
**Appendix A. Initial Study, Notice of
Preparation, & NOP Comments**



REDLANDS GENERAL PLAN TRANSIT VILLAGES DISTRICT AND SPECIFIC PLAN PROJECT

INITIAL STUDY/NOTICE OF PREPARATION

Lead Agency:
City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373

August 30, 2021

Table of Contents

1 INTRODUCTION..... 1

1.2 PURPOSE OF THE INITIAL STUDY 2

1.3 DOCUMENT ORGANIZATION..... 2

1.4 INITIAL STUDY FINDINGS..... 3

2 ENVIRONMENTAL SETTING..... 4

2.1 PROJECT LOCATION 4

2.2 EXISTING SETTING 4

2.3 EXISTING GENERAL PLAN AND ZONING DESIGNATIONS 6

2.4 SURROUNDING LAND USES, GENERAL PLAN, AND ZONING DESIGNATIONS..... 7

3 PROJECT DESCRIPTION 23

3.1 PROJECT OVERVIEW..... 23

3.2 TRANSIT VILLAGES..... 23

3.3 REGULATING PLAN AND ZONES 24

3.4 TRANSPORTATION..... 26

3.5 OPEN SPACE AND LANDSCAPE..... 26

3.6 INFRASTRUCTURE IMPROVEMENTS..... 26

3.7 PROJECT AREA BUILDOUT..... 27

3.8 DISCRETIONARY APPROVALS 27

4 ENVIRONMENTAL CHECKLIST..... 37

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 37

4.2 DETERMINATION 38

4.3 ENVIRONMENTAL CHECKLIST QUESTIONS..... 40

1. AESTHETICS..... 40

2. AGRICULTURE AND FORESTRY RESOURCES 48

3. AIR QUALITY 50

4. BIOLOGICAL RESOURCES 53

5. CULTURAL RESOURCES 57

6. ENERGY 59

7. GEOLOGY AND SOILS 60

8. GREENHOUSE GAS EMISSIONS 65

9. HAZARDS AND HAZARDOUS MATERIALS..... 66

10. HYDROLOGY AND WATER QUALITY..... 71

11. LAND USE AND PLANNING 77

12. MINERAL RESOURCES 78

13. NOISE 80

14. POPULATION AND HOUSING 82

15. PUBLIC SERVICES..... 84

16. RECREATION 88

17. TRANSPORTATION 89

18. TRIBAL CULTURAL RESOURCES 91

19. UTILITIES AND SERVICE SYSTEMS..... 93

20. WILDFIRES 96

21. MANDATORY FINDINGS OF SIGNIFICANCE..... 98

5 DOCUMENT PREPARERS AND CONTRIBUTORS..... 101

6 REFERENCES 102

Tables

Table 1: TVSP Proposed Buildout27
Table 2: Scenic Roadways in the City.....46
Table 3: Estimate of Numbers of New Residents82
Table 4: RUSD Schools Serving the TVSP Area.....85
Table 5: Existing Parks within the TVSP Area86

Figures

Figure 1: Regional Location 9
Figure 2: Local Vicinity.....11
Figure 3: Aerial Photograph.....13
Figure 4: Specific Plan Station Areas.....15
Figure 5: General Plan Land Use Designation17
Figure 6: General Plan Transit Villages.....19
Figure 7: Existing Zoning Districts.....21
Figure 8: Regulating Plan.....29
Figure 9: Future Street Network Improvements31
Figure 10: Future Bicycle Network Improvements33
Figure 11: Public Realm Plan.....35
Figure 12: Transit Villages Specific Plan and Transit Priority Areas43

This page intentionally left blank.

1 INTRODUCTION

1.1 PROJECT SUMMARY

In 2012, the City Council of the City of Redlands (the “City”) commenced the process of developing goals and policies within Redlands’ General Plan to establish a framework for bringing transit-oriented development to the City by adopting Resolution No. 7173. Specifically, the City Council resolved an ambiguity in the General Plan which resulted from the voters’ approval in 1997 of a citizen-sponsored initiative ordinance, commonly known as Measure U, which prohibited the City Council from establishing new residential land use classifications in the General Plan, such as a residential mixed-use classification designed to facilitate transit-oriented development around such Metrolink stations. The City Council found, determined, and concluded in that resolution that Measure U, to carry out its purposes, should be interpreted as exempting the establishment of a “Transit-Village Overlay” (TVOZ) classification from its prohibition against the creation of new residential land use classifications in the General Plan.

In 2017, the City concluded its process of updating its General Plan, and the new, adopted, “City of Redlands General Plan 2035” (GP2035) included Chapter 4.5, titled “Transit Villages,” which set forth a “Transit Village Area Strategy” and “Concept” comprised of the TVOZ which was proposed for areas within a one-half mile radius of the five (5) contemplated transit stations, and a “Mixed Use Core” which would cover areas within a quarter-mile of four (4) those transit stations; specifically those stations proposed to be located at California Street, Alabama Street, New York Street, and the University of Redlands. The Mixed Use Core was not proposed for the Downtown Station, as the General Plan contemplated development occurring around that station under the City’s existing “Downtown Specific Plan” (Specific Plan No. 45), as it might be amended.

The City’s proposed project that is the subject of this Initial Study would amend the text of the City’s GP 2035 to eliminate references to the “floating” TVOZ and, in place thereof, establish the Transit Villages District (TVD) land use classification contemplated by City Council Resolution No. 7173 with specific, delineated, geographical boundaries. The land use map for the GP2035 would also be amended to change the land use designations (e.g., Figure 4-1 (General Plan Land Use, Figure 4-8 (Transit Village land Use)), as necessary, for those properties within the new Transit Villages District to facilitate transit-oriented development. Other related amendments to the GP2035 would be made to revise the reference to the Mixed Use Core and make it applicable to the downtown transit station, revise the GP2035 tables and text relating to residential build-out projections, and change certain roadway designations (e.g., Figure 5-5 (Roadway Classification)) in the City’s downtown area from “boulevards” and “major arterials,” to “minor arterials.”

The City’s proposed project would then implement the new TVD, and the accompanying aforementioned GP2035 amendments through the adoption of the Transit Villages Specific Plan (TVSP). The boundaries of the TVSP are coterminous with the TVD and encompass approximately 947 acres generally bounded on the west by Alabama Street, West Redlands Boulevard, Kansas Street, and Tennessee Street; on the north by Interstate 10, Colton Avenue, and Sylvan Boulevard; on the east by Judson Street; and on the south by Citrus Avenue, Central Avenue, East Redlands Boulevard, Olive Avenue, Brookside Avenue, Ash Street, Pine Avenue, Tennessee Street, and West State Street. The aforementioned GP2035 amendments, and the TVSP are collectively referred to herein as the “Project”

1.2 PURPOSE OF THE INITIAL STUDY

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the Project. As required by State CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the lead agency, the City, in consultation with other jurisdictional agencies, to determine if a Negative Declaration (ND), Mitigated Negative Declaration (MND) or an Environmental Impact Report (EIR) is required for the Project.

This Initial Study informs the City's decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A "significant effect" or "significant impact" on the environment means "a *substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project*" (State CEQA Guidelines Section 15382). As such, the document's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (California Public Resources Code Section 21003.1)
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (State CEQA Guidelines Section 15004(b)(3))

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 et seq.); and
- California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines Sections 15000 et seq.).

1.3 DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1.0 Introduction

Introduction and Purpose. Discusses the document's purpose, format and content, CEQA requirements, the planning context under which the document was prepared, the Initial Study findings, a summary of the public review and processing of the document, and a list of the technical reports used to prepare the document.

Section 2.0 Project Setting

Provides information about the Project location.

Section 3.0 Project Description

Includes a description of the Project's physical features and construction and operational characteristics. It lists the discretionary actions required to implement the Project's amendments to the GP2035, and the adoption of the TVSP.

Section 4.0 Environmental Checklist

Includes the environmental checklist and evaluates the Project's potential to result in significant adverse effects to the physical environment.

Section 5.0 Document Preparers and Contributors

Includes a list of the persons that prepared this Initial Study.

Section 6.0 References

Includes a list of the references in this Initial Study pursuant to State CEQA Guidelines Section 15150.

1.4 INITIAL STUDY FINDINGS

Section 4.0 of this document contains the Environmental Checklist that was prepared for the Project pursuant to CEQA requirements. The Environmental Checklist indicates that the Project would result in no impacts or less than significant environmental effects under the issue areas of agriculture and forestry resources, biological resources, mineral resources, and wildfire.

The Environmental Checklist indicates that the proposed Project would potentially result in significant environmental effects under the issue areas of 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, and utilities and service systems. Therefore, these subjects are recommended for further evaluation in an EIR.

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The City is located near the base of the San Bernardino Mountains in San Bernardino County, approximately 60 miles northeast from the City of Los Angeles and approximately 45 miles west from the city of Palm Springs. The City is situated along the Interstate 10 (I-10) corridor, which links the City with the cities of San Bernardino, Fontana, Ontario, and Los Angeles to the west, and Yucaipa, Beaumont, and Coachella Valley cities to the east. State Route 210 (SR-210) originates in the City and traverses the northwest part of the City, heading north then west towards the cities of Highland and Pasadena (see Figure 1, *Regional Location*).

Redlands is a mid-sized city encompassing approximately 36 square miles with an estimated 2019 population of approximately 71,513 residents (USCB 2020). A new commuter rail line, called the Arrow, is under construction in the City that will be operated by San Bernardino County Transportation Authority (SBCTA). The Arrow will initially include five stations, three stations in the City of Redlands and two stations in the City of San Bernardino, connecting the existing San Bernardino Transit Center in Downtown San Bernardino and the University of Redlands using an approximately 9-mile stretch of former Atchison, Topeka, and Santa Fe railway right-of-way.

The three Arrow stations proposed to be developed by SBCTA in the City, include: 1) New York Street/Esri Station near the intersection of Redlands Boulevard and New York Street across from the existing Esri campus, 2) Downtown Station adjacent to the existing historic Santa Fe Depot between Eureka Street and Orange Street, and 3) University Station adjacent to the University of Redlands at the south end of campus at University Street (see Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph*).

The Project area generally includes the parcels located within approximately one-half mile, or a 10-minute walk, of the three new Arrow stations in the City. The Project area, which covers approximately 947 acres (approximately 1.48 square miles), is generally bounded as follows: to the west by Kansas Street, Redlands Boulevard, Alabama Street, and Tennessee Street; to the north by Interstate 10, Colton Avenue, and Sylvan Boulevard; to the east by Judson Street; and to the south by Citrus Avenue, Central Avenue, Redlands Boulevard, Olive Avenue, Brookside Avenue, Ash Street, Pine Avenue, Tennessee Street, and State Street (see Figure 4, *Specific Plan Station Areas*). The Project area also includes the parcels fronting both sides of the Orange Street corridor between Colton Avenue and Lugonia Avenue (see Figure 4, *Specific Plan Station Areas*).

2.2 EXISTING SETTING

The Project area is divided into three planning areas referred to as transit villages, which generally surround each new Arrow station, as shown on Figure 4. The New York Street/Esri Transit Village area is generally west of Texas Street and Center Street. The Downtown Transit Village area is generally bounded to the east by Church Street, to the west by Texas Street, and includes the parcels along both sides of Orange Street between Colton Avenue and Lugonia Avenue. The University Transit Village area is located east of Church Street and west of Judson Street. These are further described in detail below.

- **Existing setting of the New York Street/Esri Transit Village area.** The area around this station is car-oriented. Large blocks generally comprise the area with commercial and light industrial buildings set back away from the street behind parking lots or landscaped front yards. The I-10 and SR-210 interchange is to the northwest of this transit village. Freeway access is provided at Alabama Street and Tennessee Street. Alabama Street, Tennessee Street, and Texas Street pass beneath the I-10, connecting the transit village area to the neighborhoods north of the freeway. The transit village is traversed east-west by the railways, which run along the north side of Redlands Boulevard, until New York Street, where they branch off from one another as they proceed eastward.

There are no existing bicycle facilities within this village area aside from the western segment of the Orange Blossom Trail (a Class 1 bicycle facility).

The Arrow station will be located along the north side of Redlands Boulevard at New York Street. To the south of the station site and Redlands Boulevard is Esri's campus headquarters, and to the southeast (across the intersection) from the station site is Jennie Davis Park, a 5.2-acre neighborhood park with picnic and playground facilities. Land uses to the west of the Esri campus (across Tennessee Street) consist primarily of light industrial warehouse buildings and commercial services or office uses. To the south of the Esri campus is a neighborhood of apartments and multifamily buildings.

North of the railway, existing development consists of car-oriented uses, strip mall shopping centers, fast-food restaurants, hotels, and recreational facilities. North of the I-10 are commercial and single-family residences. Buildings within this area range from one to three-story buildings. Many of the one-story light industrial and retail buildings are tall one-story buildings facing the street. The parcels surrounding the station are largely vacant.

- **Existing setting of the Downtown Transit Village area.** This area includes the City's urban core and the historic Santa Fe Depot. The station site will be at the north side of the Santa Fe Depot (for the new Arrow platform) and immediately west of the Depot (for the new Metrolink platform). Blocks located east of Orange Street within Downtown are small and promote walkability, with commercial and mixed-use buildings built adjacent to and accessed directly from the sidewalk. Blocks west of Orange Street are larger and less pedestrian-friendly with buildings and site designs that are more car-oriented, with buildings located behind street-facing parking lots. Access to the I-10 is via ramps at Sixth Street, Orange Street, and Eureka Street. Streets that pass underneath the freeway include Texas Street, Eureka Street, Orange Street, Sixth Street, and Church Street.

State Street, which is lined with buildings that face and are accessed from the sidewalk and shaded by ficus trees, is the City's prime pedestrian-friendly street and a remaining portion of the original historic downtown business district. Sidewalks within the Downtown Village are typically eight feet wide and located adjacent to the curb. Additionally, bicycle facilities exist along segments of Colton Avenue and Citrus Avenue.

Many parcels west of the Downtown Station are vacant as well as a few vacant remnant packinghouse buildings to the north and south of the Santa Fe Depot. Most of the buildings within this transit village are one- and two-story in height. A notable exception is the Citibank building, which is six stories tall. In addition, many of the old packinghouse buildings surrounding the Santa Fe Depot are one-story buildings with tall interiors.

There are two parks within this transit village, Terrace Park and the northeastern tip of Smiley Park. Terrace Park is a linear park built along the south side of Colton Avenue between Orange Street and Church Street. The portion of Smiley Park within the transit village consists of the lawns, paths, and benches that surround the historic Police Annex building. The rest of Smiley Park that is not within the TVSP includes the Redlands Bowl amphitheater, the Lincoln Memorial Shrine, the A.K. Smiley Library, shuffleboard courts, and a restroom building.

- **Existing setting of the University Transit Village area.** This area includes the portion of the University of Redlands campus located south of Sylvan Boulevard and Sylvan Park (which is 18-acres). Access to the I-10 is provided via University Street and Cypress Avenue. Church Street, University Street, and Citrus Street pass underneath the freeway providing access to other areas in the City.

Many street sections within this village area, particularly those surrounding the station area, do not have adequate sidewalks. Sidewalks within the residential neighborhoods tend to be separated from the curb by continuous planters planted with trees. The Orange Blossom Trail, a Class I bicycle trail to the east, provides limited bicycle connectivity in the village area.

Land uses located north of the I-10 and west of University Street include Sylvan Park, single-family residences, and some multi-family buildings. The southeast portion of the village primarily consists of multi-family buildings. Most of the buildings within this transit village area are one- and two-story in height. Single-family residences are mostly one-story and multi-family buildings are two stories. Most of the land immediately surrounding the station site is vacant and unimproved.

2.3 EXISTING GENERAL PLAN AND ZONING DESIGNATIONS

The GP2035 designates the Project area with a mix of land uses including: Medium Density Residential (up to 15 dwelling units per acre), High Density Residential (up to 27 dwelling units per acre), Office, Commercial, Commercial/Industrial, Industrial, Public/Institutional, and Parks.

Most of the New York Street/Esri Transit Village area consists of non-residential land use designations except for the multi-family residential area in the southern portion of the village. The Downtown Transit Village area is also primarily non-residential, with multi-family allowed along the eastern edge. Land use designations in the University Transit Village are primarily medium and high density residential, except the institutional designations associated with the University of Redlands campus to the north of the station site. The TVOZ enables residential uses in a mixed-use configuration within a half-mile of each station (see Figure 5, *General Plan Land Use Designation*).

GP2035 Livable Community Element includes a Transit Villages section (Section 4.5) that provides for the TVOZ, which applies to areas within a half-mile radius of the five rail stations that were anticipated in the GP2035, which includes the initial three Arrow stations within the City currently under construction. The TVOZ includes strategies for transportation system enhancements including vehicle, pedestrian, and bicycle connectivity to each station and mixed-use development. Land use designations in the TVOZ include modified residential land use designations for: low medium-, medium-, and high-density residential; commercial and commercial/industrial; office;

public/institutional; park; and agriculture. These designations are designed to foster higher intensities and more compact development patterns within the TVOZ than elsewhere in the City (see Figure 6, *General Plan Transit Villages*).

Existing residential zoning is primarily Multi-Family Residential (R-2 and R-3); however, there are two small areas with existing single-family zoning. The parcels on 11th Street between the I-10 and Colton Avenue in the Downtown Transit Village are zoned Single-Family Residential (R-1) and the parcels in the University Transit Villages bounded by the I-10, East Cypress Avenue, and East Citrus Avenue are zoned Suburban Residential (R-S). See Figure 7, *Existing Zoning Districts*.

Non-residential zoning in the Project area include Industrial (I-P), Light Industrial (M-1), Planned Industrial (M-P), Administrative and Professional Office (A-P), Neighborhood Stores (C-1), General Commercial (C-3), Highway Commercial (C-4), Commercial (C-M), Educational (E), Transitional (T), Open Land (O), Floodplain (FP), East Valley-General Commercial (EV/CG), and East Valley-Public Institutional (EV/PI).

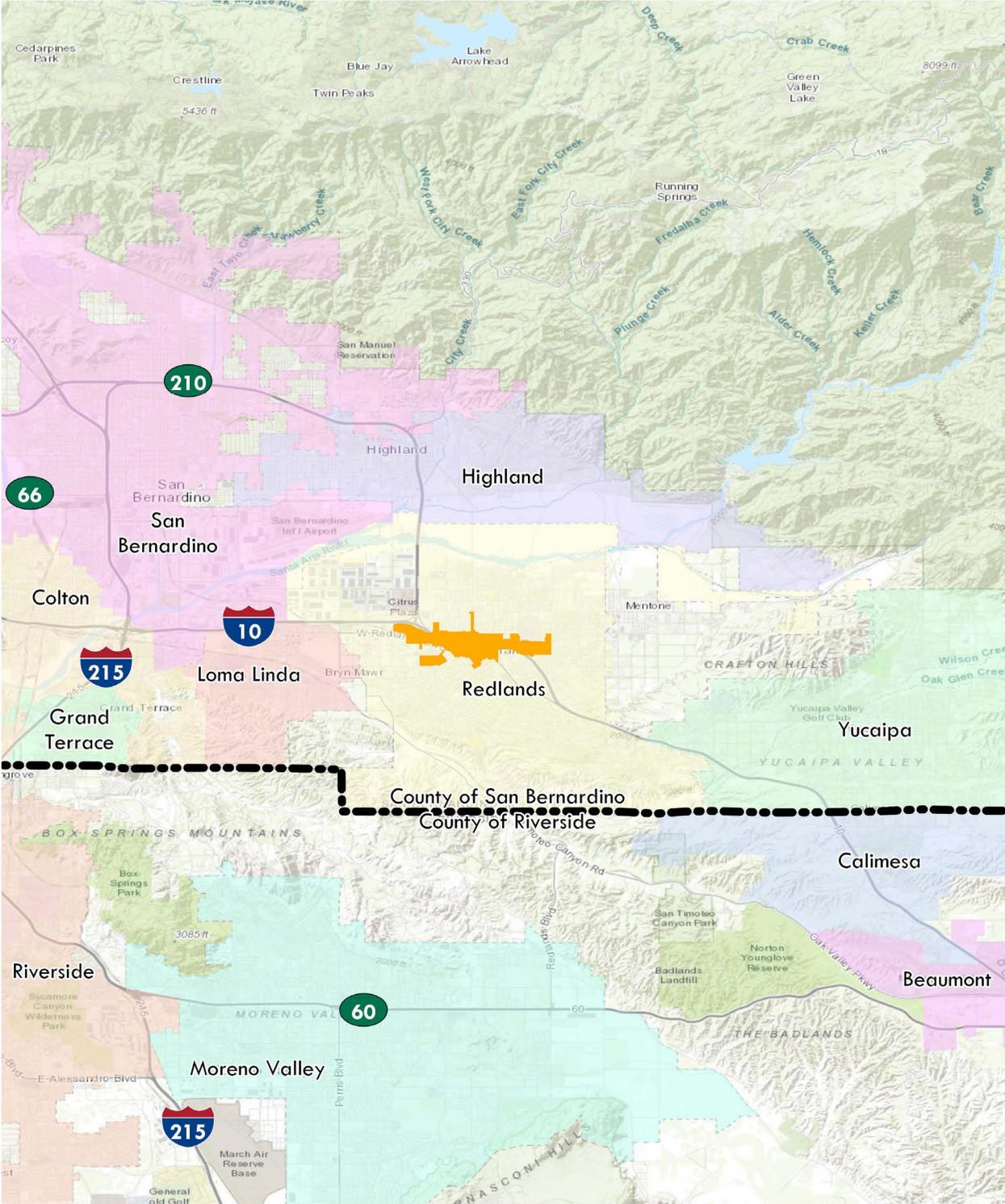
The current Downtown Specific Plan (Specific Plan No. 45) governs the parcels in the downtown area, which is divided into Town Center, Town Center-Historic District, and Service-Commercial District. The objective of the Downtown Specific Plan is to create a compact, pedestrian-oriented environment. If adopted, the TVSP would replace the current Downtown Specific Plan in its entirety.

2.4 SURROUNDING LAND USES, GENERAL PLAN, AND ZONING DESIGNATIONS

The Project area is generally surrounded by a variety of GP2035 land use designations and zones including industrial, institutional, agricultural, commercial, and single- and multi-family residential. Views of the surrounding GP2035 land use designations can also be seen on Figure 5, and views of the surrounding zoning can be seen on Figure 7.

This page intentionally left blank.

Regional Location

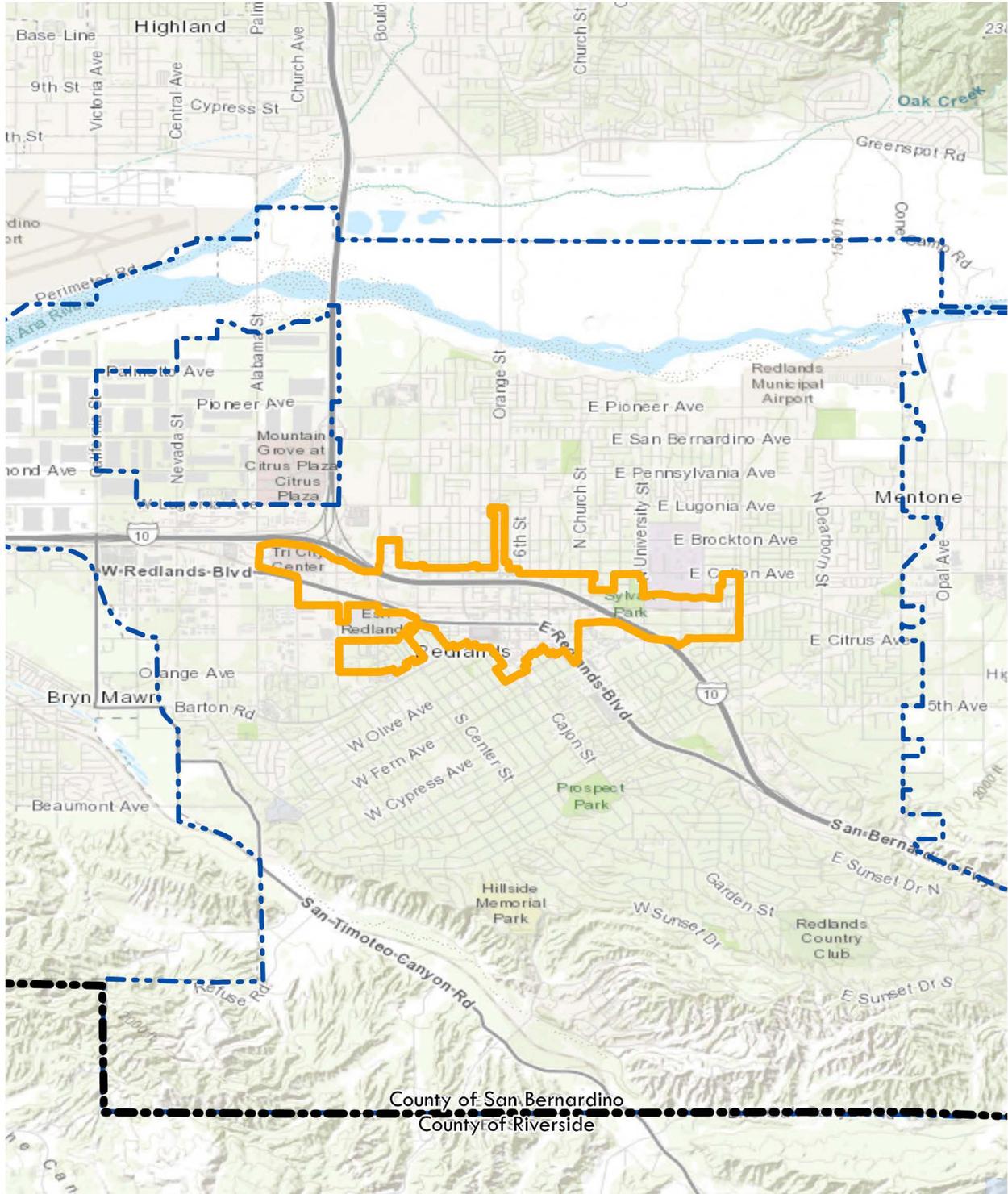


Redlands Transit Villages Specific Plan

Figure 1

This page intentionally left blank.

