capped at $95,000 annually, retroactively effective July 1, 2023. This model, while more flexible, led to additional unbudgeted costs when the $95,000 cap was exceeded by $48,000 in FY 2023/24. To manage cost control, the City reinstated a flat-fee structure with

George Hills on March 1, 2025, for the balance of FY 2024/25.

To secure long-term cost efficiency and improve service reliability, the City issued a Request for Proposals (RFP) in early 2025 for TPA services. Five proposals were received in response to the RFP. Proposals were evaluated based on qualifications, pricing, service structure, and references.

Carl Warren & Company, LLC was selected based on:

- Proven record of managing municipal liability claims
- Competitive flat-fee pricing structure
- Ability to scale services to claims volume
- Strong customer service and reporting tools

The initial term of the agreement is three years with the option to extend two additional one-year terms. The transition to Carl Warren & Company, LLC will be effective July 1, 2025, aligning with the new fiscal year.

ALTERNATIVES:

Remain with and enter into negotiations with our current provider, George Hills & Company.

STRATEGIC PLAN:

None

SUBMITTED BY:

Robert J. Meteau Jr., Human Resources/Risk Management Director

RECOMMENDED BY:

Charles M. Duggan Jr., City Manager

REVIEWED BY:

Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:

Marla Martinez, Human Resources Manager

Fiscal Impact

Fiscal Year:	2025-26
Revenue Generating:	N
Appropriation Required Y/N:	N
Amount:	663,735
Budgeted Y/N:	N
Account No.:	602140-6710

Discussion:

Fiscal year 2025/26 is currently budgeted for $115,000. This agreement would require an increase of $21,744, included in the existing budget, for a total of $136,744.

The amounts listed for each following fiscal year are as follows and these funds will be incorporated in future budget requests for City Council consideration:

2026/27 One hundred twenty-five thousand five hundred fifty dollars ($125,550)

2027/28 One hundred twenty-nine thousand four hundred eighty-nine dollars ($129,489)

2028/29 One hundred thirty-three thousand eight hundred sixty-six dollars ($133,866)

2029/30 One hundred thirty-eight thousand eighty-six dollars ($138,086)

Attachments

Carl Warren Agreement 2025

AGREEMENT TO PERFORM PROFESSIONAL SERVICES

This agreement for the provision of claims adjusting and administration services ("Agreement") is made and entered in this 3rd day of June, 2025 ("Effective Date"), by and between the City of Redlands, a municipal corporation ("City") and Carl Warren & Company, LLC, a California limited liability company. ("Consultant"). City and Consultant are sometimes individually referred to herein as a "Party" and, together, as the "Parties." In consideration of the mutual promises contained herein, City and Consultant agree as follows:

ARTICLE 1 – ENGAGEMENT OF CONSULTANT

1.1 City hereby engages Consultant to provide claims adjusting and administration services for City (the "Services").

1.2 The Services shall be performed by Consultant in a professional manner, and Consultant represents that it has the skill and the professional expertise necessary to provide the Services to City at a level of competency presently maintained by other practicing professional consultants in the industry providing like and similar types of Services.

ARTICLE 2 – SERVICES OF CONSULTANT

2.1 The Services that Consultant shall perform are more particularly described in Exhibit "A," titled "Scope of Services," which is attached hereto and incorporated herein by reference.

2.2 Consultant shall comply with applicable federal, state and local laws and regulations in the performance of this Agreement including, but not limited to, any applicable State prevailing wage laws.

ARTICLE 3 – RESPONSIBILITIES OF CITY

3.1 City designates Robert J. Meteau, Human Resources/Risk Management Director, as the City's representative with respect to performance of the Services, and such person shall have the authority to transmit instructions, receive information, interpret, and define City's policies and decisions with respect to performance of the Services.

ARTICLE 4 – PERFORMANCE OF SERVICES

4.1 Consultant shall perform and complete the Services in a prompt and diligent manner in accordance with the schedule set forth in Exhibit "A," titled "Scope of Services," which is attached hereto and incorporated herein by reference.

4.2 The term of this Agreement shall be for a period of three (3) years beginning July 1, 2025 (the "Initial Term"). The City shall have the option to extend the Initial Term of this Agreement by two (2) additional one-year terms (each, an "Extended Term"), on the same terms and conditions, by providing written notice to Consultant at least thirty (30) days prior to the expiration of the Initial Term or any Extended Term.

4.3 If Consultant's Services include deliverable electronic visual presentation materials, such materials shall be delivered in a form, and made available to the City, consistent with City Council adopted policy for the same. It shall be the obligation of Consultant to obtain a copy of such policy from City staff.

ARTICLE 5 – PAYMENTS TO CONSULTANT

5.1 The total annual compensation for Consultant's performance of the Services is specified in Exhibit B, "Fee Schedule," which is fully incorporated herein. Fees and expenses to be paid to the Consultant during the Initial Term commencing on the Effective Date, shall not exceed the amounts below per fiscal year:

- 2025/26 One Hundred Thirty-Six Thousand Seven Hundred Forty-Four Dollars ($136,744)
- 2026/27 One Hundred Twenty-Five Thousand Five Hundred Fifty Dollars ($125,550)
- 2027/28 One Hundred Twenty-Nine Thousand Four Hundred Eighty-Nine Dollars ($129,489)

If the Agreement is extended for two additional one year renewal options, the Fees and expenses paid to Consultant shall not exceed the amounts below per fiscal year:

- 2028/29 One Hundred Thirty-Three Thousand Eight Hundred Sixty-Six Dollars ($133,866)
- 2029/30 One Hundred Thirty-Eight Thousand Eighty-Six Dollars ($138,086).

The Agreement total amount shall not exceed Six Hundred Sixty-Three Thousand Seven hundred Thirty-Five Dollars ($663,735). City shall pay Consultant based on fixed and reimbursable costs and expenses, up to the not-to-exceed amount in accordance with Exhibit "B" titled "Fee Schedule" which is attached hereto and incorporated herein by reference.

5.2 Consultant shall submit monthly invoices to City for Services performed during the preceding month. Consultant's invoices shall include a brief description of services performed outside the fixed monthly fee, i.e. field work and ancillary services, , the dates performed, the number of hours spent and by whom, and a description of reimbursable expenses related to the Services. City shall pay Consultant no later than thirty (30) days after receipt and approval by City of Consultant's invoice.

5.3 Any notice or other communication required, or which may be given, pursuant to this Agreement, shall be in writing. Any such notice shall be deemed delivered (i) on the date of delivery in person; (ii) five (5) days after deposit in first class registered mail, with return receipt requested; (iii) on the actual delivery date if deposited with an overnight courier; or (iv) on the date sent by facsimile or electronic mail transmission (including PDF), if confirmed with a copy sent contemporaneously by first class, certified, registered or

express mail; in each case properly posted and fully prepaid to the appropriate address set forth below, or such other address as a Party may provide notice in accordance with this section:

CITY:	CONSULTANT:
City Clerk City of Redlands 35 Cajon Street P.O. Box 3005 (mailing) Redlands, CA 92373 jdonaldson@cityofredlands.org Phone: (909) 798-7531	Angelique King, President Carl Warren & Company, LLC P.O. Box 2411 Tustin, CA 92781 aking@carlwarren.com Phone: (916) 477-4211 Fax: (866) 254-4423

ARTICLE 6 – INSURANCE AND INDEMNIFICATION

6.1 The following insurance coverage required by this Agreement shall be maintained by Consultant for the duration of its performance of the Services. Consultant shall not perform any Services unless and until the required insurance listed below is obtained by Consultant. Consultant shall provide City with certificates of insurance and endorsements evidencing such insurance prior to commencement of the Services. Insurance policies shall include a provision prohibiting cancellation or modification of the policy except upon thirty (30) days prior written notice to City.

A. Workers' Compensation and Employer's Liability insurance in the amount that meets statutory requirements with an insurance carrier acceptable to City, or certification to City that Consultant is self-insured or exempt from the workers' compensation laws of the State of California. Consultant shall execute and provide City with Exhibit "C," titled "Workers' Compensation Insurance Certification," which is attached hereto and incorporated herein by this reference, prior to performance of the Services.

B. Comprehensive General Liability insurance with carriers acceptable to City in the minimum amount of Two Million Dollars ($2,000,000) per occurrence and Four Million Dollars ($4,000,000) aggregate, for public liability, property damage and personal injury is required. City shall be named as an additional insured, and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

C. Commercial Auto Liability coverage, with minimum limits of One Million Dollars ($1,000,000) per occurrence, combined single limit bodily injury liability and property damage liability. This coverage shall include all Consultant owned vehicles used in connection with Consultant's provision of the Services, hired and non-owned vehicles, and employee non-ownership vehicles. City shall be named as an additional insured, and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

D. Consultant is expressly prohibited from assigning or subcontracting any of the Services without the prior written consent of City. In the event of mutual agreement by the Parties to assign or subcontract a portion of the Services, Consultant shall add such assignee or subcontractor as an additional insured to the insurance policies required hereby and provide City with the insurance endorsements prior to any Services being performed by the assignee or subcontractor.

6.2 Consultant shall defend, indemnify and hold harmless City and its elected officials, employees and agents from and against any and all claims, losses or liability, including attorneys' fees, arising from injury or death to persons or damage to property occasioned by any negligent act or omission by, or the willful misconduct of, Consultant, or its officers, employees and agents in performing the Services.

ARTICLE 7 – CONFLICTS OF INTEREST

7.1 Consultant covenants and represents that it does not have any investment or interest in any real property that may be the subject of this Agreement or any other source of income, interest in real property or investment that would be affected in any manner or degree by the performance of Consultant's Services. Consultant further covenants and represents that in the performance of its duties hereunder, no person having any such interest shall perform any Services under this Agreement.

7.2 Consultant agrees it is not a designated employee within the meaning of the Political Reform Act because Consultant:

A. Does not make a governmental decision whether to:

(i) approve a rate, rule or regulation, or adopt or enforce a City law;
(ii) issue, deny, suspend or revoke any City permit, license, application, certification, approval, order or similar authorization or entitlement;
(iii) authorize City to enter into, modify or renew a contract;
(iv) grant City approval to a contract that requires City approval and to which City is a party, or to the specifications for such a contract;
(v) grant City approval to a plan, design, report, study or similar item;
(vi) adopt, or grant City approval of, policies, standards or guidelines for City or for any subdivision thereof.

B. Does not serve in a staff capacity with City and in that capacity, participate in making a governmental decision or otherwise perform the same or substantially the same duties for City that would otherwise be performed by an individual holding a position specified in City's Conflict of Interest Code under Government Code section 87302.

7.3 In the event City determines that Consultant must disclose its financial interests, Consultant shall complete and file a Fair Political Practices Commission Form 700, Statement of Economic Interests, with the City Clerk's office pursuant to the written instructions provided by the City Clerk.

ARTICLE 8 – GENERAL CONSIDERATIONS

8.1 In the event any action is commenced to enforce or interpret any of the terms or conditions of this Agreement the prevailing Party shall, in addition to any costs and other relief, be entitled to the recovery of its reasonable attorneys' fees, including fees for the use of in-house counsel by a Party.

8.2 Consultant shall not assign any of the Services, except with the prior written approval of City and in strict compliance with the terms and conditions of this Agreement. Any assignment or attempted assignment without such prior written consent may, in the sole discretion of City, result in City's immediate termination of this Agreement.

8.3 Consultant is for all purposes under this Agreement an independent contractor and shall perform the Services as an independent contractor. Neither City nor any its agents shall have control over the conduct of Consultant or Consultant's employees, except as herein set forth. Consultant shall supply all necessary tools and instrumentalities required to perform the Services. Assigned personnel employed by Consultant are for its account only, and in no event shall Consultant or personnel retained by it be deemed to have been employed by City or engaged by City for the account of, or on behalf of City. Consultant shall have no authority, express or implied, to act on behalf of City in any capacity whatsoever as an agent, nor shall Consultant have any authority, express or implied, to bind City to any obligation.

8.4 This Agreement may be terminated by City, in its sole discretion, by providing not less than five (5) days prior written notice to Consultant of City's intent to terminate. If this Agreement is terminated by City, an adjustment to Consultant's compensation shall be made, but (1) no amount shall be allowed for anticipated profit or unperformed Services, and (2) any payment due Consultant at the time of termination may be adjusted to the extent of any additional costs to City occasioned by any default by Consultant. Upon receipt of a termination notice, Consultant shall immediately discontinue its provision of the Services and, within five (5) days of the date of the termination notice, deliver or otherwise make available to City, copies (in both hard copy and electronic form, where applicable) of project related data, design calculations, drawings, specifications, reports, estimates, summaries and such other information and materials as may have been accumulated by Consultant in performing the Services. Consultant shall be compensated on a pro-rata basis for Services completed up to the date of termination.

8.5 Consultant shall maintain books, ledgers, invoices, accounts and other records and documents evidencing costs and expenses related to the Services for a period of three (3) years, or for any longer period required by law, from the date of final payment to Consultant

pursuant to this Agreement. Such books shall be available at reasonable times for examination by City at the office of Consultant.

8.6 This Agreement, including the Exhibits incorporated herein by reference, represents the entire agreement and understanding between the Parties as to the matters contained herein, and any prior negotiations, written proposals or verbal agreements relating to such matters are superseded by this Agreement. Except as otherwise provided for herein, any amendment to this Agreement shall be in writing, approved by City and signed by City and Consultant.

8.7 This Agreement shall be governed by and construed in accordance with the laws of the State of California.

8.8 If one or more of the sentences, clauses, paragraphs or sections contained in this Agreement is declared invalid, void or unenforceable by a court of competent jurisdiction, the same shall be deemed severable from the remainder of this Agreement and shall not affect, impair or invalidate the remaining sentences, clauses, paragraphs or sections contained herein, unless to do so would deprive a Party of a material benefit of its bargain under this Agreement.

IN WITNESS WHEREOF, duly authorized representatives of City and Consultant have signed in confirmation of this Agreement.

CITY OF REDLANDS

By: _____
Mario Saucedo, Mayor

CARL WARREN & COMPANY, LLC

By: _____
Angelique King, President

ATTEST:

_____
Jeanne Donaldson, City Clerk

EXHIBIT "A"
SCOPE OF SERVICES

This Exhibit A is intended to provide the scope of services and specific service expectations in this Agreement, that would not otherwise require revision during the Agreement period, and which may differ from or elaborate upon our Client Service Profile. Services to be provided by Consultant on behalf of City may include all or some of the following,

I. SERVICES INCLUDED IN THE AGREEMENT

A. Claims Administration:
Consultant shall provide administrative services that include, but are not limited to:

1. Administering the City's self-insurance retention program and shall act as the City's representative in connection with the investigation, adjustment, processing, supervision and resolution of general liability, motor vehicle liability, property damage and potential money damage claims asserted by third parties against City, or against parties for whom City is alleged to be legally responsible, which are premised upon allegations of willful, intentional, negligent or careless acts and/or omissions;

2. Perform liability claims adjusting services;

3. Inform City staff of any changes to current laws that could have an impact on the City's liability claims program;

4. Advise City staff of any claim trends that may have an impact on the City's claim program; provide data and analytics regarding the City's program to the Risk Manager and/or Claims Specialist on a monthly basis; provide ad hoc reports as requested by the City;

5. Attend meetings and file reviews and provide updates on the City's open liability cases;

6. Provide statistical reports on a monthly basis that depict the claims opened or closed per month, payments that have been issued and current reserves on all open claims; and other reports as needed;

7. Respond to any inquiries the City's excess carrier may have in regards to any particular claim as well as providing the excess carrier with any reports requested;

8. Identify all subrogation claims and initiate a written report to the City on potential success of subrogation; identify all costs including attorney fees involved in specific subrogation eligible files; provide recommendations based upon cost-benefit analysis of potential subrogation files.

B. Claims Handling
All new claims received by the City will be mailed/faxed/scanned/uploaded to the

Claims Administrator. Upon receipt, the Claims Administrator shall:

1. Set up a claim file within 24 hours of receipt of the claim;

2. Send an acknowledgment letter on all new files opened;

3. Assign an initial case reserve;

4. Review the claim to verify the claim complies with the reporting requirements as set forth in the California Government Code;

5. With prior approval of the City on a per claim basis, promptly issue the appropriate letters and notices to the Claimant advising of any deficiencies; claim rejections; claim denials; or any other pertinent correspondence as required under the California Government Code;

6. If claim is to be accepted, gather damages documentation and with prior written approval on a per-claim basis from the City, negotiate a reasonable settlement for final presentation to the City for approval or ratification (all settlement discussions with claimant must be made using the following guideline: subject to City and/or City Council approval);

7. Claims Administrator shall prepare a settlement request and forward that request to the Human Resources Manager or HR/Risk Management Analyst for approval;

8. All settlements are subject to City approval and the Claims Administrator has no settlement authority;

9. Obtain settlement agreements and releases upon settlement of claims or potential claims not in litigation;

10. Report claims to City's excess carrier as appropriate and directed; and in compliance with excess insurance policy requirements; provide ongoing reporting for all excess cases as may be requested or required by the excess insurance carrier;

11. Obtain reimbursement from excess carrier should expenditures exceed self-insured retention; monitor and manage all excess reporting and reimbursement from the excess carrier; all reimbursements shall be reconciled by the Third Party Administrator and any and all reductions or short pays shall be immediately flagged and identified for specific discussion and reporting to the City; all reimbursements paid in full and received by the Third Party Administrator must be immediately provided to the City for deposit into the City's bank account. Provide monthly reports on reimbursement or excess carrier recoveries; and monitor excess carrier request for reimbursement every 30 days;

12. In addition to the above, it is the City's intent that the Claims Administrator shall act as the City's Reporting Agent in compliance with the Medicare Secondary payer requirements under the CMS Section 111 Mandatory Reporting Program.

C. Investigative Services:
Consultant shall provide administrative services that include, but are not limited to:

1. Receipt and examination of all reports of accidents, incidents, or claims that are or may be the subject of claims.

2. Conduct investigation on behalf of the City's Attorney's Office and Risk Management which shall include contact with the claimant or attorney for additional claim details, requests for information regarding the claim from the City and field work, if appropriate, which will include photographs, measurements of defects etc.; for all field work, prior approval of the City on a per-claim basis is required.

3. Investigate accidents, incidents, or claims where the examination warrants such investigation to include on-site investigation, photographs, interviewing of witnesses, determination of losses and other such investigative services necessary to determine any City losses, but not to include extraordinary investigative services outside the expertise of the Consultant.

4. After investigation is complete, determine whether to recommend the City accept or reject the claim.

5. If rejection is appropriate, promptly issue rejection notice to claimant or claimant's attorney or representative, which will include an explanation of why the claim was rejected; and may include any and all other notices required under the California Government Code.

6. Maintain service on a 24-hour, 7 days per week basis, to receive telephone reports of any incident or accident which may be the subject of a liability claim and provide immediate investigative services to the extent necessary to provide a complete investigation.

7. Undertake items of investigation requiring special handling for City at the direction of the City Attorney or authorized representative.

D. Adjustment Services:
Consultant will provide complete adjustment services on each accident or incident which is or may be the subject of a claim. Such services shall include:

1. Maintain a claim file on each potential or actual claim reported.

2. Process any such claim or potential claim for settlement in accordance with instructions and policies of City for settlement of such claims.

3. Notify City's primary and excess carriers of all claims which exceed or may exceed

City's self-insurance retention.

4. Act as liaison between the excess/insurance carriers and the City on matters affecting the adjustment of such claims.

5. Maintain records on any such claim and notify City when City is entitled to reimbursements for loss in excess of retention.

6. Litigation management at direction of City Attorney.

E. Administrative Services:
Consultant shall provide administrative services that include, but are not limited to:

1. Assist in training at the request of the City.

2. Assist City in preparing accident kits for City vehicles.

3. Assign a principal account adjuster satisfactory to City to provide liaison between City and Consultant.

4. Provide tabulated monthly statistical reports and status reports of all reported claims. Monthly reports shall indicate the status of each reported open claim, the outstanding reserves for each claim and details of all claim payments during the month. The status report shall be delivered to the City Attorney and Human Resources Manager within five days of the close of each calendar month.
5. Periodically review and adjust reserves on all open claims.

6. Assist City Attorney in selection of special counsel, if requested.

7. Investigate and handle through conclusion telephone adjusted claims.

8. Prepare an Internal Revenue Service Form Number 1099 for service providers as required by the Internal Revenue Code.
9. Provide loss information for the City's annual excess liability application.

F. Legal Support Services:
Consultant will provide the following legal support services on each claim in which a third-party claimant has commenced or threatened to commence litigation:

1. Upon notification by the City Attorney that litigation has been filed on an open claim, provide special counsel with all information and files concerning the claim.

2. Cooperate with and assist any attorney assigned to litigation of open claims and provide such investigative services as directed during pre-trial and trial stages.

3. Oversee the efforts of defense counsel through a sound litigation management plan; responsible for obtaining a copy of defense counsel's proposed defense budget; and setting reserve appropriately for each specific case/file/claim

4. Assist in answering any interrogations or requests for admissions filed by third parties.

5. At the request of the City Attorney, attend mandatory settlement conferences on behalf of City.

6. At the request of the Human Resources Manager or designee, file small claim actions and appear on behalf of City in small claim actions filed against or on behalf of the City on open claims handled by Consultant.

7. Regularly and reasonably discuss and review investigation issues, discovery, and case strategy with special counsel.

8. Review case evaluations, correspondence and status reports forwarded to Consultant by special counsel.

9. Cooperate with special counsel as a team with an open communication approach on each case to obtain the most economical and best result for the City.

G. Third Party Subrogation Services

Consultant personnel are well-versed in the identification, handling, and pursuit of subrogation claims arising out of Claims which are the subject of this Agreement. Included within this Agreement, Consultant will perform the following functions:

1. Identify potential opportunities to recover from persons, businesses, and entities other than the City.
2. Prepare and file a claim with each identified entity.
3. As applicable, tender defense to or seek recovery from any identified entity.
4. With the assistance of counsel, prepare and file any necessary litigation required to effect the claim of recovery on behalf of the City
5. Manage litigation related to such claims made to other person, businesses or entities

H. First Party Subrogation Services

Consultant is a claim administration firm experienced in the handling of first-party subrogation claims and is ready and capable of performing such services on behalf of the City. Our services are unique to a first-party loss of the City caused by the intentional or negligent act of a third party. Such losses generally are for the recovery of damages, and may include:

1. Labor costs, fully loaded and including benefit costs, for City or other personnel responding to or in any manner providing services;
2. Services or materials provided by outside vendors or contractors;
3. Internal or external vehicle or equipment use and/or rental;
4. Materials and/or goods utilized for the repair/replacement of damaged property; and/or

5. Additional fees that may be specific to the individual entity that are provided for within municipal code, ordinances or other governing documents.

I. File Reviews

It is anticipated that regularly scheduled file reviews will take place throughout the year. These file reviews are intended to evaluate open claims which shall include the litigated claims and to determine whether the reserves and current strategies for the handling of the files are appropriate. These reviews can also assist in identifying current claim trends, case law changes and ways to improve the claims administration and communication process. The Claims Administrator shall be prepared to attend these meetings as requested by the City whether on a regular scheduled basis or ad hoc scheduling.

EXHIBIT "B"
FEE SCHEDULE

The following compensation, fees and expenses, shall be paid in consideration for the services provided by Consultant as described in this Agreement and which shall not exceed those amounts set forth in Article 5 ("Payments to Consultant").

The compensation paid to Consultant for "Claims Administration Services" shall be as follows:

1) Fees for Claims Administration Services

City agrees to pay a fixed fee of $123,744 per year for the first year of its engagement with Consultant.

The compensation paid to Consultant for "Reimbursable Costs and Expenses" shall be as follows:

1) Reimbursable Costs and Expenses

a. Field Work Services
   - Scene Investigations: $95.00 per hour
   - Surveillance, appraisals – At cost

b. Ancillary Services
   - MMSEA- per submission: $5.00
   - Index/OFAC per submission - $20.00
   - Misc/loss expenses (medical reports, appraisals) – At cost

c. Risk Management Information System Services,
   - Custom Reports, data fees - $250 per hour.

The fees and expenses/costs will be billed together monthly in Consultant's standard invoice format.

Additionally, if the City elects any optional services identified in this section, such as First Party Subrogation Services or any of the identified Optional Services, such agreed upon additional amounts will also be billed together monthly where applicable.

1) First Party Subrogation Services and Fees

Consultant is a claim administration firm experienced in the handling of first party subrogation claims and is ready and capable of performing such services on behalf of City. City will pay a Subrogation Fee in the amount of 21% of the net recovery obtained.

EXHIBIT "C"
WORKERS' COMPENSATION INSURANCE CERTIFICATION

Every employer, except the State, shall secure the payment of compensation in one or more of the following ways:

(a) By being insured against liability to pay compensation by one or more insurers duly authorized to write compensation insurance in this State.

(b) By securing from the Director of Industrial Relations, a certificate of consent to self-insure, either as an individual employer, or as one employer in a group of employers, which may be given upon furnishing proof satisfactory to the Director of Industrial Relations of ability to self-insure and to pay any compensation that may become due to his or her employees.

CHECK ONE

_____I am aware of the provisions of Section 3700 of the Labor Code which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and I will comply with such provisions before commencing the performance of the work and activities required or permitted under this Agreement. (Labor Code §1861).

_____I affirm that at all times, in performing the work and activities required or permitted under this Agreement, I shall not employ any person in any manner such that I become subject to the workers' compensation laws of California. However, at any time, if I employ any person such that I become subject to the workers' compensation laws of California, immediately I shall provide the City with a certificate of consent to self-insure, or a certification of workers' compensation insurance.

I certify under penalty of perjury under the laws of the State of California that the information and representations made in this certificate are true and correct.

Carl Warren & Company, LLC

By:_____ Date: _____
Angelique King, President

City Council Meeting **L. 4.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of the Fire Department's continued participation in the CONFIRE Joint Powers Authority for Fiscal Year 2025–2026 and authorization to pay the associated annual service fee in an amount not to exceed $922,557 (Fire Chief Sessler)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the continued participation of the Fire Department in the CONFIRE Joint Powers Authority and authorize payment of the associated annual service fee in an amount not to exceed $922,557.

RECOMMENDATION:

Staff recommends that the City Council approve the continued participation of the Redlands Fire Department in the CONFIRE Joint Powers Authority and authorize payment of the annual service fee in an amount not to exceed $922,557 for Fiscal Year 2025–2026. Continued membership in CONFIRE ensures the City's access to regional fire and emergency medical dispatch services, public safety communications infrastructure, and shared technology resources that support efficient and effective emergency response.

DISCUSSION:

In 1990, the City of Redlands joined with the cities of Colton, Loma Linda, Rialto, and the County of San Bernardino to form the Consolidated Fire Agencies of the East Valley, known as CONFIRE. This regional partnership was established through a Joint Powers Agreement (JPA), pursuant to Title 1, Division 7, Chapter 5 of the California Government Code, which authorizes public agencies to jointly exercise powers they hold in common.

The founding agencies recognized the need for a coordinated regional approach to fire protection and public safety communications. They determined that the centralized use of public safety radio channels and a shared computer-aided dispatch system would more effectively and efficiently serve their communities. By combining resources, the participating agencies benefit from improved interoperability, cost savings, and enhanced service delivery.

Through this cooperative effort, CONFIRE provides centralized dispatching for fire and emergency medical services, serves as a secondary public safety answering point for 9-1-1 calls, and supports information technology services for member agencies. The governance and operational practices of CONFIRE are directed collectively by the member agencies to ensure mutual benefit and accountability.

The City of Redlands' continued participation in CONFIRE for Fiscal Year 2025–2026 supports the City's commitment to regional collaboration and high-quality public safety services. Although the CONFIRE Joint Powers Authority (JPA) agreement remains in effect unless the City of Redlands chooses to withdraw, staff requires approval to pay the associated fees. The annual service fee for Fiscal Year 2025–2026 is $922,557.

ALTERNATIVES:

The City Council may choose not to authorize the continued participation of the Redlands Fire Department in the CONFIRE Joint Powers Authority and may provide alternative direction to staff.

STRATEGIC PLAN:

Priority B - Public Health and Safety

SUBMITTED BY:
Rich Sessler, Fire Chief

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Bruni Reyes, Management Analyst

Fiscal Impact

Fiscal Year: FY 2025-26

Discussion:

The Confire JPA total annual fee for Fiscal Year 2025-2026 is $922,557. Funding has been budgeted in the FY 2025-2026 Fire Department Budget to cover this cost.

