

2. Introduction

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Project. This EIR has been prepared by the City of Redlands 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 identify, analyze, and mitigate the 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 EIR, the City of Redlands has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this Draft EIR reflect the independent judgment of the City as Lead Agency.

2.1 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 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 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.

2.2 EIR SCOPE AND CONTENT

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 General Plan Transit Villages District and Specific Plan Project (“TVSP” or “proposed Project”). Topics requiring a detailed level of analysis evaluated in this Draft EIR have been identified based upon the responses to both the NOP 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 EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- 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 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 EIR:

- Agriculture & Forest Resources
- Biological Resources
- Mineral Resources
- Wildfire

2.3 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 September 1, 2021 for a 30-day public review and comment period that ended on September 30, 2021. 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 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	
California Department of Transportation (Caltrans), October 13, 2021	
This letter provides background on Caltrans and their role as a responsible agency, as well as their recommendations for the Project. They recommend preparing a Traffic Impact Analysis (TIA) from data no more than 2 years old, and submitting the TIA prior to the circulation of the DEIR. They also included the following comments: They recommend designing local streets to serve circulation and safety equally, and to consider the standards provided by the Americans with Disability Act and the California Highway Design Manual. They also recommend placing all non-preferential parking behind buildings, and to provide electric vehicle charging stations and consider them as preferential parking.	Transportation
South Coast Air Quality Management District, September 20, 2021	
This letter provides background on CEQA Air Quality Analysis and the South Coast Air Quality Management District (SCAQMD) recommendations for the analysis of potential air quality impacts. The SCAQMD requested that these recommendations are included, and requested electronic versions of all related documents. The recommendations include the use of the SCAQMD's CEQA Air Quality Handbook and website as guidance when preparing the air quality and greenhouse gas analyses, and CalEEMod2 land use emissions software. The letter also suggests mitigation measures, including list of resources to utilize that involve the aforementioned handbook, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities. Lastly, they also provided a point of contact.	Air Quality, Greenhouse Gas Emissions
Native American Heritage Commission, September 20, 2021	
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
Regional/Local Agencies	
Department of Public Works, San Bernardino County, September 28, 2021	
This letter provides two comments with information regarding the District's Comprehensive Storm Drain Plan (CSDP), and San Bernardino County Flood Control District (SBCFCD) permitting.	Hydrology & Water Quality, Land Use & Planning, Utilities & Service Systems
The Department of Public Works has advised that the Project is subject to the CSDP, which is available at the County's Flood Control District Offices. The CSDP should be used as a guideline for drainage in the area, and any revision to the existing drainage should be reviewed and approved by the City of Redlands. They also state that if construction of new, or alterations to	