Local Vicinity



Project Site



Redlands City Limits



This page intentionally left blank.

Aerial View

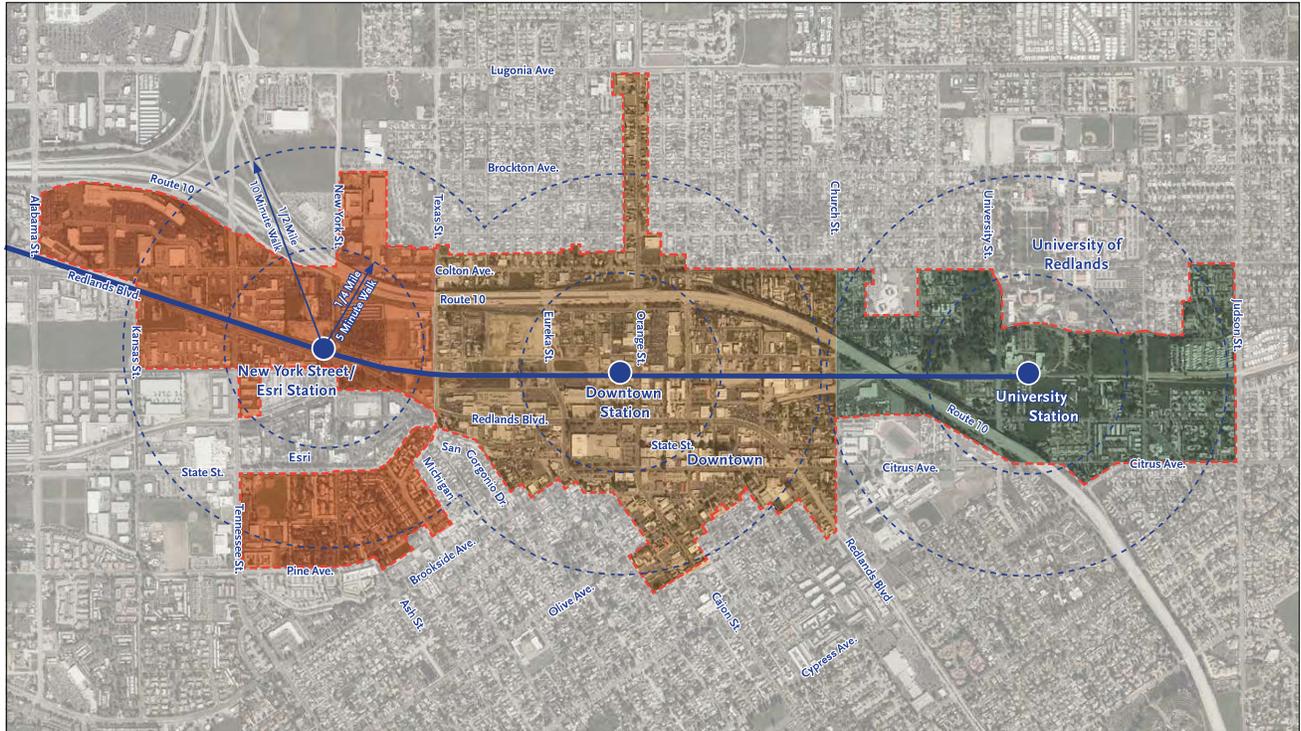


 Project Site



This page intentionally left blank.

Specific Plan Station Areas



LEGEND

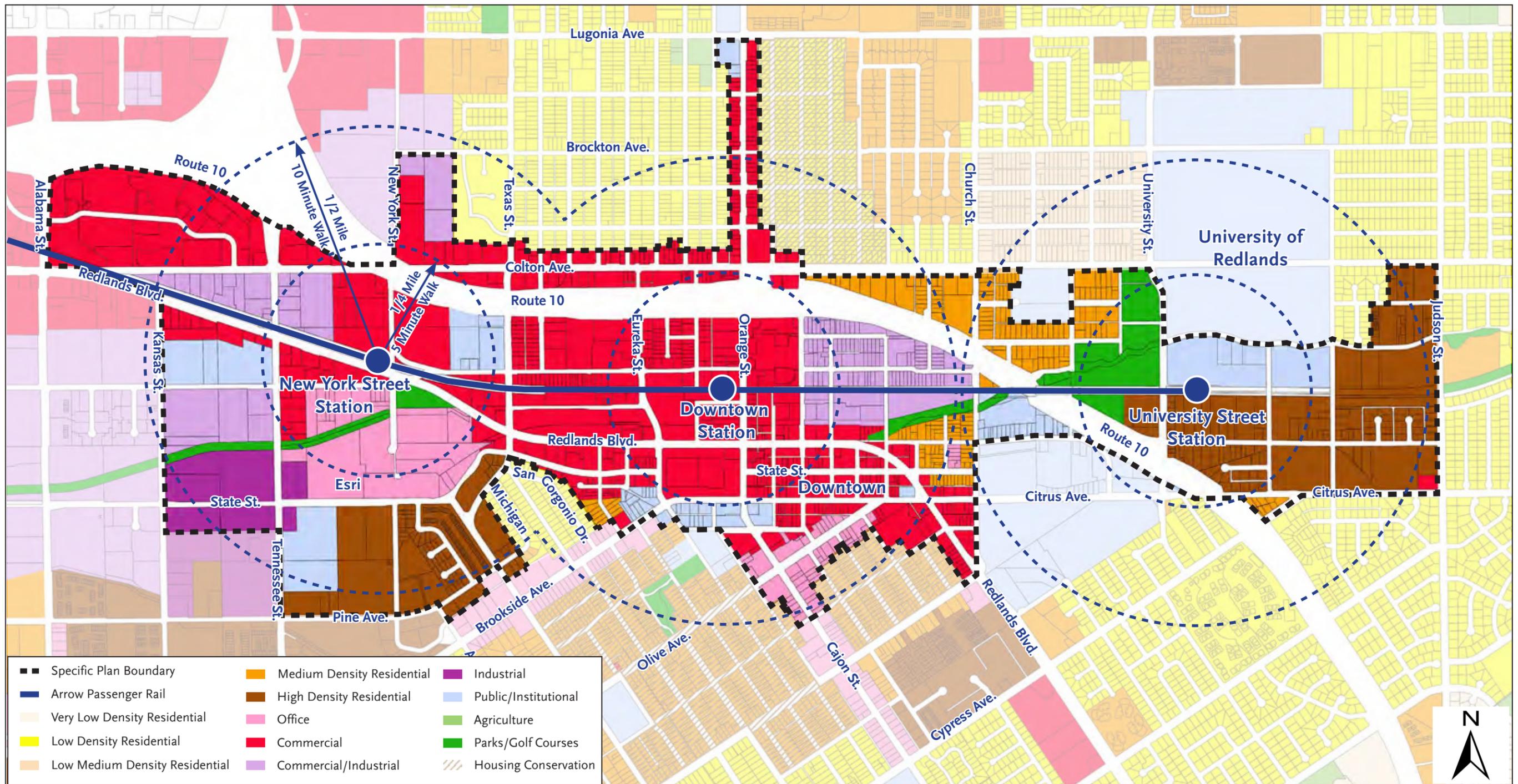
- - - Specific Plan Boundary
- Arrow Passenger Rail
- University Transit Village
- Downtown Transit Village
- New York Street/Esri Transit Village



Moule & Polyzoides Architects and Urbanists: Redlands Transit Villages Specific Plan (April 20, 2020)

This page intentionally left blank.

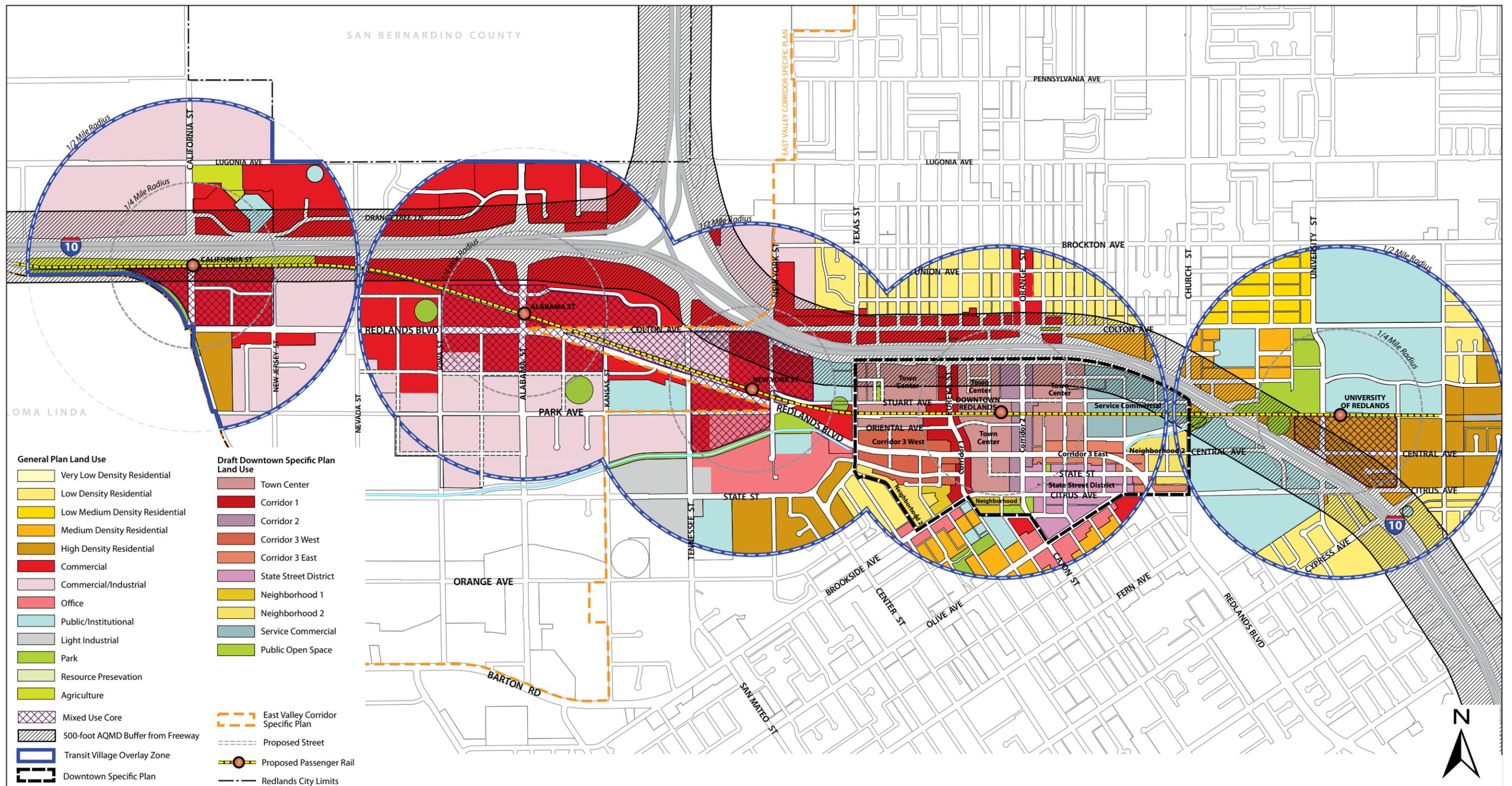
General Plan Land Use Designation



Moule & Polyzoides Architects and Urbanists: Existing Conditions Analysis for Redlands Transit Villages Specific Plan (Nov 26, 2018)

This page intentionally left blank.

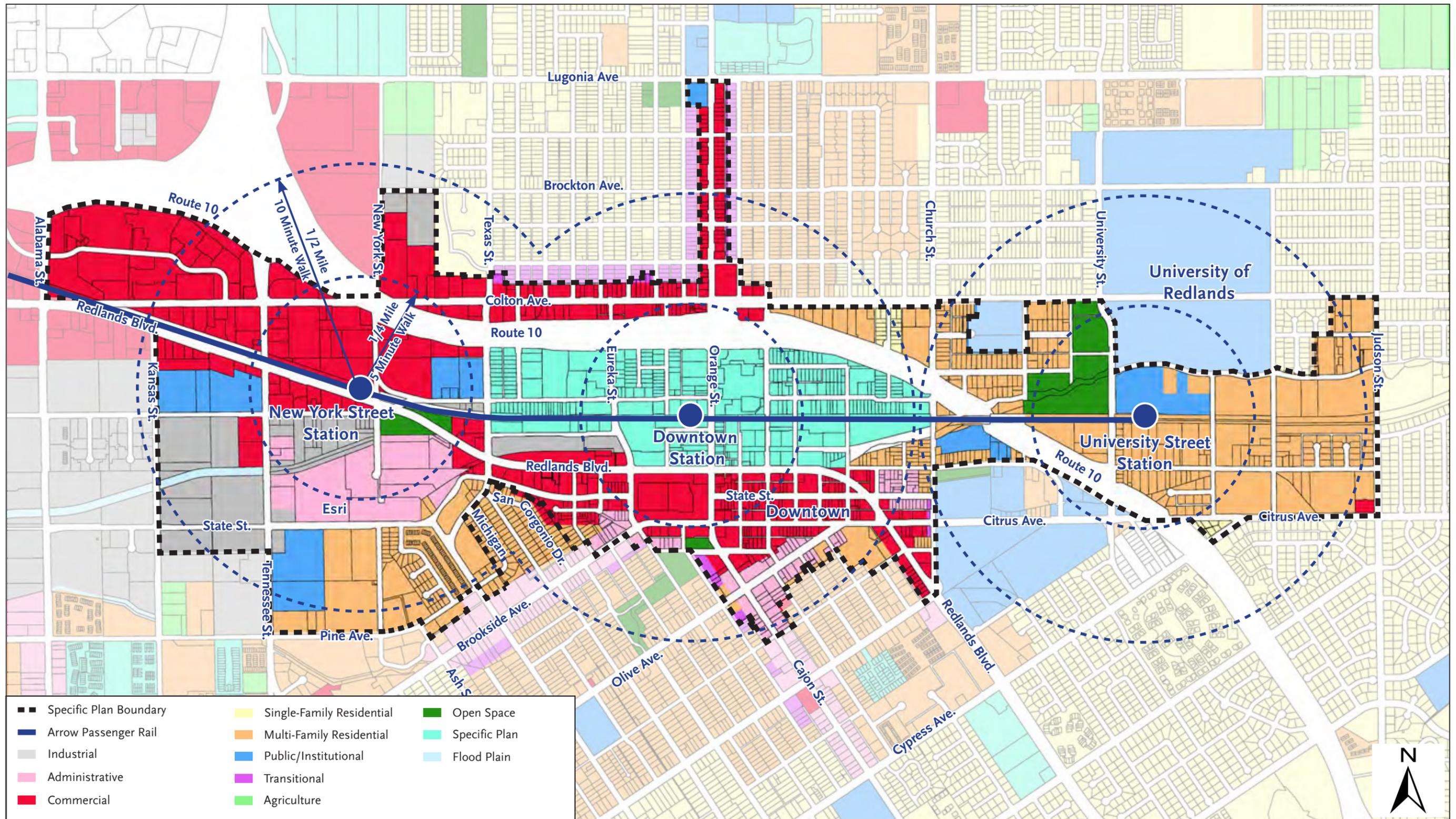
General Plan Transit Villages



Moule & Polyzoides Architects and Urbanists: Existing Conditions Analysis for Redlands Transit Villages Specific Plan (Nov 26, 2018)

This page intentionally left blank.

Existing Zoning Districts



Moule & Polyzoides Architects and Urbanists: Existing Conditions Analysis for Redlands Transit Villages Specific Plan (Nov 26, 2018)

This page intentionally left blank.

3 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The GP2035 includes more than 100 Policies and Actions related to the future development of transit villages around the new Arrow rail line stations in the City. Of the five Arrow rail stations that were shown in the GP2035, three are currently being built by SBCTA, in the first phase of Arrow's operation: New York Street/Esri Station, Downtown Station, and University Station. The remaining two stations, which will be located at Alabama Street and California Street, will be built by SBCTA in a later phase of Arrow development, the timing of which is unknown at this time.

The Project would advance the GP2035's present Transit Village Strategy and Concept by amending the GP2035 to establish the new TVD land use designation to encourage development in the center of town by providing a plan for introducing new residential and commercial uses located within 0.5 mile of each of these three new stations. The proposed adoption of the TVD, along with the implementing TVSP, will set regulations for the community's long-term vision for compact, efficient, responsible, and environmentally sustainable development. As a form-based code, the TVSP will emphasize building form, a mix and density of different uses, strong pedestrian orientation and transit-oriented development, and public realm improvements and amenities.

3.2 TRANSIT VILLAGES

New York Street/Esri Village

The Project would implement mixed-use development on the vacant and underutilized parcels and provide tree-lined streets and sidewalks for pedestrian access to the station, Esri campus, and Downtown Village area. Infill development in the area would reduce the scale of the existing area to provide consistency in scale with the Downtown Transit Village and surrounding pre-World War II neighborhoods. Landscaping would be introduced to the Zanja Channel west of New York Street to provide open space and recreational opportunities, and the New York Street Neighborhood Park could be sited in the center of the residential planning areas north of the Arrow station. Bike lanes would be installed on New York Street and new street trees would be planted between on-street parallel parking spaces. Redlands Boulevard between Texas Street and Tennessee Street would be improved to facilitate access to the new station by installing sidewalks, a planted center median, bicycle lanes, and a crosswalk at New York Street.

Downtown Transit Village

The Project would provide a walkable mixed-use district consisting of pedestrian-scaled blocks, tree-lined streets with seating and exterior dining opportunities, and squares and plazas. Surface parking lots would be infilled with compact mixed use development that would utilize onsite parking garages. Orange Street and Redlands Boulevard, as the primary entries into downtown, would be enhanced with new street trees, streetlights, and other streetscape elements. The Santa Fe Depot has been rehabilitated and restored, a new four-level parking structure is being constructed adjacent to the Arrow and Metrolink platforms, a new at-grade pedestrian passage crosses the railway along the Third Street alignment connecting the parking structure to the Santa Fe Depot, and possibly a small plaza located south of the railway.

The Downtown Transit Village anticipates redevelopment of the Redlands Mall site, (for which applications are presently being processed with the City) and the realignment of State Street and Third Street to restore the interconnected block pattern that existing prior to construction of the mall. Redevelopment of the mall site would include up to 4-story tall mixed-use and/or multi-family residential buildings located throughout the mall site. Within the High Avenue neighborhood, the Project provides for infill development of vacant and underutilized parcels, and a possible future parking garage on the Ed Hales Park parking lot located south of Redlands Boulevard between Fifth and Sixth Streets.

The Project includes development of multi-family residential uses between Eureka Street to the east and Texas Street to the west, Stuart Avenue to the north, and State Street to the south, in walking distance of both the New York Street/Esri Station and Downtown Station. Additionally, a neighborhood park could possibly be located between the railway and Oriental Avenue, east of Texas Street, and a greenway and park network is envisioned to extend between the Esri campus and Downtown.

University Village

This village would be redeveloped with pedestrian-oriented mixed-use buildings and connect directly with the University of Redlands campus. Toward that end, amenities in this village would also be directed toward university students and faculty. The Arrow station would be flanked by new tree-lined street couplet, Park Avenue North and Park Avenue South, providing access to the transit village and commuter parking. The mixed-use buildings would be concentrated along the Rambla corridor, a distinctive north-south running thoroughfare between Central Avenue and Sylvan Boulevard with travel lanes on either side of a median.

The University Transit Village would include a new University Village comprised of Village North, Village Center, and Village South, and a new Sylvan Neighborhood. Village North, would provide academic and campus-oriented uses as well as mixed-use buildings with ground floor retail and residential, office, or academic uses on the upper floors. A central park would be located east of the station, and a university-oriented hotel and conference center north of the central park.

Village Center, located between the Arrow station to the north and Citrus Avenue to the south of west of the Rambla, would include mixed-use blocks with neighborhood-serving ground floor uses and possibly a market hall or grocery store. Village South, located between Central Avenue to the north and Citrus Avenue to the south, would include commercial and mixed-use buildings that provide regional retail uses, and residential uses along Cook Street. A parking structure lined on the outside by ground floor retail uses and upper floor office or residential uses would be added as the area infills. Moreover, the Sylvan Neighborhood would be located to the east of Village North and consist of residential uses.

3.3 REGULATING PLAN AND ZONES

The Project identifies allowed land uses and, through the TVSP, provides detailed standards for building placement, height, massing, articulation, frontage, landscape, and parking based on a form-based code. The form-based code incorporates a gradual transitioning of the height and mass of larger buildings from larger to smaller to avoid incompatible buildings heights next to each other. The TVSP's regulating plan is shown in Figure 8, *Regulating Plan*, and would serve as the zoning map for the TVSP. The Regulating Plan includes the following districts:

- **Village Center (VC).** This district applies to the parcels immediately surrounding the three Arrow stations. Like the three- and four-story buildings that lined State Street and Orange Street prior to World War II, new buildings in this zone could reach a height of four stories and would be mixed-use, all residential, or all office. Retail ground floors would be located at the back of sidewalk, while residential ground floors may be placed behind small front yards. Parking would be located within structured garages behind buildings or storefront liners, or constructed subterranean.
- **Downtown (DT).** The district applies to parcels facing State Street east of Orange Street, and along the east side of Orange Street between the railway right of way and State Street. This district is largely built-out. New buildings could be up to three stories in height and accommodate a mix of uses with commercial ground floors and residential or commercial upper floors. Parking would be located within structured garages behind buildings or storefront liners, subterranean, or in park-once lots or structures.
- **Village General (VG).** This district applies to parcels located around the periphery of the three Arrow stations and permits multi-family and mixed-use buildings with an average height of three stories. Parking may be within structured garages or surface lots that would be located behind buildings, or subterranean garages.
- **Village Corridor (COR).** This district applies to parcels located along the north side of Colton Avenue, both sides of Orange Street north of the I-10, and both sides of Olive Avenue. This district provides for small-scale mixed-use buildings up to two stories in height, with commercial ground floors and residential or commercial upper floors. Parking lots would be located behind and to the sides of buildings.
- **Neighborhood General 1 (NG1).** This district applies to parcels located between Sixth Street and Church Street and would provide for small-scale commercial and residential-style buildings that accommodate commercial, light industrial, and live-work uses. New buildings would be up to two stories in height. Parking lots would be allowed behind and to the side of buildings.
- **Neighborhood General 2 (NG2).** This district would enable house-form buildings that accommodate residential and office uses. New buildings would be up to two stories in height and set back from the sidewalk behind front yards. Parking lots would be located behind buildings. New buildings would match or complement prevalent building setbacks along the length of the block and complement building heights and massing of adjacent buildings or buildings across the street.
- **Special District (SD).** This district applies to school and other institutional sites. New buildings would accommodate educational, religious, and other civic uses. Parking would be in surface parking lots or garages.
- **Civil Space (CS).** This district applies to parks, plazas, greens, and other open spaces within the TVSP area. These open spaces may accommodate small structures such as gazebos, restrooms, and community centers.

3.4 TRANSPORTATION

The Project provides a framework for the development of a walkable, mixed-use environment around the three new Arrow stations. A key component of this framework is a network of complete, multi-modal streets that provide for pedestrians, bicyclists, transit patrons, and motorists (see Figure 9, *Future Street Network Improvements*).

Bicycle infrastructure improvements identified in the Project include:

- Class 1 Orange Blossom Trail. A Class 1 bicycle facility is a separate right-of-way for exclusive use for bicyclists and pedestrians.
- Class 2 lanes, which are on-street facilities dedicated to bicycles and identified with lane striping and pole signs, would be developed on Colton Avenue between Orange Street and Redlands Boulevard, Redlands Boulevard, Tennessee Street, Texas Street, Center Street, Eureka Street, Sixth Street, University Street, Gove Street, and State Street west of Eureka Street;
- Class 3 routes, which are on-street bike routes shared with motorists, would be developed on New York Street and Church Street (see Figure 10, *Future Bicycle Network Improvements*).