Attachments

ConFire Joint Agreement

CONFIRE Revenue by Agency

JOINT POWERS AGREEMENT

THIS AGREEMENT is entered into by and between the public agencies signatory hereto, hereinafter called "public agencies."

WITNESSETH:

WHEREAS, the signatories herein have determined that there is a need by public agencies within the East End cities of San Bernardino County, California, to establish a regional fire agency to best serve the needs of all the citizens of said public agencies; and,

WHEREAS, said public agencies have heretofore determined that the interests of the citizens of each of said public agencies can best be served by the coordinated use of public safety radio channels and centralized regional computer aided communications system; and,

WHEREAS, said public agencies recognize the mutual benefit of a centralized joint effort for the development, implementation, and subsequent operation and maintenance of such a centralized system; and,

WHEREAS, said public agencies desire to centralize and provide safety communication operations; and,

WHEREAS, said public agencies have heretofore determined that it is desirable and necessary to collectively direct the management policies and operational practices of said regional fire agency; and,

WHEREAS, the cost of developing, operating and

maintaining said centralized systems is more cost effective to such public agencies; and,

WHEREAS, said public agencies operate a cooperative program of fire protection and related functions that are mutually agreed upon; and,

WHEREAS, Title 1, Division 7, Chapter 5 of the Government Code of the State of California authorizes public agencies to enter into an agreement for the joint exercise of any power common to them; and,

WHEREAS, these public agencies possess the power to consolidate public safety communications and operational programs by the execution and implementation of this Agreement.

NOW, THEREFORE, FOR AND IN CONSIDERATION OF THE MUTUAL ADVANTAGES TO BE DERIVED THEREFROM, AND IN CONSIDERATION OF THE MUTUAL COVENANTS HEREIN CONTAINED, IT IS AGREED BY AND BETWEEN THE PARTIES HERETO AS FOLLOWS:

1. Agency Established. Pursuant to the joint powers authorization of the California Government Code, the undersigned do hereby federate together in a cooperative agency for the joint and mutual operation of a centralized public safety communication agency and a cooperative program of fire protection and related functions, to be known as the Consolidated Fire Agencies of the East Valley, hereinafter designated as "CONFIRE," which shall be a public entity separate from the parties to the Agreement.

2. By-Laws. The Agency shall be subject to, and shall be governed by, those certain By-Laws, a copy of which is attached hereto, marked Exhibit "A" and by this reference made a part of this Agreement.

3. Purpose. The purpose of this Agreement shall be as set forth in Section 1, above, and Article I of the By-Laws. The purpose shall be accomplished and carried out in the manner set forth in the By-Laws.

4. Administration. CONFIRE, as established by this Agreement and as governed by its By-Laws, shall be the "Agency" to administer this Agreement, pursuant to joint powers provisions of the Government Code of California.

5. Membership. Each public agency signatory to this Agreement, and each additional public agency which may hereafter sign the Agreement, is a member of the Agency and is entitled to all the rights and privileges and subject to the obligations of membership, as provided in the By-Laws.

6. Withdrawal of Membership. This Agreement shall remain in full force and effect as to all member agencies for a minimum of two (2) years from and after the effective date hereof. Thereafter, any party to this Agreement may cease to be a party hereto and may withdraw from membership in the Agency upon the adoption by its legislative body of a resolution of intention to withdraw and the giving of written notice thereof to the Chairman of the Board of Directors of the Agency and to each of the other public agencies signatory

to this Agreement at least one hundred eighty (180) days prior to the end of the then current fiscal year.

7. Powers and Debts of Authority. Agency shall have the power in its own name, to make and enter into contracts, to employ agents and employees, to acquire, hold and dispose of property, real and personal, to sue and be sued in its own name, and to incur debts, liabilities or obligations necessary for the accomplishment of the purpose of this Agreement. However, the debts, liabilities, and obligations of the Agency shall not constitute any debt, liability or obligation to any of the individual public agencies which are signatory to this Agreement. The Agency shall not have the power of eminent domain nor the power to levy taxes, and its power generally shall be subject to the restrictions applicable to the Central Valley Fire Protection District.

8. Amendment. This Agreement may not be amended, except written agreement of all the parties, provided, however, that the By-Laws may be amended from time to time by the method and means provided therein.

9. Duration of Agreement. This Agreement shall continue in effect until terminated by unanimous consent of the parties or until dissolution of the Agency in the manner provided in said By-Laws. Upon such termination, or dissolution, the non-grant assets remaining, including any surplus money, shall be disposed of in proportion to contributions made. Grant funded assets shall be disposed of

in accordance with Federal and State regulations and instructions.

10. Enforcement. Agency is hereby given the power to enforce this Agreement. If suit is necessary to enforce any of the provisions hereof, including any provision of the By-Laws, the defaulting member shall pay reasonable attorney fees to the Agency as adjudicated and determined by the Court.

11. Authorization. Upon execution of this Agreement, each member shall deliver to the Agency a certified copy of a governing board action, resolution or minute order authorizing and directing the execution of this Agreement.

12. Board of Directors.

A. There is established a Board of Directors for the Agency which shall consist of a representative of the governing body of each member agency. The governing body of each member agency shall designate in writing to CONFIRE, the primary and alternate members to serve on the Board of Directors. At its annual meeting, the Board of Directors shall select one of its members to serve as Chairperson of the Board until the next annual meeting. The Chairpersonship of the Board of Directors shall rotate annually in a fixed sequence among the members.

B. The Board of Directors shall have the responsibility for the appointment of auditors, approval of new members, and approval of the annual budget and assessment schedule of the Agency, and the exercise of those powers granted to it by the

By-Laws.

C. Each public agency which is a member of the Agency shall be entitled to one (1) Director on the Board and shall be entitled to one (1) vote thereon. Such one vote may be cast only by the member agency's designated primary or alternate representative in attendance.

13. Source of Funds. Any contributions of funds by member agencies shall be apportioned based on the number of fires in each agency's jurisdiction over the immediate preceding two year period.

14. Accountability and Audits. The Agency shall be strictly accountable for all funds and shall report all receipts and disbursements, as required by Government Code Section 6505. The Treasurer of San Bernardino County shall act as treasurer and depositary for the Agency pursuant to Government Code Section 6505.5, and shall handle and have access to Agency property, under an official bond in an amount fixed by the member agencies. The Agency shall contract for a certified public accountant to perform an annual audit of the accounts and records of the Agency, and a report thereof shall be filed as public record with each of the contracting parties and with the Auditor of the County of San Bernardino within 60 days subsequent to the end of the fiscal year under examination.

15. Indemnification. Each party hereby agrees to defend, indemnify, and hold each other party, its elected

officials, officers, agents, and employees free and harmless from any and all liability or claims for personal injury, death, and property damage which may arise from the indemnifying party's negligent acts or omissions under this Agreement. None of the parties shall be held responsible or liable to any other party for any loss, damage or delay caused by accidents, strikes, lockouts, fire, flood, act of civil or military authority or by insurrection or riot or by any other cause which is beyond its control.

16. Effective Date of Agreement. This Agreement shall become effective upon its execution by the Cities of Colton, Loma Linda, Redlands, and Rialto, the Central Valley Fire Protection District and the San Bernardino County Consolidated Fire Agency. Within 30 days of said date, the Agency shall cause notice of this Agreement to be filed with the Secretary of State of California, pursuant to Government Code Section 6503.5.

IN WITNESS WHEREOF, the undersigned public agencies have set their signature on the respective dates set forth below. This document may be signed in duplicate originals.

ATTEST:

City Clerk

CITY OF REDLANDS
A Municipal Corporation

By: _____
Mayor

ATTEST:

City Clerk

CITY OF LOMA LINDA
A Municipal Corporation

By: _____
Mayor

ATTEST:

City Clerk

CITY OF COLTON
A Municipal Corporation

By: _____
Mayor

ATTEST:

City Clerk

CITY OF RIALTO
A Municipal Corporation

By: _____
Mayor

ATTEST:

Clerk of the Board of Supervisors

APPROVED AS TO FORM
DATE MAY 15 1990
Alan K. Marks, COUNTY COUNSEL
SAN BERNARDINO COUNTY CALIFORNIA
BY _____ DEPUTY

SIGNED AND CERTIFIED THAT A COPY OF THIS DOCUMENT HAS BEEN DELIVERED TO THE CHAIRMAN OF THIS BOARD
ATTEST: BOARD OF SUPERVISORS
Clerk of the Board of Supervisors
of the County of San Bernardino
By _____ Deputy
SAN BERNARDINO COUNTY, CALIFORNIA

SAN BERNARDINO COUNTY
CONSOLIDATED FIRE AGENCY

By: _____
Chairman, Board of Supervisors of San Bernardino County, as Governing Body of San Bernardino County Consolidated Fire Agency

CENTRAL VALLEY FIRE PROTECTION DISTRICT

By: _____
Chairman, Board of Supervisors of San Bernardino County, as Governing Body of Central Valley Fire Protection District

CONFIRE 2025-26 Revenue By Agency

Jurisdiction	2024 # of Incidents	% of Call Volume	Fund 5008 2024-25 Costs	Fund 5008 2025-26 Cost Change	Fund 5009 2024-25 Costs	Fund 5009 2025-26 Cost Change	Total 2024-25 Costs (All Funds)	Total 2025-26 Cost Change	% Change	2025-26 Total from Agency
AppleValley	13,138	5.16%	$ 722,317	$ 88,215	$ 24,552	$ 679	$ 746,869	$ 88,894	11.9%	$ 835,763
Big Bear Fire	3,408	1.34%	$ 245,953	$ 22,883	$ 8,071	$ 679	$ 254,024	$ 23,562	9.3%	$ 277,586
ChinoValleyFD	14,079	5.52%	$ 806,000	$ 94,534	$ 26,218	$ 680	$ 832,218	$ 95,214	11.4%	$ 927,432
Colton	7,900	3.10%	$ 524,276	$ 53,045	$ 51,324	$ 10,659	$ 575,600	$ 63,704	11.1%	$ 639,304
Loma Linda	4,506	1.77%	$ 328,796	$ 30,256	$ 22,415		$ 351,211	$ 30,256	8.6%	$ 381,467
MontclairFD	4,991	1.96%	$ 277,780	$ 33,512	$ 9,479	$ 340	$ 287,259	$ 33,852	11.8%	$ 321,111
RanchoCucamonga	18,781	7.37%	$ 1,056,185	$ 126,105	$ 35,682		$ 1,091,867	$ 126,105	11.5%	$ 1,217,972
Redlands	11,706	4.59%	$ 788,868	$ 78,600	$ 55,089		$ 843,957	$ 78,600	9.3%	$ 922,557
Rialto	12,138	4.76%	$ 818,659	$ 81,501	$ 58,820		$ 877,479	$ 81,501	9.3%	$ 958,980
Running Springs	514	0.20%	$ 53,377	$ 3,451	$ 1,531		$ 54,908	$ 3,451	6.3%	$ 58,359
San Bernardino County	135,922	53.34%	$ 7,007,978	$ 912,651	$ 252,667		$ 7,260,645	$ 912,651	12.6%	$ 8,173,296
San Manuel FD	2,344	0.92%	$ 146,182	$ 15,739	$ 4,418		$ 150,600	$ 15,739	10.5%	$ 166,339
VictorvilleFD	24,359	9.56%	$ 1,306,483	$ 163,559	$ 45,808	$ 680	$ 1,352,291	$ 164,239	12.1%	$ 1,516,530
										$ -
Baker Ambulance	753	0.30%	$ 36,799	$ 5,056	$ 1,439		$ 38,238	$ 5,056	13.2%	$ 43,294
Road Department	296	0.12%	$ 14,562	$ 1,987	$ 569		$ 15,131	$ 1,987	13.1%	$ 17,118
Total	254,835	100.00%	$ 14,134,215	$ 1,711,095	$ 598,082		$ 14,732,297	$ 1,711,095		$ 16,443,392

BDC Division	# of Incidents	% of total		$ 912,651
Adelanto	5,351	3.94%		$ 35,929
CrestForest	2,154	1.58%		$ 14,463
East Valley	46,713	34.37%		$ 313,653
Fontana	21,926	16.13%		$ 147,222
Hesperia	13,582	9.99%		$ 91,196
Mountain	2,763	2.03%		$ 18,552
Needles	1,222	0.90%		$ 8,205
North Desert	12,348	9.08%		$ 82,910
South Desert	11,280	8.30%		$ 75,739
Valley	18,584	13.67%		$ 124,782
	135,923	100.00%		$ 912,651

City Council Meeting **L. 5.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideraton of a five-year Professional Services Agreement with ICS Intelesys, Inc. for Cloud VoIP Services Migration in an amount not-to-exceed $74,601 and a five-year Master Service Agreement with RingCentral, Inc. for corresponding phone hardware, software, and VoIP as a service in an amount not-to-exceed $485,548 (Management Services/Finance Director Garcia)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motions are provided:

1. I move that the City Council approve the Professional Services Agreement with ICS Intelesys, Inc. for Cloud VoIP Migration Services for five years in the amount not-to-exceed $74,061; and

2. I further move that the City Council approve the Master Service Agreement with Ring Central, Inc. for corresponding phone hardware, software, and VoIP as a service, in an amount not-to-exceed $485,548.

RECOMMENDATION:

Staff recommends that the City Council approves the Professional Services Agreement with ICS Intelesys, Inc. for Cloud VoIP Migration Services for five years in the amount not-to-exceed $74,061. Staff further recommends that the City Council approve the agreement with Ring Central, Inc. for phone hardware, software, and VoIP as a service for five years in the amount not-to-exceed $485,548.

DISCUSSION:

The City currently uses the Mitel phone system for its communications infrastructure. However, Mitel has announced that it will no longer support or provide updates for this system beyond its designated end-of-support (EOS) date, which is December 31, 2025. As such, staff released a Request for Proposal (RFP) in search of a replacement phone system that would fit the requirements of the City as well as offer new enhancements to communication and collaboration.

The City received fifteen responses to the RFP. A committee within the Division of Innovation & Technology (DoIT) reviewed and ranked the proposals and selected the top three vendors. These three vendors were then scheduled to hold an on-site demo for a new committee which was formed from departments citywide, including the Police Department, Facilities and Community Services, Development Services, and the Utility Billing Customer Service Call Center. ICS Intelesys, Inc. was selected as the highest-ranked vendor and is proposing a RingCentral solution that was demonstrated live for staff.

The process of migrating away from our current Mitel phone system will require purchasing services from two parties.

- ICS Intelesys, Inc. will provide professional services including discovery, planning, programming and post go-live support.
- RingCentral will provide both the phone hardware, the software, and the dial tone required to make the solution work.

ICS Intelesys, Inc. has been a provider of telephone system solutions to educational and government agencies in Southern California for the last 30 years, and has extensive knowledge and experience necessary to address the needs of public sector communications system. City staff has negotiated a reasonable fee for ICS Intelesys, Inc.'s implementation services and is recommending that the Council approve an agreement with ICS Intelesys, Inc. for five (5) years for an amount not-to-exceed $74,601. This amount includes design, programming, training, and onsite development in the first year, and support costs for the following four years.

Additionally, RingCentral, Inc. is a leading provider of cloud-based unified communication solutions. Some of the benefits of transitioning to RingCentral include:

- Cloud-based Flexibility:
    - RingCentral operates entirely in the cloud, providing increased flexibility for the City’s workforce.
- Cost Savings:
    - The current service provider, which provides dial tone to our current

phone system, has continually increased costs for our PRI circuits. These circuits run on old copper telephone lines which are being phased out.

- Improved Collaboration:
  - RingCentral provides an all-in-one platform for voice, video, messaging, and file sharing. This enhances internal communication and collaboration across departments.

ALTERNATIVES:

City Council may choose to reject, modify, or table the proposed agreements and the City will continue to use the existing phone system until end of support, or issue another request for proposal to search for additional alternative solutions.

STRATEGIC PLAN:
N/A

SUBMITTED BY:
Danielle Garcia, Management Services/Finance Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Yvette M. Abich Garcia, City Attorney
Janice McConnell, Assistant City Manager
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Valerie Abrego, Management Analyst

Fiscal Impact

Fiscal Year:	2025
Revenue Generating:	No
Appropriation Required Y/N:	No
Amount:	$157,683
Budgeted Y/N:	Y
Account No.:	604900

Discussion:

Funding for this project has been included in the Management Services' Budget for fiscal years 2025 and 2026.

Fiscal Year:	2026
Revenue Generating:	No
Appropriation Required Y/N:	No
Amount:	$83,953
Budgeted Y/N:	Y
Account No.:	604900

Discussion:

Funding for this project has been included in the Management Services' Budget for fiscal years 2025 and 2026.

Fiscal Year:	2027-2029
Revenue Generating:	No
Appropriation Required Y/N:	No
Amount:	$318,514
Budgeted Y/N:	No
Account No.:	604900

Discussion:

Years 3 through 5 of this service will be covered in future budget requests.

Attachments

Intelesys One VoIP Migration Professional Services Agreement

Ring Central Master Services Agreement & Initial Order Form

AGREEMENT TO PERFORM PROFESSIONAL SERVICES

This agreement for the provision of Cloud VoIP Services Migration ("Agreement") is made and entered in this 3rd day of June, 2025 ("Effective Date"), by and between the City of Redlands, a municipal corporation ("City") and ICS Intelesys, Inc., a California corporation. ("Consultant"). City and Consultant are sometimes individually referred to herein as a "Party" and, together, as the "Parties." In consideration of the mutual promises contained herein, City and Consultant agree as follows:

ARTICLE 1 – ENGAGEMENT OF CONSULTANT

1.1 City hereby engages Consultant to provide Cloud VoIP Services Migration services for City (the "Services").

1.2 The Services shall be performed by Consultant in a professional manner, and Consultant represents that it has the skill and the professional expertise necessary to provide the Services to City at a level of competency presently maintained by other practicing professional consultants in the industry providing like and similar types of Services.

ARTICLE 2 – SERVICES OF CONSULTANT

2.1 The Services that Consultant shall perform are more particularly described in Exhibit "A," titled "Scope of Services," which is attached hereto and incorporated herein by this reference.

2.2 Consultant shall comply with applicable federal, state and local laws and regulations in the performance of this Agreement including, but not limited to, any applicable State prevailing wage laws.

ARTICLE 3 – RESPONSIBILITIES OF CITY

3.1 City designates Danielle Garcia, Management Services Director, as City's representative with respect to performance of the Services, and such person shall have the authority to transmit instructions, receive information, interpret and define City's policies and decisions with respect to performance of the Services.

ARTICLE 4 – PERFORMANCE OF SERVICES

4.1 Consultant shall perform and complete the Services in a prompt and diligent manner in accordance with the schedule set forth in Exhibit "B," titled "Project Schedule," which is attached hereto and incorporated herein by reference.

4.2 The term of this Agreement shall be for a period of five (5) years from the Effective Date of this Agreement, unless terminated earlier as provided herein.

4.3 If Consultant's Services include deliverable electronic visual presentation materials, such materials shall be delivered in a form, and made available to City, consistent with City Council-adopted policy for the same. It shall be the obligation of Consultant to obtain a copy of such policy from City staff.

ARTICLE 5 – PAYMENTS TO CONSULTANT

5.1 Compensation: The compensation for Consultant's performance of the Services shall not exceed the amount of Seventy-Four Thousand Sixty-One Dollars ($74,061.00) for the Services provided during the Term of five years. For the five-year term, City shall pay Consultant for both materials and professional services on a not-to-exceed amount in accordance with the rates specified in Exhibit "C," titled "Solution Platform Pricing", which is attached hereto and incorporated herein by this reference.

5.2 Consultant shall submit monthly invoices to City describing the Services performed during the preceding month. Consultant's invoices shall include a brief description of the Services performed, the dates the Services were performed, the number of hours spent and by whom, and a description of reimbursable expenses related to the Services. City shall pay Consultant no later than thirty (30) days after receipt and approval by City of Consultant's invoice.

5.3 Any notice or other communication required, or which may be given, pursuant to this Agreement, shall be in writing. Any such notice shall be deemed delivered (i) on the date of delivery in person; (ii) five (5) days after deposit in first class registered mail, with return receipt requested; (iii) on the actual delivery date if deposited with an overnight courier; or (iv) on the date sent by facsimile or electronic mail transmission (including PDF), if confirmed with a copy sent contemporaneously by first class, certified, registered or express mail; in each case properly posted and fully prepaid to the appropriate address set forth below, or such other address as a Party may provide notice in accordance with this section:

CITY:	CONSULTANT:
City Clerk City of Redlands 35 Cajon Street P.O. Box 3005 (mailing) Redlands, CA 92373 jdonaldson@cityofredlands.org Phone: (909) 798-7531	Aaron Betts, President ICS Intelesys, Inc. 3155 B Sedona Court Ontario, CA 91764 aaronb@it4ps.com Phone: (909)802-7338

ARTICLE 6 – INSURANCE AND INDEMNIFICATION

6.1 The following insurance coverage required by this Agreement shall be maintained by Consultant for the duration of its performance of the Services. Consultant shall not perform

any Services unless and until the required insurance listed below is obtained by Consultant. Consultant shall provide City with certificates of insurance and endorsements evidencing such insurance prior to commencement of the Services. Insurance policies shall include a provision prohibiting cancellation or modification of the policy except upon thirty (30) days prior written notice to City.

A. Workers' Compensation and Employer's Liability insurance in the amount that meets statutory requirements with an insurance carrier acceptable to City, or certification to City that Consultant is self-insured or exempt from the workers' compensation laws of the State of California. Consultant shall execute and provide City with Exhibit "D," titled "Workers' Compensation Insurance Certification," which is attached hereto and incorporated herein by this reference, prior to performance of the Services.

B. Comprehensive General Liability insurance with carriers acceptable to City in the minimum amount of One Million Dollars ($1,000,000) per occurrence and Two Million Dollars ($2,000,000) aggregate, for public liability, property damage and personal injury is required. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

C. Consultant shall secure and maintain professional liability insurance throughout the term of this Agreement in the amount of One Million Dollars ($1,000,000) per claim made.

D. Business Auto Liability coverage, with minimum limits of One Million Dollars ($1,000,000) per occurrence, combined single limit bodily injury liability and property damage liability. This coverage shall include all Consultant owned vehicles used in connection with Consultant's provision of the Services, hired and non-owned vehicles, and employee non-ownership vehicles. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

E. Consultant is expressly prohibited from assigning or subcontracting any of the Services without the prior written consent of City. In the event of mutual agreement by the Parties to assign or subcontract a portion of the Services, Consultant shall add such assignee or subcontractor as an additional insured to the insurance policies required hereby and provide City with the insurance endorsements prior to any Services being performed by the assignee or subcontractor.

6.2 Consultant shall defend, indemnify and hold harmless City and its elected and appointed officials, employees and agents from and against any and all claims, losses or liability, including attorneys' fees, arising from injury or death to persons or damage to property occasioned by any negligent act or omission by, or the willful misconduct of, Consultant, or its officers, employees and agents in performing the Services.

ARTICLE 7 – CONFLICTS OF INTEREST

7.1 Consultant covenants and represents that it does not have any investment or interest in any real property that may be the subject of this Agreement or any other source of income, interest in real property or investment that would be affected in any manner or degree by the performance of Consultant's Services. Consultant further covenants and represents that in the performance of its duties hereunder, no person having any such interest shall perform any Services under this Agreement.

7.2 Consultant agrees it is not a designated employee within the meaning of the Political Reform Act because Consultant:

A. Does not make a governmental decision whether to:

(i) approve a rate, rule or regulation, or adopt or enforce a City law;
(ii) issue, deny, suspend or revoke any City permit, license, application, certification, approval, order or similar authorization or entitlement;
(iii) authorize City to enter into, modify or renew a contract;
(iv) grant City approval to a contract that requires City approval and to which City is a party, or to the specifications for such a contract;
(v) grant City approval to a plan, design, report, study or similar item;
(vi) adopt, or grant City approval of, policies, standards or guidelines for City or for any subdivision thereof.

B. Does not serve in a staff capacity with City and in that capacity, participate in making a governmental decision or otherwise perform the same or substantially the same duties for City that would otherwise be performed by an individual holding a position specified in City's Conflict of Interest Code under Government Code section 87302.

7.3 In the event City determines that Consultant must disclose its financial interests, Consultant shall complete and file a Fair Political Practices Commission Form 700, Statement of Economic Interests, with the City Clerk's office pursuant to the written instructions provided by the City Clerk.

ARTICLE 8 – GENERAL CONSIDERATIONS

8.1 In the event any action is commenced to enforce or interpret any of the terms or conditions of this Agreement the prevailing Party shall, in addition to any costs and other relief, be entitled to the recovery of its reasonable attorneys' fees, including fees for the use of in-house counsel by a Party.

8.2 Consultant shall not assign any of the Services, except with the prior written approval of City and in strict compliance with the terms and conditions of this Agreement. Any assignment or attempted assignment without such prior written consent may, in the sole discretion of City, result in City's immediate termination of this Agreement.

8.3 Consultant is for all purposes under this Agreement an independent contractor and shall perform the Services as an independent contractor. Neither City nor any its agents shall have control over the conduct of Consultant or Consultant's employees, except as herein set forth. Consultant shall supply all necessary tools and instrumentalities required to perform the Services. Assigned personnel employed by Consultant are for its account only, and in no event shall Consultant or personnel retained by it be deemed to have been employed by City or engaged by City for the account of, or on behalf of City. Consultant shall have no authority, express or implied, to act on behalf of City in any capacity whatsoever as an agent, nor shall Consultant have any authority, express or implied, to bind City to any obligation.

8.4 This Agreement may be terminated by City, in its sole discretion, by providing not less than five (5) days prior written notice to Consultant of City's intent to terminate. If this Agreement is terminated by City, an adjustment to Consultant's compensation shall be made, but (1) no amount shall be allowed for anticipated profit or unperformed Services, and (2) any payment due Consultant at the time of termination may be adjusted to the extent of any additional costs to City occasioned by any default by Consultant. Upon receipt of a termination notice, Consultant shall immediately discontinue its provision of the Services and, within five (5) days of the date of the termination notice, deliver or otherwise make available to City, copies (in both hard copy and electronic form, where applicable) of project related data, design calculations, drawings, specifications, reports, estimates, summaries and such other information and materials as may have been accumulated by Consultant in performing the Services. Consultant shall be compensated on a pro-rata basis for Services completed up to the date of termination.

8.5 Consultant shall maintain books, ledgers, invoices, accounts and other records and documents evidencing costs and expenses related to the Services for a period of three (3) years, or for any longer period required by law, from the date of final payment to Consultant pursuant to this Agreement. Such books shall be available at reasonable times for examination by City at the office of Consultant.

8.6 This Agreement, including the Exhibits incorporated herein by reference, represents the entire agreement and understanding between the Parties as to the matters contained herein, and any prior negotiations, written proposals or verbal agreements relating to such matters are superseded by this Agreement. Except as otherwise provided for herein, any amendment to this Agreement shall be in writing, approved by City and signed by City and Consultant.

8.7 This Agreement shall be governed by and construed in accordance with the laws of the State of California, without regard to its conflicts of laws provisions. The Parties agree that all actions or proceedings arising in connection with this Agreement shall be tried and litigated only in the state courts located in San Bernardino County, California, and the federal courts located in Riverside County, California.

8.8 If one or more of the sentences, clauses, paragraphs or sections contained in this Agreement is declared invalid, void or unenforceable by a court of competent jurisdiction, the same shall be deemed severable from the remainder of this Agreement and shall not affect, impair or invalidate the remaining sentences, clauses, paragraphs or sections contained herein, unless to do so would deprive a Party of a material benefit of its bargain under this Agreement.

IN WITNESS WHEREOF, duly authorized representatives of City and Consultant have signed in confirmation of this Agreement.

CITY OF REDLANDS

By: _____
Mario Saucedo, Mayor

ICS Intelesys, Inc.

By: _____
Aaron Betts, President

ATTEST:

_____
Jeanne Donaldson, City Clerk

EXHIBIT "A"

SCOPE OF SERVICES

Through many municipal implementations, Consultant has developed a **6 Phase White Glove Implementation Process** that will be directed by Consultant's' Project Team consisting of a Project Manager, Account Manager, and Senior Engineer.

Phase 1: Discovery

During this phase - Consultant will focus on "as built" information as a starting point and identify areas needing change such as network assessment data, routing, and third-party product integration. This will be an efficient process with little strain on the department's internal resources. Consultant will explore 3rd party items, such as elevators, door boxes, and panic buttons that need to be incorporated into the system. Consultant will gather all current City phone numbers to ensure all numbers move to the new solution.

