

## 5.17 Mandatory Findings of Significance

### 5.17.1 SIGNIFICANT 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.” Potential environmental effects of the proposed Project and mitigation measures are discussed in detail throughout in Chapter 5 of this Draft EIR. As summarized below and detailed in Section 5.2, *Air Quality*, and Section 5.14, *Transportation*, impacts in the following areas would remain significant and unavoidable, even with the incorporation of standard conditions; plans, programs, policies; and feasible mitigation measures.

#### **Air Quality**

As detailed in Section 5.2, *Air Quality*, due to the uncertainty of the timing and methods of construction activities related to TVSP development projects, a significant impact could occur related to construction emissions of VOC and NO<sub>x</sub>, with implementation of South Coast Air Quality Management District (SCAQMD) Rules and mitigation measures. In addition, operation of the proposed TVSP at buildout would result in exceedance of the applicable SCAQMD thresholds for VOC, NO<sub>x</sub>, and CO after implementation of mitigation. The large majority of operational-source CO and NO<sub>x</sub> 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, emissions generated from implementation of the proposed TVSP 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.

In addition, per 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. Due to the Project exceedance of CO, VOC, and NO<sub>x</sub> thresholds, impacts would be cumulatively considerable and significant and unavoidable.

#### **Transportation**

As detailed in Section 5.14, *Transportation*, all TAZs within the TVSP area satisfy screening criteria 1, 2, 3, or 4 and are less than significant, except for TAZ 53827101 on the western boundary of the TVSP area. In order for projects within TAZ 53827101 to have a less than significant VMT impact, developments must adhere to the land use types in Screening Criteria 3 or land use quantities in Screening Criteria 4 – Land Use Quantities. Specific development within this TAZ is currently unknown. As such, Mitigation Measure TR-1 is included to require implementing projects within TAZ 53827101 to conduct a VMT Screening Analysis or VMT Analysis prior to approval of any site plans. While it is likely that implementing projects would meet the screening criteria, it is also possible that an implementing project would include development beyond the land uses provided for in Screening Criteria 4 and would result in more than 3,000 MT CO<sub>2</sub>e of GHG emissions per year. Therefore, individual implementing projects within TAZ 53827101 would potentially need to conduct their own CEQA analysis. Additionally, anticipated VMT reductions from inclusion of Transportation Demand Management (TDM) measures for implementing projects that result in a VMT impact, are not large enough to guarantee that significant impacts from implementing projects could be fully mitigated. As such, despite inclusion of Mitigation Measure TR-1, impacts related to VMT within TAZ 53827101 are considered be significant and unavoidable.

## 5.17.2 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 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 TVSP would result in development of up to 613,000 square feet of retail commercial, hotel, and office space by 2045. SCAG estimates that employment in the City will increase from 42,600 jobs in 2016 to 56,300 in 2045, which is an increase of 13,700 jobs or a 32.2 percent increase (SCAG 2020 growth forecast). The employment anticipated by the proposed TVSP would generate approximately 1,226 new employees (see Section 5.11, *Population and Housing*), which represents 8.9 percent of the estimated

job growth by 2045. The 1,226 jobs expected in the TVSP area are included in SCAG projections because the employment land in the TVSP area is included in the General Plan and is not changing with implementation of the TVSP. Thus, the employment that would occur within the TVSP area would be less than significant.

The new Project would accommodate the forecasted employment in an environmentally sustainable manner by providing for housing to maintain the jobs to housing balance, that would reduce vehicle miles traveled. Also, as listed below, the City of Redlands has had recent unemployment rates ranging between 3.0 and 7.5 percent (EDD, 2021).

- December 2021: 3.6 percent unemployment rate
- 2020 Annual Average: 7.5 percent unemployment rate
- 2019 Annual Average: 3.0 percent unemployment rate
- 2018 Annual Average: 3.3 percent unemployment rate
- 2017 Annual Average: 3.8 percent unemployment rate
- 2016 Annual Average: 4.5 percent unemployment rate

The jobs would provide new employment opportunities for people living in Redlands and the surrounding cities. Most of the new commercial and office jobs that would be created by the proposed TVSP would be positions that are anticipated to be filled by people who would already be living within Redlands and surrounding communities and would not induce an unanticipated influx of new labor into the region. As described in Section 5.11, *Population and Housing*, buildout of the TVSP would result in maintenance and future improvement of the projected jobs-household ratio, which is a benefit of the proposed TVSP because a more balanced jobs-to-housing ratio could improve the environment by reducing vehicle miles traveled and emissions from motor vehicles. Overall, the proposed TVSP would accommodate forecasted employment growth consistent with SCAG's regional forecasts. Thus, impacts related to increased growth through the provision of employment opportunities would be less than significant.

**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 TVSP area is a developed urban area that is connected to the City's existing infrastructure system. Water, sewer, drainage, and roadways provide service to all of the areas within the TVSP. As described in Section 5.16, *Utilities and Service Systems*, development projects pursuant to the TVSP would include 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 are sized to accommodate the TVSP buildout and not provide excess capacity. As described above, the TVSP area is urban and developed and the projects implemented by the TVSP would consist of infill and redevelopment of existing uses or development of vacant parcels that are in between developed parcels in the urban area. The TVSP related infrastructure and utility improvements do not involve extension of utilities into undeveloped areas. Therefore, the infrastructure improvements implemented by the Project would not result in unplanned growth.