Comment Letter and Comment	Relevant EIR Section
<p>any existing storm drains would be necessary as part of the Proposed Project, their impacts and any required mitigation should be discussed within the Draft EIR before the document is adopted by the Lead Agency.</p> <p>The Department also noted that San Bernardino County Flood Control District (SBCFCD) right-of way and facilities are located within the proposed Project area. They also stated that any encroachments in the right-of-way or facilities that is not authorized under Permit P-22017018 to SBCTA for rail line construction would require a permit from the SBCFCD prior to start of construction. They have also stated that the necessity for permits, and any impacts associated with them, should be addressed in the EIR prior to adoption and certification.</p> <p>The Department has also requested to be included in the circulation list for all project notices, public reviews, or public hearings.</p>	
San Manuel Band of Mission Indians, September 2, 2021	
<p>This letter provides the desired level of involvement of the San Manuel Band of Mission Indians (SMBMI) in the Project. The letter informs that the Project site is included under Serrano ancestral territory, and borders the Asistencia and the Zanja. The commenter requests that the following actions are taken and submitted to SMBWI for review upon availability:</p> <ul style="list-style-type: none"> - Cultural report - Geotechnical report (if required for the project) - Project plans showing the depth of proposed disturbance <p>The letter states that the above information will help the Tribe be consulted as per AB 52. The letter also provides a point of contact for the tribe.</p>	Cultural Resources, Tribal Cultural Resources
University of Redlands, September 29, 2021	
<p>This letter provides concerns regarding the costs associated with infrastructure, floodplain mitigation, and appropriate required density. The letter also states that the impacts of the 3,000 dwelling units across the three transit villages need to be studied.</p>	Population & Housing, Hydrology & Water Quality
Individuals	
Andrew Hoder, September 30, 2021	
<p>This letter provides the commenter's opposition to the Project. The commenter states that the Project is not transparent enough. The commenter cited the bulldozing and replacement of the La Posada hotel to be replaced with the Redlands Mall, and believes that this similar venture will impact the historic resources within the area. The commenter implored the City to collaborate with residents and provide alternatives. The letter also suggests that residents would like to replace the mall with a Civic Center to support public utilities.</p> <p>The letter also provides comments directly concerning the NOP. The commenter notes not all proposed platforms are within the Project area. They also state that the historic buildings proposed to be preserved are already mostly torn down. The commenter also pointed out that parking facilities are needed but there isn't mention of who would pay for them. The commenter is concerned that the city will become more like Santa Monica and Los Angeles. They also mentioned concerns regarding water resources and associated infrastructure, as well as associated costs.</p>	Aesthetics, Cultural Resources, Public Services, Utilities & Service Systems, Alternatives
Christian Bogan, September 27, 2021	
<p>This letter provides the commenter's opposition to the Project. The commenter is concerned as that traffic would increase and impact their small business. They stated that there are many issues affecting the city that are more important to invest in than developments.</p>	Transportation
Jeanne Munz, October 4, 2021	

Comment Letter and Comment	Relevant EIR Section
This letter provides the commenter's opposition to the Project. The commenter states that Redlands doesn't need a train, and that the already crowding downtown area would be negatively impacted by tall buildings. They also enquired as to if the City had the right to alter the residential area, and as to whether the current residents had been asked their opinions. Commenter suggested ceasing Project activity before further action is taken by them.	Aesthetics
Teresa McNally, September 25, 2021	
This letter provides the commenter's opposition to the Project. The commenter expressed concern that unrestricted development would turn the city into Los Angeles. They cited the mall at Alabama and Lugonia as a good example of positive development but wants the Redlands Mall to be demolished and believes other residents do as well. They also cited the vote for limiting growth and said that the residents will fight against this and won't give up.	Aesthetics
Richard Bledsoe, Saturday, September 25	
This letter provides the commenter's opposition to the Project. The commenter states that they are a longtime resident that has noticed orange groves have been disappearing. They noted concerns for the short-term new residents and traffic impacts. They stated that they want to slow down development.	Aesthetics, Population & Housing, Transportation
Sharen Wilbur, September 28, 2021	
This letter provides the commenter's opposition to the Project. The commenter states that they are concerned with overdevelopment near the transit stop. The commenter is also expressed concerns that traffic and exhaust will become a major problem. They are interested in keeping the visual character of the city. They want to increase open space and trees to preserve groundwater and air quality. The state is in a water crisis, we are next. They also expressed concerns that tax payers will be supporting the infrastructure required in relation to the Project.	Aesthetics, Air Quality, Hydrology & Water Quality, Transportation, Utilities & Service Systems
Merry Smith, September 3, 2021	
This letter provides the commenter's opposition to the Project. The commenter cited the passing of measure G and has requested that buildings above three stories remain prohibited. They believe that future generations would be impacted by aesthetic changes to downtown.	Aesthetics
Royce, September 4, 2021	
This commenter enquired as to when high rises became categorized under villages.	Aesthetics
Richard O'Donnell, September 1, 2021	
This letter provides the commenter's opposition to the Project. The commenter states that the Project is a violation of the restrictions of voter approved initiative Measure U. They believe the Project is using City Council Resolution 7173 to bypass citizens, and that if the Project was submitted to a popular vote it would fail.	Transportation
Marcia Hemphill, September 27, 2021	
This comment provides the commenter's concern for the Project and its potential to lower the quality of life in Redlands by obstructing mountain views, impacting population density, parking, water supply and traffic.	Aesthetics, Population & Housing, Hydrology & Water Quality, Transportation, Utilities & Service Systems
Lynda Stewart, September 28, 2021	
This comment provides the commenter's opposition to obstructing mountain views.	Aesthetics
Virginia Carlson, September 4, 2021	
This letter provides the commenter's opposition to the Project. The comment states that the City of Redlands should wait to implement the project until after	Not applicable