The Project includes parking improvements in the Downtown Transit Village that include on-street parallel parking, angled parking, parking lot expansion, and new parking garages.

3.5 OPEN SPACE AND LANDSCAPE

The proposed street and open space network would provide contiguous green space connecting the TVSP villages. One feature in particular is the proposed Zanja Greenway, a historic existing irrigation feature that traverses the Project area from the along Sylvan Boulevard in the University Transit Village trending southwest past the New York Street/Esri Transit Village. The TVSP would introduce riparian landscaping along the Zanja, which also runs parallel to the City-designated Orange Blossom Trail, providing the TVSP open space connectivity. The TVSP also introduces an open space plaza at State Street/Third Street, midtown greenbelt in the Downtown Transit Village, a central park in the University Transit Village, and a neighborhood park in the New York Street/Esri Transit Village. See Figure 11, *Public Realm Plan*.

3.6 INFRASTRUCTURE IMPROVEMENTS

Water system infrastructure improvements include upgrading potable water mains due to age and size to provide reliable fire suppression and adding non-potable water mains to serve the New York Street/Esri and Downtown station areas. The University Station area would be served by extending a private university-owned non-potable system.

Regarding the floodplain, advanced hydrologic modeling demonstrated that approximately 155 properties could be removed from floodplain area and implementing Alternative 1 of the Master Plan of Drainage would further reduce the floodplain area. However, until these means of significantly reducing the existing 100-year floodplain can be realized, there are several design responses enumerated in the TVSP to ensure that properties subject to the City's floodplain regulations maintain a street-oriented, pedestrian-friendly urban character.

As new development occurs within the Project area, undergrounding of dry utilities would be required for electrical transmission lines less than 66 kilovolts (kV).

3.7 PROJECT AREA BUILDOUT

There are a number of vacant parcels located within the Project area, mostly concentrated along and near the railway right-of-way, as well as other developed or vacant parcels near the train stations. The acreage and units that could be developed from buildout of the Project is shown on Table 1, *Project Proposed Buildout*. The amount of square-footage and dwelling units listed in Table 1 could be constructed at the present time under the current zoning designations within the Project area (e.g., General Commercial (C-3) and Downtown Specific Plan (SP 45) in the proposed Downtown Transit Village area). However, the TVSP as a form-based code 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, among other aesthetic and community benefits.

Table 1: TVSP Proposed Buildout

Residential			
Type of Dwelling Unit <i>(estimate only)</i>	Number of Units (and %) <i>(estimate only)</i>	Avg. Floor Area per Dwelling Unit <i>(estimate only)</i>	Gross building square-footage <i>(estimate only)</i>
Studio	600 (25%)	650	390,000
1 bedroom	600 (25%)	750	450,000
2 bedrooms	600 (25%)	1,000	600,000
3 bedrooms	600 (25%)	1,300	780,000
Residential Total	2,400 (100%)	925 avg.	2,220,000
Retail Commercial	--	--	265,000
Office	--	--	238,000
Hotel	220	--	110,000
Open Space and Parks	--	--	280,000

3.8 DISCRETIONARY APPROVALS

Approval and implementation of the Project requires approval of the following discretionary actions:

CITY OF REDLANDS

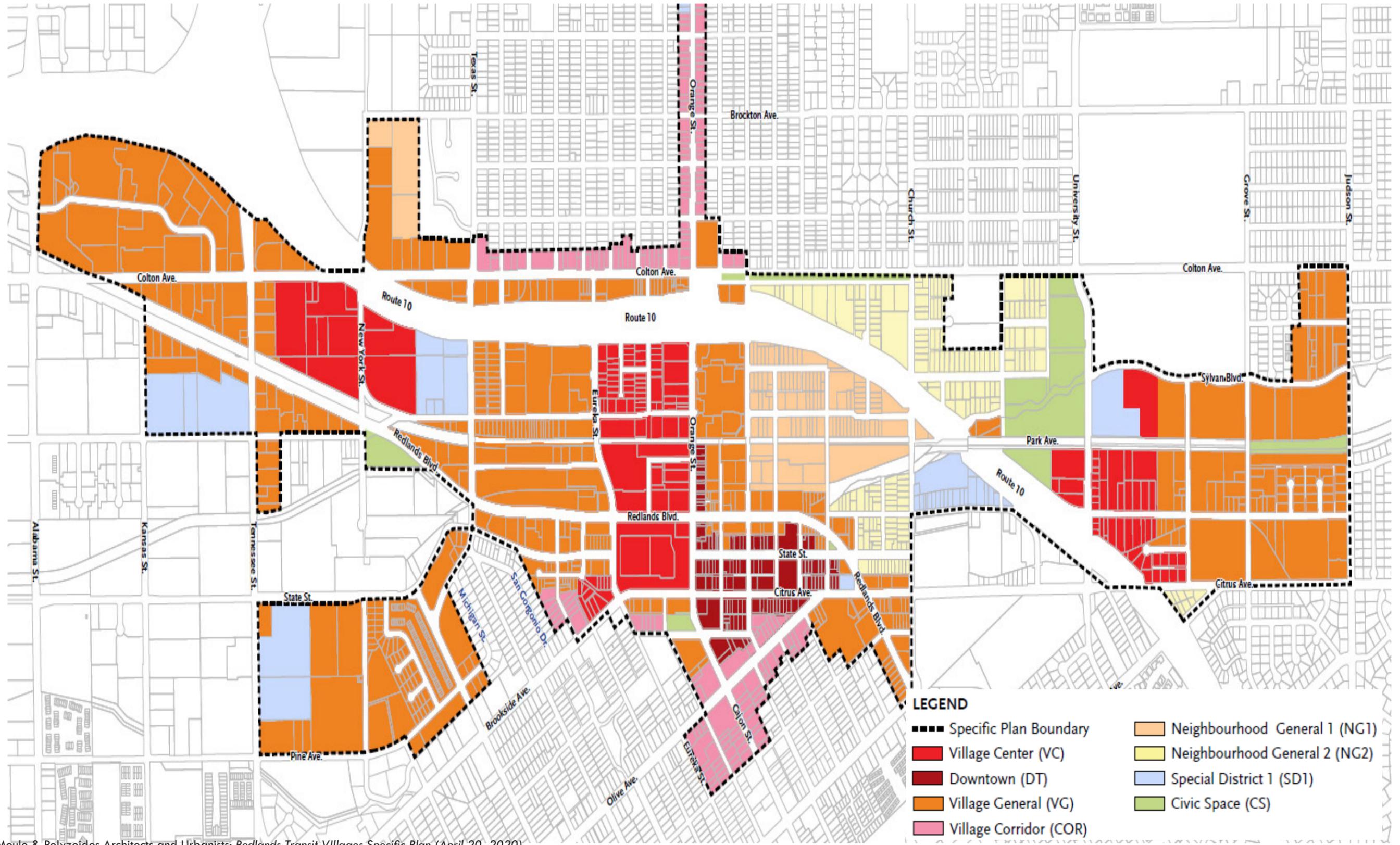
- Certification of the EIR for the Project.
- Amendments to the GP2035
- Adoption of the TVSP

This Initial Study and forthcoming 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 Project. The state or local agencies

that may rely upon the information contained in this Initial Study and forthcoming 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 within Caltrans rights-of-way)

Remainder of Page Intentionally Blank



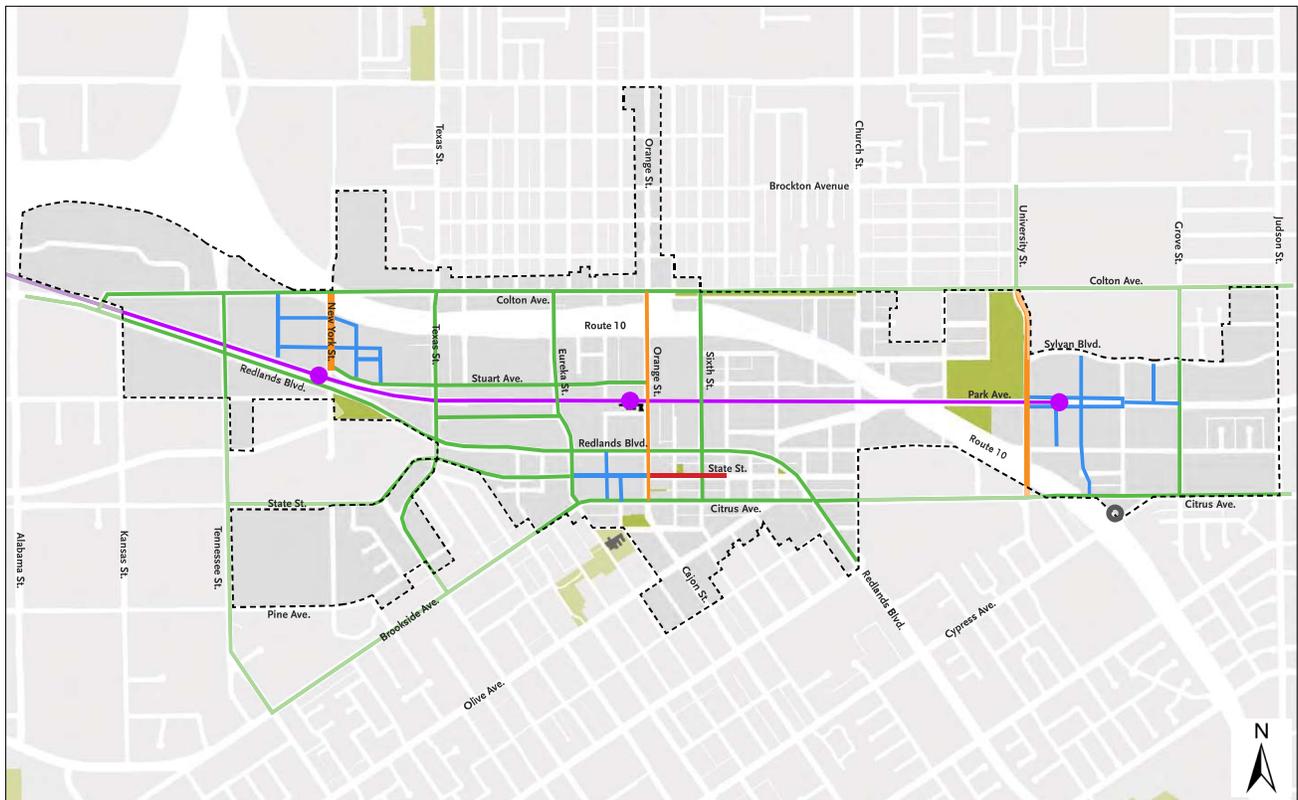
LEGEND

<ul style="list-style-type: none"> ■ Specific Plan Boundary ■ Village Center (VC) ■ Downtown (DT) ■ Village General (VG) ■ Village Corridor (COR) 	<ul style="list-style-type: none"> ■ Neighbourhood General 1 (NG1) ■ Neighbourhood General 2 (NG2) ■ Special District 1 (SD1) ■ Civic Space (CS)
--	--

Moule & Polyzoides Architects and Urbanists: Redlands Transit Villages Specific Plan (April 20, 2020)

This page intentionally left blank.

Future Street Network Improvements



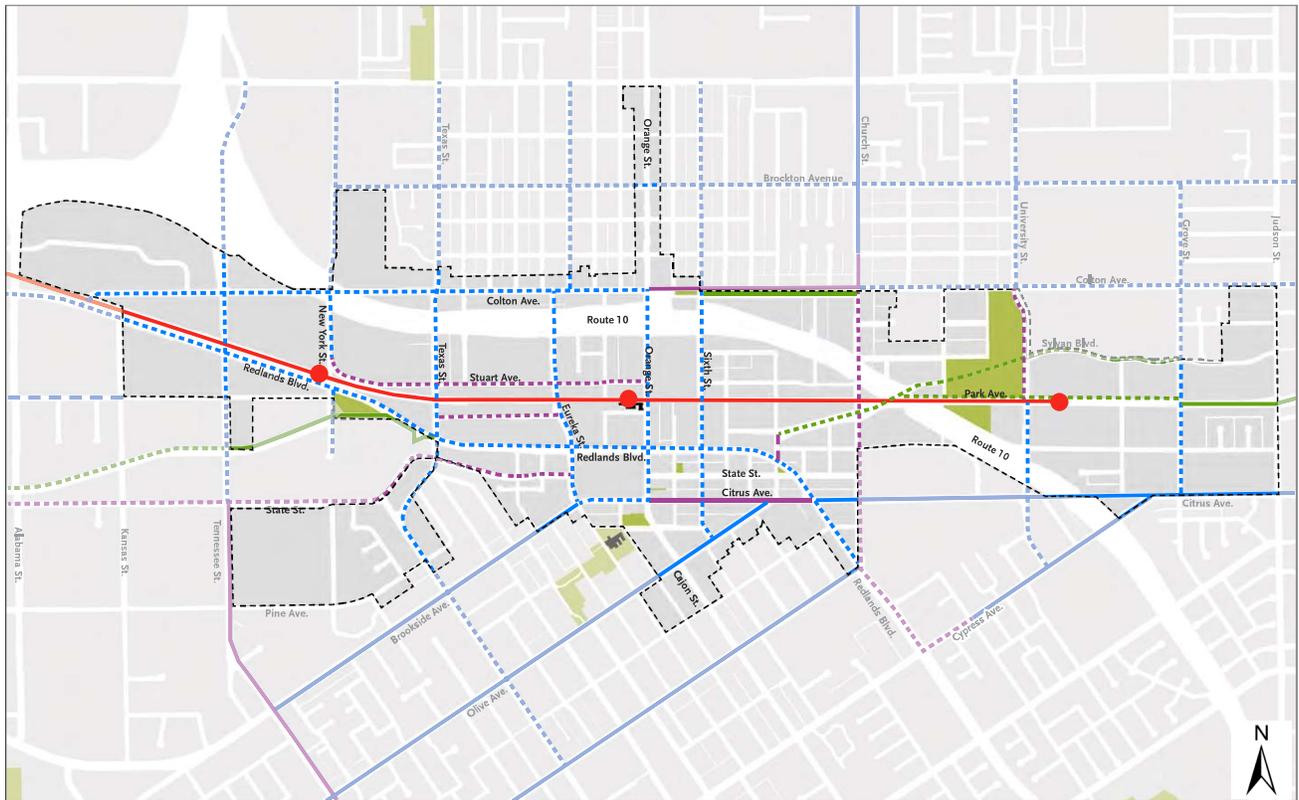
LEGEND

- Specific Plan Boundary
- 1/4 Mile Pedestrian Shed
- 1/2 Mile Pedestrian Shed
- Arrow Passenger Rail and Station
- Gateway Street
- New Street
- Multi-modal Street
- Convert to Two-Way
- Potential Cypress Ave. Roundabout

Moule & Polyzoides Architects and Urbanists: Redlands Transit Villages Specific Plan (April 20, 2020)

This page intentionally left blank.

Future Bicycle Network Improvements

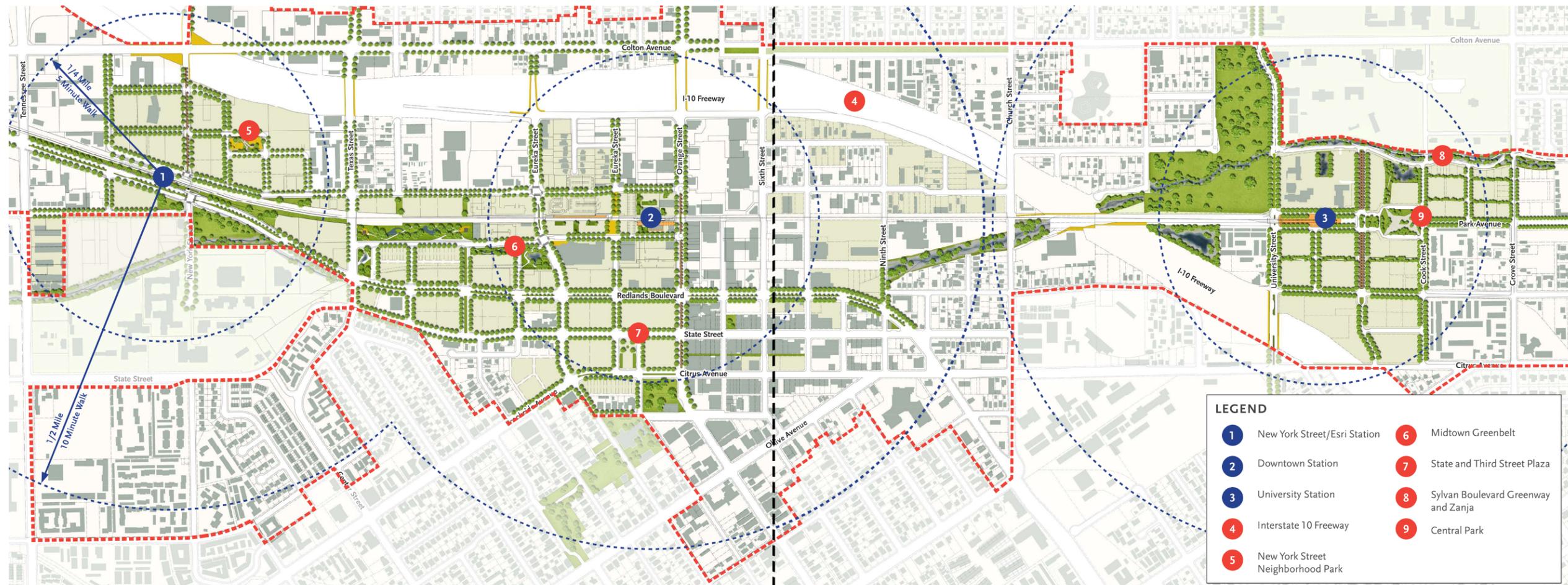


LEGEND

- - - Specific Plan Boundary
- - - 1/4 Mile Pedestrian Shed
- - - 1/2 Mile Pedestrian Shed
- Existing Shared-Use Path
- Existing Bicycle Lane
- Existing Bicycle Route
- - - Future Shared-Use Path
- - - Future Bicycle Lane
- - - Future Bicycle Route
- Arrow Passenger Rail and Station

Moule & Polyzoides Architects and Urbanists: Redlands Transit Villages Specific Plan (April 20, 2020)

This page intentionally left blank.



Moule & Polyzoides Architects and Urbanists: Redlands Transit Villages Specific Plan (April 20, 2020)

This page intentionally left blank.

4 ENVIRONMENTAL CHECKLIST

This section includes the completed environmental checklist form. The checklist form is used to assist in evaluating the potential environmental impacts of the proposed Project. The checklist form identifies potential Project effects as follows: 1) Potentially Significant Impact; 2) Less Than Significant with Mitigation Incorporated; 3) Less Than Significant Impact; and, 4) No Impact. Substantiation and clarification for each checklist response is provided in Section 5 (Environmental Evaluation). Included in the discussion for each topic are standard condition/regulations and mitigation measures, if necessary, that are recommended for implementation as part of the proposed Project.

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (☒) would be potentially affected by the Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

Environmental Factors Potentially Affected

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

4.2 DETERMINATION

(To be completed by the Lead Agency) based on this initial evaluation

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



Signature

8-26-2021

Date

BRIAN FOOTE, CITY PLANNER

Printed Name

For

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is

- appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
 - 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
 - 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4.3 ENVIRONMENTAL CHECKLIST QUESTIONS

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

State Transit Priority Regulations

Public Resources Code (PRC) Section 21099(d) (Senate Bill 743 (2013)) sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.”

PRC Section 21099 defines a “transit priority area” as an area within 0.5-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 a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.”

PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site

adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

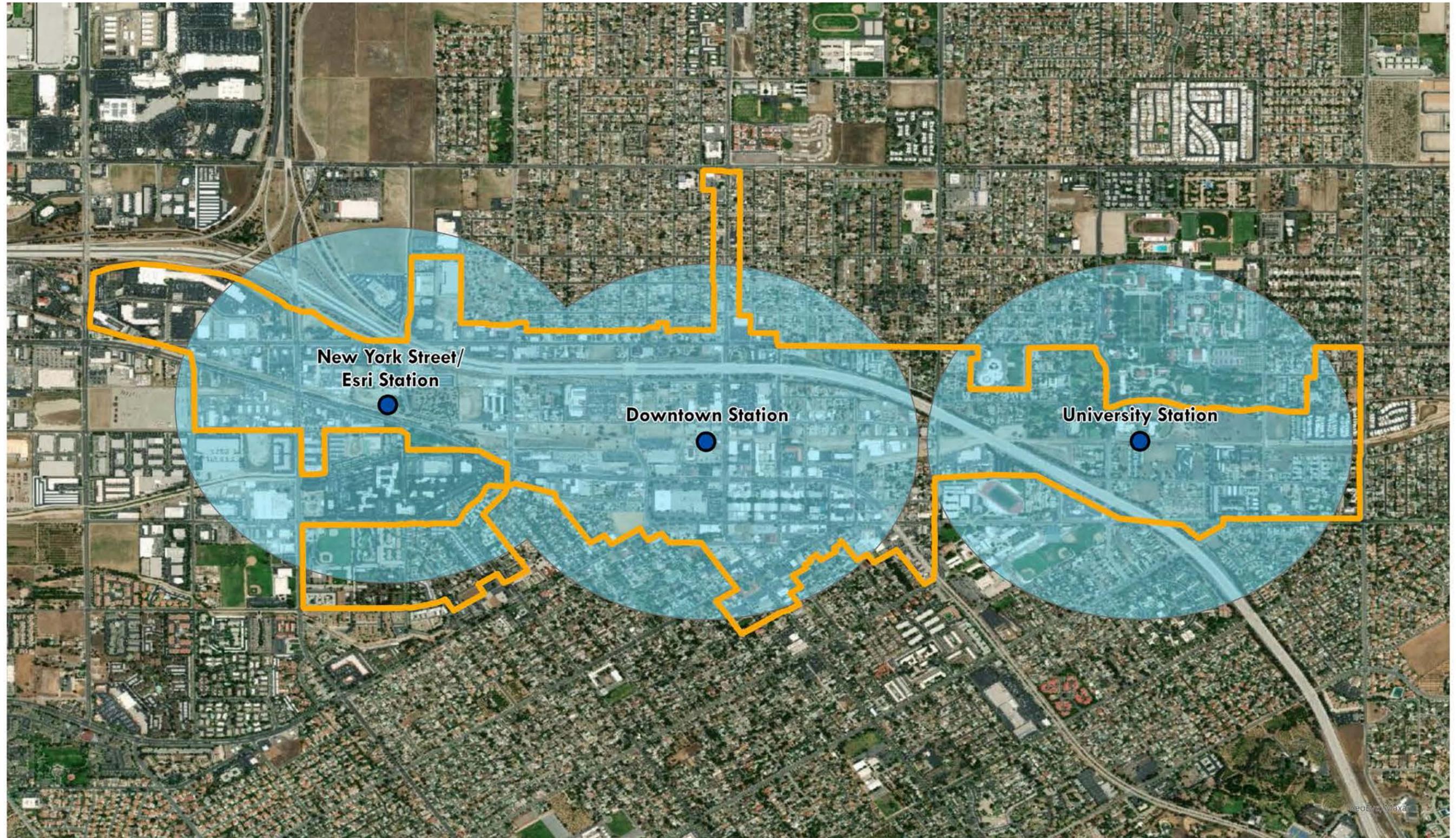
The under-construction Arrow stations constitute major transit stops as they will serve rail transit. Accordingly, PRC Section 21099 applies to the majority of the Project area within a half-mile of each Arrow station is a TPA (see Figure 12, *Transit Villages Specific Plan and Transit Priority Areas*). There are no other major transit stops in the City. Therefore, individual development projects under the TVD and TVSP that are within a TPA (as well as future projects within a TPA but outside the Project area) are exempt from aesthetic impacts under CEQA. As not all the Project area lies within a TPA, an aesthetics analysis is included in this Initial Study.

The following analysis analyzes impacts to aesthetics from Project implementation; however, this analysis for future individual development projects within a TPA is for informational purposes only and not for determining its impacts to the environment. Specifically, for those individual development projects within a TPA, nothing in the aesthetic impact analysis in this Initial Study shall trigger the need for any findings, analysis, or mitigation measures under CEQA.

Remainder of Page Intentionally Blank

This page intentionally left blank.

Transit Villages Specific Plan and Transit Priority Areas



 Project Site

 Major Transit Stop

 Transit Priority Area (1/2 Mile Radius)



This page intentionally left blank.

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

Less Than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Scenic vistas in the City consist of the scenic corridors and views to and from open spaces (e.g., watershed features, hillsides, habitats, and grove preserves) including San Timoteo Canyon, Live Oak Canyon, Crafton Hills, Santa Ana River wash, and the San Bernardino Mountains (GP2035 EIR, p. 3.1-9). These scenic vistas are not within or adjacent to the Project area.