Phase 2: Design

In this phase, Consultant will utilize all information gathered to create the design for City. Consultant will tailor the system to ensure that it provides the best experience for external callers and internal staff alike. Consultant will design the system to be intuitive so that users are quick to adopt features.

- Consultant will take a 2-focus approach to design:
    - What is required *now* to meet the City's needs?
    - What is the City's *future direction* ?

- Consultant understands the need of an intentional design for municipal entities. From design points such as call flow and numbering plans to programmed button positions on all phones- all details will be addressed to City staff's needs.

- Prior to initiating any programming, Consultant's project team will review the design with City's IT staff for their approval.

- The Ring Central solution is capable of scaling beyond its current need and will therefore be capable of growing and adapting with the City. Consultant will implement best practices early in the design phase that will allow the system to accommodate future growth.

- As phone use changes, both the Ring Central architecture and Consultant's proactive design requires minimal effort to add, change, or remove resources as needed. This allows tight alignment with City's needs at any given time, allowing City to control costs and resource allocation.

Phase 3: Programming

Consultant and Ring Central will work together to program from end-to-end to ensure City will have full control of system functions with the following assurances:

- City's new system is tested and benchmarked before "go-live."
- Consultant's in-house voice talent will record all custom prompts and auto-attendant menus to convey professionalism to callers.
- Consultant will perform exhaustive testing prior to conversion, including call testing, integration testing, 911 testing, and more.

Phase 4: Conversion

This phase is the most visible to City staff. Consultant understands that disruption to staff is unacceptable, and will schedule all installation to occur outside the business day.

- Consultant's Client Education Team will work with City's team to design the optimum plan for training each person who will be using the existing phones on the new system.
  - End-User Training Sessions: Consultant's trainers will meet with City staff in convenient groups, small or large, at every site to introduce how to use the specific features.
  - Ongoing Resources: Consultant will provide videos and documentation that can be made accessible on City's network for users to reference as needed.
  - Consultant's engineers will confirm that all calling capabilities and quality meet City's strict standards. Inbound and outbound calling will be tested, along with other areas, before the system is certified "live."
  - Consultant will have a dedicated team onsite during and after City's numbers are ported to the Ring Central solution to ensure a seamless transition.
  - Consultant's project team will work side-by-side with City staff for any questions and hands-on support for the initial start and first use of the newly implemented system.
  - Consultant will work 1-on-1 with executives and key individuals of City to ensure their comfort with the functions they need to be effective.
  - During the conversion, Consultant will maintain a list of any modifications that are requested so that the project team can work with City to prioritize how they are addressed.

Phase 5: Wrap-Up

- Comprehensive Administrator Training**:** City's system administrators will receive customized training led by a certified Ring Central engineer.

- Any outstanding items on the list we've created are addressed in full.

- Consultant's project team will have a Post-Install Meeting with City to review the success of the implementation.

Phase 6: Transition to Support

As a municipal entity, City will continue to receive a high level of service long after the deployment is complete.

- Consultant's Service Manager will personally meet with City's team to formally transition the system to support.

- Consultant will conduct a meeting with their Service Team to familiarize them with City's account and how Consultant has designed the Ring Central system. The Service Team will strive to understand the City's operations to provide customized service and support.

- As security updates and new features are released by Ring Central, City staff will receive those updates outside of normal business hours to minimize productivity impact.

EXHIBIT "B"
PROJECT SCHEDULE

City of Redlands
Sample Install

This is a sample project plan – actual plan and dates will be customized for the City of Redlands upon kick-off call once awarded

Intelesys
Aaron Betts

Project Start: Mon, 3/31/2025
Display Week: 1

TASK	ASSIGNED TO	PROGRESS	START	END
Project Kickoff - Assignment identification			3/31/25	3/31/25
Phase 1 DISCOVERY				
Gather all users & extensions	Intelesys / Redlands		3/31/25	4/2/25
Collect all numbers	Intelesys / Redlands		4/1/25	4/4/25
Download current system programming	Intelesys		4/7/25	4/8/25
Identify all integrations	Intelesys		4/9/25	4/11/25
Identify all dial tone and begin porting process	Intelesys		4/14/25	4/18/25
Phase 2 DESIGN				
Department Head Design Sessions	Intelesys / Redlands		4/14/25	4/25/25
ACD Agent Call Flow Design	Intelesys / Redlands		4/14/25	4/25/25
Identify Music on Hold	Intelesys		4/21/25	4/22/25
Determine any paging	Intelesys		4/23/25	4/25/25
Client Design sign-off	Redlands		4/28/25	4/29/25
Phase 3 PROGRAMMING				
Data Input	Intelesys		4/29/25	5/9/25
AA Recordings	Intelesys		4/30/25	5/1/25
Equipment Delivery	Intelesys		5/5/25	5/6/25
Phone Deployment	Intelesys		5/7/25	5/14/25
Softw are Installation	Intelesys		5/8/25	5/9/25
Phase 4 CONVERSION				
Configure analog devices	Intelesys		5/12/25	5/14/25
End User Training	Intelesys / Redlands		5/19/25	5/21/25
Port Numbers	Intelesys		5/22/25	5/22/25
Go Live	Intelesys		5/22/25	5/22/25
Gather old Equipment	Intelesys		5/22/25	5/23/25
Phase 4 WRAP-UP				
Admin Training	Intelesys		5/15/25	5/16/25
Finish punch list	Intelesys		5/24/25	5/24/25
User Acceptance Testing	Intelesys / Redlands		5/24/25	5/24/25
System Acceptance	Intelesys / Redlands		5/24/25	5/24/25
Phase 4 TRANSITION TO SUPPORT				
Review service procedures	Intelesys / Redlands		5/24/25	5/24/25
Introduce customer portal	Intelesys / Redlands		5/24/25	5/25/25
Assign account management	Intelesys / Redlands		5/24/25	5/25/25
Service Handoff	Intelesys / Redlands		5/24/25	5/25/25

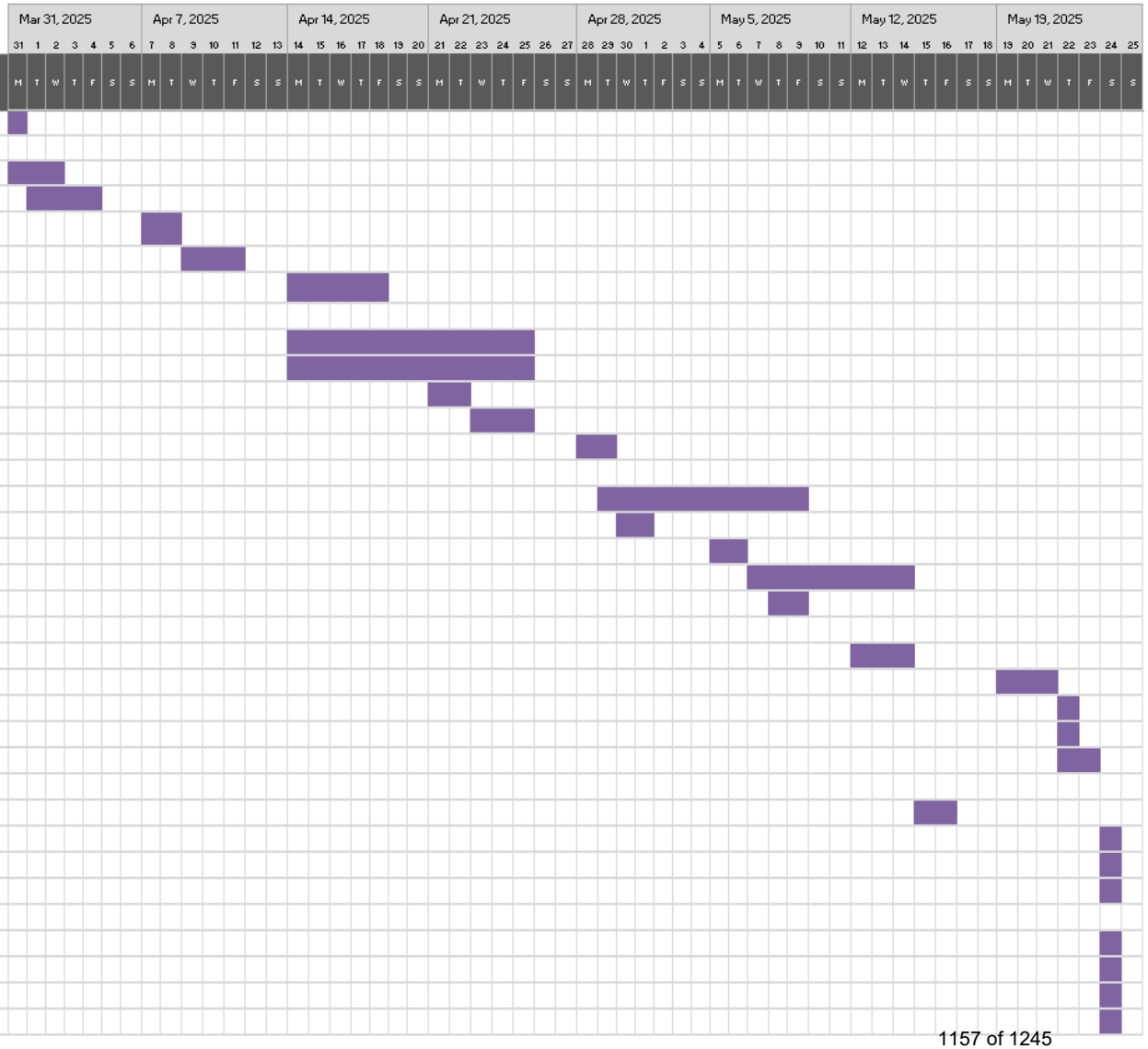


EXHIBIT "C"

SOLUTION PLATFORM PRICING

One Time Setup / Annual Support (Intelesys)		
Intelesys Manged - Ring EX Professional Services (Includes design, programming, training and onsite deployment)	$	52,950.00
Professional Services Discount	$	(13,237.50)
Ring EX Training	$	4,500.00
Training Discount	$	(1,125.00)
RingCentral Managed - RingCX Install	$	8,000.00
RingCentral RingCX Install Discount	$	(2,000.00)
One-time Total	$	49,087.50
Total first year costs	**$**	**49,087.50**
Second Year Support Costs	$	6,243.40
Third Year Support Costs	$	6,243.40
Total Three Year Costs	**$**	**61,574.30**
Fourth Year Support Costs	$	6,243.40
Fifth Year Support Costs	$	6,243.40
Total Five Year Total Costs	**$**	**74,061.10**

EXHIBIT "D"

WORKERS' COMPENSATION INSURANCE CERTIFICATION

Every employer, except the State, shall secure the payment of compensation in one or more of the following ways:

(a) By being insured against liability to pay compensation by one or more insurers duly authorized to write compensation insurance in this State.

(b) By securing from the Director of Industrial Relations, a certificate of consent to self-insure, either as an individual employer, or as one employer in a group of employers, which may be given upon furnishing proof satisfactory to the Director of Industrial Relations of ability to self-insure and to pay any compensation that may become due to his or her employees.

CHECK ONE

_____I am aware of the provisions of Section 3700 of the Labor Code which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and I will comply with such provisions before commencing the performance of the work and activities required or permitted under this Agreement. (Labor Code §1861).

_____I affirm that at all times, in performing the work and activities required or permitted under this Agreement, I shall not employ any person in any manner such that I become subject to the workers' compensation laws of California. However, at any time, if I employ any person such that I become subject to the workers' compensation laws of California, immediately I shall provide the City with a certificate of consent to self-insure, or a certification of workers' compensation insurance.

I certify under penalty of perjury under the laws of the State of California that the information and representations made in this certificate are true and correct.

ICS Intelesys, Inc.

By:_____ Date: _____

Aaron Betts, President

INITIAL ORDER FORM

This Initial Order Form is a binding agreement between RingCentral, Inc. (**"RingCentral"**) and **City of Redlands** (**"Customer"** or **"You"**) (together the **"Parties"**), for the purchase of the Services, licenses, and products listed herein. This Initial Order Form is subject to and incorporates the terms and conditions of the separate written agreement, executed by the Parties governing the purchase of the Services described in this Order Form (hereinafter referred to as the **"Agreement"**). Capitalized terms not defined herein shall have the same meanings as set forth in the applicable Agreement between the Parties. Unless agreed by both Parties in writing, any terms or conditions set forth in a Customer-issued purchase order or ordering document shall not apply.

Please note that RingCentral MVP is now RingEX. All references to "RingCentral MVP", whether in terms of service, advertising or product descriptions, mean "RingEX".

Customer
City of Redlands

35 Cajon St. Ste 222
Redlands, CA 92373
United States

Eric Owens
9093354798
eowens@cityofredlands.org

Service Provider
RingCentral, Inc.

20 Davis Drive
Belmont, CA 94002
United States

Service Commitment Period

Start Date: June 03, 2025

Initial Term: 36 Months

Renewal Term: Two 12-month terms, exercisable by Customer

Payment Schedule: Monthly

RingEX Services

Recurring Services			
Summary of Service	**Qty**	**Rate**	**Subtotal**
DigitalLine Unlimited Advanced	**401**	**$11.99**	**$4,807.99**
DigitalLine Unlimited Advanced		$7.49	
Compliance and Administrative Cost Recovery Fee		$3.50	
e911 Service Fee		$1.00	
DigitalLine Basic	**71**	**$7.99**	**$567.29**
DigitalLine Basic		$3.49	
Compliance and Administrative Cost Recovery Fee		$3.50	
e911 Service Fee		$1.00	
Additional Local Number	**1**	**$0.49**	**$0.49**
		Monthly Recurring Services*	**$5,375.77**

One-Time Items			
Summary of Item(s)	**Qty**	**Rate**	**Subtotal**
Yealink T54W Prime Business Phone	**20**	**$136.80**	**$2,736.00**
Yealink T43U Ultra-elegant Gigabit IP Phone	**395**	**$97.80**	**$38,631.00**
Yealink W76P Cordless Phone with 1 Handset	**5**	**$107.40**	**$537.00**
Yealink CP925 - Touch-Sensitive IP Conference Phone	**15**	**$342.00**	**$5,130.00**
Cisco ATA191 Analog Telephone Adapter	**58**	**$81.60**	**$4,732.80**
		One-Time Total	**$51,766.80**

RingCX Services

Recurring Services			
Summary of Service	**Qty**	**Rate**	**Subtotal**
RingCX, named agent seat	**20**	**$55.00**	**$1,100.00**
Call recording storage - 30 days, per seat	**20**	**$0.00**	**$0.00**
		Monthly Recurring Services*	**$1,100.00**

Total Initial Amount	**$58,242.57**

*Amounts are exclusive of applicable Taxes, Fees, and Shipping Charges.

Overage Rates*	
RingCX Services	**Rate**
RingCX, named agent seat on demand	**$75.00**
Inbound calls to North America toll-free numbers, per 10 min	**$0.14**
Outbound calls via automated dialer to North America numbers, per 10 min	**$0.16**
IVR calls processing, overage per 10 minutes	**$0.20**
Call recording storage - 30 days, overage per seat	**$0.00**
Disconnect Scrub, per 10 scrubs	**$0.08**
Automated speech recognition, per 10 minutes	**$0.30**
RingCX Analytics - Historical Data Retention 2Y	**$24.00**
RingCX Analytics - Historical Data Retention 3Y	**$36.00**
RingCX Analytics - Historical Data Retention 4Y	**$48.00**
RingCX Analytics - Historical Data Retention 5Y	**$60.00**
RingCX Analytics - Historical Data Retention 6Y	**$72.00**
RingCX Analytics - Historical Data Retention 7Y	**$84.00**
RingCX Analytics - Historical Data Retention 8Y	**$96.00**

Cost Center Billing

For customers with cost center billing, it is the customer's responsibility to provide cost center allocation information to RingCentral at least 10 days prior to the issuance of the invoice. After the information is received, itwill be reflected on future invoices, but will not be adjusted retroactively on past invoices. If purchasing additional services through the administrative portal, it is the customer's responsibility to assign cost centers at the time of purchase; otherwise, those services will not be allocated by cost center on the next invoice. Please note that cost center allocation is not available for certain items, such as minute bundles and credit memos. For additional questions, please contact the RingCentral invoice billing team at billingsupport@ringcentral.com.

Free Services Amount

Customer will receive the amount(s) indicated below (the "**Free Service Amount**"), which will be applied against charges for the recurring Services set forth in this Order Form and any applicable taxes and fees associated with those Services invoiced by RingCentral. The Free Service Amount is non-transferable and non-refundable and will expire upon termination of this Order Form. The Customer will be responsible for paying for any additional services and products ordered, and any applicable associated taxes and fees.

RingEX Free Services Amount: 18,392.91 US Dollars

RingCX Free Services Amount: 3,300.00 US Dollars

Customer Reference. Customer may promote their use of RingCentral services and agrees that RingCentral may identify customer as a user of the services. All press releases or quotes regarding Customer's use of service will be pre-approved by Customer, which consent will not be unreasonably withheld.

Add-on Services. Customer is responsible for reviewing additional terms and conditions that may apply to RingCentral add-on services (where available) and certain Advanced Support Services listed on this order form, and which are available at https://www.ringcentral.com/legal/add-on-services.html.

Special Terms & Notes

RingCX

RingCX Analytics. RingCX Analytics includes real-time and historical reporting as custom and pre-built visual dashboards with pre-defined reports. RingCentral will retain historical reporting data according to your selected historical data retention period after which data will be purged on a rolling basis. Retention periods apply to all users of the RingCX product and will be billed on a per seat per month basis.

RingCentral will retain one year's worth of historical reporting data after which any data older than one year, will be purged. Access to longer periods of analytics data may be purchased according to the table above. The applicable retention period selected for the Services above is 2 years.
Customer must contact RingCentral support to modify historical reporting data retention periods, if available.

IN WITNESS WHEREOF, the Parties have executed this Initial Order Form above through their duly authorized representatives.

Customer	RingCentral
City of Redlands	**RingCentral, Inc.**
By: _____	By: _____
Name: _____	Name: _____
Title: _____	Title: _____
Date: _____	Date: _____

ATTEST:

_____

City Clerk

MASTER SERVICES AGREEMENT

This Master Services Agreement is effective as of the date of last signature (**"Effective Date"**) and made between:

City of Redlands ("Customer")	**RingCentral, Inc. ("RingCentral')**
Address:	**Address:**
35 Cajon St. Ste 222 Redlands, CA 92373	20 Davis Drive Belmont, CA 94002

By:	_____	By:	_____
Name:	_____	Name:	_____
Title:	_____	Title:	_____
Date:	_____	Date:	_____

RingCentral and Customer are together referred to as the "Parties" and each individually as a "Party."

1. The Master Services Agreement (**"Agreement"**) consists of the terms and conditions contained herein, and any Service Attachments applicable to Customer's Services, and any other Attachments agreed by the Parties, are incorporated into and form a part of this Agreement.

Exhibit A – Definitions

Attachment A – RingEX Services

Attachment B – RingCX Services

Attachment C – Service Level Agreement for RingEX Services

Attachment D – Service Level Agreement for RingCX Services

Attachment E – Security Addendum

Attachment F – Copy of Terms and Conditions of Sale Hardware

THE PARTIES AGREE AS FOLLOWS:

2. Ordering and Term

A. Ordering Services. Customer may order the Services set forth in the relevant Attachments, attached hereto, by executing an Order Form in the format provided by RingCentral. Customer must submit the Order Form to RingCentral either in writing or electronically via the Administrative Portal. The Order Form will identify the Services requested by Customer together with: (i) the price for each Service; (ii) scheduled Start Date; (iii) and products rented, licensed, or sold to Customer, if any. An Order Form will become binding when it is executed by the Customer and accepted by RingCentral. RingCentral may accept an Order Form by commencing performance of the requested Services. The Services and invoicing for those Services will begin on the Start Date, as identified in the applicable Order Form or on the day Services are ordered via the Administrative Portal. Customer may purchase additional Services, software, and equipment via the Administrative Portal or by executing additional Order Forms.

B. Equipment. Subject to availability based on brand and Customer location, Customer may purchase or rent equipment from RingCentral for use with the Services. The terms and conditions that govern any such transaction can be found at:

i. Purchase: http://www.ringcentral.com/legal/ringcentral-hardware-terms-conditions.html:

ii. Rental: http://www.ringcentral.com/legal/lease-rental.html, and

iii. Device as a Services: https://www.ringcentral.com/legal/daas-agreement.html.

C. Term of this Agreement. The Term of this Agreement will commence on the Effective Date and continue until the last Order Form is terminated or expires, unless terminated earlier in accordance with its terms.

D. Services Term. The Services Term will begin on the Start Date of the initial Order Form and continue for the initial term set forth in the initial Order Form (**"Initial Term"**). Upon expiration of the Initial Term, Customer shall have the option to renew term recurring Services for successive periods as set forth in the initial Order Form (each a **"Renewal Term"**) by providing written notice to RingCentral at least thirty (30) days before the expiration of the Initial Term or the then-current Renewal Term. The Term of any recurring Services added to your Account after the initial Order Form is executed will start on the Start Date in the applicable Order Form, will run coterminously with the then-current Term of any preexisting Services unless otherwise extended in the applicable Order Form, and will be invoiced on the same billing cycles as the preexisting Services.

3. Invoicing and Payment

A. Prices and Charges. All prices are identified in US dollars on the Administrative Portal or in the applicable Order Form unless otherwise agreed by the Parties. Additional charges may result if Customer activates additional features, exceeds usage thresholds, or purchases additional Services or equipment. Customer will be liable for all charges resulting from use of the Services on its Account. Unless otherwise agreed between the Parties, recurring charges (such as charges for Digital Lines, product licenses, minute bundles, and equipment rental fees) for the Services begin on the Start Date identified in the Administrative Portal or in the applicable Order Form and will remain in effect for the Initial Term (as described in an Order Form) or, if applicable, the then-current Renewal Term. RingCentral will provide notice of any proposed increase in such charges no later than sixty (60) days before the end of the Initial Term or then-current Renewal Term, and any such increase will be effective on the first day of the next Renewal Term. Administrative Fees that RingCentral is entitled to pass on to its customers as a surcharge pursuant to applicable Law may be increased on thirty (30) days' written notice. Outbound calling rates will be applied based on the rate in effect at the time of use. Customer may locate the currently effective rates in the Administrative Portal.

B. Invoicing and Payment. Invoices will be issued in accordance with the payment terms set forth in the Order Form. If Customer chooses to pay by credit or debit card, by providing a valid credit or debit card, Customer is expressly authorizing all Services and equipment charges and fees to be charged to such payment card, including recurring payments billed on a monthly or annual basis. In addition, Customer's provided credit card shall be used for any in-month purchases of additional services and products, or where Customer has exceeded usage or threshold limits, any overage charges. Unless otherwise stated in the applicable Order Form, recurring charges are invoiced in advance in the frequency set forth in the Order Form, and usage-based and onetime charges are billed monthly in arrears. Customer shall make payment in full, without deduction or set-off, within thirty (30) days of the invoice date. Any payment not made when due may be subject to a late payment fee equivalent to the lesser of (i) one and a half percent (1.5%) per month or (ii) if applicable, the highest rate allowed by Law. In no event may payment be subject to delays due to Customer internal purchase order process.

C. Taxes. All rates, fees, and charges are exclusive of applicable Taxes, for which Customer is solely responsible. Taxes may vary based on jurisdiction and the Services provided. If any withholding tax is levied on the payments, then Customer must increase the sums paid to RingCentral so that the amount received by RingCentral after the withholding tax is deducted is the full amount RingCentral would have received if no withholding or deduction had been made. If Customer is a tax-exempt entity, tax exemption will take effect upon provision to and validation by RingCentral of certificate of tax exemption.

D. Billing Disputes. If a Customer reasonably and in good faith disputes any portion of RingCentral's invoice, it must provide written notice to RingCentral within thirty (30) days of the invoice date, identifying the reason for the dispute and the amount being disputed. Customer's dispute as to any portion of the invoice will not excuse Customer's obligation to timely pay the undisputed portion of the invoice. Upon resolution, Customer must pay any validly invoiced unpaid amounts within thirty (30) days. Any amounts that are found to be in error resulting in an overpayment by the Customer will be applied as a billing credit against future invoices. Customer will be reimbursed any outstanding billing credits at the expiration or termination of this Agreement.

4. Provision of the Service

A. General Terms. RingCentral will provide the Services as described in the relevant Service Attachment. RingCentral may enhance, replace, and/or change the features of the Services, but it will not materially reduce the core features, functions, or security of the Services during the Term without Customer's consent.

B. Customer Care

i. Customer must provide Helpdesk Support to Customer's End Users. RingCentral may require Customer's Helpdesk Support personnel to complete a designated series of training courses on RingCentral's Services. Such training will be provided to Customer online in English at no cost.

ii. RingCentral will make remote support available to Customer's Helpdesk Support personnel and/or Account Administrators via the Customer Care call center, which will be available 24/7, to attempt to resolve technical issues with, and answer questions regarding the use of the Services. Unless otherwise agreed by the parties, Customer Care support will be provided in English, and onsite and implementation services are not included in the Customer Care support.

iii. Customer may open a case with Customer Care following the process in place at the time. Any individual contacting Customer Care on behalf of Customer must be authorized to do so on behalf of the Account and will be required to follow applicable authentication protocols.

C. Professional Services. RingCentral offers a broad portfolio of professional services that includes onsite and remote implementation services; extended enterprise services including premium technical support; and consulting. Any such services are governed by this Agreement, the Professional Services terms, and any applicable Statement of Work (SOW), which may be attached hereto.

D. **Advanced Support.** Customer may purchase Advanced Support services from RingCentral for use with the Services. The terms and conditions that govern the Advanced Support can be found at: https://www.ringcentral.com/legal/enterprise-service-attachment.html.

E. **Managed Services.** Customer may purchase Managed Services from RingCentral for use with the Services. The terms and conditions that govern the Managed Services can be found at: https://www.ringcentral.com/legal/managed-services-attachment.html.

F. **Subcontracting.** RingCentral may provide any of the Services hereunder through any of its Affiliates or subcontractors, provided that RingCentral will bear the same degree of responsibility for acts and omissions for those subcontractors acting on RingCentral's behalf in the performance of its obligations under this Agreement as it would bear if such acts and omissions were performed by RingCentral directly.

5. Use of the Service

A. **Service Requirements.** The Services are dependent upon Customer's maintenance of sufficient Internet access, networks, and power as set forth in RingCentral's Technical Sufficiency Criteria, available at https://www.ringcentral.com/legal/policies/technical-sufficiency-criteria.html. RingCentral will not be responsible for any deficiencies in the provision of the Services if Customer's network does not meet RingCentral's Technical Sufficiency Criteria.

B. **Use Policies.** Customer and its End Users may use the Services only in compliance with this Agreement, applicable Law, and the Use Policies referenced below, which are incorporated into and form part of this Agreement. Customer must ensure that its End Users comply with the Use Policies. Any breach of this Section (Use Policies) will be deemed a material breach of this Agreement. RingCentral may update the Use Policies from time to time and will provide notice of material updates to Customer at the email address on file with the Account. All updates will become effective thirty (30) days after such notice to Customer or upon posting for non-material changes. Customer may object to a modification that negatively impacts its use of the Service by sending written notice ("Objection Notice") to RingCentral within thirty (30) days from the date of the notice of modification. If the Parties cannot reach agreement, then either Party may terminate the affected Services without penalty with thirty (30) days written notice to the other Party.

i. **Acceptable Use Policy.** The Services must be used in accordance with RingCentral's Acceptable Use Policy, available at https://www.ringcentral.com/legal/acceptable-use-policy.html. Notwithstanding anything to the contrary in this Agreement, RingCentral may act immediately and without notice to suspend or limit the Services if RingCentral reasonably suspects fraudulent or illegal activity in the Customer's Account, material breach of the Acceptable Use Policy, or use of the Services that could interfere with the functioning of the RingCentral Network provided such suspension or limitation may only be to the extent reasonably necessary to protect against the applicable condition, activity, or use. RingCentral will promptly remove the suspension or limitation as soon as the condition, activity or use is resolved and mitigated in full. If Customer anticipates legitimate but unusual activity on its Account, Customer should contact Customer Care in advance to avoid any Service disruption.

ii. **Emergency Services.** RingCentral's policy governing the provision of emergency services accessed via the Services is available at https://www.ringcentral.com/legal/emergency-services.html.

iii. **Numbering Policy.** The provision, use, and publication of numbers used in conjunction with the Services are governed by RingCentral's Numbering Policies, available at https://www.ringcentral.com/legal/policies/numbering-policy.html.