Comment Letter and Comment	Relevant EIR Section
the next election after expressing concerns of termination due to Proposition G. They are also concerned about the allocation of tax dollars.	
Fred H. Dill, September 29, 2021	
<p>This letter provides the commenter's disapproval of the methods for circulation of the NOP; stating that the Project was not sufficiently circulated.</p> <p>The commenter states that in order to be properly made available to the public, paper mail should be sent to every resident, and that newspapers and other media should have involvement. They also expressed that the scoping meeting over Zoom should be disregarded, as it was not done in person. Lastly, the commenter expressed concerns that judicial disapproval is likely.</p>	Introduction
Pamela Resheske Clark, October 2021	
<p>This letter provides the commenter's opposition to the Project. The comment states that the City of Redlands' Residents voted against developing the mall site over 2 stories high, and that the City should wait to implement the project until after the next election due to Proposition G. The commenter also noted opposition to the parking structure and its impact on downtown aesthetics.</p> <p>The commenter stated that there are ample apartments in Redlands, and this is a concern due to short tenancy and lack of commitment to the area. They also noted concerns regarding water restrictions in place. Lastly, the commenter They also noted concerns regarding increased traffic congestion and the implication on air quality that it would have.</p>	Aesthetics, Air Quality, Population & Housing, Transportation
Susan Williams, June 28, 2021	
<p>This letter provides both praise concerning the thoroughness of the IS/NOP, as well as disapproval of the Project from the commenter. They noted naivety of the speakers at the City Council Meeting, and that Redlands is too small to become more like cities mentioned in the meeting. They stated that there are thousands of apartment buildings already and expressed concern for people coming from out of town to fill the new buildings. They also expressed concern about the building heights. The commenter also expressed concerns about water usage, sewer infrastructure, and impacts to traffic and parking.</p> <p>The commenter would like it to be known that they have experience reviewing EIRs within the nearby territories and stated that they are suspicious about the intentions of the Project.</p>	Population & Housing, Transportation, Utilities & Service Systems
Julia Lambson, September 15, 2021	
<p>This letter provides support of the Project from the commenter, and expresses concerns of a small group of advocates with the intention of ceasing necessary growth within the City. The commenter stated that they have been a resident of the city since 1968, and is excited to see more growth. They expressed avoiding urban sprawl and habitat destruction by increasing building heights. They stated that increasing density downtown would decrease traffic and increase support of local institutions. They also expressed concern for housing affordability and interest in tax revenue. The commenter would like streetlights and tree trimming in their neighborhood.</p>	Public Services, Population & Housing
Cindy Pratt Holter, September 15, 2021	
<p>This letter provides the commenter's disapproval of the Project. The commenter stated that there was a vote to keep the city small, and expressed concern for the impact on the uniqueness of the town. They state that the increased population is affecting traffic, air pollution, noise, and parking. They stated that Redlands is the Emerald Jewel of the Inland Empire and requested to keep the height of the buildings to 3 stories max. The commenter</p>	Air Quality, Cultural Resources, Land Use & Planning, Noise, Population & Housing, Transportation