In general, the terrain of the Project area slopes gently to the west at about two percent and does not include hilly topography. The Project area consists of an urbanized environment that does not include or provide scenic vistas. Land use changes that would occur under the TVSP are in or near already developed areas of the City and coincide with areas designated for development under the GP2035. Likewise, the Project advances the GP2035’s intent to focus development within infill areas to relieve pressure on developing in open space and agricultural areas, while filling visual gaps in existing neighborhoods. Toward this end, the Project incorporates a TOD approach that is guided by form-based code, which means the physical form detailed in the TVSP’s Development Code is the primary urban design principal in each zone followed then by the land use, instead of the land use determining the form. As such, changes resulting from the Project would be consistent with an urbanized environment and with the type of development appropriate for the center of the City as envisioned by the GP2035. Additionally, structures resulting from the Project would be generally within the heights of the existing developed areas and would not block views of or from these scenic vistas as the Project structures would be consistent with views presently found in the area.

Thus, implementation of the Project would not directly diminish the scenic quality of an existing scenic vista, block a view corridor, or vista of a scenic resource. Therefore, implementation of the Project would not result in a substantial adverse effect on the open space scenic vistas, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

b) Substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway?

Potentially Significant Impact. There are no officially designated state scenic highways traversing the Project area; however, State Route 38 is an eligible, albeit not officially designated, state scenic highway. State Route 38 traverses the Downtown Transit Village area as Orange Street north of the I-10 to Lugonia Avenue. State Route 38 then continues outside of the Project area easterly as Lugonia Avenue, which then turns into Mentone Boulevard and Mill Creek Road as the highway continues into the San Bernardino Mountains. Moreover, the City has designated numerous roadway segments as scenic highways, drives, and historic streets subject to special development standards (GP2035 EIR, p. 3.1-11). Table 2, *Scenic Roadways in the City*, lists the City-designated scenic roadways and roadways being considered for scenic designation as well as their relationship to the Project area.

Table 2: Scenic Roadways in the City

Scenic Roadway	Scenic Segment	Relationship to TVSP Area
Brookside Avenue	from Lakeside Avenue to Eureka Street	A small portion of the easternmost terminus of this roadway segment at the intersection of Eureka Street enters the Project area in the Downtown Transit Village
Olive Avenue	from Lakeside Avenue to Cajon Street	A small portion of the easternmost terminus of this roadway segment at the intersection of Cajon Street enters the Project area in the Downtown Transit Village
Center Street	from Brookside Avenue to Crescent Avenue	Outside of the Project area
Highland Avenue	from Serpentine Drive to Cajon Street	Outside of the Project area
Sunset Drive	from Serpentine Drive to Edgemont Drive	Outside of the Project area
Cajon Street	(Whole street)	The northern terminus of this segment at Citrus Avenue/Orange Street south to Clark Street is within the Project area in the Downtown Transit Village
Mariposa Drive	between Halsey and Sunset Drive	Outside of the Project area
Dwight Street	between Pepper Street and Mariposa Drive	Outside of the Project area
<i>Roadways Being Considered for Scenic Designations</i>		
Riverview Drive	Along the Santa Ana River wash	Outside of the Project area
Live Oak Canyon Drive	(Whole street)	Outside of the Project area
San Timoteo Canyon Road	(Whole street)	Outside of the Project area
Sylvan Boulevard	(Whole street)	The western terminus at the intersection of University Street east to Judson Street is within the Project area in the University Transit Village
Nevada Street	from Orange Blossom Trail to Barton Road	Outside of the Project area
Pioneer Avenue	from River Bend Drive to Judson Street	Outside of the Project area
Rural roads in Crafton area		Outside of the Project area

As the Project proposes development near an eligible state scenic highway and City-designated scenic roadways, potentially significant impacts could occur, and this issue will be analyzed in the EIR.

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

Potentially Significant Impact. The Project area is located within an urbanized area. As discussed above, the Project incorporates a TOD approach that is guided by the proposed form-based code. The Project would alter the visual character and/or quality of the area from the existing vacant and underutilized parcels to a higher density mixed-use development with new architecture, landscaping, open space, and recreational areas. The EIR will evaluate whether the Project would conflict with zoning or other regulations governing visual character and scenic quality.

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

Potentially Significant Impact. The Project area is in a well-lit urbanized area of the City where there are low, moderate, and high levels of ambient nighttime lighting generally appropriate to the existing land use, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows). In

an urban environment, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use.

Buildout of the Project would have the potential to alter lighting patterns and overall amount of lighting in the Project area as compared with the existing conditions. Additionally, headlights from new vehicles trips to and from the Project area at night would be an increased source of light due to the greater intensity of uses from redeveloped underutilized parcels.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Potential reflective surfaces in the Project vicinity include vehicles traveling and parked on streets, and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in an area.

Given the amount of development potential of Project implementation to introduce new sources of light (i.e., street lights, vehicle lights, building lights, etc.), increase ambient lighting in daytime and nighttime, generate vehicle trips that may increase glare, and increase of reflective building materials that could result in glare such as windows, the Project may result in a substantial adverse increase in light or glare. Therefore, impacts to light and glare may be potentially significant from Project implementation, and this issue will be analyzed further in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	---	---	----------------------

2. AGRICULTURE AND FORESTRY

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

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. 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. This issue will not be analyzed further in the EIR.

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

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments. None of the parcels within the Project area are currently 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). Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

No Impact. The Project area is an urbanized environment. None of the parcels within the Project area are currently zoned as forest land, timberland, or Timberland Production (City Zoning 2020). Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

No Impact. The Project area is an urbanized environment. 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, and this issue will not be analyzed further in the EIR.

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

No Impact. The Project area is an urbanized environment. Implementation of the Project focuses on infill redevelopment pursuant to TOD planning principles, within an area where no farmland, agricultural land, or forest land exists. The Project would not result in the conversion of farmland to non-agricultural or forest land to non-forest land, either directly or indirectly. Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

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

Potentially Significant Impact. The Project site is in the South Coast Air Basin (“Basin”) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). 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 Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a proposed project would result in growth that is substantially greater than what was anticipated, then the proposed project would conflict with the AQMP. On the other hand, if a project’s density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD’s attainment plans. In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The Basin is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the Basin, including the Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

Implementation of the Project would generate pollutant emissions during both construction and operation of new developments in the Project area. During construction, sources of pollutant

emissions include heavy off-road equipment as well as on-road motor vehicles and workers' commutes to and from development sites. Construction activities would result in emissions of particulate matter, as well as nitrous oxides (NO_x) and volatile organic compounds (VOCs), which are precursors to ozone formation. Additionally, because buildout of the Project would involve changes in land use intensity and traffic patterns, an increase of air pollutant emissions could occur that may result in significant impacts to air quality. Furthermore, operation of new or altered buildings could increase emissions from new area sources. Overall, the pollutant emissions associated with the Project could result in potentially significant impacts to air quality in the area and could potentially conflict with SCAQMD's AQMP. Thus, the potential for implementation of the Project to conflict with or obstruct implementation of the AQMP will be evaluated in the EIR.

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

Potentially Significant Impact. As indicated above, short-term construction activities and long-term operation of development implemented by the Project may generate emissions that could result in either a violation of an ambient air quality standard or contribute to an existing air quality violation. Due to the elevated concentrations of air pollutants that currently occur in the Basin, when combined with other past, present, or reasonably foreseeable future projects in the area, the net increase of criteria pollutants could cumulatively contribute to the nonattainment designations of pollutants in the Basin. Thus, the EIR will evaluate the potential for the Project to generate a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). Examples of land uses that can be classified as sensitive receptors include residences, schools, daycare centers, parks, recreational areas, medical facilities, rest homes, and convalescent care facilities. Sensitive receptors within the Project area include existing and proposed residential areas, schools, parks, and recreational areas. Future development pursuant to implementation of the Project may expose these existing and/or new sensitive receptors to substantial pollutant concentrations. Therefore, the EIR will evaluate the potential for construction and operation of the future developments in the Project area to expose sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor issues include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The Project would implement residential, commercial, retail, civic, and institutional development within the Project area. These types of land uses do not include activities that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by new and existing non-residential land uses are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance

to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

During construction, emissions from diesel equipment, use of VOCs from architectural coatings, and paving activities may generate some nuisance odors. However, these odors would be temporary and are not expected to affect a substantial number of people. Therefore, impacts relating to both operational and construction activity odors would be less than significant, and this issue will not be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	---	---	---	----------------------

4. BIOLOGICAL RESOURCES.

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. As described by the City’s GP2035 EIR, there are 19 species that are state or federally listed as rare, threatened, or endangered species that have been or were identified as potentially present within the City and its Sphere of Influence. Only eight species are known to either be present or have a moderate to high probability of occurring due to the presence of suitable habitat, mainly along the Santa Ana River, Mill Creek, or San Timoteo Creek (GP2035 EIR, p. 3.4-23).

These areas are not within the Project (GP2035 EIR, Figure 3.4-12). 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, and further analysis of this issue is not required in the EIR. By focusing more future development in the future transit villages in the core area of the city (a primary strategy of the GP2035), it will result in preserving and protecting the open space and any potentially sensitive habitat areas around the periphery of the city.

b) 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 US Fish and Wildlife Service?

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. Such areas, especially those with native vegetation adjacent to or immediately upstream of the Santa Ana River, Mill Creek, and San Timoteo Creek, are not within the Project area (GP2035 EIR, Figure 3.4-1).

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. Therefore, the Project would not result in impacts on riparian habitats and this issue would not be analyzed in the EIR.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. 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. Therefore, no impact would occur in this regard, and this issue would not be further analyzed in the EIR.

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

Less Than Significant Impact. The GP2035 identifies potential wildlife corridors through the Live Oak Canyon and San Timoteo Canyon areas, and for the City to protect wildlife corridors connecting the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo

and Live Oak canyons, the Badlands, and other open space areas (GP2035 EIR, p. 3.4-29). These areas are not located within or adjacent to the Project area.

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.

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

Less Than Significant Impact. The City has a Street Tree Policy and Protection Guidelines Manual (adopted January 2013) and a tree protection ordinance codified as RMC Chapter 12.52 for street trees and trees in public places. The GP2035 also includes tree protection policies consistent with said guidelines manual.

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, and no further analysis is required in the EIR.

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

No Impact. The Project is within an urbanized area, and there are no adopted regional conservation plans in the City (CDFW 2019). There is, however, the Upper Santa Ana Wash Land Management and Habitat Conservation Plan, known also as the Wash Plan. 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. Specifically, the Wash Plan has been prepared as part of the Incidental Take Permit application submitted by the San Bernardino Valley Water Conservation District to the USFWS. The City, among other agencies, is a signatory to the Wash Plan and would participate in the implementation of the plan through a Certificate of Inclusion to

receive coverage for planned projects. Implementation of the Wash Plan would result in permanent conservation and management of approximately 1,659.9 acres of native habitats that support slender-horned spine-flower, Santa Ana River woolly-star, cactus wren, California gnatcatcher, and San Bernardino kangaroo rat.

The Wash Plan was adopted in 2020 (SBVWCD 2020). The Project area is not within 6,000 feet (i.e., more than one mile) of the nearest Wash Plan boundaries (WP 2020, Figure 1-1), and 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. No impacts would occur, and this issue will not be analyzed further in the EIR.

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

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially Significant Impact. According to the *State CEQA Guidelines*, a historical resource includes, but is not limited to, any object, building, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. CEQA mandates that lead agencies consider a resource “historically significant” if it meets the criteria for listing in the California Register of Historic Resources. Such resources meet this requirement if they (1) are associated with events that have made a significant contribution to the broad patterns of California history, (2) are associated with the lives of important persons in the past, (3) embody distinctive characteristics of a type, period, region, or method of construction, and/or (4) represent the work of an important creative individual or possesses high artistic value. These criteria mimic the criteria utilized to determine eligibility for the National Register. The City has also adopted a Historic and Scenic Preservation Ordinance that gives authority to the Historic and Scenic Preservation Commission to make recommendations, decisions, and determinations regarding the designation, preservation, protection, and enhancement of historic resources.

The Project area, particularly the Downtown Transit Village, includes nationally registered historic resources and state landmarks as well as historic districts (GP2035 EIR, Figure 3.8-1). Additional potentially historic resources may also exist in the Project area. Future development, revitalization, and/or redevelopment activities undertaken as part of the Project could potentially involve alterations to, or demolition of, some of these resources. Although the proposed Project incorporates the City’s applicable regulations pertaining to historic resources as well as the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings”, there is the potential for some change to occur with respect to the setting or surroundings of historic resources in the Downtown Village. Therefore, potentially significant impacts could occur to historic resources, and this issue will be analyzed in the EIR.

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

Potentially Significant Impact. Archaeological resources are those associated with prehistoric cultural sites and isolated artifacts that predate the advent of human written records in a particular region that are considered important to a culture, subculture, or community for scientific or humanistic reasons. These include geographic districts, structures, sites, objects, trails, and other physical evidence of prehistoric human activity. There are 11 documented prehistoric resources in the City, the location of which are confidential to protect these resources. There may be other archaeological resources in the City that have not yet been discovered.

The Project area is in an urbanized environment that has been previously disturbed and developed. However, future development, revitalization, and/or redevelopment activities that would be permitted under the individual development projects could involve grading and excavation to greater depths than previously undertaken. Therefore, individual development project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils, and this issue will be analyzed further in the EIR.

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

Less Than Significant Impact. There are no known human remains on or near the Project area, including formal cemeteries. Additionally, the Project area is 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. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). 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, and this issue will not be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

6. ENERGY. Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. Buildout of the Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. During construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel to and from the Project site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities, if applicable).

During operation of the Project related development, energy would be consumed for multiple purposes, including, but not limited to: heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during operations related to water usage, solid waste disposal, and vehicle trips. The potential for the Project to result in wasteful, inefficient, or unnecessary consumption of energy resources will be analyzed in the EIR.

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

Potentially Significant Impact. As discussed previously, implementation of the Project would consume energy during construction and operation in the form of electricity, natural gas, and transportation fuel. The development could result in a significant impact to state or local plans for renewable energy or energy efficiency if they failed to meet energy efficiency standards for equipment or prevented energy suppliers from meeting renewable energy source targets. Therefore, the consumption of energy and its effects on renewable energy plans and energy efficiency requirements may be significant, and this issue will be analyzed further in the EIR.

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

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

No Impact. The Alquist–Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures used for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on top of active faults. The law only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards, such as ground shaking or landslides. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist–Priolo Zones) around the surface traces of active faults, and to issue appropriate maps. Generally, construction within 50 feet of an active fault zone is prohibited.

No known fault lines or Alquist-Priolo Fault Zones traverse the Project area or are within 50 feet of the Project area (GP2035 EIR, Figure 3.6-2). The nearest fault line to the Project area is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue/Fifth Avenue (i.e., approximately 3,300 feet to the south of the nearest boundary of the Project along East Citrus Ave.). Therefore, individual projects constructed within the Project area 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, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. Earthquakes in and near the City have the potential to cause ground shaking of significant magnitude. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude. The Project is located within a seismically active region of Southern California. The nearest fault line to the Project area is the Redlands Fault of the Crafton Hills Fault Zone, located south of Highland Avenue and Fifth Avenue (GP2035 EIR, Figure 3.6-2).

New structures built in the City are required to be built in compliance with the California Building Code (CBC), as codified in RMC Chapter 15.04. CBC Section 1613 requires all structures be designed and constructed to resist the effects of earthquake motions in accordance with the Minimum Design Loads for Buildings and Other Structures established by the American Society of Civil Engineers. Compliance with the CBC would include 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 structures so that it would withstand the effects of strong ground shaking. Regulatory compliance with the CBC would minimize the potential for structures, including individual development projects under the TVSP, to sustain substantial damage during an earthquake as modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement. Development within the Project area would not directly or indirectly exacerbate seismic conditions in the Project area or elsewhere in the region. Therefore, impacts would be less than

significant with respect to risk of loss, injury, or death involving strong seismic ground shaking, and this issue will not be analyzed further in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

The Project area and immediate surroundings are in an area that is susceptible to liquefaction (GP2035 EIR, Figure 3.6-4). However, as described previously, the impacts from seismic ground failure, including liquefaction, from development under the Project would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements. Individual development projects within the Project area would also be required to adhere to local policies in the RMC that contain seismic safety requirements and help strengthen existing code requirements such as limiting the disturbance of natural terrain and vegetation to the minimum necessary to accommodate reasonable use of property. Therefore, the potential impact related to seismically related ground failure including liquefaction is less than significant, and this issue will not be analyzed further in the EIR.

iv. Landslides?

No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquakes induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

The Project area and surrounding area consists of relatively flat terrain that gently slopes to the west at about two percent. There are no existing hillsides within or adjacent to the Project area. Also, the Project area is not located in an area known to be susceptible to landslides (GP2035 EIR, Figure 3.6-3) and not in the path of any known or potential landslides. Thus, as the Project does not propose substantial alteration to the existing topography and would not directly or indirectly exacerbate existing environmental conditions related to landslides, no impacts would occur, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project area is in an urbanized environment and in an area that is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project area.

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 such as limiting work to dry seasons, covering stockpiled soils and use of straw bales and silt fences to minimize offsite sedimentation.

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, including the implementation of best management practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a stormwater pollution prevention plan (SWPPP). BMPs that are required under a SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. 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, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. The Project area is 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 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.

As described previously, future individual development projects proposed within the Project area would be required to implement CBC requirements and site-specific geotechnical investigations that are typically required for all new development. Therefore, compliance with the requirements of the California Building Code (see also GP2035 policies 7-A.107, 7-A.114, and 7-A.116 pertaining to current building code regulations) requires adherence to any and all geotechnical design recommendations that may be applicable to a particular project, which would be reviewed by the City for appropriate inclusion as part of the development review process and subsequent building plan check process, and would reduce potential impacts related to any unstable geologic unit or soil to a less than significant level. This issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture. Various soil types within the TVSP area include Ramona Sandy Loam (RmC), Hanford Sandy Loam (HaC), Tujunga Loamy Sand (TuB), and Greenfield Sandy Loam (GtC) (GP2035 EIR, Figure 3.6-1), which are not clay based soils, and not prone to expansion.

Also, as discussed above, 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, compliance with the

requirements of the CBC, which would be verified as part of the development review process as well as the subsequent building plan check and permitting process, would reduce potential impacts related to expansive soil to a less than significant level. This issue will not be analyzed further in the EIR.

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

No Impact. The Project area is currently served by a sewer and wastewater treatment system. Future development projects would include connection to existing sewers mainlines and service lines. Future development under the Project would not include the use of septic systems. Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

Potentially Significant Impact. Paleontological resources, including fossils, have been found in the Redlands area, and there is potential for paleontological finds to occur in the City. Paleontological resources are the fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations.

The Project area is in an urbanized environment that has been previously disturbed and developed. However, future development pursuant to the Project could involve grading and excavation to greater depths than previously undertaken and could inadvertently uncover unknown paleontological resources buried in site soils. Therefore, this issue will be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	---	---	---	----------------------

8. GREENHOUSE GAS EMISSIONS.

Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on the earth that can be measured by wind patterns, storms, precipitation, and temperature. The construction and operation of projects under the Project would have the potential to generate significant GHG emissions, either directly or indirectly. Therefore, impacts may be significant and the generation of GHG emissions resulting from Project implementation will be further evaluated in the EIR.

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

Potentially Significant Impact. The construction and operation of development projects under the Project would generate GHG emissions. However, the project as it is built-out over a period of years will result in more motor vehicle trips and other related activities that generate greenhouse gases. The City adopted a Climate Action Plan along with the GP2035 in December 2017, which utilizes the Transit Village Concept and strategy to accommodate future growth in core areas of the city while planning for comparatively less GHG emissions (compared to suburban or sprawling development patterns) through greater use of transit and other non-motorized transportation options throughout the Project area. The Project will implement the guiding policies in the GP2035 and is anticipated to be consistent overall with the City’s Climate Action Plan. Therefore, impacts will be analyzed for any significance and the Project’s consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of greenhouse gases will be evaluated in the EIR.

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

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

Less Than Significant Impact. Hazardous materials, as defined by the California Code of Regulations (CCR), are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. This refers to a variety of injurious substances, including pesticides, herbicides, toxic metals and chemicals, liquefied natural gas, explosives, volatile chemicals, and

radioactive materials. Hazardous materials are commonly found throughout the City in households, businesses, and agricultural operations. Typical residential and commercial substances include motor oil, paint, cleaners and solvents, gasoline, refrigerants, and lawn and gardening chemicals. In rural areas, pesticides and herbicides are often used in conjunction with agricultural operations.

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Nearly all businesses and households generate hazardous waste, and some businesses (such as industrial operations, gas stations and auto-related businesses, printers, and dry cleaners) may generate larger amounts. Medical waste, generated by hospitals, clinics, and laboratories, is also potentially hazardous. If improperly handled, hazardous materials and hazardous waste can be released into soils, groundwater, or air, where they can pose hazards to public health.

Implementation of the Project would provide for the development of land uses, including residential, mixed-use, recreational, commercial retail, office, institutional, and hotel uses that may require the routine use, transport, and disposal of hazardous material and waste. Additionally, construction activities associated with individual development projects under the Project may generate hazardous materials and waste, such as fuels and oils from construction equipment and vehicles.

Federal and state regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. Regulations associated with using, transporting, or disposing of hazardous materials include Resource Conservation and Recovery Act (RCRA), Emergency Planning and Community Right-to-Know Act (EPCRA), Hazardous Materials Transportation Act (HMTA), California Health and Safety Code, CCR Title 22, CCR Title 27, Senate Bill 1889, and the Consolidated Fire Code. Locally, facilities requiring a hazardous materials permit would be subject to routing inspection by the San Bernardino County Fire Department (SBFD), acting as the state-designated Certified Unified Program Agency (CUPA) for the City of Redlands, which would also minimize foreseeable risks of an accident that could create a hazard to the public or environment.

Transportation of hazardous waste from construction and operations of development projects under the Project would be subject to U.S. Department of Transportation's (USDOT) requirements for hazardous materials transport and would require carriers to register with the California Department of Toxic Substances Control (DTSC). In addition, compliance with existing regulations require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan to inventory hazardous materials onsite and emergency response regarding potential release of materials. Additionally, existing regulations specify storage areas for hazardous materials to be designed to prevent accidental release and to protect against explosion hazard, high fire or physical hazard, or health hazards.

Implementation of the applicable federal, state, and local regulations would lessen the risk of death, injury, and/or property loss associated with the transport, use, or disposal of hazardous materials by promoting safe handling and storage, documentation and information sharing, and appropriate emergency planning and response. Therefore, compliance with the existing federal and state regulations would ensure the impact of routine use, transport, and disposal of hazardous materials associated with implementation of the Project would be less than significant, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. Implementation of the Project would result in development of land uses that would involve the use, transportation, disposal, and storage of hazardous materials in the City. The Project does not propose industrial land uses. 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.

Although the risk of upset and accident conditions involving the release of hazardous materials into the environment cannot be completely eliminated, it can be reduced to a manageable level. Existing regulations at the federal, state, and local levels serve to minimize the potential for upset during routine transportation, use, and disposal as discussed in the response above. Given existing regulations and programs that reduce the potential for hazardous materials upsets and promote the ability of emergency services to respond to incidents, impacts from Project implementation associated with the release of hazardous materials into the environment would be less than significant, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. The following schools are located within the TVSP area boundaries:

- University of Redlands (southern portion of the campus)
- Redlands Adventist Academy (private school)
- Oranewood High School (public continuation school)

The following schools are not within the Project area, but are located within a quarter mile:

- Arrowhead Christian Academy Upper School (private school)
- Crafton Elementary
- Franklin Elementary
- Grove School (private school)
- Lugonia Elementary
- McKinley Elementary School
- Moore Middle School
- Redlands Christian Lower School and Preschool (private school)
- Redlands Christian Middle (private school)
- Redlands High School
- Sacred Heart Academy (private school)

Implementation of the Project would allow land uses that would be reasonably expected to handle hazardous materials or generate hazardous emissions commensurate to residential, mixed-use, recreational, commercial retail and office, institutional, and hotel uses that are proposed. The Project does not propose industrial land uses. Operation of individual development projects under the Project would not produce hazardous emissions or handle acutely hazardous materials, substances, or wastes. However, construction phase for individual development projects would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. All potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance for applicable federal, state, and local regulations. As such, given that the use of such materials would not create a significant hazard

to any nearby schools and the land uses proposed by the Project would not create a hazardous incompatibility with existing school sites. Therefore, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

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

Potentially Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

There are numerous sites in the City and within the Project area that are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 or that need further investigation (GP2035 EIR, Figure 3.7-1, Tables 3.7-1 through 3.7-3). Several of the sites have reported releases to the ground resulting in soil and groundwater contamination and which are subject to various state and federal laws and regulators, including Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), U.S. Environmental Protection Agency (EPA), DTSC, and the Regional Water Quality Control Board (RWQCB), and are in various stages of the cleanup process as stipulated by the relevant agencies. Development or redevelopment of sites with existing soil or groundwater contamination in accordance with Project implementation could potentially pose a significant hazard to the public or the environment through releases of hazardous materials into the environment. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

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

Less Than Significant Impact. The nearest airports to the Project area are Redlands Municipal Airport (approximately 1.5 miles to the northeast of the University Transit Village) and San Bernardino International Airport (approximately three miles northwest of the New York Street/Esri Transit Village). The Project area is not within the airport compatibility zones or airport influence areas for either the Redlands Municipal Airport or San Bernardino International Airport (GP2035 EIR, p. 3.7-2), nor is the TVSP area within the modeled noise contours for the Redlands Municipal Airport (GP2035 EIR, Figure 3.12-3) or San Bernardino International Airport (GP2035 EIR, Figure 3.12-4). Additionally, implementation of the Project would not result in structures that would pose a hazard to airport operations, flight patterns, or otherwise result in substantial aviation-related safety risks. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan and, to the extent that they mitigate potential disasters in the City and TVSP area, the City's Hazard Mitigation Plan (HMP), and the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Physical development

under the Project, including new roadways and new intersections to break up superblocks and increased densities (e.g., to multi-story mixed-use buildings such as near the future train stations), 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 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 TVSP to be designed so as to not interfere with an adopted emergency response plan or emergency evacuation plan, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. The Project area, as with most of the City, is characterized as having a moderate fire threat level (GP2035 EIR, Figure 3.7-3). Areas with high, very high, and extreme fire threat levels are located on the periphery of the City. Areas of high to extreme fire threat levels are characterized by natural vegetation that can serve as fuel for wildland fires, and steeper topographies that can impede emergency access and facilitate the rapid spread of potential fire.