6. Termination

A. **Termination for Cause.** Either Party may terminate this Agreement and any Services purchased hereunder in whole or part by giving written notice to the other Party: i) if the other Party breaches any material term of this Agreement and fails to cure such breach within thirty (30) days after receipt of such notice; ii) at the written recommendation of a government or regulatory agency following a change in either applicable Law or the Services; or iii) upon the commencement by or against the other Party of insolvency, receivership or bankruptcy proceedings or any other proceedings or an assignment for the benefit of creditors.

B. **Effect of Termination.** If Customer terminates the Services, a portion of the Services, or this Agreement in its entirety due to RingCentral's material breach under Section 6(A) (Termination for Cause), Customer will not be liable for any fees or charges for terminated Services for any period subsequent to the effective date of such termination (except those arising from continued usage before the Services are disconnected), and RingCentral will provide Customer a pro-rata refund of any prepaid and unused fees or charges paid by Customer for terminated Services. If this Agreement or any Services are terminated for any reason other than as a result of a material breach by RingCentral or as otherwise permitted pursuant to Section 6(A) or as set forth in Section 14(I) (Regulatory and Legal Changes) the Customer must, to the extent permitted by applicable Law and without limiting any other right or remedy of RingCentral, pay within thirty (30) days of such termination all amounts that have accrued prior to such termination, as well as all sums remaining unpaid for the Services for the remainder of the then-current Term plus related Taxes and fees.

7. Intellectual Property

A. **Limited License**

i. Subject to, and conditional upon Customer's compliance with, the terms of this Agreement, RingCentral grants to Customer and its End User, a limited, personal, revocable, non-exclusive, non-transferable (other than as permitted under this Agreement), non-sublicensable license to use any software provided or made available by RingCentral to the Customer as part of the Services (**"Software"**) to the extent reasonably required to use the Services as permitted by this Agreement,

only for the duration that Customer is entitled to use the Services and subject to the Customer being current on its payment obligations.

ii. Customer will not, and will not allow its End Users, to: (a) sublicense, resell, distribute or assign its right under the license granted under this Agreement to any other person or entity; (b) modify, adapt or create derivative works of the Software or any associated documentation; (c) reverse engineer, decompile, decrypt, disassemble or otherwise attempt to derive the source code for the Software; (d) use the Software for infringement analysis, benchmarking, or for any purpose other than as necessary to use the Services Customer is authorized to use; (e) create any competing Software or Services; or (f) remove any copyright or other proprietary or confidential notices on any Software or Services.

B. IP Rights

i. RingCentral's Rights. Except as expressly provided in this Agreement, the limited license granted to Customer under Section 7(A) (Limited License) does not convey any ownership or other rights or licenses, express or implied, in the Services (including the Software), any related materials, or in any Intellectual Property and no IP Rights or other rights or licenses are granted, transferred, or assigned to Customer, any End User, or any other party by implication, estoppel, or otherwise. All rights not expressly granted herein are reserved and retained by RingCentral and its licensors. The Software and Services may comprise or incorporate services, software, technology, or products developed or provided by third parties, including open-source software or code. Customer acknowledges that misuse of RingCentral Services may violate third-party IP rights.

ii. Customer Rights. As between RingCentral and Customer, Customer retains title to all IP Rights that are owned by the Customer or its suppliers. To the extent reasonably required or desirable for the provision of the Services, Customer grants to RingCentral a limited, personal, non-exclusive, royalty-free, license to use Customer's IP Rights in the same. Customer must provide (and is solely responsible for providing) all required notices and obtaining all licenses, consents, authorizations, or other approvals related to the use, reproduction, transmission, or receipt of any Customer Content that includes personal or Confidential Information or incorporates any third-party IP rights.

C. Use of Marks. Neither Party may use or display the other Party's trademarks, service mark or logos in any manner without such Party's prior written consent.

8. Confidentiality

A. Restrictions on Use or Disclosures by Either Party. During the Term of this Agreement and for at least one (1) year thereafter, the Receiving Party shall hold the Disclosing Party's Confidential Information in confidence, shall use such Confidential Information only for the purpose of fulfilling its obligations under this Agreement, and shall use at least as great a standard of care in protecting the Confidential Information as it uses to protect its own Confidential Information.

Each Party may disclose Confidential Information only to those of its employees, agents or subcontractors who have a need to it in order to perform or exercise such Party's rights or obligations under this Agreement and who are required to protect it against unauthorized disclosure in a manner no less protective than required under this Agreement. Each Party may disclose the other Party's Confidential Information pursuant to subpoena, court order, in any legal proceeding or to a governmental entity, and as required by Law.

These restrictions on the use or disclosure of Confidential Information do not apply to any information which is independently developed by the Receiving Party or lawfully received free of restriction from another source having the right to so furnish such information; after it has become generally available to the public without breach of this Agreement by the Receiving Party; which at the time of disclosure was already known to the Receiving Party, without restriction as evidenced by documentation in such Party's possession; or which the Disclosing Party confirms in writing is free of such restrictions.

Upon termination of this Agreement, the Receiving Party will promptly delete, destroy or, at the Disclosing Party's request, return to the Disclosing Party, all Disclosing Party's Confidential Information in its possession, including deleting or rendering unusable all electronic files and data that contain Confidential Information, and upon request will provide the Disclosing Party with certification of compliance with this subsection.

9. Data Protection

A. Data Privacy. RingCentral respects Customer's privacy and will only use the information provided by Customer to RingCentral or collected in the provision of the Services in accordance with RingCentral's Data Processing Addendum, available at https://www.ringcentral.com/legal/dpa.html, incorporated by reference. RingCentral may update the Data Processing Addendum from time to time and will provide notice of any material updates to the Customer as required by applicable Laws at the email address on file with the Account. Such updates will be effective thirty (30) days after such notice to Customer.

B. Data Security. RingCentral will take commercially reasonable precautions, including, without limitation, technical (*e.g.,* firewalls and data encryption), organizational, administrative, and physical measures, to help safeguard Customer's Account, Account Data, and Customer Content against unauthorized use, disclosure, or modification. Customer must protect all End Points using commercially reasonable security measures. Customer is solely responsible to keep all user identifications and passwords secure. Customer must monitor use of the Services for possible unlawful or fraudulent use. Customer must notify RingCentral immediately if Customer becomes aware or has reason to believe that the Services are being used fraudulently or without authorization by any End User or third party. Failure to notify RingCentral may result in the suspension or termination of the Services and additional charges to Customer resulting from such use. RingCentral will not be liable for any charges resulting from unauthorized use of Customer's Account.

C. Software Changes. RingCentral may from time-to-time push software updates and patches directly to Customer's device(s) for installation and Customer will not prevent RingCentral from doing so. Customer must implement promptly all fixes, updates, upgrades and replacements of software and third-party software that may be provided by RingCentral. RingCentral will not be liable for inoperability of the Services or any other Services failures due to failure of Customer to timely implement the required changes.

10. Limitations of Liability

A. Excluded Damages

IN NO EVENT WILL EITHER PARTY OR ITS AFFILIATES OR ITS OR THEIR SUPPLIERS BE LIABLE FOR (1) INDIRECT, INCIDENTAL, PUNITIVE, OR CONSEQUENTIAL DAMAGES; (2) LOSS OF USE OR LOSS OF DATA; (3) LOSS OF BUSINESS OPPORTUNITIES, REVENUES OR PROFITS; OR (4) COSTS OF PROCURING REPLACEMENT PRODUCTS OR SERVICES, IN ALL CASES WHETHER ARISING UNDER CONTRACT, WARRANTY, TORT (INCLUDING NEGLIGENCE OR STRICT LIABILITY), OR ANY OTHER THEORY OF LIABILITY, AND EVEN IF SUCH PARTY HAS BEEN INFORMED IN ADVANCE OF SUCH DAMAGES OR SUCH DAMAGES COULD HAVE BEEN REASONABLY FORESEEN.

B. Liability Caps

EXCEPT AS SET FORTH HEREIN, THE TOTAL CUMULATIVE LIABILITY OF THE PARTIES UNDER THIS AGREEMENT WILL NOT EXCEED THE AMOUNTS PAID OR PAYABLE UNDER THIS AGREEMENT DURING THE PREVIOUS SIX (6) MONTHS. LIMITATIONS UNDER THIS SECTION (LIABILITY CAPS) WILL NOT APPLY TO:

i. FEES OWED BY CUSTOMER

ii. EITHER PARTY'S LIABILITY FOR INFRINGEMENT OR MISAPPROPRIATION OF THE OTHER PARTY'S IP RIGHTS

iii. EITHER PARTY'S LIABILITY RESULTING FROM GROSS NEGLIGENCE, FRAUD, OR WILLFUL OR CRIMINAL MISCONDUCT

iv. CUSTOMER'S LIABILITY RESULTING FROM USE OF THE SERVICES IN BREACH OF THE ACCEPTABLE USE POLICY OR EMERGENCY SERVICES POLICY

v. EITHER PARTY'S LIABILITY ARISING FROM DEATH OR PERSONAL INJURY CAUSED BY NEGLIGENCE, OR FOR ANY OTHER LIABILITY WHICH MAY NOT BE RESTRICTED, LIMITED, OR EXCLUDED PURSUANT TO APPLICABLE LAW.

11. Indemnification

A. Indemnification by RingCentral

i. RingCentral shall indemnify and hold harmless the Customer and its Affiliates for Indemnifiable Amounts, and shall defend any third-party claims or causes of action (a **"Third Party Claim"**) to the extent such Third Party Claim arises out of or alleges that:

a. The Services, as provided by RingCentral, infringe or misappropriate the patent, copyright, trademark, or trade secret rights of a third party.

ii. RingCentral will have no obligations under subsection (i) above to the extent the Third Party Claim arises from: (a) use of the Services in combination with data, software, hardware, equipment, or technology not provided or authorized by RingCentral in writing unless any of the foregoing are necessary for the proper operation of the Services; (b) modifications to the Services not made by RingCentral; (c) Customer Content; (d) failure to promptly install any updates of any software or firmware or accept or use any modified or replacement items provided free of charge by or on behalf of RingCentral; (e) breach of the Agreement; or (f) a Third Party Claim brought by Customer's Affiliate, successor, or assignee.

iii. If such a Third-Party Claim is made or appears possible, Customer agrees to permit RingCentral, at RingCentral's sole discretion and expense, to (a) modify or replace the Services, or component or part thereof, to make it non-infringing or (b) obtain the right for Customer to continue to use the Services. If RingCentral determines that neither alternative is commercially reasonable, RingCentral may terminate this Agreement in its entirety or with respect to the affected Service, component or part (a **"Discontinued Component"**), effective immediately on written notice to Customer, in which case Customer will not owe any fees or charges relating to the Discontinued Component for any period subsequent to the date of such termination, and will be entitled to receive a refund of any prepaid but unused fees relating to the Discontinued Component. In the event the removal of the Discontinued Component does not substantially affect Customer's use of the Services, the refund or fee abatement pursuant to the foregoing shall be a reasonable portion of the total fees owed by Customer for the Services as a whole based on the significance of the Discontinued Component to the total value of the Services as a whole. RingCentral's obligations under this Sub-Section will be RingCentral's sole and exclusive liability and Customer's sole and exclusive remedies with respect to any actual or alleged intellectual property violations.

B. Indemnification by Customer. To the extent permitted by the laws and the constitution of the jurisdiction of Customer, Customer shall indemnify, and hold harmless RingCentral and its Affiliates for Indemnifiable Amounts, and shall defend any Third Party Claims arising out of or in connection with: (i) material violation of applicable Law by the Customer, its Affiliates, or their respective End Users in connection with their use of the Services; (ii) use of the Services in breach of the Use Policies; (iii) failure to promptly install any updates of any software or firmware or accept or use modified or replacement items provided free of charge by or on behalf of RingCentral; or (iv) Customer Content.

C. **Defense and Indemnification Procedures.** Any Party seeking indemnification under this Section 11 (the **"Indemnified Party"**) shall provide the Party from which it seeks such indemnification (the **"Indemnifying Party"**) with the following: (a) prompt written notice of the Third-Party Claim, (b) sole control over the defense and settlement of the Third-Party Claim, and (c) reasonable information, cooperation, and assistance (at the Indemnifying Party's sole expense except for the value of the time of the Indemnified Party's personnel) in connection with the defense and settlement of the Third-Party Claim. The Indemnified Party's failure to comply with the foregoing obligations will not relieve the Indemnifying Party of its defense or indemnification obligations under this Section 11 (Indemnification) except to the extent that the Indemnifying Party is materially prejudiced by such failure. The Indemnified Party will have the right to participate (but not control), at its own expense, in the defense of such Third-Party Claim, including any related settlement negotiations. No such claim may be settled by the Indemnifying Party without the Indemnified Party's express written consent (not to be unreasonably withheld, conditioned, or delayed) unless such settlement includes a full and complete release of all claims and actions against the Indemnified Party by each party bringing such Third-Party Claim, requires no admission of fault, liability, or guilt by the Indemnified Party, and requires no act by the Indemnified Party other than the payment of a sum of money fully indemnified by the Indemnifying Party.

12. Warranties

A. **RingCentral Warranty.** RingCentral will provide the Services using a commercially reasonable level of skill and care, in material compliance with all applicable Laws and otherwise subject to the terms of this Agreement. To the extent permitted by Law, RingCentral shall pass through to Customer any and all warranties RingCentral receives in connection with equipment provided to Customer by or on behalf of RingCentral.

B. **Customer Warranty.** Customer's and its End Users' use of the Services must always comply with all applicable Laws and this Agreement. Further, when Customer's subscription for Services exceeds one (1) fiscal year, Customer warrants that it shall exercise due diligence and best efforts to secure an adequate appropriation of funds on time from its legislative or similar government body to pay for the contracted Services in the follow-on fiscal year(s).

C. **Disclaimer of Warranties. EXCEPT AS SPECIFICALLY SET FORTH IN THIS AGREEMENT AND TO THE FULLEST EXTENT PERMITTED BY LAW, THE SERVICES ARE PROVIDED "AS IS" AND "AS AVAILABLE," AND RINGCENTRAL MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF MERCHANTABILITY, NON-INFRINGEMENT, QUIET ENJOYMENT, AND FITNESS FOR A PARTICULAR PURPOSE AND ANY WARRANTIES ARISING FROM A COURSE OF DEALING OR USAGE IN TRADE, TOGETHER WITH SIMILAR WARRANTIES, WHETHER ARISING UNDER ANY LAW OR OTHERWISE. TO THE EXTENT THAT RINGCENTRAL CANNOT DISCLAIM ANY SUCH WARRANTY AS A MATTER OF APPLICABLE LAW, THE SCOPE AND DURATION OF SUCH WILL BE LIMITED TO THE FULLEST EXTENT PERMITTED BY LAW.**

13. Dispute Resolution

A. **Governing Law.** Any dispute arising out of or relating to this Agreement shall be governed and construed in accordance with the laws of CA, without regard to its choice of law rules, and the parties agree to submit to the jurisdiction of, and venue in, the courts in that state. The United Nations Convention on Contracts for the International Sale of Goods does not apply to this Agreement or Customer's use of the products or Services.

B. **Good Faith Attempt to Settle Disputes.** In the event of a dispute, each Party shall appoint a duly authorized representative who shall use all reasonable endeavors to resolve in good faith any dispute within reasonable timescales.

C. **Equitable Relief.** Any breach of either Party's IP Rights may cause that Party irreparable harm for which monetary damages will be inadequate and such Party may, in addition to other remedies available at Law or in equity, obtain injunctive relief without the necessity of posting a bond or other security, proof of damages, or similar requirement, in additional to any other relief to which such Party may be entitled under applicable Law.

D. **Limitations.** Except for actions for non-payment or liability arising from Section 11 (Indemnification), no claim, suit, action or proceeding relating to this Agreement may be brought by either Party more than two (2) years after the cause of action has accrued. Any actions, lawsuits, or proceedings must be conducted solely on an individual basis and the Parties expressly waive any right to bring any action, lawsuit or proceeding as a class or collective action, private attorney general action or in any other capacity acting in a representative capacity.

14. Miscellaneous

A. **Relationship of the Parties.** RingCentral and Customer are independent contractors, and this Agreement will not establish any relationship of partnership, joint venture, employment, franchise or agency between RingCentral and Customer.

B. **Assignment.** Neither Party may assign its rights or obligations under this Agreement or any Order Form without the prior written consent of the other Party, not to be unreasonably withheld or delayed. However, RingCentral may assign the Agreement or any portion thereof and any or all of its rights and obligations thereunder without consent (a) to an Affiliate; (b) as part of, or otherwise in connection with, the transfer or disposition of equity securities representing more than fifty percent (50%) of its voting control; (c) to the successor or surviving entity in connection with a merger, acquisition, or consolidation; or (d) as part of, or otherwise in connection with, the sale or other transfer of one or more of the service(s) under the Agreement or greater than 50% of the principal assets used in connection with the provision such service(s). This Agreement will bind and inure to the benefit of the Parties, and their permitted assigns and successors.

C. **Notices.** Except where otherwise expressly stated in the Agreement, all notices or other communications must be in English and are deemed to have been fully given when made in writing and delivered in person, upon delivered email, confirmed

facsimile, or five days after deposit with an reputable overnight courier service, and addressed as follows: To RingCentral at RingCentral, Inc., Legal Dept., 20 Davis Drive, Belmont, CA 94002 USA, with a copy to legal@ringcentral.com, and to Customer at either the physical address or email address associated with the Customer Account.

Customer acknowledges and agrees that all electronic notices have the full force and effect of paper notices. The addresses to which notices may be given by either Party may be changed (a) by RingCentral upon written notice given to Customer pursuant to this Section or (b) by Customer in the Administrative Portal.

D. Force Majeure. Excluding either Party's payment obligations under the Agreement, neither Party will be responsible or liable for any failure to perform or delay in performing to the extent resulting from any event or circumstance that is beyond that Party's reasonable control, including without limitation any act of God; national emergency; third-party telecommunications networks; riot; war; terrorism; governmental act or direction; change in Laws; fiber, cable, or wire cut; power outage or reduction; rebellion; revolution; insurrection; earthquake; storm; hurricane; flood, fire, or other natural disaster; strike or labor disturbance; or other cause, whether similar or dissimilar to the foregoing, not resulting from the actions or inactions of such Party.

E. Third-Party Beneficiaries. RingCentral and Customer agree that there will be no third-party beneficiaries to this Agreement.

F. Headings, Interpretation. The headings, section titles, and captions used in the Agreement are for convenience of reference only and will have no legal effect. All defined terms include related grammatical forms, and, whenever the context may require, the singular form of nouns and pronouns include the plural, and vice versa. The Parties agree that this Agreement will be deemed to have been jointly and equally drafted by them, and that the provisions of this Agreement therefore should not be construed against a Party or Parties on the grounds that the Party or Parties drafted or was more responsible for drafting the provision(s).

G. Anti-Bribery. Each Party represents that in the execution of this Agreement and in the performance of its obligations under this Agreement it has complied and will comply with all applicable anti-bribery Laws and regulations, including, without limitation, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and similar applicable Laws.

H. Export Control. Any services, products, software, and technical information (including, but not limited to, services and training) provided pursuant to the Agreement may be subject to U.S. export Laws and regulations. Customer will not use distribute, transfer, or transmit the services, products, software, or technical information (even if incorporated into other products) except in compliance with U.S. and other applicable export regulations.

I. Regulatory and Legal Changes. In the event of any change in Law, regulation or industry change that would prohibit or otherwise materially interfere with RingCentral's ability to provide Services under this Agreement, RingCentral may terminate the affected Services or this Agreement or otherwise modify the terms thereof.

J. Use of Beta, Preview, or Early Access Software. If you use any beta, preview, or early access services, features, products, or software offered or made available by RingCentral, then you acknowledge that your use of the services, products, or software are governed by the Beta Evaluation License Agreement and not by this Agreement.

K. Entire Agreement. The Agreement, together with any exhibits, Order Forms, Use Policies, and Attachments, each of which is expressly incorporated into this Agreement with this reference, constitutes the entire agreement between the Parties and supersedes and replaces any and all prior or contemporaneous understandings, proposals, representations, marketing materials, statements, or agreements, whether oral, written, or otherwise, regarding such subject. RingCentral expressly rejects in their entirety any additional or conflicting terms or conditions contained in Customer purchase order, or similar Customer document, which the Parties agree are solely for the Customer's convenience.

L. Order of Precedence. In the event of any conflict between the documents comprising this Agreement, precedence will be given to the documents in the following descending order: (i) the applicable Order Form (including any hyperlinks); (ii) the applicable Attachment; (iii) the main body of this Agreement; (iv) Use Policies and Data Processing Addendum incorporated by reference in this Agreement; and (v) and any other document expressly referred to in this Agreement which governs the Services. With respect to data processing, the Data Processing Addendum shall take precedence over any inconsistent terms in any of the documents listed in the previous sentence.

M. Amendments. Except as otherwise provided, this Agreement may only be modified by a written amendment executed by authorized representatives of both Parties. In no event will handwritten changes to any terms or conditions, including in the applicable Order Form, be effective.

N. Severability and Waiver. In the event any provision of this Agreement is held by a court of competent jurisdiction to be invalid, void or unenforceable, such provision(s) will be stricken and the remainder of this Agreement will remain legal, valid, and binding. The failure by either Party to exercise or enforce any right conferred by this Agreement will not be deemed to be a waiver of any such right or to operate so as to bar the exercise or enforcement of any such or other right on any later occasion. Except as otherwise expressly stated in this Agreement, all rights and remedies stated in the Agreement are cumulative and in addition to any other rights and remedies available under the Agreement, at Law, or in equity.

O. Execution. Each Party represents and warrants that: (a) it possesses the legal right and capacity to enter into the Agreement and to perform all of its obligations thereunder; (b) the individual signing the Agreement and (each executable part thereof) on that Party's behalf has full power and authority to execute and deliver the same; and (c) the Agreement will be a binding obligation of that Party. Each Party agrees that an Electronic Signature, whether digital or encrypted, is intended to authenticate this Agreement and to have the same force and effect as manual signatures.

P. Counterparts. This Agreement may be executed electronically and in separate counterparts each of which when taken together will constitute one in the same original.

Q. Survival. The rights and obligations of either Party that by their nature would continue beyond the expiration or termination of this Agreement or an Order Form will survive expiration or termination of this Agreement or the Order Form, including without limitation payment obligations, warranty disclaimers, indemnities, limitations of liability, definitions and miscellaneous.

R. Family Education Rights and Privacy Act (FERPA). Customer Content when in-transit on the RingCentral Network and when at-rest within RingCentral Data Centers may contain communications and/or educational records pertaining to students in connection with the performance of the Services pursuant to the Agreement. RingCentral shall only use or disclose such Customer Content as is reasonably necessary to provide the Services or for RingCentral to otherwise perform its obligations under the Agreement.

EXHIBIT A
DEFINITIONS

Definitions. Capitalized terms used in this Agreement but otherwise not defined have the following meaning:

1. **"Account"** means the numbered account established with RingCentral and associated with Customer and the Services provided to Customer under this Agreement. For billing and convenience purposes, multiple services, Digital Lines, or End Users may be included in a single billing account, and/or a single Customer may have multiple billing accounts encompassing different geographic locations, business units, or other designations as requested by Customer and accepted by RingCentral.
2. **"Account Administrator"** means the person(s) who have been granted authority by Customer to set up, amend, or otherwise control settings and/or make additional purchases for the Account via the Administrative Portal. Account Administrators may have varying levels of Account rights, skills, or permissions.
3. **"Account Data"** means: any business contact information provided with the Account; RingCentral-generated logs of calling or other metadata developed or collected in the provision of the Services; configuration data; and records of Digital Lines and any Services purchased under this Agreement.
4. **"Administrative Fees"** means any administrative recovery fees, 911 cost recovery fees and the like separately charged by RingCentral to Customer.
5. **"Administrative Portal"** means the online administrative portal through which Account Administrators control settings and/or make additional purchases for the Account.
6. **"Affiliate(s)"** means a person or entity that is controlled by a Party hereto, controls a Party hereto, or is under common control with a Party hereto, and "control" means beneficial ownership of greater than fifty percent (50%) of an entity's then-outstanding voting securities or ownership interests.
7. **"Attachment(s)"** means documents appended to the contract containing additional terms for products and Services. Attachments and the terms and conditions contained therein are part of this Agreement.
8. **"Confidential Information"** means any information disclosed by or on behalf of the Disclosing Party) to the Receiving Party that should reasonably be considered as confidential given the nature of the information and the circumstances surrounding its disclosure.
9. **"Customer Care"** means Customer support operations delivered by RingCentral and/or its subcontractors.
10. **"Customer Content"** means the content of calls, facsimiles, SMS messages, voicemails, voice recordings, shared files, conferences, or other communications transmitted or stored through the Services.
11. **"Digital Line"** means a phone number assigned to an End User or a specifically designated location (e.g., conference room) and the associated voice service for inbound and outbound calling that permits an End User generally to make and receive calls to and from the public switched telephone network as well as to and from other extensions within the same Account.
12. **"Disclosing Party"** means the Party disclosing Confidential Information or on whose behalf Confidential Information is disclosed by such Party's agents, including but not limited to, its Affiliates, officers, directors, employees, and attorneys.
13. **"Electronic Signatures"** means an electronic sound, symbol, or process, including clicking a digital button to accept, attached to or logically associated with a contract or other record and executed or adopted by a person with the intent to sign the record.
14. **"End Point"** means an application or device through which any End-User might access and/or use any of the Services, including without limitation IP Desk Phones, Desktop Clients, Web Clients, Mobile Applications, and Software Integrations.
15. **"End User"** means an individual user to whom Customer makes the Services available, and may be a natural person, and may include but is not limited to Customer's employees, consultants, clients, external users, invitees, contractors, and agents.
16. **"Helpdesk Support"** shall mean the performance of the following tasks:
    - Standard feature/functionality ("how to") support for End Users (i.e. call forwarding, voice mail set-up, etc.).
    - Standard management of the Admin Interface within the product.
    - Support all moves, adds, changes, and deletes of employees.
17. **"Indemnifiable Amounts"** means all (X) damages and other amounts awarded against the Indemnified Party by a court of competent jurisdiction pursuant to a final judgment in connection with such Third-Party Claim; (Y) any amounts payable by the Indemnified Party or its Affiliates pursuant to a binding, written agreement settling the Third Party Claim, provided such agreement is approved in advance in writing by the Indemnifying Party; and (Z) all reasonable costs and expenses paid to third parties by the Indemnified Party or its Affiliates in connection with the Indemnified Party's or its Affiliates' attorneys' fees and related expenses.
18. **"Indemnifying Party"** and **"Indemnified Party"** have the meanings set forth in Section 11(C) (Defense and Indemnification Procedures).
19. **"Initial Term"** has the meaning set forth in Section 2(D) (Services Term).

20. **"Intellectual Property Rights"** or **"IP Rights"** means all common law and statutory rights (whether registered or unregistered, or recorded or unrecorded, regardless of method) arising out of or associated with: (a) patents and patent applications, inventions, industrial designs, discoveries, business methods, and processes; (b) copyrights and copyright registrations, and "moral" rights; (c) the protection of trade and industrial secrets and Confidential Information; (d) other proprietary rights relating to intangible property; (e) trademarks, trade names and service marks; (f) a person's name, likeness, voice, photograph or signature, including without limitation rights of personality, privacy, and publicity; (g) analogous rights to those set forth above; and (h) divisions, continuations, continuations-in-part, renewals, reissuances and extensions of the foregoing (as applicable).

21. **"Law"** means any law, statute, regulation, rule, ordinance, administrative guidance, treaty or convention, or court or administrative order or ruling of any governing Federal, State, local or non-U.S. governmental body with jurisdiction over the Services.

22. **"Order Form(s)"** means a request for Service describing the type and quantity of Services required by Customer and submitted and accepted by the Parties in accordance with Section 2(A) (Ordering Services). The Order Form may be presented and executed via the Administrative Portal.

23. **"Receiving Party"** means the Party or its agents, including, but not limited to its Affiliates, officers, directors, employees, and attorneys receiving Confidential Information.

24. **"Renewal Term"** has the meaning set forth in Section 2(D) (Services Term).