The TVSP would also implement circulation improvements to street, pedestrian, and bicycle facilities, which would enhance local circulation and the use of transit. The circulation improvements provided by the TVSP would not extend circulation into a new area or provide excess circulation capacity that could induce growth. The improvements proposed by the TVSP would enhance circulation to provide for multi-modal transportation and implement use of transit. As a result, the circulation improvements would result in less than significant growth inducing impacts.

### **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 change to a jurisdiction's general plan and zoning code, which allows new development to occur in underutilized areas. The proposed TVSP includes amending the GP2035 to establish a new Transit Village District (TVD) land use designation to provide for infill development of new residential and commercial uses within 0.5 mile of each of the three new Arrow stations. The proposed TVSP provides detailed standards for building placement, height, massing, articulation, frontage, landscape, and parking based through a form-based code. The form-based code incorporates a gradual transitioning of the height and mass of buildings from larger to smaller to avoid incompatible buildings heights next to each other. The amount of square-footage and dwelling units listed at buildout of the proposed TVSP could be constructed at the present time under the current GP2035 land use designations and current zoning designations within the TVSP area. The difference is that with implementation of the Project, the new development would achieve preferred building forms and design, promote compact and walkable urban form in the vicinity of the train stations, introduce a greater variety of transportation options (and reduce vehicle trips and vehicle miles traveled), and provide more public open space and amenities that provides aesthetic and community benefits. Therefore, the proposed TVSP related changes to land use and zoning designations would not result in removing an obstacle to growth.

Also, SCAG household growth projections estimate that between 2021 and 2045 the number of households within the City will grow by 21.2 percent (5,395 households). Assuming that the maximum number of residential units in the proposed TVSP are developed and occupied (no vacancy), the 2,400 additional households in the TVSP area would consist of a 9.4 percent increase of households citywide, which is within the SCAG anticipated growth of both the City and the County. Likewise, as described previously, the employment anticipated by the TVSP would generate approximately 1,226 new employees (see Section 5.11, *Population and Housing*), which represents 8.9 percent of the estimated job growth by 2045. These jobs are included in SCAG projections because the employment land in the TVSP area is included in the General Plan and is not changing with implementation of the TVSP. 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 5.12, *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. 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 TVSP would 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 development of the proposed TVSP have been analyzed in all technical sections of this Draft EIR and Initial Study prepared for this Project. For example, activities such as excavation, grading, and construction as required for the buildout of the TVSP have been evaluated herein. Also, all operational aspects of the TVSP have been analyzed in this Draft EIR and through implementation of existing regulations, including the General Plan and zoning ordinance, would not create an environmental impact of induced growth.

### **5.17.3 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).

### **Energy Resources**

While not implementing development under the TVSP would not involve the wasteful use of energy, new development under the TVSP would result in an increase of energy use. Residential, commercial, office, and mixed-use developments would use electricity, natural gas, and petroleum products for lighting, heating, and power. Additionally, vehicles traveling within and to and from the TVSP area would utilize both oil and gas. Use of these types of energy for development within the TVSP would result in an increase of use of nonrenewable energy resources, which represents an irreversible environmental change.

### **Construction Impacts**

Construction of implementing development projects under the TVSP 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.

### **5.17.4 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.

### **Agricultural Resources**

The Project area is urbanized and largely developed. There is no designated Prime Farmland, Unique Farmland, or Farmland of Local Importance within the Project area (GP2035 EIR, Figure 3.2-1). Therefore, implementation of the Project would not convert existing designated farmland and no related impact would occur. Also, none of the parcels within the Project area are zoned for agricultural use, nor is there any land under a Williamson Act contract within the Project area (City Zoning 2020), and GP2035 EIR, Figure 3.2-1).

None of the parcels within the Project are currently zoned as forest land, timberland, or Timberland Production, and the Project would not result in the conversion of farmland to non-agricultural or forest land to non-forest land, either directly or indirectly. As such, the Project would not involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or forest land to non-forest land.

### **Biological Resources**

The Project area is urbanized and developed. 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. Therefore, the Project would not result in impacts on species identified as candidate, sensitive, or special status.

The Project area is located in an area that contains a considerable amount of impervious surfaces (i.e., asphalt, cemented streets, parking lots, buildings, etc.) and non-native ornamental trees, shrubs, and ground cover; therefore, riparian habitat is not present nor another sensitive natural community present in the Project area. The Project would involve infill and redevelopment within an already highly disturbed urban environment and would not involve any changes or alterations to any riparian habitat or other sensitive natural community. Likewise, the Project area does not contain protected wetlands (USFWS 2020). The Project area is a highly disturbed urban environment. Implementation of the TVSP would not have a substantial adverse effect on wetlands as defined by Section 404 of the Clean Water Act.

No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located within the Project area 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 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 and no further analysis is required in the EIR.

Implementation of the Project is not anticipated to conflict with the provisions of these existing tree policies and guidelines. Future development, revitalization, 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. Additionally, the Project outlines standards and guidelines to ensure the proper management (e.g., planting, health, maintenance) of trees occurs. 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.

### **Mineral Resources**

The Project area consists of the City's urban core, residential neighborhoods, civic uses, and parks. 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, specific plan or other land use plan, and no impact would occur.

### **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.

## REFERENCES

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