The Project area is an urbanized environment that does not contain wildlands. City policies require all development to adhere to safety standards provided in the CBC and 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. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

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

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

Less Than Significant Impact. Impacts on water quality is closely related to the hydrologic context of a region, and the sources and types of pollutants that can further degrade or impair the area’s water resources. Impervious surfaces from Project implementation may increase as a result of the placement of new roads, buildings, and other infrastructure where vacant or undeveloped parcels exist now. Other sources of water quality impacts include direct discharge associated with

industrial/commercial activities, automobiles, agricultural runoff, and herbicides. Pollutant sources may be generated from past waste disposal practices and chemicals and fertilizers applied to landscaping. Contaminants may include sediment, PCBs/mercury, hydrocarbons and metals, pesticides, nutrients, bacteria, and trash.

Project implementation would have a significant environmental impact if it would violate water quality standards and waste discharge requirements set out in current NPDES and municipal permits issued by the Santa Ana RWQCB. Violation of these permits could occur if the individual development projects under the Project would substantially increase pollutant loading levels in the sanitary sewer system or in groundwater underlying the City, either directly through the introduction of pollutants, or indirectly through stormwater pollution. The NPDES permit is based on the federal Clean Water Act, compliance with the Porter-Cologne Water Quality Control Act (Division 7 of the Water Code, commencing with Section 13000), applicable state and federal regulations, all applicable provisions of statewide water quality control plans and policies adopted by the State Water Resources Control Board (SWRCB), the Santa Ana River Basin Plan adopted by the Santa Ana RWQCB, the California Toxics Rule, and the California Toxics Rule Implementation Plan. Regulatory compliance of development under the Project with the NPDES permit would, by extension, ensure compliance with these other applicable plans and regulations pertaining to water quality.

Implementation of the Project would implement additional development and redevelopment within the Project area that would increase impervious surfaces, and could therefore increase the amount of runoff and associated pollutants during both construction and operation of development. However, construction activities are 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 Project. As a standard requirement in the City, individual development projects are required to demonstrate compliance with the applicable regulations prior to issuance of building or engineering permits.

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 onsite for the development projects, which would improve the quality of stormwater before it enters the City's stormwater system.

The Project includes stormwater management guidelines that require a Water Quality Management Plan (WQMP) that incorporates Low Impact Development (LID) design principles and provide water quality improvements. Moreover, the Project also includes street and streetscape design standards that require runoff from public right-of-way to be treated per water quality standards of the San Bernardino County Stormwater Program Water Quality Management Plan and as approved by the City. Compliance with federal, state, and local water quality regulations will ensure that water quality is protected to the maximum extent practicable. Therefore, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

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

Potentially Significant Impact. 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. The Project

would result in new development that would require potable water. Therefore, potential impacts may be significant, and this issue will be analyzed further in the EIR.

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

i. result in substantial erosion or siltation on- or off-site;

Potentially Significant Impact. Much of the Project area is within a 100-year floodplain, and the Project area has historically experienced flooding in some sections during moderate storm events. The main cause of the flooding is a lack of conveyance capacities in the Zanja Channel, the Redlands Boulevard storm drain, and the Oriental storm drain. With a capacity of approximately 2,400 cubic feet per second (cfs), the Redlands Boulevard storm drain receives over 4,200 cfs from the Zanja and the Carrot storm drain, and 4,000 cfs from Reservoir Canyon and the Oriental storm drain. All four of these tributaries experience a confluence near the intersection of Redlands Boulevard and Ninth Street. Over the past three decades, the focus of several studies has been to reduce the flood potential from the Zanja and Reservoir Canyon storm drain. Several alternatives have been investigated and proposed as part of developing the draft TVSP, ranging from multiple detention basins, to a downtown underground “bypass” pipeline that would direct Zanja flows around the Redlands Boulevard storm drain.

The TVSP Infrastructure Plan includes improvements to divert flows away from undersized segments of the existing drainage system, such as the undersized Zanja channel through the University Transit Village, and the undersized Mission Creek channel through the New York Street/Esri Transit Village, among other flood-related strategies. Thus, as the Project may result in the alteration of existing drainage patterns of the area, impacts from substantial erosion or siltation on- or off-site may be potentially significant from Project implementation, and this issue will be analyzed further in the EIR.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Potentially Significant Impact. As discussed in response 10(c)(i), above, the TVSP Infrastructure Plan includes improvements that would remove properties from the existing 100-year floodplain that traverses most of the TVSP area, which may result in the alteration of the existing drainage pattern of the area. Such alterations may result in flooding on- or off-site. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Potentially Significant Impact. As discussed in response 10(c)(i), above, the existing stormwater drainage system in the Project area results in flooding in moderate storm events due to undersized channels and storm drains from the volume of water that converges downtown. The TVSP Infrastructure Plan would implement improvements to address the flooding from undersized conveyance infrastructure. Implementation of the

Project would result in additional impervious surface area that would increase runoff, which may exacerbate the flooding issues. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

iv. impede or redirect flood flows?

Potentially Significant Impact. According to the Federal Emergency Management Agency (FEMA), much of the Project area is within a 100-year floodplain. These floodplain conditions create significant challenges to existing and new development. As a result, impacts from impeding or redirecting flood flows are potentially significant, and this issue will be analyzed in the EIR.

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

Potentially Significant Impact. As discussed in response 10(c)(iv), above, much of the Project area is within a 100-year floodplain. Therefore, potentially significant impacts may result from floodwater inundation causing pollutants to be released, and this issue will be analyzed further in the EIR.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The City is approximately 50 miles inland from the Pacific Ocean. Therefore, the Project area is not at risk of inundation from a tsunami, and this issue will not be analyzed further in the EIR.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The TVSP area is not located adjacent to any water retention facilities, lakes, or other bodies of water. Therefore, the Project area is not at risk of inundation from seiching, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. The City is within the Santa Ana RWQCB jurisdiction. The Santa Ana RWQCB adopted the Santa Ana Region Basin Plan which designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As summarized below, the Project would comply with the applicable NPDES permits, and implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff.

As discussed in response 10(a), above, 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 Project. 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 onsite for the development projects, generally improving the quality of stormwater before it infiltrates into the groundwater basin.

The Project includes stormwater management guidelines that requires a WQMP, and street and streetscape standards that require runoff from public right-of-way to be treated per water quality standards of the San Bernardino County Stormwater Program Water Quality Management Plan and as approved by the City. The Project in conjunction with City policies promote the protection of the City's natural water bodies, prevent water pollution, ensure preparation and implementation of applicable water quality plans, require incorporation of BMPs, and otherwise ensure compliance with the City's NPDES permit. As such, Project implementation would not result in water quality impacts that would conflict with the RWQCB's Santa Ana Region Basin Plan.

The Bunker Hill Basin, which underlies the City, stores approximately five million acre-feet of water and is recharged by rain, runoff from the surrounding mountains, and imported water. The Bunker Hill Basin provides water to the cities of Redlands, Highland, San Bernardino, Loma Linda, Colton, Rialto, Fontana, Grand Terrace, Riverside, and portions of unincorporated San Bernardino County.

Regarding a sustainable groundwater management plan, in September, 2014, the California Legislature enacted the Sustainable Groundwater Management Act of 2014 (SGMA), which established a statewide framework, and granted new authorities and responsibilities to local agencies, for the sustainable management of groundwater resources. While adjudicated basins, such as the Bunker Hill Basin in the San Bernardino Basin Area (SBBA), are not subject to most provisions of the SGMA, local agencies, such as the City, are expected to responsibly manage the SBBA in accordance with common sustainability principles. Using SGMA as a model to achieve water supply reliability and long-term groundwater sustainability, in 2015, the City and other local water agencies began meeting to identify and develop a Groundwater Sustainability Council for the SBBA, which is presently known as the Groundwater Council (GC). The City is the second largest user of groundwater within the SBBA, and as a voting member of the GC, is a participant as critical SBBA sustainability decisions are made, and GC membership fees are used, to purchase water during "wet" years when supplies are less expensive and more readily available.

Early efforts in the development of the GC identified water resources to ensure a sustainable water supply into the future and to equitably share the cost of those resources among SBBA pumpers. Ultimately, the GC developed two (2) primary tools to sustain the SBBA: (i) method to allocate the costs of sustainable basin management, and (ii) a five-year agreement that establishes an organizational structure to administer the process, known as the San Bernardino Basin Groundwater Council Framework Agreement. The agreement is for a five-year initial term, and is currently in its third year. The fourth year budget was recently approved by the GC in January, 2021.

The GC provides the funding, integration, and agency coordination necessary to manage imported water, and associated groundwater replenishment facilities, within the SBBA. The GC partners collaborate to manage the SBBA, including accessing and applying imported water supplies to augment and complement native water supplies. The goal of the GC is to maintain the long-term yield of the SBBA by ensuring overdraft, or other negative impacts, are prevented in the future, and to take advantage of imported water replenishment opportunities as they arise.

Participation in the GC is open to groundwater producers in the SBBA. Current members include Redlands, the cities of Colton, Loma Linda, Rialto, and San Bernardino the East Valley Water District, West Valley Water District, San Bernardino Valley Municipal Water District, San Bernardino Valley Water Conservation District, West valley Water District and the Yucaipa Valley Water District, the Bear Valley Mutual Water Company and the Fontana water, and Loma Linda University.

The 2015 San Bernardino Valley Regional Urban Water Quality Control Management Plan (UWMP), amended in June 2017, also provides management strategies to meet targets for future water use, including groundwater supply from the Bunker Hill Basin. The WQMP for the Project addresses quality and quantity of stormwater runoff and provides BMPs for construction and operation to ensure compliance with the current General Stormwater Permit. The Project would also be consistent with the management strategy outlined by the UWMP for local surface water and groundwater in the San Bernardino Valley. Therefore, as Project implementation would not conflict with a water quality control plan or sustainable groundwater management plan, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	---	---	---	----------------------

11. LAND USE AND PLANNING. Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

a) Physically divide an established community?

No Impact. The Project is anticipated to facilitate the development of a more cohesive community, and connectivity through focusing on improvements to roadways as corridors for multiple modes of travel (including pedestrians, bicycles, transit options, and motor vehicles). The Project would provide for infill and redevelopment of parcels within and around the Esri campus, Downtown, and southern portion of the University of Redlands (portions of which are currently bisected by the Interstate 10 freeway), which would not physically divide an established existing community. The Project would also “break up” superblocks with the introduction of new streets, restoring a more pedestrian- and circulation-friendly grid pattern to the area, which would improve community connectivity and not physically divide the community. The Project public realm and landscaping plan would interconnect the three transit villages as well by providing connected open space and parks. The Project does not include any components that would physically divide the community. Therefore, no impacts would occur, and this issue will not be analyzed further in the EIR.

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

Potentially Significant Impact. The Project identifies sites that have the potential for development, revitalization, and/or redevelopment and proposes to amend the GP2035 land use designations for of specific properties within the Project area, and to correspondingly “re-zone” such properties by the adoption of the TVSP, to provide for Transit Oriented Development (TOD). The Project would result in increases in development intensity and changes in land uses that might possibly conflict with an applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project’s compatibility with existing plans, policies, and regulations will be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

12. MINERAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires all cities and counties to incorporate in the general plans the mapped designations approved by the State Mining and Geology Board. SMARA provides for a mineral lands inventory process termed “classification-designation.” Study regions are classified in various Mineral Resource Zones (MRZs) based on their mineral resource potential. The classifications used to define MRZs in the San Bernardino Production-Consumption Region, which includes portions of both San Bernardino and Riverside counties, are as follows:

- MRZ-1: Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- MRZ-2: Areas where geologic data indicate that significant Portland cement concrete (PCC)-Grade aggregate resources are present
- MRZ-3: Areas containing known or inferred mineral occurrences of undetermined mineral resource significance.

Large areas in the northern portion of the City around the Santa Ana River wash are classified as MRZ-2, which contains high quality construction aggregates (e.g., sand, gravel, and crushed stone) that have been mined since the 1920s. Active mining in the Santa Ana River wash is located on both sides of the boundary between the cities of Redlands and Highland, and new areas are currently being proposed for mining along the northern boundary of the City. This mining operations in the Santa Ana River wash are not within or adjacent to the Project <http://usrpt.com/area>.

The northwestern portion of the New York Street/Esri Transit Village area is within MRZ-2 (GP2035 EIR, Figure 3.11-1). 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. Therefore, impacts would be less than significant from implementation of the Project, and this issue will not be analyzed further in the EIR.

b) 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?

No Impact. The Project area does not include areas designated for mining in any land use plan. Also, as described previously, implementation of the Project would not result in the loss of availability of a known mineral resource recovery site. Therefore, impacts would be less than significant from implementation of the Project, and this issue will not be analyzed further in the EIR.

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

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

Potentially Significant Impact. The City’s General Plan Noise Element establishes limitations on sound levels at various land uses. The RMC Chapters 8.06.070 and 8.06.080 include residential exterior and interior noise standards, which represent the maximum acceptable noise levels.

Sensitive receivers of generated noise 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 schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses which are considered relatively insensitive to noise include business, commercial, and professional developments.

Future development under the Project would have the potential to increase temporary and/or permanent noise levels due to vehicle trips that would be generated and from on-site operational activities, such as outdoor use of proposed open space and recreation areas, and stationary sources including mechanical systems. In addition, project-related demolition and construction activities could generate substantial noise affecting existing residents. Therefore, impacts may be potentially significant, and this issue will be analyzed in the EIR.

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

Potentially Significant Impact. Per the Federal Transit Administration Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures. It is expected that ground-borne vibration from individual development projects under the Project may cause intermittent, localized intrusion. Operation would likely not result in excessive vibratory impacts as the land uses proposed by the Project would not include any equipment that would generate high vibration levels, which are more typical for large industrial projects. Even so, implementation of the Project may result in individual development projects that could generate excessive vibratory or groundborne noise levels that could substantially impact sensitive land uses and older or historic structures. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

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

Less Than Significant Impact. The nearest airports to the Project area are Redlands Municipal Airport, approximately 1.5 miles to the northeast of the University Transit Village, and San Bernardino International Airport, approximately three miles northwest of the New York Street/Esri Transit Village. The Project area is not within the airport compatibility zones for either the Redlands Municipal Airport or San Bernardino International Airport (GP2035 EIR, p. 3.7-2), nor is the Project area within the modeled noise contours for the Redlands Municipal Airport (GP2035 EIR, Figure 3.12-3) or San Bernardino International Airport (GP2035 EIR, Figure 3.12-4). There are no private airstrips in the vicinity of the Project area (AirNav 2020). Thus, individual development projects under the Project would not expose people residing or working in the Project area to excessive noise levels from airport operations. Therefore, impacts would be less than significant, and this issue will not be analyzed further in the EIR.

Potentially Significant Impact Less Than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

14. POPULATION AND HOUSING.

Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

Potentially Significant Impact. Implementation of the Project would implement development of up to 2,400 residential dwelling units (resulting in up to approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, up to 238,000 square feet of office uses, and up to 280,000 square feet of new parks and open space. This development would result in population growth consistent with population projections. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not result in the displacement of substantial number of existing housing, nor would it result in the displacement of substantial numbers of people within the Project area. The Project provides for infill development and redevelopment and would include a mix of residential, commercial (retail and office), hotel, and civic uses. Build-out of the Project would provide up to 2,400 additional residential dwelling units (that provides for approximately 4,500 residents) within the Project area. The estimated number of persons is based on the following assumptions and could result in approximately 4,500 persons, total.

Table 3: Estimate of Number of New Residents

Type of Dwelling Unit	Number of Units (and %) (approximate)	Persons per Household (estimate only)	Total Number of Persons (approximate)
Studio	600 (25%)	1.0	600
1 bedroom	600 (25%)	1.5	900
2 bedrooms	600 (25%)	2.0	1,200
3 bedrooms	600 (25%)	3.0	1,800
TOTAL	2,400 (100%)	1.875 avg.	4,500

Individual development projects pursuant to the 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 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, and this issue will not be analyzed further in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	---	---	----------------------

15. PUBLIC SERVICES.

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

Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

- Fire protection?**
- Police protection?**
- Schools?**
- Parks?**
- Other public facilities?**

Fire Protection – Potentially Significant Impact. Fire protection services in the City, including the Project area, is provided by the Redlands Fire Department (RFD). RFD operates four fire stations in the City. Fire Station 261 (located at 525 East Citrus Avenue) is located within the boundaries of the Downtown Transit Village, and Fire Station 264 (located at 1270 West Park Avenue) is located within the boundaries of the New York Street/Esri Transit Village. Other nearby City fire stations outside of the Project area include Station 262 (located at 1690 Garden Street) and Station 263 (located at 10 West Pennsylvania Avenue).

The Project buildout would add up to 2,400 residential dwelling units (resulting in approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses, which would increase the permanent and daytime (employee) population in the City and thereby increase the number of calls for RFD services. RFD has indicated that it will need to increase the number of fire stations to meet increased future service

demands regarding GP2035 buildout (GP2035 EIR, p. 3.13-27). Therefore, implementation of the Project may result in significant impacts to fire protection services, and this issue will be analyzed further in the EIR.

Police Protection – Potentially Significant Impact. Public safety services in the City, including the Project area, is 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. RPD maintains other locations in the City where it houses other divisions. The Project development potential would add approximately 2,400 residential dwelling units (approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses, which would increase the permanent and daytime (employee) population in the City and thereby increase the call volume. RPD expects that it would need additional staffing to accommodate increases in demand from a growing population, which may require new construction or physically altering an existing RPD facility (GP2035 EIR, p. 3.13-27). Therefore, implementation of the Project may result in significant impacts to police protection services, and this issue will be analyzed further in the EIR.

Schools – Less Than Significant Impact. The City, including the Project area, is within the Redlands Unified School District (RUSD). RUSD has 16 elementary schools (grades K-5), four middle schools (grades 6-8), and three comprehensive high schools (grades 9-12), an alternative high school, an independent study program, home education learning program, and a grades K-12 online academy. Current enrollment at RUSD is approximately 21,233 students (RUSD 2020). Table 4, *RUSD Schools Serving the TVSP Area*, shows RUSD schools that serve the Project area.

Table 4: RUSD Schools Serving the TVSP Area

School Type (Grades)	School Name	Location (in Redlands)
Elementary School (K-5)	Kimberly	301 W. South Ave.
	Mariposa	30800 Palo Alto Dr.
	McKinley	645 W. Olive Ave.
	Kingsbury	600 Cajon St.
	Franklin	850 E. Colton Ave.
	Lugonia	202 E. Pennsylvania Ave.
	Crafton	311 N. Wabash Ave.
	Smiley	1210 W. Cypress Ave.
Middle School (6-8)	Cope	1000 W. Cypress Ave.
	Moore	1550 E. Highland Ave.
	Clement	501 E. Pennsylvania Ave.
High School (9-12)	Redlands	840 E. Citrus Ave.
	Redlands East Valley	31000 E. Colton Ave.
	Citrus Valley	800 W. Pioneer Ave.

Source: RUSD, General District Information, Schools Boundary Maps, <https://www.redlandsusd.net/Page/114>, accessed June 2020.

As new residential units would be included in the Project, the school-aged population is expected to increase and increase enrollment at the schools listed in Table 4. The EIR will analyze the increase in school-age children and the school district’s capacity, although ongoing demographic trends are causing reductions in the percentage of school-aged children compared to the total population (GP2035 EIR, p. 3.13-24).

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 impacts 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, RUSD has instituted school facility fees that would apply to Project implementation, specifically fees for new residential construction and commercial construction based on square footage. Accordingly, project applicant(s) are required to pay school fees to 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 RUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project’s impacts on schools’ facilities. Thus, impacts on school facilities would be less than significant, and this issue will not be analyzed further in the EIR.

Parks – Potentially Significant Impact. Existing parks within the City include four pocket parks (1.8 acres), eight neighborhood parks (76.8 acres), six community parks (143.2 acres), and three other parks (202.4 acres) for a total of approximately 424.2 acres (GP2035 EIR, Table 3.13-1). At the estimated 2019 population of 71,513 residents, the ratio of existing parkland acres per 1,000 residents is 5.9, which exceeds the GP2035’s parkland/recreational space standard of 5.0 acres per 1,000 residents consistent with state law (Quimby Act). There are several parks within the TVSP area that provide open space and recreational opportunities to surrounding residents, workers, and visitors. Table 5, *Existing Parks within the Project Area*, shows the existing parks within the TVSP area as well as additional park information.

Table 5: Existing Parks within the TVSP Area

Park Type	Park Name	Location (in Redlands)	Park Size	Park Details
Pocket Park	Ed Hales Park	101 E. State St.	0.7 acre	Picnic facilities in the downtown central business district
Neighborhood Park	Smiley Park (Portion)	126 E. Eureka St.	9.2 acres (Only a portion located within TVSP area)	Located at the Redlands Civic Center, this park is home to A. K. Smiley Public Library, the Lincoln Memorial Shrine, and the Redlands Bowl
	Jennie Davis Park	923 W. Redlands Blvd.	5.2 acres	Playground facilities and location of the annual Veteran’s Day Parade and Celebration
Community Park	Sylvan Park	University St. between Colton Ave. and Park Ave.	23.3 acres	Open grassy areas, rose garden, picnic areas, a playground, a stage/bandstand area, a skate park, a baseball/softball field, horseshoe pits, bag toss, lawn bowling, and trails.
Other Park	Terrace Park	Between N. Sixth St. and Church St. on Colton Ave.	2.4 acres	Linear park featuring landscaped tree-lined walkway with benches and drinking fountain

Source: City of Redlands, Facilities & Community Services Department, <https://www.cityofredlands.org/parks>, accessed June 2020.

Implementation of the Project would develop up to approximately 280,000 square feet (6.4 acres) of new parks and open space within the Project area at full buildout, which would bring the City's total parkland acreage to 430.6 acres (not including any additional parkland that may be added in the future by the City outside the Project area). The estimated buildout population to be added by the Project of approximately 4,500 residents added into the City's 2019 population estimate would result in a parkland ratio of 5.5 acres for every 1,000 residents. Conservatively assuming the Project buildout population added to the GP2035's estimated buildout population increase of 10,964 residents with the 2019 population estimate (for a total of 87,277 residents), this would result in a parkland ratio of 4.8 acres for every 1,000 residents. When including the 140.9 acres of parkland proposed in the GP2035 in the City to this future scenario (for a total of 571.5 acres), the parkland ratio would be 6.4 acres for every 1,000 residents (GP2035 EIR, p. 3.13-19).

Without the development of new parks, future increases would place additional physical demands on existing parks and facilities. The GP2035 provides for new parkland to serve the City's population as it grows. The City's mechanism for addressing parkland needs are its development impact fees as set forth in RMC Chapter 3.32. Development impact fees are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. The development impact fee program is set forth in Government Code Sections 66000-66025. In the City, development impact fees are collected at the time a building permit is issued for the purpose of further alleviating the impacts caused by new development on the City's infrastructures. Fees are used to finance the acquisition, construction, and improvement of public facilities needed because of new development. A separate funding structure has been established to account for the impact of new development on each of the following types of public facilities: open space, parks, public facilities (including public safety, library and general government facilities), transportation, water, solid waste, and sewer.

Individual development projects under the Project would be subject to the payment of these development impact fees to the City, which includes fees specific to TOD, as currently set forth in City Resolution No. 7951. As noted, the addition of approximately 4,500 residents would place additional physical demands on existing parks and facilities. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

Other Services – Potentially Significant Impact. Other governmental services include the City's library system. The A. K. Smiley Public Library, established in 1894, is a 34,000-square-foot facility located at 125 West Vine Street. In addition to its diverse collection of resource materials, the library system offers services and programs for all ages, including an adult literacy program. It also houses a museum, and the Lincoln Memorial Shrine. At the time the GP2035 was drafted, the library was in need of additional storage space for the museums, and plans were underway for an adjunct building at 700 Brookside Avenue (formerly the Redlands Daily Facts building) for the Redlands Historical Museum (GP2035 EIR, p. 3.13-13).