25. **"RingCentral Network"** means the network and supporting facilities between and among the RingCentral points of presence (**"PoP(s)"**), up to and including the interconnection point between the RingCentral's network and facilities, and the public Internet, and the Public Switched Telephone Network (PSTN). The RingCentral Network does not include the public Internet, a Customer's own private network, or the PSTN.

26. **"Service(s)"** means all services provided under this Agreement and set forth in one or more Order Form(s).

27. **"Start Date"** means the date so identified in the relevant Order Form or the date on which Customer orders Services via the Administrative Portal.

28. **"Taxes"** means any and all federal, state, local, municipal, foreign, and other taxes and fees charged or collected from Customers, including but not limited to any Universal Service Fund, TRS and 911 taxes and fees.

29. **"Term"** means the Initial Term plus any Renewal Terms.

30. **"Third Party Claim"** has the meaning set forth in Section 11(A) (Indemnification by RingCentral).

31. **"Use Policy"** refers to any of the policies identified in Section 5(B) (Use Policies).

ATTACHMENT A
SERVICE ATTACHMENT - RINGEX SERVICES

This Service Attachment is a part of the Master Services Agreement (the **"Agreement"**) that includes the terms and conditions agreed by the Parties under which RingCentral will provide to the Customer the RingEX Services as described under the applicable Order Form (the **"Services"**).

1. Service Overview

The Services are a cloud-based unified communications service that includes enterprise-class voice, fax, call handling, mobile apps, and bring-your-own-device (BYOD) capability that integrates with a growing list of applications.

The Services include:

- Voice Services, including extension-to-extension calling and the ability to make and receive calls to and from the public switched telephone network (PSTN)
- Video and audio-conferencing service, including screen sharing
- Collaboration Tools, including One-to-One and Team Chat, File Sharing, task management, SMS/Texting (where available), and other innovative tools

The Services may be accessed from a variety of user End Points, including IP Desk Phones, Desktop Clients, Web Clients, Mobile Applications, and Software Integrations.

2. RingEX Purchase Plans

A. Tiers of Service. The Services are made available in several pricing tiers, which are described more fully at https://www.ringcentral.com/office/plansandpricing.html. While RingCentral offers unlimited monthly plans for some of its products and services, RingCentral Services are intended for regular business use. "Unlimited" use does not permit any use otherwise prohibited by the Acceptable Use Policy, available at https://www.ringcentral.com/legal/acceptable-use-policy.html, including trunking, access stimulation, reselling of the Services, etc. Use of the RingCentral AI Assistant capabilities is subject to the applicable terms contained in the AI Assistant Add-On Service Description available at https://www.ringcentral.com/legal/add-on-services.html#qlnks-12.

B. Minute and Calling Credit Bundles. Each plan includes a number of Toll-Free minutes, per month, which are pooled to create a single allotment of Toll-Free minutes available for the entire account. Core/Advanced/Ultra tier plans include a monthly allotment of 100/1000/10000 toll free minutes per account, respectively. Overage charges of 3.9¢ per minute apply to calls made in excess of allotment.

International Calling Credit Bundles can be purchased in addition to any base amount included with the purchased tier. International External Calls are charged against Calling Credits on the Account per destination rates, or as overage once Calling Credits are exceeded. Currently effective rates are available at https://www.ringcentral.com/support/international-rates.html.

Extension-to-Extension Calls within the Customer account never incur any usage fee and are unlimited, except to the extent that such calls are forwarded to another number that is not on the Customer account.

Additional Calling Credits may be purchased through the Auto-Purchase feature, which can be selected for automatic purchase in various increments on the Administrative Portal. Auto-Purchase is triggered when the combined usage of all End Users on an Account exceeds the total Calling Credits or when End Users make calls with additional fees (e.g., 411).

Minute Bundles and Calling Credit Bundles expire at the end of month and cannot roll over to the following month. Auto-Purchased Calling Credits expire twelve (12) months from date of purchase. Bundles may not be sold, transferred, assigned, or applied to any other customer.

C. Enhanced Business SMS Allotment and Pricing. Each plan includes a number of SMS per each user, per month, which are pooled to create a single allotment of SMS available to the entire account. Core/Advanced/Ultra tier plans include a monthly allotment of 25/100/200 SMS, per user respectively. Each SMS sent or received will be deducted from the pool of available SMS on the account. Overage charges apply to SMS sent or receive in excess of allotment and will be charged at the then-applicable rates, available at https://www.ringcentral.com/support/new-sms-rates.html. Additional SMS bundles are available for purchase at discounted prices. Customer must successfully register phone numbers with the SMS registar prior to using SMS. RingCentral may attempt to deliver SMS sent from unregistered phone numbers at its discretion, however unregistered SMS are excluded from the monthly allotment and any purchased SMS bundles, and will be charged at then-applicable unregistered SMS rates, available at https://www.ringcentral.com/support/new-sms-rates.html.

3. Operator Assisted Calling, 311, 511 and other N11 Calling

RingCentral does not support 0+ or operator assisted calling (including, without limitation, collect calls, third party billing calls, 900, or other premium line numbers or calling card calls). The Services may not support 211, 311, 411, 511 and/or N11 calling. To the extent they are supported, additional charges may apply for these calls.

4. Directory Listing Service

RingCentral offers directory listing (the **"Directory Listing Service"**). If Customer subscribes to the Directory Listing Service, RingCentral will share certain Customer Contact Data with third parties as reasonably necessary to include in the phone directory (**"Listing Information"**). This information may include, but is not limited to, Customer's company name, address, and phone numbers. Customer authorizes RingCentral to use and disclose the Listing Information for the purpose of publishing in, and making publicly available through, third-party directory listing services, to be selected by RingCentral or third-party service providers in their sole discretion. Customer acknowledges and agrees that by subscribing to the Directory Listing Service, Customer's Listing Information may enter the public domain and that RingCentral cannot control third parties' use of such information obtained through the Directory Listing Service.

A. Opt Out. Customer may opt out of the Directory Listing Service at any time; however, RingCentral is not obligated to have Customer's Listing Information removed from third-party directory assistance listing services that have already received Customer's information.

B. No Liability. RingCentral will have no responsibility or liability for any cost, damages, liabilities, or inconvenience caused by calls made to Customer's telephone number; materials sent to Customer, inaccuracies, errors or omissions with Listing Information; or any other use of such information. RingCentral will not be liable to Customer for any use by third parties of Customer's Listing Information obtained through the Directory Listing Service, including without limitation the use of such information after Customer has opted out of the Directory Listing Service.

5. Global RingEX or RingCentral Global Office. Global RingEX (which is also known as RingCentral Global Office and references in the Service Description to Global RingEX shall also refer to Global Office) provides a single communications system to companies that have offices around the world, offering localized service in countries for which Global RingEX is available. Additional information related to Global RingEX Services is available at http://www.ringcentral.com/legal/policies/global-office-countries.html. This section sets forth additional terms and conditions concerning RingCentral's Global RingEX for customers that subscribe to it.

A. Emergency Service Limitations for Global RingEX. RingCentral provides access to Emergency Calling Services in many, but not all, countries in which RingCentral Global RingEX is available, allowing End Users in most countries to access Emergency Services. Emergency Services may only be accessed within the country in which the Digital Line is assigned, e.g., an End User with a Digital Line assigned in Ireland may dial Emergency Services only within Ireland. Access to Emergency Calling Services in RingCentral Global RingEX countries, where available, is subject to the Emergency Services Policy, available at https://www.ringcentral.com/legal/emergency-services.html. Customer must make available and will maintain at all times traditional landline and/or mobile network telephone services that will enable End Users to call the applicable Emergency Services number. Customer may not use the RingCentral Services in environments requiring fail-safe performance or in which the failure of the RingCentral Services could lead directly to death, personal injury, or severe physical or environmental damage.

B. Global RingEX Provided Only in Connection with Home Country Service. RingCentral provides Global RingEX Service only in connection with Services purchased in the Home Country. RingCentral may immediately suspend or terminate Customer's Global RingEX Services if Customer terminates its Digital Lines in the Home Country. All invoicing for the Global RingEX Services will be done in the Home Country on the Customer's Account, together with other Services purchased under this Agreement, using the Home Country's currency. Customer must at all times provide a billing address located in the Home Country. RingCentral will provide all documentation, licenses, and services in connection with the Global RingEX Service in English; additional language support may be provided at RingCentral's sole discretion.

C. Primary Place of Use of Global RingEX Service. Customer represents and warrants that the primary place of use of the Global RingEX Services will be the country in which the Digital Line is assigned, e.g., an End User with a Digital Line assigned in Ireland will primarily use that Digital Line in Ireland.

D. Relationships with Local Providers. In connection with the provision of Global RingEX Services, RingCentral relies on local providers to supply certain regulated communication services; for example (i) for the provision of local telephone numbers within local jurisdictions; (ii) to enable you to place local calls within local jurisdictions; and (iii) to enable you to receive calls from non-RingCentral numbers on Customer's Global RingEX telephone number(s), by connecting with the local public switched telephone network. Customer hereby appoints RingCentral as Customer's agent with power of attorney (and such appointment is coupled with an interest and is irrevocable during the Term) to conclude and enter into agreements with such local providers on Customer's behalf to secure such services. RingCentral's locally licensed affiliates provide all telecommunications services offered to Customer within the countries in which such affiliates are licensed; in some cases, RingCentral may obtain services from locally licensed providers on Customer's behalf. RingCentral is responsible for all contracting, billing, and customer care related to those services. Customer is responsible for providing RingCentral with all information necessary for RingCentral to obtain numbers in Global RingEX countries.

6. **Additional Services.** RingCentral offers add-on services for the Services (where available), which are described at https://www.ringcentral.com/legal/microsoft-teams-services-attachment.html. Additional terms or charges may apply, depending on the selected features.

7. **Bring Your Own Carrier (BYOC) Services.** RingCentral offers a software-as-a-service in which customers provide and maintain their own local telecommunications services, which may be connected to RingCentral's cloud PBX, videoconferencing, and team messaging services. BYOC and additional terms are described and available at https://www.ringcentral.com/legal/BYOC-service-description.html.

8. **Definitions.** Terms used herein but not otherwise defined have the meanings ascribed to them in the Agreement. For purposes of this Service Attachment, the following terms have the meanings set forth below:

   A. **"Digital Line"** means a phone number assigned to an End User or a specifically designated location (e.g., conference room) and the associated voice service for inbound and outbound calling that permits the End User generally to make and receive calls to and from the public switched telephone network as well as to and from other extensions within the same Account.

   B. **"End Point"** means an application or device through which any End-User might access and/or use any of the Services, including without limitation IP Desk Phones, Desktop Clients, Web Clients, Mobile Applications, and Software Integrations.

   C. **"Extension-to-Extension Calls"** means calls made and received between End Points on the Customer Account with RingCentral, regardless of whether the calls are domestic or international.

   D. **"External Calls"** means calls made to or received from external numbers on the PSTN that are not on the Customer Account with RingCentral.

   E. **"Home Country"** means the United States or the country that is otherwise designated as Customer's primary or home country in the Order Form.

ATTACHMENT B
SERVICE ATTACHMENT - RINGCX SERVICES

This Service Attachment is a part of the Master Services Agreement (the **"Agreement"**) that includes the terms and conditions agreed by the Parties under which RingCentral will provide to the Customer the RingCX Services as described under the applicable Order Form.

In the event of any conflict between the provisions of the Agreement and the provisions of this Service Attachment, such provisions of this Service Attachment will prevail.

1. Service Overview

"RingCX Services" is a cloud-based, contact center and omnichannel communications solution consisting of inbound and outbound voice media routing, queuing, and distribution as well as digital channel management, and related services, applications, and features, whether included as part of a Subscription Package or ordered separately.

2. Billing and Payment

A. Billing

Starting at the Start Date set forth in the Order Form and until the end of the Term, You agree to pay for: a) the RingCX Services fees for at least the number of Seats set forth in the RingCX Services Order (as amended as permitted below) (an **"RingCX Contract Seat"**) based on the per Seat pricing set forth in the RingCX Services Order (the **"RingCX Contract Seat Price"**), as amended from time to time, regardless of the number of Seats being used; b) any Usage (per minute) fees; c) any Subscription Packages set forth in the RingCX Services Order (e.g. Interactive RingCX Response, minutes, international minutes); and d) any additional fees set forth in the RingCX Services Order.

B. Adding New RingCX Contract Seats

You may add RingCX Contract Seats at any time either through a new RingCX Services Order or a written amendment executed by You and RingCentral. The RingCX Services fees related to these additional RingCX Contract Seats will be billed at the per Seat price set forth in the RingCX Order form. For the avoidance of doubt, You will be required to pay for RingCX Services fees related to these additional RingCX Contract Seats until the end of the Term.

C. Adding On-Demand RingCX Seats

At any time, You may utilize additional Seats with your RingCX Services on an as-needed basis (each, an **"On-Demand RingCX Seat"**). You will be billed for any RingCX Services at the rate of the RingCX Contract Seat Price plus an overage charge of 20 USD per month per Seat (the **"On-Demand RingCX Price"**) until You remove this On-Demand RingCX Seat from Your RingCX Services subscription (which You may do at any time in your discretion). RingCX Services fees for any On-Demand RingCX Seats will be charged for the full month, regardless of the number of days used. For each monthly billing period, You will be charged for the highest number of On-Demand RingCX Seats used within such billing period. Fees for other RingCX Service licenses may be billed at the price set forth in the RingCX Order Form.

3. RingCX Services, Settings, and Modifications

A RingEX account is required to use the RingCX Services. The settings and preferences for your RingCX Services, including without limitation user rights, user skills, and permissions; routing, scripts; registration Information; and activation of On-Demand RingCX Seats, among others, may be set and modified by those individuals whom You allow to have access to the web console (**"Account Administrators"**). The Customer acknowledges that the acts or omissions of the Account Administrators may result in additional charges or affect RingCX Services. The Customer will be solely responsible for the acts or omissions and the impact on billable amounts of the Account Administrators.

4. Use of RingCX Services

You acknowledge and agree that all use of the RingCX Services shall be subject to this Service Attachment and the Agreement, including without limitation the use policies and data privacy policies. You acknowledge and agree that You are fully responsible and liable for all use of the RingCX Services, any software or hardware used in conjunction with the RingCX Services, and any and all fees and charges that are incurred as a result of such use. Notwithstanding anything to the contrary stated in the Agreement, the use of the RingCX Services shall be subject to the following terms:

A. NO 911 SERVICE. YOU ACKNOWLEDGE AND AGREE THAT 911 / EMERGENCY CALLS OR MESSAGES MAY NOT BE PLACED OR SENT THROUGH THE RINGCX SERVICES, AND NO 911 CALLING OR SMS OR OTHER EMERGENCY MESSAGING SERVICE IS OFFERED OR PROVIDED WITH THE RINGCX SERVICES. YOU MUST MAKE AVAILABLE ALTERNATIVE ARRANGEMENTS TO PLACE 911 CALLS.

B. Customer 911 Notification Obligations. You represent, warrant, and covenant that: (i) You shall ensure that any person who might use the RingCX Services or be present at the physical location where any the RingCX Services might be accessed or used is fully informed and aware that he or she will not be able to place calls or send messages to 911 or other emergency response services through the RingCX Services; and (ii) You shall provide all of the foregoing parties with an alternate method by which to place such calls and, as applicable, to send such messages.

C. Cardholder Data. You acknowledge and agree that when using RingCX Services, You will not record or store Cardholder Data (**"CHD"**) as that term is defined by the PCI Data Security Standard. If You are required to receive CHD using the RingCX Services, You will pause any recordings or otherwise ensure that no CHD is being recorded or saved.

5. Compliance and Regulations

You disclaim and deny any reliance on any marketing materials relating to the RingCX Services with regard to Telephone Consumer Protection Act (**"TCPA"**) compliance and/or the Telemarketing Sales Rule. Any statements regarding the TCPA or other legal compliance are opinion only, and You are ultimately responsible for making your own determinations regarding the requirements of the TCPA and its applicability to the RingCX Services.

RingCentral shall not redesign or otherwise modify its Manual Dial product, including any relevant hardware or software, in a manner that would give it the capacity to dial randomly or sequentially generated numbers, function as a predictive dialer or dial numbers in any manner that does not require human intervention for each call.

6. Definitions

Terms used herein but not otherwise defined have the meanings ascribed to them in the Agreement. For purposes of this Service Attachment, the following terms have the meanings set forth below:

A. **"RingCX Materials"** means documentation, either electronic or otherwise, that RingCentral provides or makes available to the Customer describing the RingCX Services, including the components of each Subscription Package, if applicable, and any other features and functionality offered as part of the RingCX Services. The RingCX Materials may include without limitation manuals, product descriptions, user or installation instructions, diagrams, printouts, listings, flowcharts, and training materials related to the RingCX Services.

B. **"RingCX Services Order"** is an Order form executed by the Parties under the terms of the Agreement and this Service Attachment, setting out the details of the subscription to the RingCX Services, including any Subscription Package, and any additional products, services and functionality purchased by theCustomer

C. **"Interactive Voice Response"** or **"IVR"** means a module that allows customers to script automated voice interactions, accessing third-party services and databases when needed to service the customer. IVR-only packages do not include any services or restrictions related to Seats.

D. **"Seat"** means either: i) a named license based on the named persons that use the RingCX Services, or ii) a concurrent license based on the number of persons simultaneously using the RingCX Services. Each Seat includes 2,000 minutes of IVR per month and unlimited inbound and manually dialed outbound domestic minutes. All use is subject to the Acceptable Use Policy. Overages apply.

E. **"Subscription Package"** is a set of RingCX Services features and applications, as further defined in the RingCX Materials, that could be ordered as a bundle.

F. **"Usage"** means any charges incurred in connection with the use of your RingCX Services, including, without limitation, local, long-distance, international, and toll-free minutes, charges, and any products listed on the RingCX Service Order.

ATTACHMENT C
SERVICE LEVEL AGREEMENT FOR RINGEX SERVICES

This Service Level Agreement for RingEX Services (the **"RingEX SLA"**) is a part of the Master Services Agreement (the **"Agreement"**) that includes the Service Availability levels RingCentral commits to deliver on the RingCentral Network for RingEX Services.

1. Overview

RingCentral will maintain the following performance levels:

	Performance Level
Voice Services Availability (Monthly Calculation)	99.999%
Quality of Voice Service (Monthly Calculation)	3.8 MOS Score

2. Minimum Eligibility

Customer is entitled to the benefits of this RingEX SLA only to the extent that Customer maintains a minimum of fifty (50) Digital Lines under the RingEX Service Attachment with a minimum twelve (12) month Term. This RingEX SLA shall not apply to any period of time where Customer does not meet the foregoing requirements.

3. Service Delivery Commitments

A. Calculation of Service Availability for Voice Services

Service Availability = [1 – ((number of minutes of Down Time x number of Impacted Users) / (total number users x total number of minutes in a calendar month))] x 100

Service Availability shall be rounded to nearest thousandth of a percent in determining the applicable credit. Service Credits for Down Time will not exceed 30% MRC.

B. Calculation of Service Credits

Customer is entitled to the Accelerated Service Credits calculated based on the table below:

B.1 Accelerated Service Credit Table

Voice Service Availability	Service Credits
≥ 99.999%	0% MRC
≥ 99.500% and < 99.999%	5% MRC
≥ 99.000% and < 99.500%	10% MRC
≥ 95.000% and < 99.000%	20% MRC
< 95.000%	30% MRC

C. No Cumulative Credits

Where a single incident of Down Time affects RingEX Services and any other Services provided by RingCentral and covered under a separate service level agreement executed between the parties, resulting in Service Credits under both agreements, Customer is entitled to claim Service Credits under one of the agreements, but not for both.

Service Credits to be paid under this RingEX SLA will be calculated based on Customer's RingEX MRC only and will not include any other fees paid by RingCentral for any other Services, (e.g., Contact Center Services). Service Credits may not exceed the total MRC paid for the relevant Services.

D. Qualifying for Service Credits

Service Credits for Down Time will accrue only to the extent:

i. Down Time exceeds 1 minute.

ii. Customer reports the occurrence of Down Time to RingCentral by opening a Support Case within twenty-four (24) hours of the conclusion of the applicable Down Time period.

iii. RingCentral confirms that the Down Time was the result of an outage or fault on the RingCentral Network.

iv. Customer is not in material breach of the Agreement, including its payment obligations.

v. Customer must submit a written request for Service Credits to Customer Care within thirty (30) days of the date the Support Case was opened by Customer, including a short explanation of the credit claimed and the number of the corresponding Support Case.

4. Quality of Service Commitments

A. Quality of Service Targets. RingCentral will maintain an average MOS score of 3.8 over each calendar month for Customer Sites in the Territory, except to the extent that Customer endpoints connect via public Wi-Fi, a low bandwidth mobile data connection (3G or lower), or Customer uses of narrowband codecs such as G.729.

B. Quality of Service Report. Customer may request a Quality of Service Report for the preceding calendar month by submitting a Support Case. RingCentral will endeavor to provide the Quality of Service Report within five (5) business days.

C. Diagnostic Investigation. If the Quality of Service Report shows a failure to meet the target 3.8 average MOS as calculated under this Section, RingCentral will use industry-standard diagnostic techniques to investigate the cause of the failure. Customer shall cooperate with RingCentral in this investigation fully and in good faith.

D. Diagnostic Remediation. Based on its investigation, RingCentral will provide a reasonable determination of the root cause(s) of any failure for the quality of service to meet the target MOS of 3.8. RingCentral will resolve any root cause(s) on the RingCentral Network; Customer shall timely implement settings or other resolution advised by RingCentral to improve the quality of service.

5. Chronic Service Failures

A. Service Availability. Customer may terminate the Agreement without penalty, and will receive a pro-rata refund of all prepaid, unused fees in the following circumstances if RingCentral fails to meet a Service Availability of at least 99.9% on the RingCentral Network for Voice Servicesduring any three (3) calendar Months in any continuous 6 Month period, and customer has timely reported Down Time as set forth herein.

B. Quality of Service. Customer may terminate the affected Customers Sites under its Agreement without penalty, and will receive a pro-rata refund of all prepaid, unused fees in the following circumstances if RingCentral fails to meet a minimum 3.5 MOS, as measured in duly requested Quality of Service Reports, for the affected Customer Sites within 4 months of the date of Customer's initial Support Case requesting a Quality of Service Report, except that such right inures only to the extent that Customer has complied fully and in good faith with the cooperation requirements and timely implemented all suggestions from RingCentral, in RingCentral's sole reasonable judgment.

C. To exercise its termination right under this RingEX SLA, Customer must deliver written notice of termination to RingCentral no later than ten (10) business days after its right to terminate under this Section accrues.

6. Sole Remedy

The remedies available pursuant to this RingEX SLA (i.e. the issuance of credits and termination for chronic service failure) shall be Customer's sole remedy for any failure to meet committed services levels under this RingEX SLA.

7. Definitions

Terms used herein but not otherwise defined have the meanings ascribed to them in the Agreement. For purposes of this Service Level Agreement, the following terms have the meanings set forth below:

A. "Down Time" is an unscheduled period during which the Voice Services for RingEX on the RingCentral Network are interrupted and not usable, except that Down Time does not include unavailability or interruptions due to (1) acts or omissions of Customer; (2) an event of a Force Majeure; or (3) Customer's breach of the Agreement. Down Time begins to accrue after one (1) minute of unavailability, per incident.

B. "Impacted User" means a user with a Digital Line affected by Down Time. In the event that due to the nature of the incident it is not possible for RingCentral to identify the exact number of users with a Digital Line affected by Down Time, RingCentral will calculate the Impacted Users on a User-Equivalency basis as defined below.

C. "MOS" means the Mean Opinion Score, determined according to the ITU-T E-model, as approved in June 2015, rounding to the nearest tenth of a percent. MOS provides a prediction of the expected voice quality, as perceived by a typical telephone user, for an end-to-end (i.e. mouth-to-ear) telephone connection under conversational conditions. MOS is measured by RingCentral using network parameters between the Customer endpoint, e.g., the IP Phone or Softphone, and the RingCentral Network, and will accurately reflect quality of the call to the caller using the Voice Services.

D. "MRC" means the monthly recurring subscription charges (excluding taxes, administrative or government mandated fees, metered billings, etc.) owed by Customer to RingCentral for RingEX Services for the relevant month. If customer is billed other than on a monthly basis, MRC refers to the pro-rata portion of the recurring subscription charges for the relevant calendar month. MRC does not include one-time charges such as phone equipment costs, set-up fees, and similar amounts, nor does it include any charges or fees for services other than RingEX Services.

E. **"Quality of Service Report"** means a technical report provided by RingCentral, detailing MOS and related technical information.

F. **"RingCentral Network"** means the network and supporting facilities between and among the RingCentral points of presence (**"PoP(s)"**), up to and including the interconnection point between the RingCentral's network and facilities, and the public Internet, and the PSTN. The RingCentral Network does not include the public Internet, a Customer's own private network, or the Public Switched Telephone Network (PSTN).

G. **"Service Availability"** is the time for which Voice Services for RingEX are available on the RingCentral Network, expressed as a percentage of the total time in the relevant calendar month, and calculated as set forth above.

H. **"Service Credits"** means the amount that RingCentral will credit a Customer's account pursuant to this RingEX SLA.

I. **"Site"** means a physical location in the Territory at which Customer deploys and regularly uses at least five (5) RingCentral Digital Lines. A Digital Line used outside such physical location for a majority of days in the relevant calendar month, such as home offices, virtual offices, or other remote use, will not be included in the line count for this purpose.

J. **"Support Case"** means an inquiry or incident reported by the Customer, through its Helpdesk Support, to Customer Care via the designated Customer Care portal.

K. **"Territory"** means those countries in which Customers subscribes to RingEX or Global RingEX Services.

L. **"User-Equivalency"** means the calculation made by RingCentral to estimate the percentage of the Voice Services impacted by the Down Time. RingCentral may use number of calls, network, device information, vendor and customer reports, and its own technical expertise to make these calculations.

M. **"Voice Services"** means the audio portion of the Services, across endpoints, including the Softphone, and IP desk phone.

ATTACHMENT D
SERVICE LEVEL AGREEMENT FOR RINGCX SERVICES

This Service Level Agreement for RingCX Services (the **"RingCX SLA"**) is a part of the Master Services Agreement (the **"Agreement"**) that includes the Service Availability levels RingCentral commits to deliver on the RingCentral Network for RingCX Services.

1. Overview

RingCentral will maintain the Quality of Service for the RingCX Core Services at the performance levels as defined below:

	Core Services
Service Availability (Monthly Calculation)	99.99%
Maximum Credit	15% of MRC

2. Minimum Eligibility. Customer is entitled to the benefits of this RingCX SLA only to the extent that Customer maintains a minimum of ten (10) RingCX Seats under the Agreement with a minimum twelve (12) month Initial Term and twelve (12) month Renewal Term. This RingCX SLA shall not apply to any period of time where Customer does not meet the foregoing requirements.

3. Service Delivery Commitments

A. Calculation of Service Availability

Service Availability = [1 – ((number of minutes of Down Time x number of impacted users) / (total number users x total number of minutes in a calendar month))] x 100

Availability shall be rounded to nearest hundredth of a percent in determining the applicable credit.

B. Calculation of Service Credits

i. Service Credits only begin to accrue after Service Availability falls below a certain percentage (shown in the tables below).

ii. Customer is entitled to Service Credits for the RingCX Core Services according to the following table:

Service Availability	Service Credits
≥ 99.99%	0% MRC
≥ 99.95% and < 99.99%	5% MRC
≥ 99.90% and < 99.95%	10% MRC
< 99.90%	15% MRC

C. Qualifying for Service Credits. Service Credits for Down Time will accrue only to the extent:

i. Service Availability falls below the percentage as illustrated in the tables (above) under Calculation of Service Credits.

ii. Customer reports the occurrence of Down Time to RingCentral Customer Service by opening a Support Case within twenty-four (24) hours of the beginning of the applicable Down Time period.

iii. Customer must submit a written request for Service Credits to Customer Care within ten (10) business days of the date the Support Case was opened by Customer, including a short explanation of the credit claimed and the number of the corresponding Support Case.

iv. RingCentral confirms that the Down Time was the result of an outage or fault on the RingCentral Network.

v. Customer is not in material breach of the Agreement, including its payments obligations.

D. Finality of Decisions. Credits may be issued in RingCentral's sole reasonable discretion and will expire at the expiration or termination of the Agreement.