Comment Letter and Comment	Relevant EIR Section
<p>would like it to be known that they grew up in the city, and that old buildings and orange groves should not be replaced by housing.</p>	
<p>Richard O'Donnell, September 20, 2021</p>	
<p>This comment provides concerns from the commenter regarding the true intentions of the Project, and that they believe future infrastructure updates are the eventual goal. They cited a railway plan from Redlands to San Bernadino as a similar Project with hidden intentions. They noted that the project area is prone to flooding. The commenter suggested that the plan should be divided into an infrastructure plan and a building plan in order to fully disclose costs, and allow for the two plans to be judged separately. The commenter enquired who would pay for the Project, and if there were hidden funds involved.</p>	<p>Hydrology & Water Quality</p>
<p>William E. Cunningham, September 29, 2021</p>	
<p>This letter provides the commenter's opinions as to which impact areas would have significant impacts. They believe aspects of the Project would have significant and unmitigable impacts for several impact areas, including air quality and greenhouse gasses. The commenter provided a variety of concerns related to population growth induced by the Project. They believe that parks are at maximum capacity and stated that 6 acres are required per resident by the city. They stated that the projected population increase was inaccurate and provided an alternative estimate of 6,720 new residents. They also believe that parks are at maximum capacity and stated that 6 acres are required per resident by the city.</p> <p>The commenter stated that the historic value of the town would be impacted due to the increase in residents and new buildings. The commenter also noted that the buildings would impact mountain views both physically and with light and glare.</p>	<p>Aesthetics, Air Quality, Cultural Resources, Noise, Greenhouse Gas Emissions, Recreation, Population & Housing, Public Services, Water & Hydrology</p>
<p>Diane Christensen, September 25, 2021</p>	
<p>This letter provides the commenter's concerns regarding the Project. The concerns include decreased visibility of historic buildings and the construction of large parking structures changing the historic nature of the area. The commenter has also expressed disapproval of existing 3 story apartments. They also stated that SB 9 and SB10 are merely to acquire land. The commenter believes that a hotel would eliminate space for housing, increase traffic, and impact Franklin Elementary School.</p>	<p>Aesthetics, Cultural Resources, Population & Housing, Public Services, Transportation</p>
<p>Organizations</p>	
<p>Southwest Regional Council of Carpenters, September 30, 2021</p>	
<p>This letter provides background information on the Southwest Regional Council of Carpenters (SRCC) and its members, as well as the organization's suggestions and requests regarding the Project.</p> <p>The SRCC requests that the Lead Agency provide notice all notices referring or related to the Project.</p> <p>The SRCC has suggested that City should require development projects constructed within the Project Area to hire a percentage of workers within 10 miles of the project site, and that those workers have graduated from a Joint Labor Management apprenticeship training program approved by the State of California or have equal hours of on-the-job experience in the applicable craft. The SRCC also described community and environmental benefits of hiring a local and skilled workforce, and further outlined some of these benefits by including GHG modeling and VMT analysis.</p>	<p>Population and Housing, Greenhouse Gas Emissions, Transportation</p>

Comment Letter and Comment	Relevant EIR Section
<p>Friends of Redlands, September 3 and September 15, 2021</p> <p>The Friends of Redlands (FOR) submitted two letters: one in regard to the Project impacts, and one in regard to the scoping meeting.</p> <p>This first letter from the Friends of Redlands (FOR) provides recommendations and questions regarding the Project.</p> <p>The FOR noted that the Downtown Historical District is a significant and unique cultural to downtown Redlands, and that structures built in the Project area should be constructed in proportion to existing structures, and enquired about the building heights in relationship to obstruction of mountain views.</p> <p>The commenter requested that the Project ensure that the increased traffic caused by the additional population will not degrade the existing Level of Service (LOS C) and allow for easy access on and off the I-10 Freeway. They noted that Downtown Redlands lacks adequate parking, and requested the Project assure that there is ample parking to meet the increase in population in the Project area. They also requested mitigation be provided for the increased noise due to the increase in traffic and the Arrow train.</p> <p>They requested that the Project provide increased policing and fire protection in proportion to the expected increase in population due to apartment living and to increased foot traffic due to the Arrow commuter train stations. They also suggested that the Project account for taxpayer costs imposed by potential modifications to water and sewage infrastructure to meet increased demand. They questioned if infrastructural changes can be completed at an acceptable cost, and asked what the impact of increased population would be on both services. They have also enquired about the impact of increased population on Redlands schools.</p> <p>Lastly, they suggested considering the increased population density in relationship to social distancing in planning for any future pandemic.</p> <p>The second letter was written regarding the scoping meeting. The commenter noted that there was low attendance, they weren't able to figure out the system, and that there needs to be more public outreach to inform voters. They also referred to the above letter and enquired as to whether or not their concerns would be incorporated into the NOP. They also enquired about the anticipated maximum building height would be. They stated that water supply is a concern, and enquired where the water was going to come from. Lastly, they expressed concern for taxpayers supporting the required infrastructure.</p>	<p>Aesthetics, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, Public Services, Transportation, Utilities & Service Systems</p>
<p>The Redlands Area Historic Society Inc, September 21, 2021</p> <p>This letter provides information regarding the Project location and what could be hundreds of historic resources within and adjacent to it, and an attached list including some of those resources.</p> <p>The letter also states that some structures have received the Historic Society's Heritage Awards over the years. The letter requests that appropriate mitigation measures be applied in regard to these resources.</p>	<p>Cultural Resources, Tribal Cultural Resources</p>

Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Redlands hosted two public scoping meetings 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 EIR for the proposed Project. The Agency Scoping Meeting was held on September 15, 2021, at 4:00 p.m. via Zoom. The Public Scoping Meeting was held on September 15, 2021, at 5:00 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
Bruce Wick	
The commenter stated that they understand that vehicle miles traveled (VMT) is a concern related to air quality and pollution. The commenter asked if adjustments are being made within VMT analysis regarding individuals working from home more.	Transportation
Sharen Wilbur	
The commenter stated that Redlands has an adequate water supply currently and asks how much the Draft EIR will take into account the years of drought that the region is currently facing or potential drought in the future. The commenter further stated that the Inland Empire has some of the worst air quality in the country and asked what the Draft EIR will use to analyze air quality pollution. The commenter further stated that the influx of residents to the area will make air quality worse.	Air Quality, Hydrology & Water Quality
Katherine Vienne	
The commenter asked if the Draft EIR will analyze impacts from increased residents on schools.	Public Services
Richard O'Donnell	
The commenter asked for an explanation as to why the majority of the TVSP area is not currently developed and asks if the proposed Project would make the property owners want to develop.	Project Description
Mike Schneblin	
The commenter asked if there are any green spaces included in the plan as Redlands' founding fathers wanted to create green space within the city. The commenter asked if there is a conceptual plan to capture stormwater as the Downtown area has experienced flooding in the past.	Project Description, Hydrology & Water Quality

Public Review of the Draft EIR

The City of Redlands filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this Draft EIR has been completed and is available for review. A Notice of Availability of the Draft EIR was published concurrently with distribution of this document. The Draft 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 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 EIR should be addressed to:

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Email: bfoote@cityofredlands.org

Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final 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 EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by the City, as well as other responsible agencies per CEQA. The Final EIR may also contain corrections and additions to the Draft EIR, and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the City. Notice of the availability of the Final EIR will be sent to all who commented on the Draft EIR.

2.3 ORGANIZATION OF THIS DRAFT EIR

The Draft EIR is organized into the following Sections. To help the reader locate information of interest, a brief summary of the contents of each chapter of this Draft 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 EIR, the scope of this Draft EIR, a summary of the legal authority for the Draft 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 the 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 also identified.
- **Section 7 Report Preparation and Persons Contacted:** This section lists authors of the Draft EIR and City staff that assisted with the preparation and review of this document. This section also lists other people that were contacted for information that is included in this Draft EIR document.

2.4 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 EIR. Where this Draft EIR incorporates a document by reference, the document is identified in the body of the Draft 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 EIR.

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 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 Project. Accordingly, the Program EIR for the General Plan 2035 is herein incorporated by reference in accordance with State CEQA Guidelines Section 15150. The documents are available at <https://www.cityofredlands.org/post/planning-division-general-plan>.

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