Implementation of the Project would development approximately 2,400 residential dwelling units (approximately 4,500 residents), which would likely increase demand for library and other community services. While individual development projects under the TVSP would be subject to the payment of development impact fees to the City for library services, which includes fees specific to TOD, as currently set forth in City Resolution No. 7951, impacts may be potentially significant. This issue will be analyzed further in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	---	---	---	----------------------

16. RECREATION.

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Potentially Significant Impact. See response to 15.a), above. In addition to parks, the City operates numerous recreational community centers and facilities, and has a joint use agreement with RUSD allowing public access to school recreational facilities. Other recreational opportunities include open spaces such as San Timoteo Canyon, Live Oak Canyon, Crafton Hills, and approximately 27.58 acres of recreational trails. At the estimated 2019 population of 71,513 residents, the ratio of existing parkland acres per 1,000 residents is 5.9, which exceeds the GP2035’s parkland/recreational space standard of 5.0 acres per 1,000 residents. Implementation of the Project would develop up to approximately 280,000 square feet (6.4 acres) of new parks and open space within the Project area at full buildout, which brings the City’s total parkland acreage to 430.6 acres (not including any additional parkland that may be added in the future by the City outside the Project area).

Even so, without the development of new parks, future population increases would place additional physical demands on existing parks and facilities. While individual development projects would be subject to development impact fees per RMC Chapter 3.32, the addition of approximately 4,500 residents at full buildout of the Project would place additional physical demands on existing parks and facilities. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

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

Potentially Significant Impact. Implementation of the Project would develop up to approximately 280,000 square feet (6.4 acres) of new parks and open space within the Project area (as detailed in Chapter 7 of the TVSP, Public Realm of Open Space and Landscape), construction or operation of which may have adverse effects on the environment. Therefore, impacts may be potentially significant, and this issue will be analyzed further in the EIR.

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

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The TVSP’s Chapter 5, Transportation and Circulation, would maintain existing roadways, introduce segments of new roadways, and promote Complete Streets principles in each transit village to encourage multi-modal transportation. The Project includes new roadway designs including traffic calming features, narrower lane widths and smaller curb radii, sidewalks, and safety streetscape design considerations for pedestrians and bicyclists. The Project would also install new bicycle lanes and routes through specified roads in the Project area consistent with the City’s existing Bicycle Master Plan. Implementation of the Project will implement numerous guiding policies of the GP2035, including a number of transportation and circulation policies beneficial to pedestrians, bicyclists, commuters, and motorists (see list of GP2035 policies in TVSP’s Chapter 1). However, implementation of the Project would result in additional vehicular trips that could result in traffic impacts. Thus, implementation of the Project could conflict with an existing program, plan, ordinance, or policy addressing the circulation system in effect in the Project area or Citywide, and impacts may be potentially significant. This issue will be analyzed further in the EIR.

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

Potentially Significant Impact. State CEQA Guidelines Section 15064.3 codifies that transportation impacts are measured by evaluating a project’s vehicle miles travelled (VMT). Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT

associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that lead agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that lead agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT, and the City has adopted its own Local VMT Guidelines. Implementation of the Project would result in additional vehicular trips that could result in significant impacts regarding VMT thresholds. Therefore, this issue will be analyzed further in the EIR.

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

Less Than Significant Impact. The Project would introduce roadway and streetscape designs that would facilitate multi-modal streets that conveniently and safely accommodate a variety of users, including pedestrians, bicyclists, transit riders, and motorists. The Project roadway network would include, among other considerations, roadways designed according to the adjacent building intensities and uses, traffic calming offsets, and narrow lane widths and tight curb radii. These design considerations would not constitute a design hazard but would serve to slow automobile travel speeds and require heightened driver awareness of the surroundings to enhance the safety of bicyclists and pedestrians as well as safety of other motorists. The Project land uses represent urban TOD and would not create hazards from incompatible uses in the Project area or with the surrounding area. Future individual development projects under the Project would be subject to the typical development review process, which includes planning and engineering review, and compliance with standard engineering design requirements will ensure no hazardous design conditions. Therefore, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

d) Result in inadequate emergency access?

Less Than Significant Impact. As discussed above, the Project would introduce roadway and streetscape designs that would facilitate multi-modal streets that conveniently and safely accommodate a variety of users, including pedestrians, bicyclists, transit riders, and motorists. The transportation network design in the Project also considers emergency access and accommodates emergency vehicles. As the Project would break up the superblocks in the Project area by introducing new roadways in a more traditional grid pattern, the improved connectivity would benefit emergency vehicles by increasing turning movement options and routes. Moreover, construction of development projects under the Project would require the presence of construction equipment and materials adjacent to roadways. Construction activities 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. Therefore, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	---	---	----------------------

18. TRIBAL CULTURAL RESOURCES.

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

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Potentially Significant Impact. Assembly Bill 52 (2014)(AB 52) requires lead agencies to evaluate a project’s potential to impact Tribal Cultural Resources (TCRs) and establishes a formal notification and, if requested, consultation process for California Native American tribes as part of CEQA. TCRs include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that an agency provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project. Additionally, Senate Bill 18 (2004) (SB 18) requires when a city’s general plan is proposed to be amended that California Native American tribes be notified and, if requested, conduct consultations for the purpose of preserving specified places, features, and objects that are located within that agency’s jurisdiction. The City has provided both SB 18 and AB 52 notification to tribal governments and has initiated consultation with multiple responding tribes as requested, and consultations remain on-going.

The Project is in an urbanized environment that has been disturbed by past development activities. However, construction of development projects under the Project may involve excavation and other

ground-disturbing activities beyond previous levels of disturbance, and thus, the potential exists for the discovery of TCRs. At the present time, the City has not been provided with any information or evidence from tribal governments concerning any known or likely potential sub-surface tribal cultural resources, although consultations are on-going. The Project requires amendments to the GP2035, thereby triggering the SB 18 notification and consultation process. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Potentially Significant Impact. If a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. To be considered a TCR as defined in PRC Section 21074, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. Construction of development projects within the TVSP may involve excavation and other ground-disturbing activities beyond previous levels of disturbance. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

19. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Implementation of the Project would add up to 2,400 residential dwelling units (approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses. The addition of these land uses would increase the demand for water and generation of wastewater that would be conveyed to and from the Project area. This may result in the need for additional or expanded water and sewer pipelines and other existing facilities. Therefore, impacts from TVSP implementation may be potentially significant, and this issue will be analyzed further in the EIR.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. Implementation of the Project would add up to 2,400 residential dwelling units (approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses. The addition of these land uses would increase water demand, which could impact existing and projected water supplies.

Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

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

Potentially Significant Impact. Implementation of the Project would add approximately 2,400 residential dwelling units (approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses. The addition of these land uses is expected to increase the amount of wastewater to be treated at the existing wastewater treatment facility, which may exceed capacity at the facility. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

- d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?**

Potentially Significant Impact. Implementation of the Project would add up to 2,400 residential dwelling units (approximately 4,500 residents), up to 220 hotel rooms, up to 265,000 square feet of retail/commercial uses, and up to 238,000 square feet of office uses. The addition of these land uses would increase the amount of solid waste generation, which may exceed the capacity of local infrastructures or impair solid waste reduction goals. Therefore, impacts from Project implementation may be potentially significant, and this issue will be analyzed further in the EIR.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less Than Significant Impact. The California Integrated Waste Management Act (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995 and 50 percent by 2000. AB 341 (2011) amended AB 939 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020 and annually thereafter. In addition, AB 341 requires California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal.

According to the City's General Plan Sustainable Community Element, future solid waste reduction strategies include improved commercial recycling diversion rates, enhanced food waste diversion, and exploring the potential to generate energy using biomethane from the City's landfill and wastewater treatment plant, among other strategies.

Individual development projects proposed under the Project would be required comply with RMC 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 Project would be required to comply with all federal, state, and local regulations related to solid waste, and toward that end, the Project would comply with all applicable standards related to solid waste diversion, reduction, and recycling during construction and operation. Therefore, implementation of the 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. This issue will not be analyzed further in the EIR.

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

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

Less Than Significant Impact. As discussed in response to 9(g) above, the Project area (as with most of the City) is characterized as having a moderate fire threat level (GP2035 EIR, Figure 3.7-3). The Project area is also not located in or near a state responsibility area. Moreover, as previously discussed in response 9(f) above, the Project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts from Project implementation would be less than significant, and this issue will not be analyzed further in the EIR.

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

No Impact. 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. Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

No Impact. 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. The Project area is served by existing utility and roadway infrastructure. Implementation of the Project would include the introduction of new roadways into each of the transit villages to break up the superblocks and provide for a more traditional grid pattern and may require utility system upgrades to meet future demand during buildout. However, these new roadways within an existing urbanized environment, and anticipated utility upgrades if needed, would not exacerbate fire risk or result in temporary or ongoing impacts to the environment in regards to wildfires. Moreover, the Project would underground electric transmission lines that are less than 66 kilovolts as development occurs from Project buildout, which would also have the benefit of reducing fire risks by eliminating potential sources of ignition such as damaged power lines. Therefore, no impact would occur, and this issue will not be analyzed further in the EIR.

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

Less Than Significant Impact. The Project area is an urbanized environment with moderate fire threat level. The Project area is generally flat with a gentle westerly slope of approximately two percent, and is not located near hillside areas or in the downslope pathway of a potential landslide. While the Project area is within a 100-year floodplain, implementation of the Project would improve the existing drainage. Therefore, post-fire risks related to downstream flooding or landslides would be less than significant. This issue will not be analyzed further in the EIR.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

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

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

Potentially Significant Impact. Implementation of the Project would not substantially reduce the habitat of a fish or wildlife species, or cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, as noted in the foregoing analysis, significant impacts may result to historic, archaeological, and paleontological resources, or to TCRs. Therefore, the potential from Project implementation to eliminate important examples of the major periods of California history or prehistory will be analyzed further in the EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant cumulative impact may occur if a project, in combination with other development projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The effects from buildout of the Project could combine with the impacts of other development projects within or near the City of Redlands.

For those environmental issues discussed above that are to be analyzed in the EIR, the EIR will include an analysis of the cumulative impacts associated with those environmental issues. The following is a list of the cumulative impacts analyses to be included in the 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

The following environmental issues were determined in the foregoing analysis to result in less than significant impacts, and as such, will not be analyzed further in the EIR. The following discussion also determines that significant cumulative impacts would not result from TSVP implementation.

- Agriculture and Forestry Resources
- Biological Resources
- Mineral Resources
- Wildfire

Implementation of the Project would not contribute to a cumulative loss of agriculture or forest land uses or the associated zoning for such activities as no such land would be lost under the Project.

No sensitive, natural biological communities or habitats or special status species would be impacted by Project implementation, and therefore, the Project would not contribute to a cumulative loss of such communities or habitats or species. Other development projects would similarly be required to comply with existing federal, state, and local laws and regulations regarding the protection of biological resources such as nesting migratory birds.

While portions of the New York Street/Esri Transit Village are within the MRZ-2 area, no mineral extraction activities have occurred historically, presently, nor are such activities planned for the future in the Project area. Therefore, the Project would not result in the loss of availability or access to mineral resources, and would not, therefore, result in a cumulatively considerable contribution toward the loss of mineral resources availability or access.

The Project area is in an urbanized environment with a moderate fire threat level, the same level as most of the City. The Project area is not located near areas of high, very high, or extreme fire threat levels and would not expose people or structures or risk of wildfire or otherwise exacerbate the danger of wildfire that is present in the hillside and canyon areas. Other development projects

would be required to comply with existing regulations, such as the California Building Code, to reduce any potential wildfire risk. Implementation of the Project would not result in a considerable contribution to a potential cumulative impact from wildfire.

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

Potentially Significant Impact. The analysis contained in this Initial Study concludes that implementation of the Project may result in potentially significant impacts on human beings both directly and indirectly. The issues that may result in significant impacts will be analyzed further in the EIR as previously described.

5 DOCUMENT PREPARERS AND CONTRIBUTORS

Lead Agency:

City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373

CEQA Document Preparer:

EPD Solutions, Inc.
Konnie Dobrevá, JD, Vice President of Environmental Planning
Renee Escario, Senior Project Manager
Meaghan Truman, Assistant Environmental Planner
Brad Perrine, Senior Project Manager

6 REFERENCES

AirNav (AirNav 2020), <https://www.airnav.com/airports/search.html>

California Department of Fish and Wildlife (CDFW 2019),
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline> (accessed June 16, 2020)

California Department of Water Resources (DWR 2020),
<https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Groundwater-Sustainable-Agencies> (accessed June 16, 2020)

City of Redlands (City Zoning 2020), Zoning Map,
<https://www.cityofredlands.org/sites/main/files/file-attachments/zoning.pdf> (accessed June 16, 2020)

City of Redlands (GP2035 EIR), General Plan 2035 Environmental Impact Report,
<https://www.cityofredlands.org/post/planning-division-general-plan> (accessed June 16, 2020)

City of Redlands (GP2035), General Plan 2035, <https://www.cityofredlands.org/post/planning-division-general-plan> (accessed June 16, 2020)

City of Redlands, Draft Transit Villages Specific Plan, <http://redlandstransitvillages.org>

Redlands Unified School District (RUSD 2020), <https://www.redlandsusd.net/Page/107> (accessed June 16, 2020)

San Bernardino Valley Water Conservation District (SBVWCD Site),
<https://www.sbvxcd.org/our-projects/wash-plan> (accessed June 16, 2020)

San Bernardino Valley Water Conservation District (WP 2020), Draft Wash Plan,
<https://www.sbvxcd.org/wash-plan/6167-washplan-hcp-final-full-clean-20200420/file>
(accessed June 16, 2020)

United States Census Bureau (USCB 2020),
<https://www.census.gov/quickfacts/fact/table/redlandscitycalifornia,US/PST045219> (accessed June 16, 2020)

United States Fish and Wildlife Service (USFWS 2020),
<https://www.fws.gov/wetlands/Data/Mapper.html> (accessed June 16, 2020)



NOTICE OF PREPARATION AND NOTICE OF PUBLIC SCOPING MEETING

Date: September 1, 2021

To: California State Clearinghouse
Responsible and Trustee Agencies

Subject: Notice of Preparation of an Environmental Impact Report for the proposed Redlands General Plan Transit Villages District and Specific Plan Project in the City of Redlands

Lead Agency: City of Redlands

Contact: Brian Foote, Planning Manager/City Planner

Project Title: Redlands General Plan Transit Villages District and Specific Plan

Project Location: The Project area covers approximately 947 acres (approximately 1.48 square miles) and is generally bounded to the west by Kansas Street, Redlands Boulevard, Alabama Street, and Tennessee Street; to the north by Interstate 10, Colton Avenue, and Sylvan Boulevard; to the east by Judson Street; and to the south by Citrus Avenue, Central Avenue, Redlands Boulevard, Olive Avenue, Brookside Avenue, Ash Street, Pine Avenue, Tennessee Street, and State Street. The Project area also includes the parcels fronting both sides of the Orange Street corridor between Colton Avenue and Lugonia Avenue (see Figure 1, *Project Location*).

In accordance with Section 15021 of the California Environmental Quality Act (CEQA) Guidelines, the City of Redlands (City), as lead agency, will prepare a Draft Environmental Impact Report (DEIR) for the Redlands General Plan Transit Villages District and Specific Plan (referred to herein as the Proposed Project or Project). Pursuant to Section 15082(a) of the State CEQA Guidelines, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, the San Bernardino County Clerk, and other interested parties with information describing the Proposed Project and its potential environmental effects. The City is soliciting your comments on the scope of the analysis to be contained in the DEIR.

In compliance with the time limits mandated by CEQA, the comment period for this NOP is **30 calendar days** starting on **September 1, 2021, and ending on September 30, 2021.** Your

response must be sent at the earliest possible date, but no later than 30 days after the date of this notice pursuant to State CEQA Guidelines Section 15082(b) and must include the name of a contact person at your agency or organization. Please send or e-mail your written responses to:

Brian Foote, Planning Manager/City Planner
City of Redlands
P.O. Box 3005
Redlands, CA 92373
Email: bfoote@cityofredlands.org

Copies of the NOP and Initial Study are available for review at the following locations:

City of Redlands, Planning Division
35 Cajon Street, Suite 20
Redlands, CA 92373

A.K. Smiley Public Library
125 W. Vine Street
Redlands, CA 92373
(909) 798 – 7565

The document can also be accessed on the City's website at:
<https://www.cityofredlands.org/post/environmental-documents>

Notice of Scoping Meeting: Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties as to the scope and content of the DEIR. The Responsible/Trustee Agency scoping meeting will be held at the following time and location: **September 15, 2021, at 4:00 p.m.** online via Zoom webinar. Pre-registration is required, and you may pre-register at the following link: https://cityofredlands.zoom.us/webinar/register/WN_5_jnA1K0RW2-MBo0aGYG1Q. A Zoom webinar link will be emailed to you after your registration form is submitted.

If you have further questions or require additional information, please contact Brian Foote, Planning Manager, at (909) 798-7562, or send an email to 'bfoote@cityofredlands.org'.



Brian Foote
Planning Manager/City Planner

August 30, 2021

Date

Project Description: The 2035 General Plan (GP2305) includes more than 100 policies and actions related to the future development of transit villages around the new Arrow passenger rail line stations in the City. Of the five Arrow rail stations that were shown in the GP2035, three are currently being built by San Bernardino County Transportation Authority (SBCTA) in the first phase of Arrow's operation: New York Street/Esri Station, Downtown Station, and University Station. The remaining two stations, which will be located at Alabama Street and California Street, will be built by SBCTA in a later phase of Arrow development, the timing of which is unknown at this time.

The proposed Project would advance the GP2035's present Transit Village Strategy and Concept by amending the GP2035 to establish the new Transit Villages District land use designation to encourage development in the center of town by providing a plan for introducing new residential and commercial uses located within 0.5 mile of each of these three new stations. As a form-based code, the Project would emphasize building form, a mix and density of different uses, strong pedestrian orientation and transit-oriented development, and public realm improvements and amenities.

The Project proposes three transit villages: New York Street/Esri Village, Downtown Transit Village, and University Village. A brief summary of the objectives for each village is provided below.

New York Street/Esri Village

The Project would implement mixed-use development on the vacant and underutilized parcels and provide tree-lined streets and sidewalks for pedestrian access to the station, Esri campus, and Downtown Village area. Infill development in the area would reduce the scale of the existing area blocks to provide consistency in scale with the Downtown Transit Village and surrounding pre-World War II neighborhoods.

Downtown Transit Village

The Project for the Downtown Transit Village would provide a walkable mixed-use district consisting of pedestrian-scaled blocks, tree-lined streets with seating and exterior dining opportunities, and squares and plazas. Surface parking lots would be infilled with compact mixed use development that would utilize onsite parking garages. The Downtown Transit Village anticipates redevelopment of the Redlands Mall site, (for which applications are presently being processed with the City) and the realignment of State Street and Third Street to restore the interconnected block pattern that existing prior to construction of the mall.

University Village

This village would be redeveloped with pedestrian-oriented mixed-use buildings and connect directly with the University of Redlands campus. Amenities in this village would also be directed toward university students and faculty. The mixed-use buildings would be concentrated along the Rambla corridor, a distinctive north-south running thoroughfare between Central Avenue and Sylvan Boulevard with travel lanes on either side of a median.

Regulating Plan and Zones:

The Project identifies allowed land uses and, through the TVSP, provides detailed standards for building placement, height, massing, articulation, frontage, landscape, and parking based on a form-based code. The form-based code incorporates a gradual transitioning of the height and mass of larger buildings from larger to smaller to avoid incompatible buildings heights next to each other. The TVSP's regulating plan is shown in Figure 2, *Regulating Plan*, and would serve

as the zoning map for the TVSP. A summary of the Regulating Plan districts follows:

- **Village Center (VC).** This district applies to the parcels immediately surrounding the three Arrow stations. Like the three- and four-story buildings that lined State Street and Orange Street prior to World War II, new buildings in this zone could reach a height of four stories and would be mixed-use, all residential, or all office. Retail ground floors would be located at the back of sidewalk, while residential ground floors may be placed behind small front yards. Parking would be located within structured garages behind buildings or storefront liners, or constructed subterranean.
- **Downtown (DT).** This district applies to parcels facing State Street east of Orange Street, and along the east side of Orange Street between the railway right of way and State Street. This district is largely built-out. New buildings could be up to three stories in height and accommodate a mix of uses with commercial ground floors and residential or commercial upper floors. Parking would be located within structured garages behind buildings or storefront liners, subterranean, or in park-once lots or structures.
- **Village General (VG).** This district applies to parcels located around the periphery of the three Arrow stations and permits multi-family and mixed-use buildings with an average height of three stories. Parking may be within structured garages or surface lots that would be located behind buildings, or subterranean garages.
- **Village Corridor (COR).** This district applies to parcels located along the north side of Colton Avenue, both sides of Orange Street north of the I-10, and both sides of Olive Avenue. This district provides for small-scale mixed-use buildings up to two stories in height, with commercial ground floors and residential or commercial upper floors. Parking lots would be located behind and to the sides of buildings.
- **Neighborhood General 1 (NG1).** This district applies to parcels located between Sixth Street and Church Street and would provide for small-scale commercial and residential-style buildings that accommodate commercial, light industrial, and live-work uses. New buildings would be up to two stories in height. Parking lots would be allowed behind and to the side of buildings.
- **Neighborhood General 2 (NG2).** This district would enable house-form buildings that accommodate residential and office uses. New buildings would be up to two stories in height and set back from the sidewalk behind front yards. Parking lots would be located behind buildings. New buildings would match or complement prevalent building setbacks along the length of the block and complement building heights and massing of adjacent buildings or buildings across the street.
- **Special District (SD).** This district applies to school and other institutional sites. New buildings would accommodate educational, religious, and other civic uses. Parking would be in surface parking lots or garages.
- **Civil Space (CS).** This district applies to parks, plazas, greens, and other open spaces within the TVSP area. These open spaces may accommodate small structures such as gazebos, restrooms, and community centers.

The Project also includes provisions for transportation and circulation, open space, and infrastructure. The Project provides a framework for complete, multi-modal streets that provide

for pedestrians, bicycles, transit patrons, and motorists in a mixed-use environment around the three Arrow stations. The Project also includes parking improvements in the Downtown Transit Village that include on-street parallel parking, angled parking, parking lot expansion, and new parking garages. Moreover, the proposed street and open space network would provide contiguous green space connecting the TVSP villages. Further, the Project identifies the necessary water system infrastructure improvements and the addition of non-potable water mains, and design considerations to address the existing 100-year floodplain as well as means to reduce the floodplain area.

The Project requires General Plan Amendments to change land use designations of parcels per Redlands Transit Villages Specific Plan, e.g., to a “Transit Village” land use classification, General Plan Amendments for minor changes to the design or designations of certain street segments, and minor text amendments to one or more policies to achieve consistency as may be required, and a Zone Change to designate the Project area as “Specific Plan.”

Environmental Issues: Based on the Initial Study, the City anticipates that the following environmental topic areas will be addressed in the DEIR:

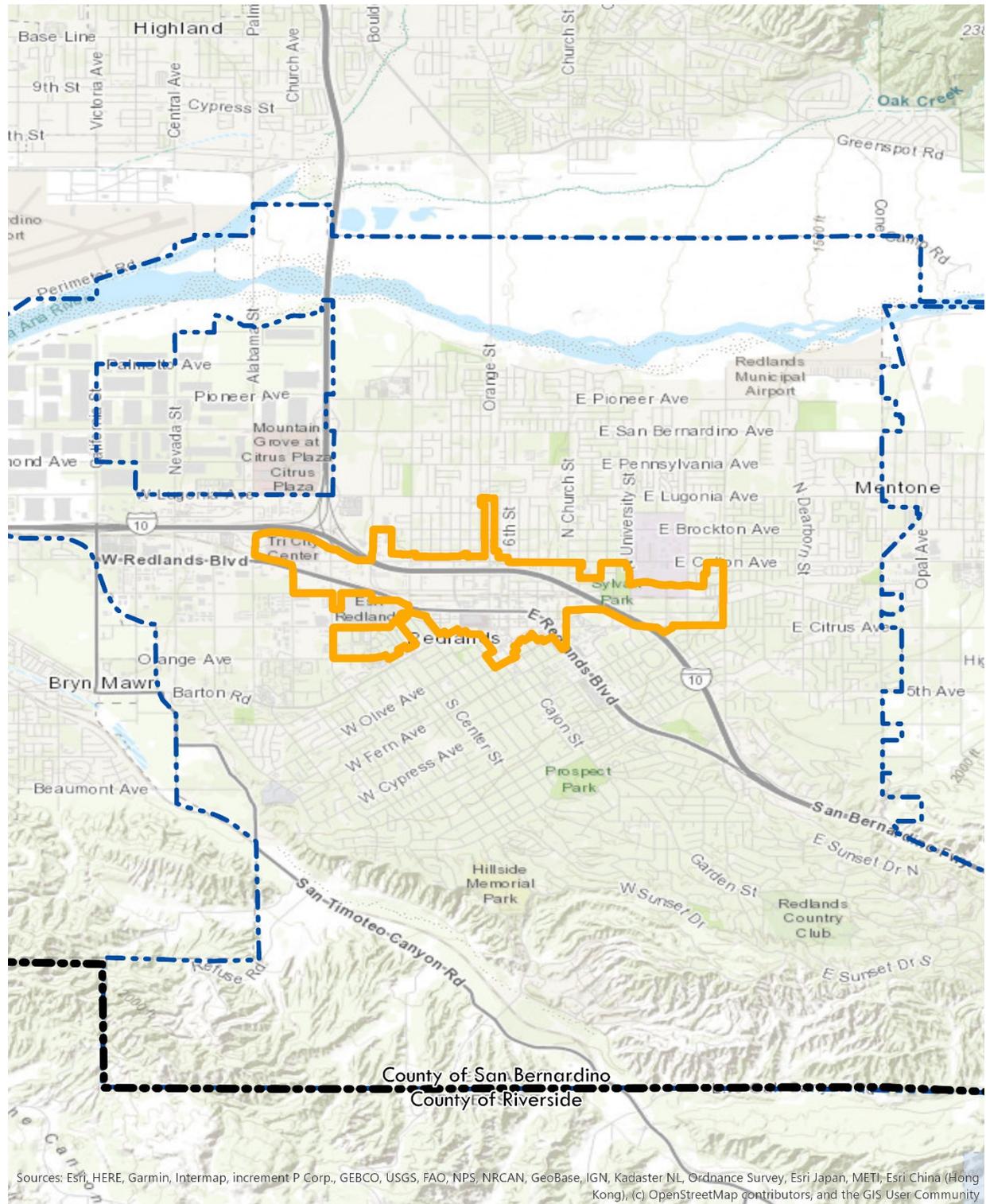
- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance

Environmental Issues not Potentially Affected: As analyzed and determined in the Initial Study, no significant impacts associated with Agriculture and Forestry Resources, Biological Resources, Mineral Resources, and Wildfire would occur as a result of the Project, and therefore these factors will not need to be analyzed further in the DEIR.