4. Chronic Service Failures

A. Service Availability. Customer may terminate the Agreement without penalty and will receive a pro-rata refund of all prepaid, unused fees if customer accrues Maximum Service Credits for Down Time for RingCX Core Services during any three (3) calendar Months in any continuous 6-Month period, and customer has timely reported Down Time as set forth herein.

B. To exercise its termination right under this RingCX SLA, Customer must deliver written notice of termination to RingCentral no later than ten (10) business days after its right to terminate under this Section accrues.

5. Sole Remedy

The remedies available pursuant to this RingCX SLA (i.e., the issuance of credits and termination for chronic service failure) shall be Customer's sole remedy for any failure to meet committed services levels under this Agreement.

6. Definitions

Terms used herein but not otherwise defined have the meanings ascribed to them in the Agreement. For purposes of this Service Level Agreement, the following terms have the meanings set forth below:

A. **"RingCX Services"** include Core Services and Non-Core Services.

B. **"Core Services" includes the following services:**

i. Inbound and Outbound Call Termination (excluding automated dialing).

ii. Inbound and outbound digital interactions.

iii. Agent and supervisor log-in.

C. **"Down Time"** is an unscheduled period during which the RingCX Services on the RingCentral Network are interrupted and not usable, except that Down Time does not include unavailability or interruptions due to (1) acts or omissions of Customer; (2) an event of a Force Majeure; or (3) Customer's breach of the Agreement.

D. **"Interactive Voice Response" or "IVR"** means a module that allows customers to script automated voice interactions, accessing third party services and databases when needed to service the customer.

E. **"MRC"** means the monthly recurring subscription charges (excluding taxes, administrative or government mandated fees, metered billings, etc.) owed by Customer to RingCentral for RingCX Services for the relevant month. If customer is billed other than on a monthly basis, MRC refers to the pro-rata portion of the recurring subscription charges for the relevant calendar month. MRC does not include one-time charges such as phone equipment costs, set-up fees, and similar amounts, nor does it include any charges or fees for services other than RingCX Services.

F. **"Non-Core Services"** means any features not expressly identified as a Core Service. For the avoidance of doubt, Non-Core Services includes the following features:

i. Historical Reports.

ii. RealTime Dashboards.

iii. Call Recording Administration, Delivery, and Retrieval.

iv. Integrations, including Workforce Management, Workforce Optimization, and CRM.

G. **"RingCentral Network"** means the network and supporting facilities between and among the RingCentral points of presence (**"PoP(s)"**), up to and including the interconnection point between the RingCentral's network and facilities, and the public Internet, and the PSTN. The RingCentral Network does not include the public Internet, or the Public Switched Telephone Network (PSTN). The RingCentral Network includes the facilities of underlying provider of the RingCX Services subcontracted by RingCentral.

H. **"Service Availability"** is the time for which RingCX Services are available on the RingCentral Network, expressed as a percentage of the total time in the relevant calendar month, and calculated as set forth below.

I. **"Service Credits"** means the amount that RingCentral will credit a Customer's account pursuant to this RingCX SLA.

J. **"Support Case"** means an inquiry or incident reported by the Customer, through its Helpdesk Support, to Customer Care via the designated Customer Care portal.

ATTACHMENT E
RINGCENTRAL SECURITY ADDENDUM

1. Scope

This document describes the Information Security Measures (**"Measures"**) that RingCentral has in place when processing Protected Data through RingCentral Services.

2. Definitions

For purposes of this Security Addendum only, capitalized terms, not otherwise defined herein, have the meaning set forth in the Agreement.

A. **"Ring Central Services"**, or **"Services"**, means services offered by RingCentral and acquired by the Customer.

B. **"Customer"** means the entity that entered into the Agreement with RingCentral.

C. **"Protected Data"** means Customer and partner data processed by RingCentral Services, as defined in the applicable RingCentral DPA or Agreement, including "personal data" and "personal information" as defined by applicable privacy laws, confidential data as defined in the Agreement, account data, configuration data, communication content including messages, voicemail, and video recording.

D. **"Agreement"** means the agreement in place between RingCentral and the Customer for the provision of the Services.

E. **"Personnel"** means RingCentral employees, contractors or subcontracted Professional Services staff.

3. Information Security Management

A. Security Program

RingCentral maintains a written information security program that:

i. Includes documented policies or standards appropriate to govern the handling of Protected Data in compliance with the Agreement and with applicable law.

ii. Is managed by a senior employee responsible for overseeing and implementing the program.

iii. Includes administrative, technical, and physical safeguards reasonably designed to protect the confidentiality, integrity, and availability of Protected Data.

iv. Is appropriate to the nature, size, and complexity of RingCentral's business operations.

B. Security Policy Management

RingCentral's security policies, standards, and procedures:

i. Align with information security established industry standards.

ii. Are subject to ongoing review.

iii. May be revised to reflect changes in industry best practices.

C. Risk Management

RingCentral:

i. Performs cybersecurity risk assessments to identify threats to their business or operations at least annually.

ii. Updates RingCentral policies, procedures and standards as needed to address threats to RingCentral's business or operations.

4. Independent security assessments

A. External Audit

RingCentral:

i. Uses qualified independent third-party auditors to perform security audits covering systems, environments, and networks where Protected Data is processed, including

a. SOC2 Type II

b. IES/ISO 27001.

ii. maintains additional audits and compliance certifications as appropriate for RingCentral's business and as identified at www.ringcentral.com/trust-center.html.

B. Distribution of Reports

Copies of relevant audit reports and certifications:

i. Will be provided to Customer on request.

ii. Are subject to Non-Disclosure Agreement.

C. Annual Risk Assessment Questionnaire

Customer may, on one (1) occasion within any twelve (12) month period, request that RingCentral complete a third-party risk assessment questionnaire within a reasonable time frame.

In case of conflict between this section and the equivalent section in the RingCentral DPA, the DPA takes precedence.

5. Human Resource Security

A. Background Checks

RingCentral requires pre-employment screenings of all employees. RingCentral ensures criminal background searches on its employees to the extent permitted by law. Each background check in the US includes:

i. An identity verification (SSN trace).

ii. Criminal history checks for up to seven (7) years for felony and misdemeanors at the local, state, and federal level, where appropriate.

iii. Terrorist (OFAC) list search, as authorized by law.

Internationally, criminal history checks are conducted as authorized by local law.

Background checks are conducted by a member of the National Association of Professional Background Screeners or a competent industry-recognized company in the local jurisdiction.

B. Training

RingCentral will ensure that all employees including contractors:

i. Complete annual training to demonstrate familiarity with RingCentral's security policies.

ii. Complete annual training for security and privacy requirements, including CyberSecurity awareness, GDPR, and CCPA.

iii. Have the reasonable skill and experience suitable for employment and placement in a position of trust within RingCentral.

C. Workstation Security

RingCentral ensures that:

i. RingCentral employees either use RingCentral owned and managed devices in the performance of their duties or Bring Your Own Device (BYOD) device.

ii. All devices, whether RingCentral owned and managed or Bring Your Own Device (BYOD) device, are enrolled in the full RingCentral managed device program.

D. Data Loss Prevention

RingCentral employs a comprehensive system to prevent the inadvertent or intentional compromise of RingCentral data and Protected Data.

E. Due Diligence Over Sub-Contractors

RingCentral will:

i. maintain a security process to conduct appropriate due diligence prior to engaging sub-contractors.

ii. assess the security capabilities of any such sub-contractors on a periodic basis to ensure subcontractors' ability to comply with the Measures described in this document.

iii. apply written information security requirements that oblige sub-contractors to adhere to RingCentral's key information security policies and standards consistent with and no less protective than these Measures.

F. Non-Disclosure

RingCentral ensures that employees and contractors/sub-contractors who process Protected Data are bound in writing by obligations of confidentiality.

6. Physical Security

A. General

RingCentral:

i. Restricts access to, controls, and monitors all physical areas where RingCentral Services process Protected Data (**"Secure Areas"**).

ii. Maintains appropriate physical security controls on a 24-hours-per-day, 7-days-per-week basis (**"24/7"**).

iii. Revokes any physical access to Secure Areas promptly after the cessation of the need to access buildings and system(s).

iv. Performs review of access rights on at least an annual basis.

B. Access and Authorization Processes

RingCentral maintains a documented access authorization and logging process. The authorization and logging process will include at minimum:

i. Reports detailing all access to Secure Areas, including the identities and dates and times of access.

ii. Reports to be maintained for at least one year as allowed by law.

iii. Video surveillance equipment to monitor and record activity at all Secure Areas entry and exit points on a 24/7 basis to the extent permitted by applicable laws and regulations.

iv. Video recording to be maintained for at least 30 days or per physical location provider's policies.

C. Data Centers

To the extent that RingCentral is operating or using a data center, RingCentral ensures that physical security controls are in alignment with industry standards such as ISO 27001 and SSAE 16 or ISAE 3402 or similar standard including:

i. Perimeter security including fencing/barriers and video surveillance.

ii. Secure access including security guard/reception.

iii. Interior access controlled through RFID cards, 2FA, anti-tailgating controls.

iv. Redundant utility feeds and support for continuous delivery through backup systems.

v. Redundant network connection from multiple providers.

7. Logical Security

A. User Identification and Authentication

RingCentral:

i. Maintains a documented user management lifecycle management process that includes manual and/or automated processes for approved account creation, account removal and account modification for all Information Resources and across all environments.

ii. Ensures that RingCentral users have an individual accounts for unique traceability.

iii. Ensures that RingCentral users do not use shared accounts; where shared accounts are technically required controls are in place to ensure traceability.

iv. RingCentral user passwords are configured aligned with current NIST guidance.

For the customer facing applications, Customers may choose to integrate with SSO (Single Sign on) so that Customer retains control over their required password settings including Customer's existing MFA/2FA solutions.

B. User Authorization and Access Control

RingCentral:

i. Configures remote access to all networks storing or transmitting Protected Data to require multi-factor authentication for such access.

ii. Revokes access to systems and applications that contain or process Protected Data promptly after the cessation of the need to access the system(s) or application(s).

iii. Has the capability of detecting, logging, and reporting access to the system and network or attempts to breach security of the system or network.

RingCentral employs access control mechanisms that are intended to:

i. Limit access to Protected Data to only those Personnel who have a reasonable need to access said data to enable RingCentral to perform its obligations under the Agreement.

ii. Prevent unauthorized access to Protected Data.

iii. Limit access to users who have a business need to know.

iv. Follow the principle of least privilege, allowing access to only the information and resources that are necessary.

v. Perform review access controls on a minimum annual basis for all RingCentral's systems that transmit, process, or store Protected Data.

8. Telecommunication and Network Security

A. Network Management

RingCentral:

i. Maintains network security program that includes industry standard firewall protection and two-factor authentication for access to RingCentral's networks.

ii. Deploys an Intrusion Detection Systems (IDS) and/or Intrusion Prevention Systems (IPS) to generate, monitor, and respond to alerts which could indicate potential compromise of the network and/or host.

iii. Monitors web traffic from the Internet and from internal sources to detect cyber-attacks including Distributed Denial of Service (DDoS) attacks against web sites / services and to block malicious traffic.

B. Network Segmentation

RingCentral:

i. Implements network segmentation between the corporate enterprise network and hosting facilities for Services.

ii. Ensures separation between environments dedicated to development, staging, and production.

iii. Restricts access between environments to authorized devices.

iv. Controls configuration and management of network segregation and firewall rules through a formal request and approval process.

C. Network Vulnerability Scanning

RingCentral:

i. Runs internal and external network vulnerability scans against information processing systems at least quarterly.

ii. Evaluates findings based on (where applicable) CVSS score and assessment of impact, likelihood, and severity.

iii. Remediates findings following industry standard timelines.

9. Operations Security

A. Asset Management

RingCentral:

i. Maintains an accurate and current asset register covering hardware and software assets used for the delivery of services.

ii. Maintains accountability of assets throughout their lifecycle.

iii. Maintains processes to wipe or physically destroy physical assets prior to their disposal.

B. Configuration Management

RingCentral:

i. Maintains baseline configurations of information systems and applications based on industry best practices including:

a. Removal of all vendor-provided passwords.

b. Remove/disable unused services and settings.

c. Anti-malware/endpoint protection as technically feasible.

ii. Enforces security configuration settings for systems used in the provision of the Services.

iii. Ensures that clocks of all information processing systems are synchronized to one of more reference time sources.

C. Malicious Code Protection

i. To the extent practicable, RingCentral has endpoint protection in place, in the form of Endpoint Detection and Response (EDR) and/or antivirus software, installed and running on servers and workstations.

ii. EDR alerts are monitored, and immediate action is taken to investigate and remediate any abnormal behavior.

iii. Where used, antivirus software will be current and running to scan for and promptly remove or quarantine viruses and other malware on Windows servers and workstations.

D. Vulnerability, Security Patching

RingCentral:

i. Monitors for publicly disclosed vulnerabilities and exposures for impact to Supplier's information systems and products.

ii. Ensures quality assurance testing of patches prior to deployment.

iii. Ensures that all findings resulting from network vulnerability scanning and relevant publicly disclosed vulnerabilities and exposures are remediated according to industry best practices, including CVSS score and assessment of impact, likelihood and severity and are remediated following industry standard timelines.

E. Logging and Monitoring

RingCentral shall ensure that:

i. All systems, devices or applications associated with the access, processing, storage, communication and/or transmission of Protected Data, generate audit logs.

ii. Access to Protected Data is logged.

iii. Logs include sufficient detail that they can be used to detect significant unauthorized activity.

iv. Logs are protected against unauthorized access, modification, and deletion.

v. Logs are sent to a centralized location for aggregation and monitoring.

10. Software Development and Maintenance

A. Secure Development Lifecycle

RingCentral:

i. Applies secure development lifecycle practices, including, during design, development, and test cycles.

ii. Ensures that products are subject to security design review including threat considerations and data handling practices.

iii. Ensures that Services are subject to a secure release review prior to promotion to production.

B. Security Testing

As part of the secure development lifecycle, RingCentral:

i. Performs rigorous security testing, including, as technically feasible:

a. static code analysis.

b. source code peer reviews.

c. dynamic and interactive security testing.

d. security logic, or security “QA” testing.

ii. Ensures that Internet-facing applications are subject to application security assessment reviews and testing to identify common security vulnerabilities as identified by industry-recognized organizations (e.g., OWASP Top 10 Vulnerabilities, CWE/SANS Top 25 vulnerabilities).

iii. For all mobile applications (i.e. running on Android, Blackberry, iOS, Windows Phone) that collect, transmit or display Protected Data, conducts an application security assessment review to identify and remediate industry-recognized vulnerabilities specific to mobile applications.

iv. Does NOT use Protected Data for testing.

v. Makes all reasonable effort to identify and remediate software vulnerabilities prior to release.

C. Annual Penetration Testing

RingCentral:

i. Engages qualified, independent third-party penetration testers to perform annual penetration test against its Products and environments where Protected Data is hosted.

ii. Requires sub-processors to perform similar penetration testing against their systems, environments, and networks.

iii. Ensures remediation of all findings in a commercially reasonable period of time.

D. Product Vulnerability Management

RingCentral:

i. Uses commercially reasonable efforts to regularly identify software security vulnerabilities in RingCentral Services.

ii. Provides relevant updates, upgrades, and bug fixes for known software security vulnerabilities, for any software provided or in which any Protected Data is processed.

iii. Ensures that all findings resulting from internal and external testing are evaluated according to industry best practices, including CVSS score and assessment of impact, likelihood and severity and are remediated following industry standard timelines.

E. Open Source and Third-Party Software

RingCentral:

i. Maintains an asset registry of all third-party software (TPS) and open-source software (OSS) incorporated into the Services.

ii. Uses commercially reasonable efforts to ensure the secure development and security of open-source software and third-party software used by RingCentral.

iii. Uses commercially reasonable efforts to evaluate, track and remediate vulnerabilities of open-source software (OSS) and other third-party libraries that are incorporated into the Services.

11. Data Handling

A. Data Classification

RingCentral maintains data classification standards including:

i. Public data, data that is generally available or expected to be known to the public.

ii. Confidential data, data that is not available to the general public.

Protected Data is classified as RingCentral Confidential Data.

B. Data Segregation

RingCentral:

i. Ensures physical or logical segregation of Protected Data from other customers' data.

ii. Ensures physical separation and access control to segregate Protected Data from RingCentral data.

C. Encryption of Data

RingCentral:

i. Shall ensure encryption of Protected Data in electronic form in transit over all public wired networks (e.g., Internet) and all wireless networks (excluding communication over Public Switch Telephone Networks).

ii. Excepting the Engage Communities feature of Engage Digital, shall ensure encryption of Protected Data in electronic form when stored at rest.

iii. Uses industry standard encryption algorithms and key strengths to encrypt Protected Data in transit over all public wired networks (e.g., Internet) and all wireless networks.

D. Destruction of Data

RingCentral shall:

i. Ensure the secure deletion of data when it is no longer required.

ii. Ensure that electronic media that has been used in the delivery of Services to the Customer will be sanitized before disposal or repurposing, using a process that assures data deletion and prevents data from being reconstructed or read.

iii. Destroy any equipment containing Protected Data that is damaged or non-functional.

12. Incident Response

RingCentral's incident response capability is designed to comply with statutory and regulatory obligations governing incident response. As such, RingCentral:

A. Maintains an incident response capability to respond to events potentially impacting the confidentiality, integrity and/or availability of Services and/or data including Protected Data.

B. Has a documented incident response plan based on industry best practices.

C. Has a process for evidence handling that safeguards the integrity of evidence collected to including allowing detection of unauthorized access to.

D. Will take appropriate steps and measures to comply with statutory and regulatory obligations governing incident response.

When RingCentral learns of or discovers a security event which impacts Protected Data, RingCentral will notify Customer without undue delay and will take commercially reasonable steps to isolate, mitigate, and/or remediate such event.

13. Business Continuity and Disaster Recovery

A. Business Continuity

RingCentral:

i. Ensures that responsibilities for service continuity are clearly defined and documented and have been allocated to an individual with sufficient authority.

ii. Has a business continuity plan (BCP) in place designed to provide ongoing provision of the Services to Customer.

iii. Develops, implements, and maintains a business continuity management program to address the needs of the business and Services provided to the Customer. To that end, RingCentral completes a minimum level of business impact analysis, crisis management, business continuity, and disaster recovery planning.

iv. Ensures that the scope of the BCP encompasses all relevant locations, personnel and information systems used to provide the Services.

v. Ensure that its BCP includes, but is not limited to, elements such location workarounds, application workarounds, vendor workarounds, and staffing workarounds, exercised at minimum annually.

vi. Reviews, updates, and tests the BCP at least annually.

B. Disaster Recovery

RingCentral:

i. Maintains a disaster recovery plan, which includes, but is not limited to, infrastructure, technology, and system(s) details, recovery activities, and identifies the people/teams required for such recovery, exercised at least annually.

ii. Ensures that the disaster recovery plan addresses actions that RingCentral will take in the event of an extended outage of service.

iii. Ensures that its plans address the actions and resources required to provide for (i) the continuous operation of RingCentral, and (ii) in the event of an interruption, the recovery of the functions required to enable RingCentral to provide the Services, including required systems, hardware, software, resources, personnel, and data supporting these functions.

ATTACHMENT F
RINGCENTRAL TERMS AND CONDITIONS OF SALE OF HARDWARE

Copied from https://www.ringcentral.com/legal/ringcentral-hardware-terms-conditions.html as of 5/13/2025

1. Definitions

- Where used in these Terms and Conditions of Sale of Hardware:
    - "**Authorised Representative**" means any person who holds the job title and office of General Manager, Finance Director or Vice-President.
    - "**Customer**" means you or any of your subsidiaries purchasing Product from RingCentral.
    - "**Conditions**" means these Terms and Conditions of Sale.
    - "**Contract**" means any agreement for the purchase and sale of Products between RingCentral and Customer which result from a Purchase Order submitted to and accepted by RingCentral under these Conditions.
    - "**Contract Date**" means the date upon which a Purchase Order is accepted by RingCentral.
    - "**Force Majeure**" means, without limitation, any acts of God, government, war, terrorism, riot, fire, floods, earthquakes, explosions, strikes, lockouts, cessation of labour, trade disputes, breakdowns, accidents of any kind or any other causes which, in all cases, are beyond the reasonable control of RingCentral (including delay or shortages by its Suppliers).
    - "**Products**" means the hardware, software, or any combination thereof, and related documentation, identified in the Website, https://www.ringcentral.com/office/voip-phone.html which are made available for purchase and/or license by Customer pursuant to a Contract. Products shall be new or like-new, unless Customer requests refurbished Product. RingCentral will fulfil Purchase Orders for refurbished Product to the extent RingCentral has refurbished Product available.
    - "**Purchase Order**" means Customer's submission of a written or electronic order for Products through the Website or other documentation indicating name, quantity and pricing of Products to be purchased.
    - "**RingCentral**" means RingCentral, Inc. and its subsidiaries.
    - "**Supplier**" means the supplier, licensor, publisher, manufacturer or other third party provider of Products.
    - "**Website**" " means the portal hosted by RingCentral through which Products are made available for purchase.
- As used in these Conditions, (i) any reference to a statute shall be construed as a reference to that statute as amended, re-enacted or otherwise modified from time to time, (ii) the term "including" will always be deemed to mean "including, without limitation", (iii) a definition is equally applicable to the singular and plural forms of the feminine, masculine and neuter forms of the term defined, and (iv) any headings in these Conditions are for convenience only and shall not affect the interpretation of any terms.

2. General Ordering Terms.

- Customer may purchase Products under these Conditions by issuing a Purchase Order to RingCentral. Only a Purchase Order submitted by Customer shall constitute an offer to contract subject to these Conditions. All Purchase Orders are subject to acceptance by RingCentral.
- No additional or alternative terms or conditions or any alteration to these Conditions proposed by the Customer contained or referred to in a Purchase Order or other form submitted to RingCentral shall be deemed to apply unless they are expressly accepted in writing by an Authorised Representative of RingCentral with respect to that Purchase Order.
- Customer's subsidiaries shall be defined as any entity which the Customer controls or owns more than 50% of its shares. Customer guarantees full and prompt payment to RingCentral of any sums as they fall due for any Purchase Orders placed hereunder by Customer's subsidiaries.

3. Cancelling & Rescheduling Purchase Orders.

Except as set forth below, no Purchase Order which has been accepted by RingCentral may be cancelled or rescheduled by Customer except with written agreement by RingCentral.

4. Limited Product Return Right.

- Product may be returned by Customer for any reason within thirty (30) days of delivery of the Product ("**Return Period**"), and RingCentral will accept the return and provide a refund to Customer of the price paid by Customer for the Product, or a lesser amount depending on the condition of the returned Product, as set forth below. The refund shall also include taxes and any fees, duties and similar charges that were paid by Customer to RingCentral and refundable. The refund will not include the shipping fees associated with the purchase of the Product. The amount of the refund will be dependent on the condition of the returned Product, such condition determined solely by RingCentral. If the Product is, in RingCentral's sole discretion, in such a condition that it cannot be resold, no refund will be provided. Customer shall contact RingCentral to arrange for any such return. All returns under this Section 4 are subject to a processing fee (which includes shipping charges to return the Product) (a "**Return Processing Fee**") of thirty Canadian dollars (CDN$30.00), fifteen British pounds (£15.00), eighteen Euros (€18.00), or twenty-five US dollars (US$25.00) or its equivalent for any other currency, that shall be charged to Customer by RingCentral. The Return Processing Fee will be assessed on each returned Product and will be collected at the time of processing Customer's return request

5. Prices.

- The price of Products on the Contract Date shall be the quoted price. All prices and charges are exclusive of the cost of shipping, delivery and insurance, if any, as well as applicable value added tax (VAT), sales, use, consumption, privilege, gross sales tax (GST), and other taxes (other than taxes based upon RingCentral's net income), duties or customs fees for which the Customer shall be additionally liable for paying. In addition, prices exclude any copyright levies, waste and environment fees and similar charges that RingCentral by law or statute may charge or collect upon in accordance with such laws or statutes.

- Customer will be responsible for any sales, uses, excise, value added, services, consumption, and other taxes and duties payable by Customer on any Products purchased by Customer where the tax is imposed on Customer's acquisition or use of such Products and the amount of tax is measured by Customer's costs in acquiring such goods or services. Customer shall make all payments of any such taxes to RingCentral without reduction for any withholding taxes, which shall be Customer's sole responsibility. All taxes shall be paid by Customer to RingCentral unless Customer provides RingCentral with a valid certificate of exemption acceptable to the appropriate taxing authority.

6. Invoicing and Payment.

- Customer shall pay the purchase price, without any deduction or set-off, within thirty (30) days from the date of the invoice which shall be issued to Customer on the date that Products are shipped. Invoices shall be issued by RingCentral to Customer upon delivery of the Products in accordance with Section 7.

- Customer shall make payment to RingCentral in the currency indicated on the invoice.

- All express deliveries may be subject to additional shipping charges regardless of invoice value.

- If: (i) Customer fails to make any payment under any Contract when due; (ii) Customer is a body corporate and any resolution or petition to wind up Customer's business (other than for the purpose of amalgamation or reconstruction) is passed or presented; or (iii) Customer is an individual or a partnership, and any grounds arise for the application for a bankruptcy order made under applicable bankruptcy and/or insolvency laws (an "Act of Bankruptcy"), then, without prejudice to any other right or remedy available to RingCentral, the full price of all Products delivered to Customer under any Contract, but not paid, shall become immediately due (notwithstanding any previously agreed credit terms) and RingCentral may take any or all of the following courses of action:

    - by notice, suspend or terminate any Contract or any part thereof, without liability, stop any Products in transit and, at its discretion, subject to Section 8, enter Customer's premises to recover Products for which payment has not been made in full;

    - charge Customer interest, both pre- and post judgment, on any unpaid amount past due, at the rate of 2.5% per month, or the maximum rate allowed by law, until full payment is made. For clarity, a part of a month shall be treated as a full month for the purpose of calculating interest;

    - set-off any amounts due against any credit note, balance or other liability issued by RingCentral to Customer;

    - appropriate any payment made by Customer for such Products as RingCentral may deem fit (notwithstanding any purported appropriation by Customer); and/or

    - alter Customer's payment terms, which may include withdrawing or altering any credit limit previously granted, requiring prepayment, and demanding adequate assurance of due performance by Customer through the provision of a bank guarantee.

7. Delivery, Risk of Loss, and Title

Customer agrees that all deliveries of Products (including deliveries after repair or replacement) will be made as follows:

- **Delivery**. Unless RingCentral provides Customer with express written confirmation of a different delivery term, all deliveries of Products will be made FCA (INCOTERMS 2010) at the delivery point specified by RingCentral. Notwithstanding the agreed delivery term, RingCentral may charge Customer for shipping and handling charges, which may be reflected as a separate line item on RingCentral's invoice.

- **Title and Risk of Loss.** Title and Risk of Loss to all Products will pass to Customer when the Products are transferred to a carrier at RingCentral´s designated shipping location. Title to Software provided under this Agreement will remain solely with RingCentral and its licensors. Notwithstanding the foregoing, should Customer fail to pay RingCentral for Products within thirty (30) days of shipment, Title may, in RingCentral's sole discretion revert back to RingCentral upon written notice to Customer.

- Any dates quoted for delivery of the Products are approximate only and RingCentral shall not be liable for any delay in delivery of the Products however caused. Any Products may be delivered by RingCentral in advance of the quoted delivery date upon giving reasonable notice to Customer.

- If the destination of the Products is not in the same country as RingCentral's designated shipping location, RingCentral may arrange on behalf of the Customer, for its shipping vendor to deliver the Products in the destination country. The foregoing in the understanding that: i) the shipment of the Products to the destination country is permitted by RingCentral, its Supplier, OEMs, and applicable regulations; ii) the delivery term will remain FCA (Incoterm 2010) RingCentral's designated shipping point; iii) Customer remains responsible for all charges as described in Section 5(a); iv) RingCentral shipping agent accepts to manage the exportation and importation of the Products for the Customer; and, v) Customer will remain responsible for import and export regulations and compliance with applicable laws, including without limitation Section 15 Compliance with Laws of these terms.

- Claims for non-delivery of Products must be made in writing to RingCentral within five (5) working days from: (i) the date of invoice; or (ii) receipt of partial delivered of the Products, if any. Customer agrees to notify RingCentral promptly in the event Customer receives the invoice prior to receipt of the Products.