Figures

- Figure 1 Project Location
- Figure 2 Regulating Plan

Figure 1 – Project Location

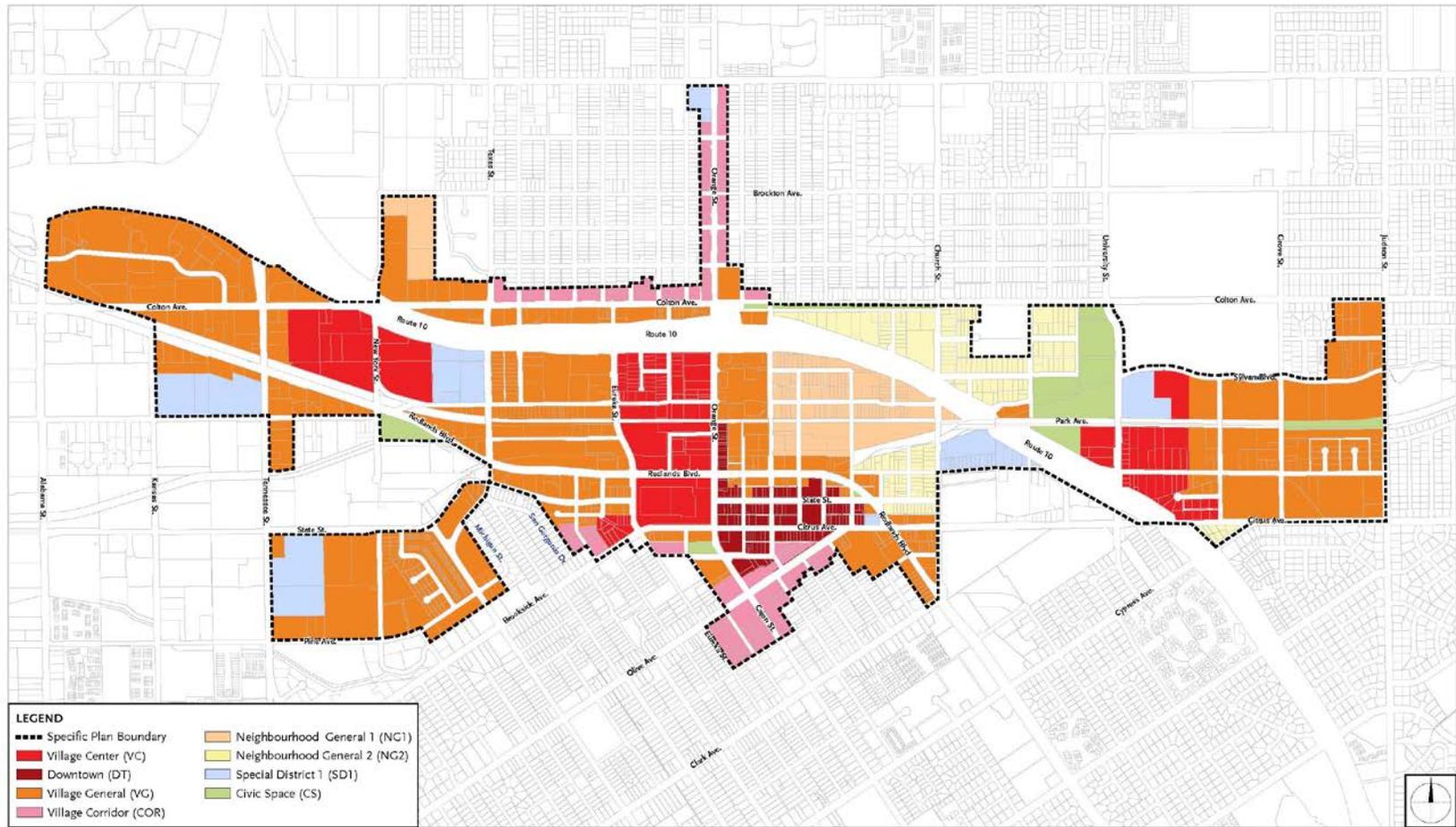


 Project Site

 Redlands City Limits



Figure 2 – Regulating Plan





**NOTICE OF PREPARATION AND
NOTICE OF PUBLIC SCOPING MEETING**

Date: September 1, 2021

To: California State Clearinghouse
San Bernardino County Clerk
Interested Parties

Subject: Notice of Preparation of an Environmental Impact Report for the proposed Redlands General Plan Transit Villages District and Specific Plan Project in the City of Redlands

Lead Agency: City of Redlands

Contact: Brian Foote, Planning Manager/City Planner

Project Title: Redlands General Plan Transit Villages District and Specific Plan

Project Location: The Project area covers approximately 947 acres (approximately 1.48 square miles) and is generally bounded to the west by Kansas Street, Redlands Boulevard, Alabama Street, and Tennessee Street; to the north by Interstate 10, Colton Avenue, and Sylvan Boulevard; to the east by Judson Street; and to the south by Citrus Avenue, Central Avenue, Redlands Boulevard, Olive Avenue, Brookside Avenue, Ash Street, Pine Avenue, Tennessee Street, and State Street. The Project area also includes the parcels fronting both sides of the Orange Street corridor between Colton Avenue and Lugonia Avenue (see Figure 1, *Project Location*).

In accordance with Section 15021 of the California Environmental Quality Act (CEQA) Guidelines, the City of Redlands (City), as lead agency, will prepare a Draft Environmental Impact Report (DEIR) for the Redlands General Plan Transit Villages District and Specific Plan (referred to herein as the Proposed Project or Project). Pursuant to Section 15082(a) of the State CEQA Guidelines, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, the San Bernardino County Clerk, and other interested parties with information describing the Proposed Project and its potential environmental effects. The City is soliciting your comments on the scope of the analysis to be contained in the DEIR.

In compliance with the time limits mandated by CEQA, the comment period for this NOP is **30 calendar days** starting on **September 1, 2021, and ending on September 30, 2021**. **Your response must be sent at the earliest possible date, but no later than 30 days after the date of this notice pursuant to State CEQA Guidelines Section 15082(b)**. If representing an organization, your response must include the name of a contact person at your agency or organization. Please send or e-mail your written response or comments to:

Brian Foote, Planning Manager/City Planner
City of Redlands
35 Cajon Street, Suite 20
Mailing: P.O. Box 3005
Redlands, CA 92373
Email: bfoote@cityofredlands.org

Copies of the NOP and Initial Study are available for review at the following locations:

City of Redlands, Planning Division
35 Cajon Street
Redlands, CA 92373

A.K. Smiley Public Library
125 W. Vine Street
Redlands, CA 92373
(909) 798 – 7565

The document can also be accessed on the City's website at:
<https://www.cityofredlands.org/post/environmental-documents>

Notice of Scoping Meeting: Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties as to the scope and content of the DEIR. The general public scoping meeting will be held at the following time and location: **September 15, 2021, at 5:00 p.m.** online via Zoom webinar. Pre-registration is required, and you may pre-register at the following link: https://cityofredlands.zoom.us/webinar/register/WN_CeKX1x4PQiWQsKjI1wzEUQ. A Zoom webinar link will be emailed to you after your registration form is submitted.

If you have further questions or require additional information, please contact Brian Foote, Planning Manager, at (909) 798-7562, or send an email to 'bfoote@cityofredlands.org'.



Brian Foote
Planning Manager/City Planner

August 30, 2021

Date

Project Description: The 2035 General Plan (GP2305) includes more than 100 policies and actions related to the future development of transit villages around the new Arrow passenger rail line stations in the City. Of the five Arrow rail stations that were shown in the GP2035, three are currently being built by San Bernardino County Transportation Authority (SBCTA) in the first phase of Arrow's operation: New York Street/Esri Station, Downtown Station, and University Station. The remaining two stations, which will be located at Alabama Street and California Street, will be built by SBCTA in a later phase of Arrow development, the timing of which is unknown at this time.

The proposed Project would advance the GP2035's present Transit Village Strategy and Concept by amending the GP2035 to establish the new Transit Villages District land use designation to encourage development in the center of town by providing a plan for introducing new residential and commercial uses located within 0.5 mile of each of these three new stations. As a form-based code, the Project would emphasize building form, a mix and density of different uses, strong pedestrian orientation and transit-oriented development, and public realm improvements and amenities.

The Project proposes three transit villages: New York Street/Esri Village, Downtown Transit Village, and University Village. A brief summary of the objectives for each village is provided below.

New York Street/Esri Village

The Project would implement mixed-use development on the vacant and underutilized parcels and provide tree-lined streets and sidewalks for pedestrian access to the station, Esri campus, and Downtown Village area. Infill development in the area would reduce the scale of the existing area blocks to provide consistency in scale with the Downtown Transit Village and surrounding pre-World War II neighborhoods.

Downtown Transit Village

The Project for the Downtown Transit Village would provide a walkable mixed-use district consisting of pedestrian-scaled blocks, tree-lined streets with seating and exterior dining opportunities, and squares and plazas. Surface parking lots would be infilled with compact mixed use development that would utilize onsite parking garages. The Downtown Transit Village anticipates redevelopment of the Redlands Mall site, (for which applications are presently being processed with the City) and the realignment of State Street and Third Street to restore the interconnected block pattern that existing prior to construction of the mall.

University Village

This village would be redeveloped with pedestrian-oriented mixed-use buildings and connect directly with the University of Redlands campus. Amenities in this village would also be directed toward university students and faculty. The mixed-use buildings would be concentrated along the Rambla corridor, a distinctive north-south running thoroughfare between Central Avenue and Sylvan Boulevard with travel lanes on either side of a median.

Regulating Plan and Zones:

The Project identifies allowed land uses and, through the TVSP, provides detailed standards for building placement, height, massing, articulation, frontage, landscape, and parking based on a form-based code. The form-based code incorporates a gradual transitioning of the height and mass of larger buildings from larger to smaller to avoid incompatible buildings heights next to each other. The TVSP's regulating plan is shown in Figure 2, *Regulating Plan*, and would serve

as the zoning map for the TVSP. A summary of the Regulating Plan districts follows:

- **Village Center (VC).** This district applies to the parcels immediately surrounding the three Arrow stations. Like the three- and four-story buildings that lined State Street and Orange Street prior to World War II, new buildings in this zone could reach a height of four stories and would be mixed-use, all residential, or all office. Retail ground floors would be located at the back of sidewalk, while residential ground floors may be placed behind small front yards. Parking would be located within structured garages behind buildings or storefront liners, or constructed subterranean.
- **Downtown (DT).** This district applies to parcels facing State Street east of Orange Street, and along the east side of Orange Street between the railway right of way and State Street. This district is largely built-out. New buildings could be up to three stories in height and accommodate a mix of uses with commercial ground floors and residential or commercial upper floors. Parking would be located within structured garages behind buildings or storefront liners, subterranean, or in park-once lots or structures.
- **Village General (VG).** This district applies to parcels located around the periphery of the three Arrow stations and permits multi-family and mixed-use buildings with an average height of three stories. Parking may be within structured garages or surface lots that would be located behind buildings, or subterranean garages.
- **Village Corridor (COR).** This district applies to parcels located along the north side of Colton Avenue, both sides of Orange Street north of the I-10, and both sides of Olive Avenue. This district provides for small-scale mixed-use buildings up to two stories in height, with commercial ground floors and residential or commercial upper floors. Parking lots would be located behind and to the sides of buildings.
- **Neighborhood General 1 (NG1).** This district applies to parcels located between Sixth Street and Church Street and would provide for small-scale commercial and residential-style buildings that accommodate commercial, light industrial, and live-work uses. New buildings would be up to two stories in height. Parking lots would be allowed behind and to the side of buildings.
- **Neighborhood General 2 (NG2).** This district would enable house-form buildings that accommodate residential and office uses. New buildings would be up to two stories in height and set back from the sidewalk behind front yards. Parking lots would be located behind buildings. New buildings would match or complement prevalent building setbacks along the length of the block and complement building heights and massing of adjacent buildings or buildings across the street.
- **Special District (SD).** This district applies to school and other institutional sites. New buildings would accommodate educational, religious, and other civic uses. Parking would be in surface parking lots or garages.
- **Civil Space (CS).** This district applies to parks, plazas, greens, and other open spaces within the TVSP area. These open spaces may accommodate small structures such as gazebos, restrooms, and community centers.

The Project also includes provisions for transportation and circulation, open space, and infrastructure. The Project provides a framework for complete, multi-modal streets that provide

for pedestrians, bicycles, transit patrons, and motorists in a mixed-use environment around the three Arrow stations. The Project also includes parking improvements in the Downtown Transit Village that include on-street parallel parking, angled parking, parking lot expansion, and new parking garages. Moreover, the proposed street and open space network would provide contiguous green space connecting the TVSP villages. Further, the Project identifies the necessary water system infrastructure improvements and the addition of non-potable water mains, and design considerations to address the existing 100-year floodplain as well as means to reduce the floodplain area.

The Project requires General Plan Amendments to change land use designations of parcels per Redlands Transit Villages Specific Plan, e.g., to a “Transit Village” land use classification, General Plan Amendments for minor changes to the design or designations of certain street segments, and minor text amendments to one or more policies to achieve consistency as may be required, and a Zone Change to designate the Project area as “Specific Plan.”

Environmental Issues: Based on the Initial Study, the City anticipates that the following environmental topic areas will be addressed in the DEIR:

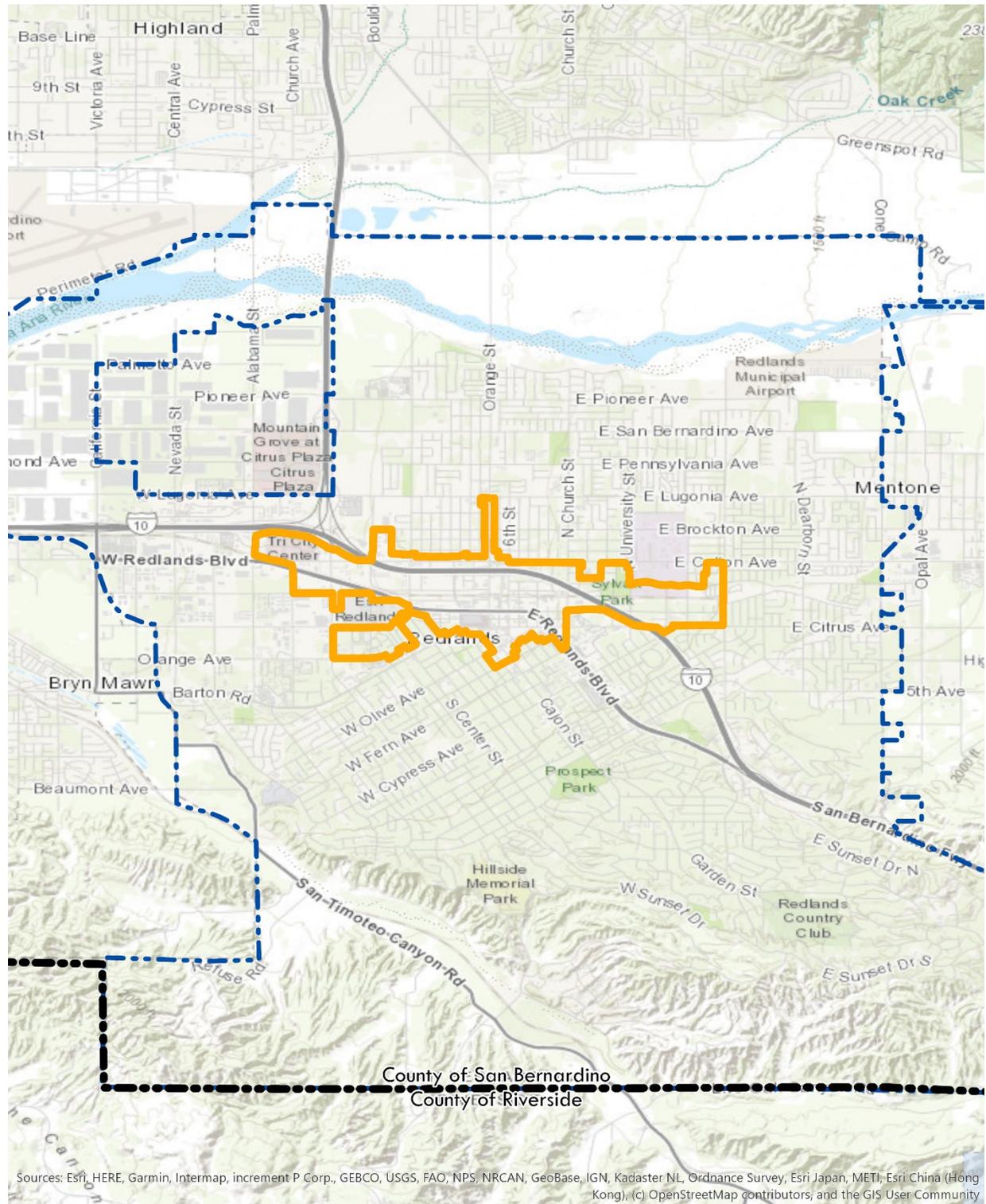
- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance

Environmental Issues not Potentially Affected: As analyzed and determined in the Initial Study, no significant impacts associated with Agriculture and Forestry Resources, Biological Resources, Mineral Resources, and Wildfire would occur as a result of the Project, and therefore these factors will not need to be analyzed further in the DEIR.

Figures

- Figure 1 Project Location
- Figure 2 Regulating Plan

Figure 1 – Project Location



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



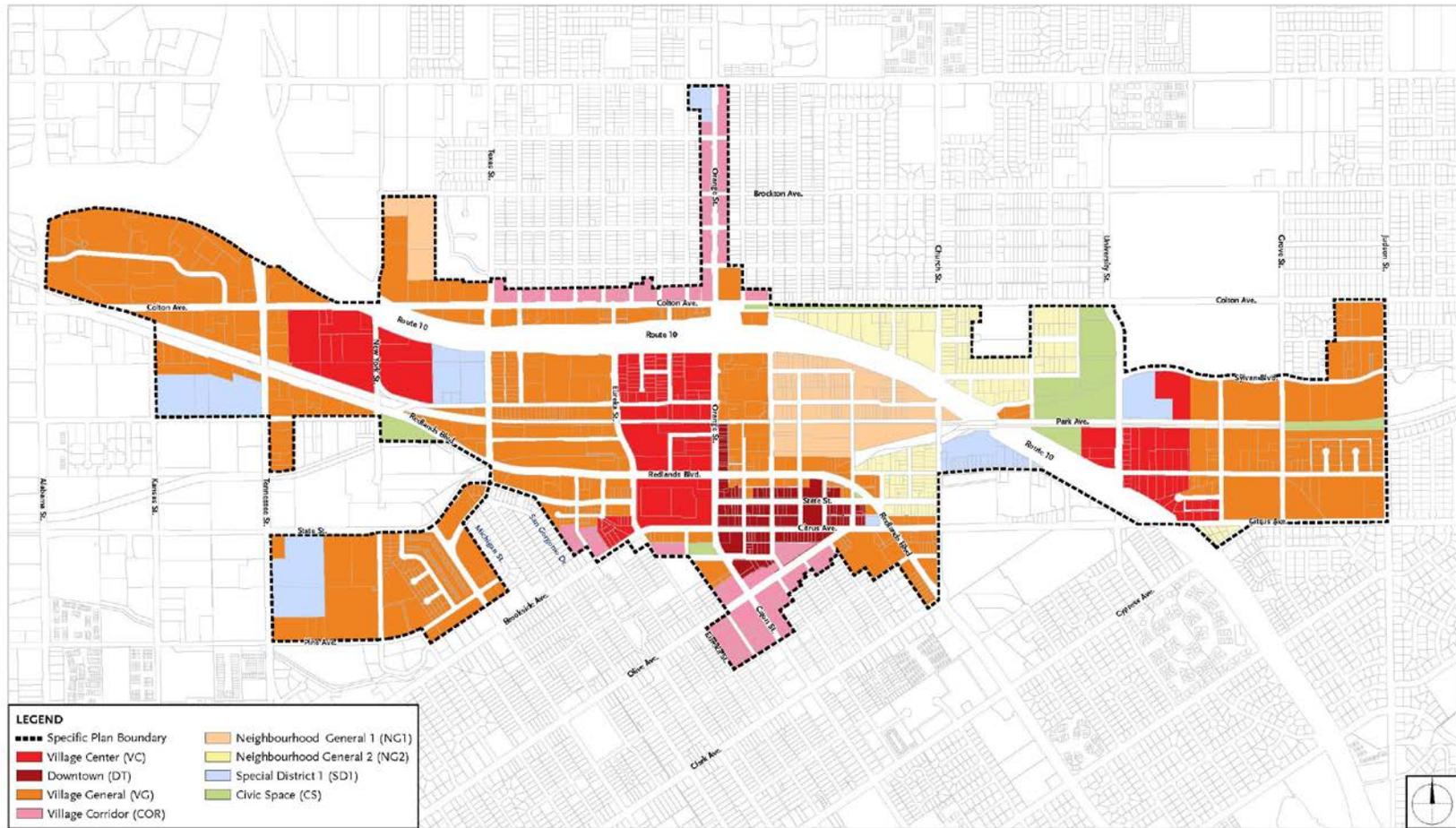
Project Site



Redlands City Limits



Figure 2 – Regulating Plan



P: (626) 381-9248
F: (626) 389-5414
E: info@mitschtsailaw.com



Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

September 30, 2021

Brian Foote, Planning Manager
City of Redlands
P.O. Box 3005
Redlands, CA 92373
Em: bfoote@cityofredlands.org

RE: Redlands General Plan Transit Villages District and Specific Plan Project – Notice of Preparation of Draft Environmental Impact Report (SCH No. 2021080622)

Dear Brian Foote,

On behalf of the Southwest Regional Council of Carpenters (“**Commenters**” or “**Southwest Carpenters**”), my Office is submitting these comments on the City of Redlands’ (“**City**” or “**Lead Agency**”) Notice of Preparation of an Environmental Impact Report (“**NOP**”) (SCH No. 2021080622) for the Redlands General Plan Transit Villages District and Specific Plan project (“**Project**”).

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states, including California, and has a strong interest in well-ordered land use planning, addressing the environmental impacts of development projects and equitable economic development.

Individual members of the Southwest live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserve the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporate by reference all comments raising issues regarding the environmental impact report (“**EIR**”) submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenters request that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require development projects constructed within the Project Area to provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of a project site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”³

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

³ City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

labor-management training programs, . . .”⁴ In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”⁵

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.⁶

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁷ Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about

⁴ City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.

⁵ City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

⁶ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

⁷ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

Also, the City should require buildings constructed within the Project area to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project’s environmental impacts and to advance progress towards the State of California’s environmental goals.

I. **THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations (“**CCR**” or “**CEQA Guidelines**”) § 15002(a)(1).⁸ “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to

⁸ The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 150000 et seq, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal. 3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. (*Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131.) As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449–450).

B. Due to the COVID-19 Crisis, the City Must Adopt a Mandatory Finding of Significance that the Project May Cause a Substantial Adverse Effect on Human Beings and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁹

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from construction activities within the Project area. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the construction sites within the Project area.