- Customer agrees to accept partial delivery of Products ordered unless otherwise mutually agreed by the parties in writing. Where the parties agree in writing that a shipment must be sent complete, Customer agrees to accept allocations of Product in the event of shortage by Supplier. Where the Products are delivered in installments, each delivery shall constitute a separate Contract. Failure by RingCentral to deliver any one or more of the installments in accordance with these Conditions or any claim by Customer in respect of any one or more instalments shall not entitle Customer to treat a Contract as repudiated or to cancel any other instalment.

- If Customer fails to take delivery of the Products within 48 hours after the scheduled date of shipment, or fails to give RingCentral adequate delivery instructions in its Purchase Order, then, without prejudice to any other right or remedy available, RingCentral may: (i) store the Products until actual delivery and charge Customer for the reasonable costs thereof, including insurance costs; (ii) terminate the Contract forthwith and sell the Products; or iii) ship the Products by a freight forwarder to Customer´s business location business location indicated in the correspondent purchase order with Customer remaining responsible for all reasonable freight and insurance costs. Title and Risk of Loss will pass when the Products are transferred to the freight forwarder at RingCentral´s, or its Supplier's, designated shipping location.

- Customer shall bear any and all costs (including original and return carriage costs) associated with any unjustified refusal of delivery of Products ordered pursuant to a Contract.

- Customer's right to possess any Products, for which payment has not made shall immediately cease: (i) after the appointment of a receiver to its property; (ii) after it has been placed in liquidation or administration; (iii) when and if Customer makes an arrangement for the benefit of creditors generally, suffers or permits the appointment of an administrator, administrative receiver or receiver for its business or assets, or avails itself or becomes subject to any proceeding under any applicable bankruptcy laws; (iv) if Customer is unable to pay its debts within the meaning of applicable bankruptcy and insolvency laws; (v) if Customer, not being a company, has become bankrupt; or (vi) if Customer otherwise ceases to trade or threatens to cease to trade.

8. Publications & Specifications.

Any and all specifications, descriptions, photographs, measurements, capacities or illustrations contained in any catalogues, price lists, brochures, leaflets, proposals, advertising matter, publications of RingCentral or a Supplier are intended to be illustrative and approximate only and shall not form part of a Contract or constitute a representation, warranty or condition regarding any Products unless specifically agreed by written agreement between the Customer and RingCentral. No employee or agent of RingCentral (or any

entity acting on RingCentral's behalf) has any authority to make any representation regarding the Products. Customer acknowledges that it has not been induced to accept these Conditions by any representations or statement, oral or written, not expressly contained herein.

9. Warranty.

- Customer understands that RingCentral is not the Supplier of the Products. Accordingly, all Products are sold subject to the express warranty terms, if any, specified by the original Supplier of the Products. Any software supplied to Customer pursuant to a Contract is supplied subject to the provisions of the Supplier's licensing terms. RingCentral will pass through to Customer all warranties that RingCentral is expressly authorized by the original Supplier to pass through to Customer.

- RingCentral represents and warrants that title to all Products shall be free from all security interests, liens, and encumbrances at the time of delivery to Customer. The foregoing shall not be construed, and RingCentral does not provide, any warranty against infringement of a third-party intellectual property right. Any warranties, conditions or other terms implied by common law or statute or otherwise in connection with these Conditions (except to title, in the case of Products) are hereby expressly excluded to the fullest extent permitted by law, save for fraudulent misrepresentation.

10. Warranty Assistance.

- For all Returned Products (whether pursuant to a Warranty Claim or otherwise) RingCentral will, on the Customer's behalf, initiate an RMA request with Supplier. Following an RMA request, RingCentral shall issue an RMA number and issue a shipping label to Customer via electronic exchange (an "**RMA**").

- Customer shall immediately notify RingCentral if any Products supplied to Customer prove to be defective in quality or condition within the Supplier's warranty period (the "Claim"). Upon receipt of notification of such Claim, RingCentral shall notify Customer whether, as a matter of Supplier policy, the Claim must be handled directly with the Supplier or indirectly through RingCentral. In the event the Claim must be handled directly between Customer and Supplier, RingCentral shall provide contact information to enable Customer to contact Supplier. In the event the Claim will be handled by RingCentral, then RingCentral shall provide Customer with a return material authorization ("RMA") for Customer to return the Products to RingCentral, and Customer shall return such Products to RingCentral in accordance with these Conditions and RingCentral's then current RMA policy (which shall be made available to Customer upon request).

- No Products may be returned to RingCentral without a valid RMA number displayed on the Products packaging. Any Products returned without a valid RMA number displayed on the Products packaging will be refused or returned. RingCentral shall not be obligated to ship replacement Products to Customer until RingCentral is in receipt of the original Products being returned. Notwithstanding the foregoing, upon receipt of notification of any warranty claim within the first ninety (90) days after receipt of the Product by Customer, RingCentral shall process such warranty claim per Supplier procedures and ensure the shipment of a replacement Product to Customer. Replacement Product may be new or used. After the first ninety (90) days from receipt of the Product by Customer, and unless otherwise directed by RingCentral, the Customer must contact the Supplier directly for any warranty repair or replacement services.

- During the first ninety (90) days after Customer's receipt of the Product, RingCentral is responsible for all shipping fees associated with a warranty claim (including, without limitation, both return of the defective Product and shipment of the replacement Product). Customer shall be responsible for any such shipping costs for warranty claims made after such initial ninety (90) day period.

- Customer agrees that RingCentral's sole liability to Customer regarding any Product defect claims is limited to the administration of such claims with the Supplier, and as set forth herein. After the first ninety (90) days from Customer's receipt of Product, RingCentral's liability to Customer regarding any Product defect claims is limited to and is expressly contingent upon RingCentral's ability to obtain a refund, credit or replacement Products from the Supplier. RingCentral has no obligation to accept a return of Products where the Customer fails to comply with Supplier's policy on Product returns.

- RingCentral shall not be liable or responsible for administering any defect or other claim which arises from normal wear and tear, misuse, negligence, accident, abuse, use not in accordance with Supplier's Product documentation, modification or alteration not authorised by Supplier, or use in conjunction with a third party product. RingCentral reserves the right to determine whether any Products are defective.

11. Warranty Returns.

- Any Products returned pursuant to an RMA issued by RingCentral must be shipped to RingCentral within seven (7) working days of the date of such RMA. Following an RMA request, RingCentral shall issue an RMA number and issue a shipping label to Customer via electronic exchange.

- Customer irrevocably authorizes RingCentral to carry out any necessary tasks related to the repair or replacement of Products on behalf of Customer under these Conditions.

- Unless RingCentral collects Products using its own carrier, Customer agrees that RingCentral shall not be liable for any loss or damage to Products returned to RingCentral.

12. Limitation of Liability.

- RINGCENTRAL'S LIABILITY FOR ANY DIRECT LOSS OR DAMAGE ARISING OUT THESE CONDITIONS AND ANY CONTRACT FOR THE SALE AND PURCHASE OF PRODUCTS HEREUNDER SHALL BE LIMITED TO, AND SHALL UNDER NO CIRCUMSTANCES EXCEED THE PRICE PAID BY CUSTOMER FOR THE PRODUCTS GIVING RISE TO THE CLAIM (EXCLUDING APPLICABLE TAXES). RINGCENTRAL SHALL HAVE NO LIABILITY UNDER THESE CONDITIONS OR ANY CONTRACT IF RINGCENTRAL HAS NOT RECEIVED PAYMENT OF THE TOTAL INVOICE PRICE OF THE PRODUCTS GIVING RISE TO THE CLAIM.

- EXCEPT AS EXPRESSLY PROVIDED IN THESE CONDITIONS, RINGCENTRAL AND ITS SUPPLIERS SHALL NOT BE LIABLE TO CUSTOMER FOR ANY FINANCIAL, CONSEQUENTIAL OR OTHER LOSS OR DAMAGE CAUSED TO CUSTOMER BY REASON OF ANY REPRESENTATION, WARRANTY (EITHER EXPRESS OR IMPLIED), CONDITION OR OTHER TERM, OR ANY DUTY AT COMMON LAW; OR FOR ANY SPECIAL, INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES (INCLUDING LOSS OF PROFITS, REVENUE, RECORDS OR DATA, COSTS OF PROCUREMENT OF SUBSTITUTE PRODUCTS, DAMAGE TO REPUTATION OR GOODWILL, OR ANY MATTER BEYOND ITS REASONABLE CONTROL) OR FOR ANY OTHER CLAIMS FOR COMPENSATION HOWEVER CAUSED (WHETHER CAUSED BY THE NEGLIGENCE OF RINGCENTRAL, ITS EMPLOYEES, AGENTS, SUPPLIERS OR OTHERWISE) WHICH ARISE OUT OF OR IN CONNECTION WITH THESE CONDITIONS OR A CONTRACT HEREUNDER, EVEN IF RINGCENTRAL OR ITS SUPPLIERS HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH LOSS, LIABILITY OR DAMAGES.

- Nothing contained herein shall be construed as excluding or limiting RingCentral's liability for death or personal injury caused by RingCentral's negligence, or wilful misconduct.

13. Intellectual Property Rights.

- Customer acknowledges that the Products are the intellectual property of the Suppliers and, to the extent any logos, copyrights, trademarks, or similar intellectual property of RingCentral or its partners are affixed to Products, RingCentral or its partners, as applicable. Nothing contained herein shall be deemed to grant any right or title to such intellectual property to Customer. Customer further agrees not to translate, reverse compile or disassemble any software. Customer will not remove, alter or destroy any form of copyright notice, proprietary markings, serial numbers, or confidential legends placed upon or contained within any Products.

- Customer understands and agrees that RingCentral will not and has no duty to indemnify, defend or hold Customer or a third party harmless from or against any claims, losses, liabilities, damages, costs and expenses, judgments or settlement amounts arising out of or in connection with the actual or alleged infringement of a third party's intellectual property rights, except and only to the extent that a Supplier has expressly agreed to offer such indemnification and defense to Customer on a pass through basis. In addition, RingCentral will pass through to Customer all indemnities made available by Supplier that Supplier has expressly authorized RingCentral to pass through to Customer.

- Nothing contained herein shall be construed as authorizing or granting to Customer any right or license to use any logo, trademark or trade name of RingCentral, or any Supplier, any license of which shall be subject to separate agreement including any then current policies of RingCentral, or its Suppliers, as appropriate.

14. Force Majeure.

- Neither party shall be liable to the other party or be deemed in breach of these Conditions or any Contract by reason of delay or failure to perform if such delay or failure to perform was caused by Force Majeure.

- In the event of a Force Majeure event: (i) the party claiming Force Majeure shall, as soon as commercially practicable, notify the other party of such Force Majeure event provided the notifying party shall incur no liability for its failure to give such notice; (ii) the notifying party's duty to perform shall be suspended for the duration of the Force Majeure event; and (iii) the time of performance for the party impacted by the Force Majeure event shall be extended by a period equal to the duration of said Force Majeure event.

- In the event a Force Majeure event should continue for more than ninety (90) days, either party may, by written notice to the other, cancel a Contract insofar as Products remain undelivered under said Contract. Upon such cancellation, RingCental

shall have no obligation to deliver and Customer will have no obligation to accept delivery of or pay for the undelivered Products, but the Contract shall remain in full force and effect regarding all Products delivered prior to the date of cancellation.

15. Compliance with Laws; Export.

- Customer acknowledges that the Products and any technical data related thereto is licensed or sold subject to and controlled by the export laws of: (i) the United States ("US") including its Export Administration Regulations; (ii) the European Union ("EU") and countries within the European Free Trade Area ("EFTA"); and (iii) any other government with jurisdiction (collectively the "Export Control Laws") and Customer hereby agrees not to export, re-export or otherwise distribute Products, or direct products thereof, in violation of any Export Control Laws. Customer acknowledges that the US government and/or the member states of the EU and EFTA, or another country's government, may require licensing or other authorisation prior to export.

- Customer warrants that it will not export or re-export any Products with knowledge that they will be used in the design, development, production, or use of chemical, biological, nuclear, or ballistic weapons, or in a facility engaged in such activities, unless Customer has obtained prior written approval from the appropriate department of the US Government or any other government with jurisdiction. Customer further warrants that it will not export or re-export, directly or indirectly, any Products to embargoed countries or sell Products to prohibited companies or individuals, as defined by applicable Export Control Laws.

- It is Customer's sole and exclusive responsibility to obtain any and all appropriate approvals from the applicable government entities, which may include the US government, the United Kingdom, and/or member states of the EU and EFTA or any other government with jurisdiction, prior to exporting such Products, or any technical data related thereto, from the country where the Products were delivered by RingCentral pursuant to Section 7 Customer will also be responsible to comply with the importation regulations applicable in the country of destination of the Products. RingCentral shall not be responsible for any costs, importation duties, liabilities or damages resulting from Customer's failure to obtain any such required authorisation. Customer understands that the Export Control Laws and importation laws may change from time to time. It is Customer's sole and exclusive responsibility to obtain guidance of counsel or other appropriate channels to ensure its compliance with these laws.

- Customer and RingCentral warrant they will not take any action or permit or authorize any action which will render the other party liable for a violation of any applicable anti-corruption and anti-bribery laws and: (a) will not violate or cause the other party to violate such laws in connection with the sale and distribution of the Products; and (b) will notify the other party in writing if any of its owners, partners, principals, directors or officers are or become officials, officers or representatives of any government or political party or candidate for political office.

- Customer shall comply with all applicable laws pertaining to hazardous substances, and electric or electronic waste, which may include, but is not limited to, EU Directives 2002/95/EC (Restriction on Hazardous Substances) and 2002/96/EC dated January 27, 2003 (Waste Electrical and Electronic Equipment) ("WEEE") generally and as instated within each country into which Products are imported, exported or otherwise distributed by Customer, such obligation which shall include registering as a "producer" under applicable WEEE legislation.

- Customer shall indemnify, defend and hold RingCentral harmless from any violation or alleged violation by Customer of the terms of this Clause. Upon RingCentral's request, Customer agrees to confirm, in writing, its compliance with applicable Export Control Laws and applicable importation regulations.

16. Additional Terms of Sale

- Notwithstanding anything to the contrary herein, RingCentral and its Suppliers reserve the right to make any changes in the specifications of the Products, without notice to Customer, which are required in order to conform to any statutory or other legal requirements or which do not materially affect the performance of the relevant Products.

- Any Products which are subject to guidelines, restrictions or provisions imposed by a Supplier are sold, supplied and delivered to Customer subject to any such guidelines, restrictions or provisions, which will be provided to Customer upon request.

17. Choice of Law & Venue.

- These Conditions, and any Purchase Order placed under them shall be governed by the laws, and be subject to the exclusive jurisdiction of the courts set forth below.

- <u>For Purchase Orders submitted to RingCentral UK Limited</u>: These Conditions and any dispute, claim or controversy arising out of, or relating to these Conditions, including formation, interpretation, breach or termination of these Conditions, a Purchase Order or a Contract, will be governed by and intended to be construed under the laws of England and Wales. Any related action, lawsuit, or proceeding shall be brought in and adjudicated by the by the courts of England and Wales.

- For Purchase Orders submitted to RingCentral Inc, or any other RingCentral's subsidiary or affiliate: These Conditions and any dispute, claim or controversy arising out of, or relating to these Conditions, including formation, interpretation, breach or termination of these Conditions, a Purchase Order, or a Contract, will be governed by New York State laws, excluding Conflict of law principles. The parties agree that Supreme Court of the State of New York, New York County, or the United States District Court for the Southern District of New York, shall have sole and exclusive jurisdiction and venue over any matter arising out of these Conditions and any orders placed under them, and each party hereby submits itself and its property to the venue and jurisdiction of such courts.

- The UN Convention on Contracts for the International Sale of Goods does not apply.

- Each party waives any right it may have to claim that the chosen jurisdiction under these Conditions is not a convenient forum and expressly waives any right to a jury trial regarding disputes related to these Conditions.

18. Miscellaneous.

- **Assignment.** Customer may not transfer or assign these Conditions to a third party by operation of law or otherwise without the prior written consent of RingCentral. RingCentral may assign any Purchase Order or these Conditions, in whole or in part without the consent of the Customer. RingCentral shall endeavor to provide prompt notice of any assignment to the Customer. Any assignment in violation of this Section shall be void.

- **Waiver.** Failure by either party to enforce any provision of these Conditions or a Contract shall not be deemed a waiver of the right to thereafter enforce that or any other provision of these Conditions or a Contract.

- **Severability.** In the event that any provision of these Conditions is held by a court of competent jurisdiction to be invalid or unenforceable, the remaining provisions of these Conditions will remain in full force and effect.

- **Notices.** All notices shall be in writing and shall be sufficiently given if delivered by email to Customer's registered address in its RingCentral Admin Portal, personally or by a reputable overnight carrier with proof of delivery or mailed by registered mail to Customer at the address provided by Customer in Customer's RingCentral Admin Portal, and to RingCentral, Inc. at 20 Davis Drive, Belmont, CA 94002, Attention**:** Legal Department or to such other address or addressee as either party may, from time to time, specify by notice in accordance with this Clause. Notices shall be deemed given upon receipt by the addressee.

- The Customer has requested these terms be drawn up in English. *Le client a exigé que les présentes Conditions Générales soient rédigées en anglais.*

19. Entire Agreement.

These Conditions constitute the entire agreement between the parties as to the subject matter hereof and supersedes and cancels any and all of Customer's terms and conditions, or other written or oral agreements previously existing between the parties and/or their affiliates with respect to such subject matter. Customer acknowledges that it is not entering these Conditions on the basis of any representations not expressly contained herein. Every Contract for the sale and purchase of Products as defined herein between RingCentral and the Customer or any of its subsidiaries shall be subject to these Conditions, unless Customer and RingCentral have signed a separate agreement regarding the subject matter herein, in which case the separate agreement will govern. Customer shall be deemed to have accepted these Conditions by the earlier of: (i) indicating acceptance to these Conditions through the Website, (ii) submitting a Purchase Order through the Website; or (iii) accepting Products from RingCentral.

City Council Meeting **L. 6.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of the Citywide Annual Purchase Orders for miscellaneous tools, equipment and supplies for Fiscal Year 2025-2026 for a total not to exceed $1,080,000 (Management Services/Finance Director Garcia)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the Citywide Annual Purchase Orders with Lowe's, Fastenal, Home Depot, and Office Depot for Fiscal Year 2025-2026.

RECOMMENDATION:

Staff recommends approval of the citywide Annual Purchase Orders.

DISCUSSION:

Staff is requesting City Council approval for citywide Annual Purchase Orders with Lowe's, Fastenal, Home Depot and Office Depot to provide miscellaneous tools, equipment, and supplies on a need-by-need basis for "not-to-exceed" total annual amounts as described below:

A. Fastenal
The City will leverage "Omnia Partners, Public Sector" cooperative purchasing contract for facilities, maintenance industrial supplies and tools, offering an average of 30% discount off wholesale prices. Purchases will be done through the City's automated warehouse program. The cooperative contract agreement has been competitively solicited, evaluated, and awarded. Based on year to date purchases, savings are estimated at approximately $57,000.

B. Home Depot
The City will leverage "Omnia Partners, Public Sector" cooperative purchasing agreement with Home Depot for retail maintenance, repair and operating commodities. The City receives 5% rebate for all of its purchases. The cooperative purchasing agreement has been competitively solicited, evaluated, and awarded. Based on year to date purchases, savings are estimated at approximately $18,000.

C. Lowe's
The City will leverage "Omnia Partners, Public Sector" cooperative purchasing agreement with Lowe's, and will receive 7% discount for all of its purchases at the point of purchase. Based on year to date purchases, savings are estimated at approximately $17,000. The current Omnia contract expires on March 31, 2025. Purchasing will roll over the Lowe's Purchase Order upon new similar contract.

D. Office Depot
The City will leverage "Omnia Partners, Public Sector" cooperative purchasing agreement for office supplies with Office Depot. The City saves on average, a minimum, 10% on the majority of purchased items compared to its retail prices, as per the cooperative purchasing agreement which has been competitively solicited, evaluated and awarded. Based on year to date purchases, savings are estimated at approximately $22,500.

The following annual purchase order amounts for miscellaneous tools, services, equipment and supplies have been budgeted by each department and will be encumbered.

VENDOR	**NOT TO EXCEED AMOUNT**
Lowe's	$200,000
Home Depot	$350,000
Office Depot	$280,000
Fastenal	$250,000
TOTAL	**$1,080,000**

ALTERNATIVES:

Reject staff request for approval of Citywide Annual Purchase Orders

STRATEGIC PLAN:

Not Applicable

SUBMITTED BY:
Danielle Garcia, Management Services/Finance Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Christopher Boatman, Assistant City Manager
Janice McConnell, Assistant City Manager

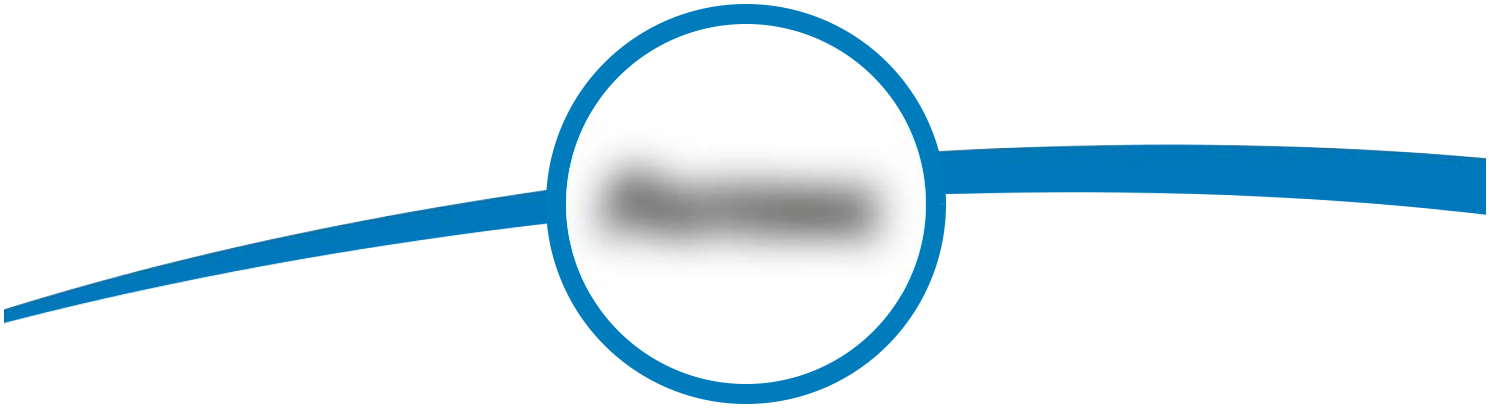
PREPARED BY:
Dana Abramovitz-Daniel, Procurement Manager

Fiscal Impact

Fiscal Year:	2026
Revenue Generating:	No
Appropriation Required Y/N:	N
Budgeted Y/N:	Y
Discussion:	

Attachments

Fastenal Omnia Contract
Home Depot Omnia Contract
Office Depot Omnia Contract
Lowe's Omnia Contract



Fastenal

Maintenance, Repair & Operations Products & Solutions

Today, Fastenal is many things to many different customers, an expert consultant, a logistics company, a technology provider, and more generally a distributor of wide-ranging industrial and construction products. These aspects of service share a common foundation: great people, close to our customers. Our service model centers on approximately 3,200 in-market locations (a combination of public branches and customer-specific onsites), each providing custom inventory and a dedicated sales team to support local customers. Fastenal is a trusted supplier-partner of OMNIA Partners and has been offering members solution for many years.

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Higher Education

State & Local Government

Fastenal's maintenance, repair and operations (MRO) solutions are available on competitively solicited, publicly awarded cooperative contracts through OMNIA Partners. These contracts include Fastenal's full catalog offering as well as additional value added services, such as, inventory management, vending services, etc.

- **Maintenance, Repair, Operations (MRO) Supplies and Related Services**
  University of California, CA | 2018.000208
- **Maintenance, Repair & Operations (MRO) Supplies & Equipment**
  Region 4 ESC - TX | R192001

VIEW CONTRACT DOCUMENTATION

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Fastenal Contract Documentation

U.S. Communities, National IPA, & NCPA are wholly-owned subsidiaries of OMNIA Partners, dba OMNIA Partners, Public Sector. All public sector participants already registered with National IPA, U.S. Communities, or NCPA continue to have access to all contracts, with certain exceptions, in the portfolio and do not need to re-register to use a legacy National IPA, legacy U.S. Communities, legacy NCPA, or new OMNIA Partners contract. U.S. Communities, National IPA, and NCPA remain separate legal entities and lead agency contracts completed under each brand are effective and available for use through the contract's approved term. In the event we believe re-registration is necessary for any reason, OMNIA Partners will let you know.

Maintenance, Repair, Operations (MRO) Supplies and Related Services

University of California, CA

Contract Number: 2018.000208

Initial Term: July 1, 2018 through June 30, 2023
Renewal Options: Option to renew for two (2) additional one-year periods through June 30, 2025
EXTENDED THROUGH June 30, 2026

Executive Summary

- Executive Summary

Master Agreement Documents

- Official Signed Contract
- Multi-Award Justification
- Contract Award Letter
- Contract Amendment 1
- Contract Amendment 2
- Contract Amendment 3
- Contract Amendment 4

Response Evaluation

- Evaluation Documents

Solicitation Process

- Original RFP Document
- Proof of Publication
- RFP Opening Documents

Maintenance, Repair & Operations (MRO) Supplies & Equipment

Region 4 ESC - TX

Contract Number: R192001

Initial Term: April 1, 2020 through March 31, 2023
Renewal Options: Option to renew for two (2) additional one-year periods through March 31, 2025
RENEWED THROUGH March 31, 2025

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Award Letter
- Contract Renewal 1
- Contract Renewal 2
- Contract Update 1
- Contract Update 2
- Contract Update 3
- Contract Update 4
- Contract Update 5
- Contract Update 6

Response Evaluation

- Supplier Response to RFP
- Evaluation Summary

Solicitation Process

- Original RFP Document
- RFP Addendum #1

- RFP Addendum #2
- RFP Addendum #3
- RFP Questions & Answers
- Proof of Publication
- RFP Request List
- RFP Opening Documents



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We Partner With Pros to Get the Job Done

The Home Depot Pro helps professionals shop the stores for the items you need with a range of delivery options to suit your needs. With 2,300+ store locations and 50,000+ essential products, the Home Depot Pro supplies what you need, when and where you need it.

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K-12 Education

Higher Education

State & Local Government

The Home Depot Pro, through OMNIA Partners, supports public agencies to save you time and money. The Home Depot's free loyalty program provides access to an expanded assortment of products, convenient delivery options, and dedicated support.

- **Maintenance, Repair, Operating Supplies, Industrial Supplies and Related Products and Services**
  Maricopa County, AZ | 16154
- **Paint and Paint Supplies**
  Maricopa County, AZ | 170009

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The Home Depot Pro Contract Documentation

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Maintenance, Repair, Operating Supplies, Industrial Supplies and Related Products and Services

Maricopa County, AZ

Contract Number: 16154

February 1, 2017 - December 31, 2021

RENEWED through December 31, 2026

Executive Summary

- Executive Summary
- Uniform Guidance
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Amendment 1

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- Proof of Publication

Paint and Paint Supplies

Maricopa County, AZ

Contract Number: 170009

3 year initial term, March 9, 2017 - February 28, 2020

Option to renew for 7 additional 1 year periods

RENEWED THROUGH February 28, 2025

Executive Summary

- Uniform Guidance

Contract Documents

- Contract No. 170009-RFP
- Contract Renewal

RFP Documents

- 170009-RFP
- 170009-RFP Addendum 1
- 170009 Posting Document

Response Evaluation

- AZ Compliance



5001 Aspen Grove Drive
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Elevate the success of your business with ODP Business Solutions™

Previously Office Depot Business Solutions Division, ODP Business Solutions™ is now more flexible and more innovative in how we focus on businesses like yours — all while bringing nearly 30 years of knowledge and experience to the table.

ODP Business Solutions is a leading B2B provider of workplace and technology solutions, combining an extensive range of products and services with a national footprint and hundreds of experienced business advisors. From accessing comprehensive solutions and strategic alliances, to supply chain innovation and robust digital platforms, ODP Business Solutions helps customers achieve business results across every industry.

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ODP Business Solutions works closely with OMNIA Partners to deliver products and services that make an impact on your bottom line. With more than 28 years serving the public sector, ODP Business Solutions understands the unique needs of public agencies. The partnership with OMNIA Partners leverages competitively solicited and publicly awarded contracts to provide exceptional savings to public sector agencies across the country.

- **Office Supplies, Related Products and Services**
  Region 4 ESC - TX | R190303
- **Office Supplies and Products**
  Florida International University, FL | PUR-05407

- **Office Supplies, Products and Related Services**
  City of Tamarac, FL | 19-12R

- **Furniture, Installation and Related Services**
  Region 4 ESC - TX | R191812

- **Cleaning Supplies, Breakroom, and Related Products**
  Region 4 ESC - TX | R211302

- **Technology Solutions, Products and Services**
  Region 4 ESC - TX | R210405

- **Janitorial Supplies & Equipment**
  University of California, CA | 2020002300

- **Online Marketplace**
  State of Utah | MA3459

- **Educational School Supplies, Instructional Solutions, and Related Products**
  Region 4 ESC - TX | R230303

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ODP Business Solutions Contract Documentation

U.S. Communities, National IPA, & NCPA are wholly-owned subsidiaries of OMNIA Partners, dba OMNIA Partners, Public Sector. All public sector participants already registered with National IPA, U.S. Communities, or NCPA continue to have access to all contracts, with certain exceptions, in the portfolio and do not need to re-register to use a legacy National IPA, legacy U.S. Communities, legacy NCPA, or new OMNIA Partners contract. U.S. Communities, National IPA, and NCPA remain separate legal entities and lead agency contracts completed under each brand are effective and available for use through the contract's approved term. In the event we believe re-registration is necessary for any reason, OMNIA Partners will let you know.

Office Supplies, Related Products and Services

Region 4 ESC - TX
Contract Number: R190303

Initial Term: July 1, 2019 through June 30, 2024
Renewal Options: Option to renew for five (5) additional one-year periods through June 30, 2029
RENEWED THROUGH June 30, 2025

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Award Letter
- Notice of Material Change to the Vendor Contract 1
- Notice of Material Change to the Vendor Contract 2
- Contract Renewal 1

- Contract Updates Years 2019-2021
- Contract Updates Years 2022-2023
- Contract Update 1
- Contract Update 2

Response Evaluation

- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Questions & Answers
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Previous Contract

- R141703

Office Supplies and Products

Florida International University, FL
Contract Number: PUR-05407

August 13, 2022 through August 12, 2027
May be renewed in writing by parties for two (2) additional two-year terms through August 12, 2031

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Amendment 1
- Contract Amendment 2

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- Proof of Publication
- RFP Request List
- Historically Underutilized Business Outreach
- RFP Opening Documents

Office Supplies, Products and Related Services

City of Tamarac, FL
Contract Number: 19-12R

October 14, 2019 through October 13, 2023
Option to renew for one (1) additional four-year period through October 13, 2027
RENEWED THROUGH October 13, 2027

Executive Summary

- Executive Summary
- Pricing
- AZ Compliance Questionnaire

Master Agreement Documents

- Official Signed Contract

- Contract Award Documents
- Contract Amendment 1
- Contract Amendment 2

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addenda
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Previous Contract

- 13-23R.pdf

Furniture, Installation and Related Services

Region 4 ESC - TX
Contract Number: R191812

Initial Term: May 1, 2020 through April 30, 2023
Renewal Options: Option to renew for two (2) additional one-year periods through April 30, 2025
RENEWED THROUGH April 30, 2025

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Notice of Material Change to the Vendor Contract 1
- Notice of Material Change to the Vendor Contract 2
- Contract Renewal 1
- Contract Renewal 2
- Contract Update - Authorized Distributor/Dealer
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Authorized Dealers
- Contract Update - Authorized Dealers
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Authorized Dealers
- Contract Update - Catalog Update
- Contract Updated - Authorized Reseller

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document

- RFP Addendum 1
- RFP Questions and Answers
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Previous Contract

- R142212

Cleaning Supplies, Breakroom, and Related Products

Region 4 ESC - TX
Contract Number: R211302

Initial Term: February 1, 2022 through January 31, 2025
Renewal Options: Option to renew for two (2) additional one-year periods through January 31, 2027

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Notice of Material Change to the Vendor Contract
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing

- Contract Update - Pricing
- Contract Update - Authorized Dealers
- Contract Update - Authorized Dealers
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Authorized Dealers
- Contract Update - Catalog Update
- Contract Update - Authorized Reseller

Response Evaluation

- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Technology Solutions, Products and Services

Region 4 ESC - TX
Contract Number: R210405

Initial Term: June 1, 2021 through May 31, 2024
Renewal Options: Option to renew for two (2) additional one-year periods through May 31, 2026

RENEWED THROUGH May 31, 2025

Executive Summary

- Executive Summary
- Pricing

- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Award Letter
- Contract Renewal 1
- Notice of Material Change to the Vendor Contract
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing
- Contract Update - Pricing

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- RFP Questions and Answers
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Previous Contract

- R160204

Janitorial Supplies & Equipment

University of California, CA

Contract Number: 2020002300

June 22, 2020 to June 21, 2027

Option to renew for three (3) additional one-year periods through June 21, 2030

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Amendment 1
- Contract Amendment 2

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- Proof of Publication
- RFP Request List
- RFP Opening Documents

Online Marketplace

State of Utah

Contract Number: MA3459

May 16, 2020 through May 5, 2025
No renewal options.

Executive Summary

- Executive Summary
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Questions and Answers
- Proof of Publication
- RFP Request List

Educational School Supplies, Instructional Solutions, and Related Products

Region 4 ESC - TX

Contract Number: R230303

Initial Term: January 1, 2024 through December 31, 2026
Renewal Options: Option to renew for two (2) additional one-year periods through December 31, 2028

Executive Summary

- Executive Summary

- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents
- Contract Update 1

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- RFP Questions and Answers
- Proof of Publication
- RFP Request List
- Historically Underutilized Business Outreach



5001 Aspen Grove Drive
Franklin, TN 37067

info@omniapartners.com
(866) 875-3299

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Lowe's has been helping customers improve the places they call home since it was founded in 1946. Traded on the New York Stock Exchange (LOW) since 1961, Lowe's has grown from a small hardware store to a hor mprovem t company providing customers inspiration and s wherever they shop. Whether our customers or at their home or place of business with a Lowe to help participants of OMNIA Partners with their purchases.

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Lowe's provides the right home improvement products, maintenance, repair & related supplies to public sector agencies of OMNIA Partners nationwide.

- **Maintenance, Repair and Operations (MRO) Supplies, Equipment, and Related Products and Services**
  Region 4 ESC - TX | R240805

VIEW CONTRACT DOCUMENTATION

CONTACT US



Lowe's Contract Documentation

U.S. Communities, National IPA, & NCPA are wholly-owned subsidiaries of OMNIA Partners, dba OMNIA Partners, Public Sector. All public sector participants already registered with National IPA, U.S. Communities, or NCPA continue to have access to all contracts, with certain exceptions, in the portfolio and do not need to re-register to use a legacy National IPA, legacy U.S. Communities, legacy NCPA, or new OMNIA Partners contract. U.S. Communities, National IPA, and NCPA remain separate legal entities and lead agency contracts completed under each brand are effective and available for use through the contract's approved term. In the event we believe re-registration is necessary for any reason, OMNIA Partners will let you know.

Maintenance, Repair and Operations (MRO) Supplies, Equipment, and Related Products and Services

Region 4 ESC - TX

Contract Number: R240805

Initial Term: November 1, 2024 through October 31, 2027
Renewal Options: Option to renew for two (2) additional one-year periods through October 31, 2029

The Successful Offeror(s) shall have the right to enter local “service” agreements with Participating Public Agencies accessing the contract through OMNIA Partners, so long as the effective date of such agreement is prior to the expiration of the Contract. All local agreements may have a full potential term (any combination of initial and renewal periods) not to exceed five years. Any local agreements, project agreements, or maintenance agreements executed against resulting Master Agreement(s) during the effective term may survive beyond the expiration of the Master Agreement as established and agreed to by the Successful Offeror(s) and Participating Public Agencies.

Executive Summary

- Executive Summary
- Pricing
- Due Diligence

Master Agreement Documents

- Official Signed Contract
- Contract Award Documents

Response Evaluation

- Supplier Response to RFP
- Evaluation Documents

Solicitation Process

- Original RFP Document
- RFP Addendum 1
- RFP Addendum 2
- RFP Questions and Answers
- Proof of Publication
- RFP Receipt List
- RFP Opening Documents



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City Council Meeting **L. 7.**

DATE: 06/03/2025

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of the sole source purchase for 800 MHz APX 6500 and APX 6000 portable radios from Motorola Solutions in an amount not to exceed $820,031.37 (Police Chief Tolber)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the sole source purchase order with Motorola Solutions in an amount not to exceed $820,031.37.

RECOMMENDATION:

Staff recommends City Council approve the sole source purchase for 800 MHz APX 6500 and APX 6000 portable and mobile radios from Motorola Solutions to replace current aging equipment in an amount not to exceed $820,031.37.

DISCUSSION:

In 1987, the 800 MHz band was set aside for exclusive use by local, regional and state public safety agencies. The City of Redlands has had an agreement with the County of San Bernardino since 1990 for rights to use the 800 MHz band for radio communication purposes. The Redlands Police Department operates 800 MHz radio equipment (mobile, portable and base stations) on an 800 MHz data system managed by the County of San Bernardino. This radio system provides cross communications between Police, Fire, Public Services, Code Enforcement, University of Redlands, and the Redlands Unified School District. It also provides radio interoperability with surrounding cities and county agencies, allowing for collaboration and shared situational awareness.

The County of San Bernardino Information Services Department (ISD) provides 800 MHz radio equipment maintenance services per their agreement with the City of Redlands. The police department is currently using 25-year-old 800 MHz portable and mobile radios for their daily operations. Unfortunately, due to the age of this equipment, the police department has been informed by ISD that the necessary parts for repairs are no longer available, rendering the radios unserviceable. Because the majority of the police department's communication is done via the 800 MHz radio system, alternative solutions were sought.

The Redlands Police Department requests the purchase of forty (40) new 800 MHz APX 6000 portable radios, seventy-seven (77) APX 6500 in-car mobile radios, and miscellaneous adapter parts and batteries to replace the current aging equipment, which was purchased approximately 25 years ago. These radios will be installed inside police vehicles as well as assigned to police personnel, which is vital for the department's operational efficiency, safety, and emergency response capabilities. Currently, all police department radios are Motorola. Motorola Solutions is the sole manufacturer of these radios, and their proprietary technology ensures compatibility with San Bernardino County's ISD's existing communication infrastructure, which will help streamline integration, reduce costs, and minimize downtime.

Additionally, by procuring directly from Motorola Solutions, the City can capitalize on a limited-time offer at a significantly discounted price, which will reduce the cost of the radios by $278,895.57. The Police Department requests approval to purchase the mobile and portable radios as a sole source purchase to maintain compliance with the City's current access and maintenance agreement with the County of San Bernardino and to take advantage of the time-limited discount.

ALTERNATIVES:

Not approve the sole source purchase for replacement 800 MHz APX 6500 and APX 6000 portable and mobile radios from Motorola Solutions.

STRATEGIC PLAN:

Not applicable.

SUBMITTED BY:
Rachel Tolber, Chief of Police

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Jimmy Nguyen, Management Analyst

Fiscal Impact

Fiscal Year:	2024-25
Revenue Generating:	N
Appropriation Required Y/N:	N
Budgeted Y/N:	Y
Account No.:	101202

Discussion:

Funding for this purchase has been included in the FY 2025 & 2026 Mid-Biennium budget request.

Attachments

Sole Source Form
Sole Source Letter
Quote

Sole Source/ Single Source/ Standardization Form

For procurement of supplies, equipment and services valued at $5,000 and over

NOTE: Every question must be answered with appropriate documentation attached; incomplete forms will be immediately rejected by Purchasing.

Date: 5/1/25

TO: Purchasing Division

FROM: Timothy Edson, Police Department

Purchase Requisition # _____

Estimated Total Cost: $ 820,031.37

Proposed Vendor: Motorola Solutions

Request Term: 07/01/2025

This form must accompany the purchase document whenever an exception to the competitive process is requested. Requests for goods and/or services from a specific vendor or limited to a specific brand, where substitutes to the recommended vendor or brand are unacceptable, must be accompanied by a written justification explaining the circumstances that make alternatives unacceptable.

The City Manager will determine whether the justification is appropriate. Requests for exception must be supported by factual statements that will pass an audit.

INSTRUCTIONS

1. Please check all applicable categories (a. through i.) below and provide additional information where indicated.

☒ a. The requested product is an integral repair part or accessory compatible with existing equipment.

Existing Equipment: County of San Bernardino 800 MHz band and data system

Manufacturer/Model Number: _____

Age: 37 Years

Current Estimated Value: _____

☐ b. The requested product has unique design/performance specifications or quality requirements that are not available in comparable products.

☐ c. I have standardized the requested product and the use of another brand/model would require considerable time and funding to evaluate.

☐ d. The requested product is one in which I (and/or my staff) have specialized training and/or extensive expertise. Retraining would incur substantial cost in time and/or funding.

☐ e. The requested product is used or demonstration equipment available at a lower-than-new cost.

☒ f. Repair/Maintenance service is available only from manufacturer or designated service representative.

☐ g. Upgrade to or enhancement of existing software is available only from manufacturer.

☒ h. Service proposed by vendor is unique; therefore, competitive bids are not available or applicable.

☐ i. Other factors (provide detailed explanation in #2 below).

2. Provide a detailed explanation and pertinent documentation *for each category* checked in item 1 above. Attach additional sheets if necessary:

In 1987, the 800 MHz band was set aside for exclusive use by local, regional and state public safety agencies. The City of Redlands has been in contract with the County of San Bernardino since 1990 for rights to use the 800 MHz band for radio communication purposes. The Redlands Police Department operates 800 MHz radio equipment (mobile, portable and base stations) on an 800 MHz data system managed by the County of San Bernardino. This radio system provides cross communications between Police, Fire, Public Services, Code Enforcement, University of

3. Was an evaluation of other equipment, products, or services performed?

☒ Yes ☐ No

***If yes, please explain the type of evaluation performed and provide all supporting documentation*:**

Staff evaluated the different portable and mobile radios and radio capabilities offered by Motoro

4. List below the name of each individual who was involved in the evaluation, if conducted, and in making the recommendation to procure this product or service. Attach additional information, if necessary.

Shayna Walker Timothy Edson

5. Explain what action(s) the department would take if the sole/single source services were no longer available

The Police Department would solicit competitive bids per the City's purchasing guidelines. However, without an infrastructure and maintenance agreement, like what is currently in place with the County of San Bernardino, the infrastructure build out would take years to complete and the costs associated have not been budgeted for.

6. I certify that the above information is accurate to the best of my knowledge, and a signed copy of this document will be kept on file and available for audit in my department

Timothy Edson Digitally signed by Timothy Edson Date: 2025.05.05 11:06:10 -07'00' 05/05/2025

Prepared by Date

_____

Department Director Date

Purchasing Approvals

_____

Purchasing Agent Approval Date

_____

City Manager Approval Date

Motorola Solutions, Inc.
10680 Treena St., Suite 200
San Diego, CA 92131

April 30th, 2025

Redlands Police Department,

Subject: Motorola Solutions Sole Source- ASTRO25 APX RADIO EQUIPMENT

Motorola Solutions, Inc. (“Motorola”) is the market leader in radio communications systems and products for the U.S. Government and Public Safety Market and is pleased to have the Redlands Police Department as a valued customer. The ASTRO25 radio subscribers we design and manufacture contain proprietary hardware and software components which are not commercially available except through Motorola and its channel partners.

The Motorola Radio Equipment and Options that will be purchased by the Redlands Police Department will be used on the County of San Bernardino's existing Motorola ASTRO P25 Trunked System. These radios will operate on P25 Trunked equipment with proprietary features, operating on the Motorola Solutions core equipment located at San Bernardino County Master Site.

If you have any questions regarding our radio equipment, please contact your Account Manager, William Golden at (909) 809-6778.

Sincerely,

Motorola Solutions, Inc.
William Golden
Sr. Account Manager

Billing Address:
REDLANDS POLICE DEPT, CITY OF
212 BROOKSIDE
REDLANDS, CA 92373
US

Quote Date:04/30/2025
Expiration Date:06/19/2025
Quote Created By:
William Golden
William.Golden@motorolasolutions.com

End Customer:
REDLANDS POLICE DEPT, CITY OF
Timothy Edson
tedson@redlandspolice.org
909 798 7681

Summary:

Any sales transaction resulting from Motorola's quote is based on and subject to the applicable Motorola Standard Terms and Conditions, notwithstanding terms and conditions on purchase orders or other Customer ordering documents. Motorola Standard Terms and Conditions are found at www.motorolasolutions.com/product-terms.

Line #	Item Number	Description	Qty	List Price	Sale Price	Ext. Sale Price
	APX™ 6000 Series	APX6000				
1	H98UCF9PW6BN	APX6000 700/800 MODEL 2.5 PORTABLE	40	$3,667.00	$2,676.91	$107,076.40
1a	QA05100AA	EHN: STD 1 YR WARRANTY APPLIES	40	$0.00	$0.00	$0.00
1b	G996AU	ADD: PROGRAMMING OVER P25 (OTAP)	40	$110.00	$80.30	$3,212.00
1c	Q361AR	ADD: P25 9600 BAUD TRUNKING	40	$330.00	$240.90	$9,636.00
1d	H38BT	ADD: SMARTZONE OPERATION	40	$1,320.00	$963.60	$38,544.00
1e	Q806BM	ADD: ASTRO DIGITAL CAI OPERATION	40	$567.00	$413.91	$16,556.40
1f	Q629AK	ENH: AES ENCRYPTION AND ADP	40	$523.00	$381.79	$15,271.60
1g	Q498AY	ENH: ASTRO 25 OTAR W/ MULTIKEY	40	$814.00	$594.22	$23,768.80
1h	QA09113AB	ADD: BASELINE RELEASE SW	40	$0.00	$0.00	$0.00
1i	QA05573AA	ALT: LI-ION IMPRES 2 IP68 5100MAH	40	$156.45	$114.21	$4,568.40
	APX™ 6500 / Enh Series	ENHANCEDAPX6500				

Any sales transaction following Motorola's quote is based on and subject to the terms and conditions of the valid and executed written contract between Customer and Motorola (the ""Underlying Agreement"") that authorizes Customer to purchase equipment and/or services or license software (collectively ""Products""). If no Underlying Agreement exists between Motorola and Customer, then Motorola's Standard Terms of Use and Motorola's Standard Terms and Conditions of Sales and Supply shall govern the purchase of the Products.
Motorola Solutions, Inc.: 500 West Monroe, United States - 60661 ~ #: 36-1115800

Line #	Item Number	Description	Qty	List Price	Sale Price	Ext. Sale Price
2	M25URS9PW1BN	APX6500 ENHANCED 7/800 MHZ MOBILE	49	$3,518.00	$2,568.14	$125,838.86
2a	G996AS	ENH: OVER THE AIR PROVISIONING	49	$110.00	$80.30	$3,934.70
2b	G51AU	ENH: SMARTZONE OPERATION APX6500	49	$1,320.00	$963.60	$47,216.40
2c	G298AS	ENH: ASTRO 25 OTAR W/ MULTIKEY	49	$814.00	$594.22	$29,116.78
2d	G843AH	ADD: AES ENCRYPTION AND ADP	49	$523.00	$381.79	$18,707.71
2e	G444AH	ADD: APX CONTROL HEAD SOFTWARE	49	$0.00	$0.00	$0.00
2f	G335AW	ADD: ANT 1/4 WAVE 762-870MHZ	49	$15.00	$10.95	$536.55
2g	G806BL	ENH: ASTRO DIGITAL CAI OP APX	49	$567.00	$413.91	$20,281.59
2h	GA01670AA	ADD: APX E5 CONTROL HEAD	49	$717.00	$523.41	$25,647.09
2i	G361AH	ENH: P25 TRUNKING SOFTWARE APX	49	$330.00	$240.90	$11,804.10
2j	GA05100AA	ADD: STD WARRANTY - NO ESSENTIAL	49	$0.00	$0.00	$0.00
2k	QA09113AB	ADD: BASELINE RELEASE SW	49	$0.00	$0.00	$0.00
2l	W22BA	ADD: STD PALM MICROPHONE APX	49	$79.00	$57.67	$2,825.83
2m	G832AD	ADD: SPKR 7.5W WTR RST APEX	49	$67.00	$48.91	$2,396.59
2n	GA00250AA	ADD: GNSS/BT-WIFI THRU MNT ANT, 17FT LOW LOSS PFP-100A/240, QMA	49	$110.00	$80.30	$3,934.70
2o	G67DT	ADD: REMOTE MOUNT E5 APXM	49	$327.00	$238.71	$11,696.79
3	PMMN4099CL	AUDIO ACCESSORY-REMOTE SPEAKER MICROPHONE,IP68 REMOTE SPEAKER MICROPHONE,3.5MM,UL	40	$142.56	$104.07	$4,162.80
	APX™ 6500 / Enh Series	ENHANCEDAPX6500				
4	M25URS9PW1BN	APX6500 ENHANCED 7/800 MHZ MOBILE	21	$3,518.00	$2,568.14	$53,930.94
4a	W665BF	ADD: BASE STATION OP APX	21	$77.00	$56.21	$1,180.41

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Line #	Item Number	Description	Qty	List Price	Sale Price	Ext. Sale Price
4b	G996AS	ENH: OVER THE AIR PROVISIONING	21	$110.00	$80.30	$1,686.30
4c	G91AF	ADD: CNTRL STATION PWR SUPPLY	21	$296.00	$216.08	$4,537.68
4d	GA00235AA	ADD: NO GPS ANTENNA NEEDED APX	21	$0.00	$0.00	$0.00
4e	G66BJ	ADD: DASH MOUNT E5 APXM	21	$138.00	$100.74	$2,115.54
4f	G51AU	ENH: SMARTZONE OPERATION APX6500	21	$1,320.00	$963.60	$20,235.60
4g	G142AD	ADD: NO SPEAKER APX	21	$0.00	$0.00	$0.00
4h	GA05100AA	ADD: STD WARRANTY - NO ESSENTIAL	21	$0.00	$0.00	$0.00
4i	G298AS	ENH: ASTRO 25 OTAR W/ MULTIKEY	21	$814.00	$594.22	$12,478.62
4j	G843AH	ADD: AES ENCRYPTION AND ADP	21	$523.00	$381.79	$8,017.59
4k	G444AH	ADD: APX CONTROL HEAD SOFTWARE	21	$0.00	$0.00	$0.00
4l	G335AW	ADD: ANT 1/4 WAVE 762-870MHZ	21	$15.00	$10.95	$229.95
4m	G806BL	ENH: ASTRO DIGITAL CAI OP APX	21	$567.00	$413.91	$8,692.11
4n	GA01670AA	ADD: APX E5 CONTROL HEAD	21	$717.00	$523.41	$10,991.61
4o	W22BA	ADD: STD PALM MICROPHONE APX	21	$79.00	$57.67	$1,211.07
4p	QA09113AB	ADD: BASELINE RELEASE SW	21	$0.00	$0.00	$0.00
4q	G361AH	ENH: P25 TRUNKING SOFTWARE APX	21	$330.00	$240.90	$5,058.90
	APX™ 6500 / Enh Series	ENHANCEDAPX6500				
5	M25URS9PW1BN	APX6500 ENHANCED 7/800 MHZ MOBILE	7	$3,518.00	$2,568.14	$17,976.98
5a	W665BF	ADD: BASE STATION OP APX	7	$77.00	$56.21	$393.47
5b	G996AS	ENH: OVER THE AIR PROVISIONING	7	$110.00	$80.30	$562.10
5c	G91AF	ADD: CNTRL STATION PWR SUPPLY	7	$296.00	$216.08	$1,512.56
5d	GA00235AA	ADD: NO GPS ANTENNA NEEDED APX	7	$0.00	$0.00	$0.00
5e	G66BJ	ADD: DASH MOUNT E5 APXM	7	$138.00	$100.74	$705.18

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Motorola Solutions, Inc.: 500 West Monroe, United States - 60661 ~ #: 36-1115800

Line #	Item Number	Description	Qty	List Price	Sale Price	Ext. Sale Price
5f	G51AU	ENH: SMARTZONE OPERATION APX6500	7	$1,320.00	$963.60	$6,745.20
5g	G142AD	ADD: NO SPEAKER APX	7	$0.00	$0.00	$0.00
5h	GA05100AA	ADD: STD WARRANTY - NO ESSENTIAL	7	$0.00	$0.00	$0.00
5i	G298AS	ENH: ASTRO 25 OTAR W/ MULTIKEY	7	$814.00	$594.22	$4,159.54
5j	G843AH	ADD: AES ENCRYPTION AND ADP	7	$523.00	$381.79	$2,672.53
5k	G444AH	ADD: APX CONTROL HEAD SOFTWARE	7	$0.00	$0.00	$0.00
5l	G335AW	ADD: ANT 1/4 WAVE 762-870MHZ	7	$15.00	$10.95	$76.65
5m	G806BL	ENH: ASTRO DIGITAL CAI OP APX	7	$567.00	$413.91	$2,897.37
5n	GA01670AA	ADD: APX E5 CONTROL HEAD	7	$717.00	$523.41	$3,663.87
5o	QA09113AB	ADD: BASELINE RELEASE SW	7	$0.00	$0.00	$0.00
5p	W382AM	ADD: CONTROL STATION DESK GCAI MIC	7	$186.00	$135.78	$950.46
5q	G361AH	ENH: P25 TRUNKING SOFTWARE APX	7	$330.00	$240.90	$1,686.30
6	NNTN8844B	CHARGER, MULTI-UNIT, IMPRES 2, 6-DISP, NA/LA-PLUG, ACC USB CHGR	5	$1,705.20	$1,244.80	$6,224.00
7	NNTN8860B	CHARGER, SINGLE-UNIT, IMPRES 2, 3A, 115VAC, US/NA	20	$186.50	$136.15	$2,723.00
	APX™ 6500 / Enh Series	ENHANCEDAPX6500				
8	M25URS9PW1BN	APX6500 ENHANCED 7/800 MHZ MOBILE	7	$3,518.00	$2,568.14	$17,976.98
8a	W665BF	ADD: BASE STATION OP APX	7	$77.00	$56.21	$393.47
8b	G996AS	ENH: OVER THE AIR PROVISIONING	7	$110.00	$80.30	$562.10
8c	G91AF	ADD: CNTRL STATION PWR SUPPLY	7	$296.00	$216.08	$1,512.56
8d	GA00235AA	ADD: NO GPS ANTENNA NEEDED APX	7	$0.00	$0.00	$0.00
8e	G66BJ	ADD: DASH MOUNT E5 APXM	7	$138.00	$100.74	$705.18
8f	G51AU	ENH: SMARTZONE OPERATION APX6500	7	$1,320.00	$963.60	$6,745.20

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Motorola Solutions, Inc.: 500 West Monroe, United States - 60661 ~ #: 36-1115800

Line #	Item Number	Description	Qty	List Price	Sale Price	Ext. Sale Price
8g	G142AD	ADD: NO SPEAKER APX	7	$0.00	$0.00	$0.00
8h	GA05100AA	ADD: STD WARRANTY - NO ESSENTIAL	7	$0.00	$0.00	$0.00
8i	G298AS	ENH: ASTRO 25 OTAR W/ MULTIKEY	7	$814.00	$594.22	$4,159.54
8j	G843AH	ADD: AES ENCRYPTION AND ADP	7	$523.00	$381.79	$2,672.53
8k	G444AH	ADD: APX CONTROL HEAD SOFTWARE	7	$0.00	$0.00	$0.00
8l	G335AW	ADD: ANT 1/4 WAVE 762-870MHZ	7	$15.00	$10.95	$76.65
8m	G806BL	ENH: ASTRO DIGITAL CAI OP APX	7	$567.00	$413.91	$2,897.37
8n	GA01670AA	ADD: APX E5 CONTROL HEAD	7	$717.00	$523.41	$3,663.87
8o	QA09113AB	ADD: BASELINE RELEASE SW	7	$0.00	$0.00	$0.00
8p	W382AM	ADD: CONTROL STATION DESK GCAI MIC	7	$186.00	$135.78	$950.46
8q	G361AH	ENH: P25 TRUNKING SOFTWARE APX	7	$330.00	$240.90	$1,686.30

Subtotal	$1,032,947.40
Total Discount Amount	$278,895.57
Estimated Tax	$65,979.54
Grand Total	$820,031.37(USD)

Notes:

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