In particular, based upon SWRCC's experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted:

Construction Site Design:

- The construction sites will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the construction site and construction site logistics for conducting temperature screening.

⁹ Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the construction site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the construction site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.¹⁰

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at construction sites within the Project Area.

¹⁰ See also The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, available at https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

SWRCC has also developed a rigorous Infection Control Risk Assessment (“**ICRA**”) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.¹¹

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should buildings constructed within the Project area to be built using a workforce trained in ICRA protocols.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,



Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

¹¹ For details concerning SWRCC’s ICRA training program, see <https://icrahealthcare.com/>.

EXHIBIT A



Technical Consultation, Data Analysis and
Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise (“SWAPE”) is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas (“GHG”) emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model (“CalEEMod”) is a “statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.”¹ CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.²

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.³

¹ “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

² “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

³ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled (“VMT”) associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.⁴

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

$$\text{“VMT}_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.”⁵

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

$$\text{“Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$ = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$ = emission factor for running emissions.”⁶

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.⁷ In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence.⁸ The default number of construction-related worker trips is calculated by multiplying the

⁴ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.

⁵ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.

⁶ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

⁷ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

⁸ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.⁹ Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively.”¹⁰ Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.¹¹ The operational home-to-work vehicle trip lengths are:

“[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings” (emphasis added).¹²

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).¹³

Worker Trip Length by Air Basin		
Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	16.47	11.17
Minimum	10.80	10.80
Maximum	19.80	14.70
Range	9.00	3.90

⁹ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

¹⁰ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

¹¹ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.

¹² “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.

¹³ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8- miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7- miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan (“Project”) located in the City of Claremont (“City”). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.¹⁴ In an effort to evaluate the potential for a local hire provision to reduce the Project’s construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,623
Amortized Construction GHG Emissions (MT CO ₂ e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,024
Amortized Construction GHG Emissions (MT CO ₂ e/year)	100.80
% Decrease in Construction-related GHG Emissions	17%

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project’s urbanization level and location.

¹⁴ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

A handwritten signature in blue ink that reads "Matt Hagemann". The signature is fluid and cursive.

Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink that reads "Paul Rosenfeld". The signature is fluid and cursive.

Paul E. Rosenfeld, Ph.D.

EXHIBIT B



Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermol and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellev, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office, Publications Clearinghouse (MS-6)*, Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States” Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florida, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld, P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld, P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 2010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

- In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019
- In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”
Defendant.
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19
- In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018
- In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017
- In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017
- In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017
- In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018
- In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action NO. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward
DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City
Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C



1640 5th St., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

**Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Brendon Biggs, M.S., P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

Trevor Leja
Assistant Director

September 28, 2021

File: 10(ENV)-4.01

City of Redlands
Attn: Brian Foote, Planning Manager/City Planner
P.O. Box 3005
Redlands, CA 92373
Email: bfoote@cityofredlands.org

Transmitted Via Email

RE: CEQA – NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN TRANSIT VILLAGES DISTRICT AND SPECIFIC PLAN

Dear Mr. Foote:

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 August 31, 2021** and pursuant to our review, we have the following comments:

Flood Control Planning & Water Resources Division (Michael Fam, Chief, 909-387-8120):

1. We are aware there may be storm drains in and around the site that may be affected by the proposed Project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the District's Comprehensive Storm Drain Plan (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 City of Redlands. Should construction of new, or alterations to existing storm drains 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.

BOARD OF SUPERVISORS

COL. PAUL COOK (RET.)
First District

JANICE RUTHERFORD
Second District

DAWN ROWE
Vice Chair, Third District

CURT HAGMAN
Chairman, Fourth District

JOE BACA, JR.
Fifth District

Leonard X. Hernandez
Chief Executive Officer

Permits/Operations Support Division (Sameh Basta, Chief, 909-387-7995):

1. San Bernardino County Flood Control District (SBCFCD) right-of way and facilities are located within the proposed Project area. Any encroachments including, but not limited to access for grading, utility crossings, pedestrian and bicycle trails on the District's right-of-way or facilities that is not authorized under Permit P-22017018 to SBCTA for rail line construction will require a permit from the SBCFCD prior to start of construction. The necessity for permits, and any impacts associated with them, should be addressed in the EIR prior to adoption and certification. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863

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 contact the individuals who provided the specific comment, as listed above.

Sincerely,

Michael Perry

MICHAEL R. PERRY
Supervising Planner
Environmental Management

MP:AJ:nl

September 29, 2021

RECEIVED

SEP 29 2021

Redlands City Clerk

City of Redlands
35 Cajon St.
Redlands, CA 92373
via hand carry to Clerk's Office

Attention: Mayor Barich and Brian Foote
Re: Environmental Impact Report Transit Village Specific
Plan etc.

Dear Sirs.

This is in response to the request for Public Comment
to be made prior to September 30, 2021.

PRELIMINARY OBJECTIONS:

1. The information as to the short time period for public comment was not published in a manner that reached the residents of Redlands. In past years Redlands had a daily newspaper with a substantial circulation. Redlands presently has the Facts which is not a local newspaper with a local staff but rather part of an Orange County based chain of newspapers which maintains a local staff to secure advertising only. Unless Redlands residents constantly monitor the City web sites no current daily information as to the subject Environmental Impact Report progress is available.
2. Apparently Brian Foote, as the City Staff employee assigned called the required conference and insisted that it be a ZOOM meeting. Many of us in Redlands do not use zoom which reportedly resulted in negligible attendance at what should have been an in person meeting. The City Council has clearly established that public meetings are once again the manner in which the City conducts business.

THE CITY NEEDS TO CORRECT THE RECENT ERRORS BY EXTENDING THE SEPT 30 DEADLINE PLUS GIVING NOTICE IN A MANNER LIKELY TO REACH ALL THE RESIDENTS:

1. As there is a lack of newspaper or other media which reaches a majority of the residents the logical method to advise the residents is a postal mailing to all local occupants.
2. The ZOOM meeting should be disregarded and an in person meeting be rescheduled in the City Hall or other venue appropriate for a public meeting. Notice of that rescheduled meeting should be given in a manner so as to actually reach the residents.

Environmental Reports of this magnitude are likely to cause the procedures and conclusions to be the subject of a thorough review in the Courts. This will be a very broad reaching Environmental Report and short cuts in the process will make judicial disapproval more likely.



Fred H. Dill
411 Brookside Ave.
Redlands, Ca 92373



NATIVE AMERICAN HERITAGE COMMISSION



September 10, 2021

Brian Foote
City of Redlands
P.O. Box 3005
Redlands, CA 92373

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
**Julie Tumamait-
Stenslie**
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2021080622, Redlands General Plan Transit Villages District and Specific Plan Project, San Bernardino County

Dear Mr. Foote:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

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, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

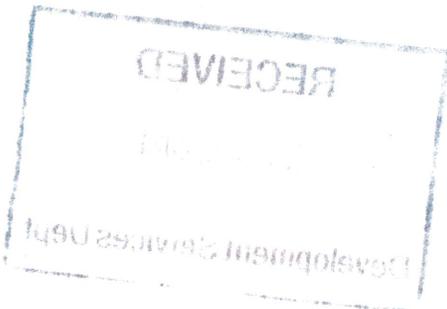
If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



RECEIVED
SEP 20 2021
Development Services Dept



September 21, 2021

Brian Foote, City Planner
Development Services Department
City of Redlands
P.O. Box 3005
Redlands, CA 92373

RE: Draft Redlands Transit Villages Specific Plan EIR

Dear Mr. Foote:

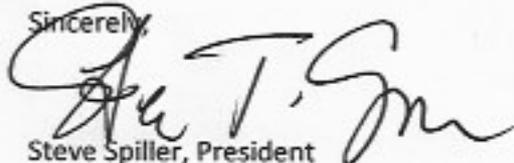
The Redlands Area Historical Society appreciates the opportunity to make comment on the proposed preparation of an Environmental Impact Report on the proposed **Redlands Transit Village Specific Plan**. The Society has reviewed the draft document for the downtown Redlands Transit Villages and has made comment on its preparation.

Our primary concern for the environmental review is the potential impacts to the several hundred historic resources that are found within the Specific Plan boundaries and its immediate adjacency. The attached is a listing of properties that should be considered in the analysis. These include several structures that have been given the Historical Society's Heritage Awards over the years. Also included are historic resources that are immediately adjacent to the Plan boundaries.

The EIR should review and analyze the potential future impacts that new development under the proposed Specific Plan would have on these properties. If impacted the EIR should outline what mitigation measures should be used to protect or lessen any future impacts.

Please contact us should you have any questions.

Sincerely,


Steve Spiller, President


Ron Running, Vice President

Attachment 1 Transit Village SP Historic Resource List

**Attachment 1
Redlands Transit Villages Specific Plan
Figure 1-3 Historic Resources**

**Listed on the City's "List of
Historic Resources" (6-17-21)?**

Address	Name/Use	APN	Comment
Bonita Street:			
529 Bonita	S.F. Home	0170-131-21	1904
Brookside Avenue:			
302 Brookside	Apartment Building	0171-203-13	Mediterranean style
Cajon Street:			
201 Cajon (10 E. Olive)	Sawyer Insurance Building	0171-331-010	2014 Heritage Award, Mission Revival style
Citrus Avenue:			
5 E. Citrus	Academy of Music Building	0171-121-04	1998 Heritage Award. 1891
19 E. Citrus	Cope Commercial Building	0171-121-03	1985 Heritage Award, 1903
125 E. Citrus	Provident Bank Building		
415 W. Citrus	S.F. Home	0171-211-10	1904 Permit no. 448
423 W. Citrus	S.F. Home	0171-211-08	1904 s/a
427 W. Citrus	S.F. Home	0171-211-07	1904 s/a
Colton Avenue:			
806 E. Colton	S.F. Home	0170-071-07	1910
808 E. Colton	S.F. Home	0170-071-08	1908
810 E. Colton	S.F. Home	0170-071-09	
812 E. Colton	S.F. Home	0170-071-10	
814 E. Colton	S.F. Home	0170-071-11	1904
816 E. Colton	S.F. Home	0170-071-12	1908
818 E. Colton	S.F. Home	0170-071-13	1901
1000 E. Colton	S.F. Home	0170-081-04	1905
1006 E. Colton	S.F. Home	0170-081-05	1901
1012 E. Colton	S.F. Home	0170-081-06	1904
1016 E. Colton	S.F. Home	0170-081-07	1926
603 W. Colton		0169-142-10	1921
402 W. Colton	Glass Shop – former church	0169-046-10	
320 W. Colton		0169-053-15	1903
314 W. Colton		0169-053-14	1907
310 W. Colton		0169-053-13	1922
306 W. Colton		0169-053-12	1900

No

Yes
HR #81

Yes
HR #91

Yes, NR,
HL #57

No

Yes, HR #54

No

No

No

No

No

No

No

Yes, HR 110

No

No

224 W. Colton		0169-053-11	1901	No
222 W. Colton		0169-053-10		No
214 W. Colton		0169-056-09		No
208 W. Colton		0169-056-08		No
206 W. Colton		0169-056-07		No
201 W. Colton		0169-054-03	1904	No
127 W. Colton		0169-154-06	1910	No
126 W. Colton		0169-063-14		No
120 W. Colton		0169-063-13	1923	No
115 W. Colton		0169-202-01		No
114 W. Colton		0169-063-16	1901	No
108 W. Colton		0169-063-17		No
107 W. Colton		0169-202-02	1912	No
39 W. Colton		0169-202-04		No
Division Street:				
509 Division	S.F. Home	0170-132-14	1925	No
615 Division	S.F. Home		On parcel w/ 861 High	No
First Street:				
47 N. First	Chamber of Commerce	0171-034-01	1900	Yes, HR #129
Fifth Street:				
113 N. Fifth	Old Augie's Building	0171-061-19		No
High Avenue:				
804 E. High	S.F. Home	0170-131-11	1956	No
805 E. High	Duplex	0170-072-35	1900	No
807 E. High	S.F. Home	0170-072-34	1902	No
809 E. High	S.F. Home	0170-072-33	1903	Yes, HR #92
813 E. High	S.F. Home 2 units	0170-072-31	1902	No
814 E. High	S.F. Home	0170-132-05	1887	No
816 E. High	S.F. Home	0170-132-06	1888 HA	Yes, HR #13
817 E. High	S.F. Home			No
819 E. High ?	S.F. Home			No
831 E. High	S.F. Home			No
839 E. High	S.F. Home			No
842 E. High	S.F. Home			No
845 E. High	S.F. Home			No
851 E. High	S.F. Home			No
856 E. High	S.F. Home			No
857 E. High	S.F. Home			No
861 E. High	S.F. Home			No
866 E. High	S.F. Home			No
915 E. High	S.F. Home			No
919 E. High	S.F. Home			No

931 E. High	S.F. Home			No
935 E. High	S.F. Home			No
	Micah House?			No
Kendell Street:				
15 Kendell	S.F. Home			No
18 Kendell	S.F. Home			No
20 Kendell	S.F. Home			No
21 Kendell	S.F. Home			No
23 Kendell	S.F. Home			No
24 Kendell	S.F. Home			No
25 Kendell	S.F. Home			No
26 Kendell	S.F. Home			No
29 Kendell	S.F. Home			No
33 Kendell	S.F. Home			No
34 Kendell	S.F. Home			No
40 Kendell	S.F. Home			No
41 Kendell	S.F. Home			No
45 Kendell	S.F. Home			No
Lawton Street:				
611 Lawton				No
615 Lawton				No
Olive Avenue:				
1 East Olive	Methodist Church Chapel		Armantrout - Post Modern 1974	No
1 East Olive	Methodist Church Education Building	0171-301-011	Mission revival style 1910	No
213 E. Olive	Office use	0171-281-016	Single story Victorian	No
215 E. Olive	Ehrler Orthodontics		Single story craftsman	No
255 E. Olive	Olive & Citrus Restaurant		1997 Heritage Award - Craftsman	Yes, HR 117
2 W. Olive	Congregational Church	0171-292-016	1981 Heritage Award	No
24 W. Olive	Apartment Building	0171-324-021	Mediterranean style	No
Redlands Boulevard:				
215 E. Redlands Blvd	Honda/Yamaha	0169-312-004	Former Gold Banner packinghouse	No
757 W. Redlands	ESRI Learning Center			No
State Street:				

11 E. State	Leroy's			No
12 E. State				No
13 E. State				No
17 E. State	Redlands Galleria Building			No
22 E. State				No
25 E. State	Roc N Fondue Building		1984 Heritage Award	Yes, HR #39
28 E. State	Former Citrograph Building		1999 Heritage Award	Yes, HR #33
103 E. State	Old Burrough's Building			No
104 E. State	Old J.C. Penney's Building			No
109 E. State	Jack's Toys			No
113 E. State	Citrograph Printing			No
200 E. State	Two Story Commercial Building			Yes, HR #91
305 W. State	Sunset Funeral Care		Frances A. Jackson home, 2002 Heritage Award, 1902 Late Victorian	No
329 W. State	James McKenzie Home		1981 Heritage Award, c.1894	No
507 W. State	?			No
Stillman Avenue:				
903 Stillman	S.F. Home		1909	No
904 Stillman	S.F. Home			No
908 Stillman	S.F. Home			No
909 Stillman	S.F. Home		1910	No
915 Stillman	S.F. Home			No
919 Stillman	S.F. Home		1910	No
921 Stillman	S.F. Home			No
923 Stillman	S.F. Home		1911	No
931 Stillman	S.F. Home		1911	No
Stuart Avenue:				
428 E. Stuart	2 nd Baptist Church		2007 Heritage Award, 1928	No
Sylvan Boulevard:				
819 E. Sylvan	S.F. Home			No
831 E. Sylvan ?	S.F. Home			No
835 E. Sylvan	S.F. Home			No
837 E. Sylvan	S.F. Home			No
839 E. Sylvan	S.F. Home			No
841 E. Sylvan	S.F. Home			No

845 E. Sylvan	S.F. Home		2009 Heritage Award, 1911	No
The Terrace:				
322 E. The Terrace	Ben Cave Home		1975 Heritage Award, 1890	No
610 E. The Terrace				No
616 E. The Terrace				
702 E. The Terrace	W.D. Clark Home		1982 Heritage Award, 1895	No
710 E. The Terrace	Harry Gregory Home		1985 Heritage Award, 1883	No
Texas Street:				
	Armory Building			No
Vine Street:				
137 E. Vine Street	Medical Office			No
150 E. Vine Street	Redlands Motorcycle Club		1986 Heritage Award, 1911	No
Adjacent Historic Areas:				
500 E. Citrus	YMCA Building			No
Northside of Colton Ave. From 6 th St. to University St	S. F. Units			No (none)
18 S. Eureka St.	S.F. Unit		2011 Heritage Award, 1899	Yes, HR #8
24 S. Eureka St.	S.F. Unit		2017 Heritage Award, 1890	Yes, SPHD, HD #8
28 S. Eureka St.	S.F. Unit			Yes, "
32 S. Eureka St.	S.F. Unit			Yes, "
148 S. Fourth St.	S.F. Unit			Yes, "
152 S. Fourth St.	S.F. Unit			Yes, "
154 S. Fourth St.	S.F. Unit			Yes, "
104 W. Olive Ave.	S.F. Unit	0171-323-009	Single story Victorian	Yes, "



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

September 20, 2021

bfoote@cityofredlands.org

Brian Foote, Manager and City Planner
City of Redlands, Planning Department
P.O. Box 3005
Redlands, California 92373

Notice of Preparation of an Environmental Impact Report for the Redlands General Plan Transit Villages District and Specific Plan

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁸ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁹, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹⁰.

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

⁹ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

SBC210901-08

Control Number



September 29, 2021

Brian Foote, Planning Manager/City Planner
City of Redlands
P.O. Box 3005
Redlands, CA 92373
Via e-mail: bfoote@cityofredlands.org

RE: Comments on Notice of Preparation of an Environmental Impact Report for the Transit Villages Specific Plan Project

Dear Mr. Foote,

The University of Redlands appreciates the opportunity to comment on the Notice of Preparation for the Redlands General Plan Transit Villages District and Specific Plan project.

Given the high infrastructure costs to allow development within the Specific Plan area, particularly the costs associated with floodplain mitigation, a certain level of density is likely needed in order to support the significant infrastructure investment by individual development projects. The EIR should consider an appropriate number of residential dwelling units and other uses. It appears that the EIR needs to study the impacts of at least 3,000 dwelling units across the three transit villages, with at least 1,000 units in the University transit village.

The University is very interested in this project and looks forward to commenting on the Draft EIR when it is available. Should there be any additional questions regarding the above comments, please contact the undersigned.

Sincerely,

Jason Doyle
Associate Director, Project & Real Estate Management
Jason_Doyle@redlands.edu

April 24, 2020

Revised: September 3, 2021 (Items 9, 10, 11, 12 added)

RECOMMENDATIONS FOR THE REDLANDS TRANSIT VILLAGES ENVIRONMENTAL IMPACT REPORT (EIR)

1. Provide for increased policing and fire protection in proportion to the expected, future increase in population due to apartment living and to increased foot traffic due to the Arrow commuter train stations.
2. Since the purpose of an EIR is to “be aware of the quality of the human environment” consideration should be given to the increased population density and possible need for social distancing in planning for any future pandemic.
3. Account for taxpayer cost to modify the infrastructure to satisfy the need for increased water usage. Can this infrastructure be completed at an acceptable cost?
4. Account for taxpayer costs due to the impact of increased population on Redlands failing sewer treatment plant. Can this infrastructure be completed at an acceptable cost?
5. The aesthetic of the Downtown Historical District is a significant cultural and identity asset and has a major influence on the uniqueness of downtown Redlands. Any structures built in the Transit Villages Area should enhance this identity and be constructed in proportion to existing structures. A prime example is the old Santa Fe Station.
6. 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.
7. Downtown Redlands has always suffered for lack of adequate parking. With the loss of the mall parking where will people park for events like Market Night, the Bicycle Classic and Redlands Bowl events? Assure that there is ample automobile parking due to the increase in population in the Transit Villages area.
8. Provide mitigation for the increased noise due to the increase in traffic and the Arrow commuter train.
9. What will be the impact of the increased population in the Transit Villages Area on water usage and future water supplies for Redlands?
10. What will be the impact of the increased population in the Transit Villages Area on the existing sewer treatment plant?
11. What will be the impact on Redlands schools of the increased population in the Transit Villages Area?
12. How will the tall buildings planned for the Transit Villages Area affect the views of the mountains and open feeling of the existing downtown?

From: [Vcarlson](#)
To: bfoote@cityofredlands.org
Subject: Comments re environmental impact report
Date: Saturday, September 4, 2021 8:27:08 AM

Hello- comment is does this make sense at this time? Redlands decided not to spend the money on a special election but is willing to spend 330K on a study when the project will likely (based on previous Proposition G) be forced to terminate after the next election. Doesn't it make more sense to save taxpayer \$\$ and wait until after the next election?

Virginia Carlson
1321 Drake Ridge Crest
Redlands CA 92373

Sent from my iPad

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobreva](#)
Subject: FW: Apartment Complexes and Parking structure
Date: Monday, October 4, 2021 8:34:00 AM

[NON-EPD]

-----Original Message-----

From: Pamela Resheske [<mailto:presheske@gmail.com>]
Sent: Thursday, September 30, 2021 4:55 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: Apartment Complexes and Parking structure

In a fair election the residents of Redlands voted 64 percent against developing the mall site over 2 stories high. I am against the City Council and Planning Department ignoring this vote and working with an Orange County Developer to build apartment complexes 3 plus stories high along with a 6 story parking structure. (The parking structure idea is insane because the City keeps saying that apartment dwellers will not have vehicles). If you would like to see what this will look like in reality,, please drive over to Riverside to Iowa and University Village to see how overpowering this will look with a large parking structure in the apartment yard blocking out any view other than the parking structure

Please take a sensible look at how this will change the quaint little downtown that residents and visitors love to visit.

Also, take a sensible look at the air pollution all the traffic will create. With all the warehouses truck traffic the air quality was bad this past summer.

The City have the residents on water restrictions, but they continue to approve apartments. Redlands is over run with apartments. Please drive through the west side of Redlands starting at Center Street. There are numerous apartments within walking distance to ESRI. Some apartments are very new and some are in the run down condition that always happens after around 7 years. This will happen ay the mall site. Apartment residents do not stay long. They are not committed to one area There are huge apartment complexes also by the Harkins and behind JC Penny. All within walking distance of stores and places to eat. ESRI employees can walk to work from there if they please to do so. Not all people have the luxury of walking to work. The City does not need to build for the sake of one employer's staff to walk to work

Also look at traffic congestion

Thank you

Pamela Resheske Clark
151 Carmody

Sent from my iPhone

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobrev](#)
Subject: FW: EIR
Date: Monday, October 4, 2021 10:52:05 AM

[NON-EPD]

From: gmajbm@verizon.net [mailto:gmajbm@verizon.net]
Sent: Thursday, September 02, 2021 11:08 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: EIR

Hi Brian,

Here are a few of uncensored comments from a long-time (80 years old) local:

1. We don't need a train in Redlands, (Kinda late, huh?)
2. Tall buildings don't help the view...just add to the crowding downtown. (Can't see the mountains.)
3. The area around the university has always been residential. What gives the UR and the City the right to change that? Have you asked those who live in that area? Hmmm?
4. Better quit before I talk dirty or get angry or take action.

Thanks for reading this.

Jeanne Munz
1313 Clock Avenue

From: [Brian Foote](#)
To: [Konnie Dobрева](#); [Meaghan Truman](#)
Cc: [Brian Desatnik](#)
Subject: FW: NOP Comments
Date: Wednesday, September 15, 2021 6:34:31 PM

[NON-EPD]

From: lwleonard7@aol.com [mailto:lwleonard7@aol.com]
Sent: Wednesday, September 15, 2021 6:32 PM
To: Brian Foote <bfoote@cityofredlands.org>
Cc: Charles Duggan <cduggan@cityofredlands.org>
Subject: NOP Comments

Brian, just listened to your webinar. I wanted to comment but the "raise my hand button" did not connect. It is disappointing that only 12 people were present. I have talked to a number of people who wanted to participate and could not figure out the system. Please do not think that this is representative of the populace. There needs to be more of an effort by the city to inform the voter and get people involved. Here were my questions:

1. Friends of Redlands submitted a list of concerns on 4/4/2020 and a revised list on 9/3/21. Are these concerns being incorporated into the NOP?
2. The moderator talked about the height of buildings. What is the final, maximum dimension allowed for a three, four and five story building? Page 4:16 of the Transit Villages Specific Plan Draft allows 65' for a four story building and an "X" dimension that is undefined. What is the maximum allowed dimension for this four story building?
3. Water is a big concern for California and Redlands. We have been on water restrictions for several years and the situation does not seem to be improving. The NOP states, on pages 71-76, that the project could have a "signifigant impact" on ground water supplies. With the growth in Redlands we are experiencing now and the anticipated 6000 new residents in the TVA where is the water going to come from?
4. What will be the cost of all the infrastructure to the taxpayer?

Thank you,

Larry Leonard - for Friends of Redlands

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobrev](#)
Subject: FW: NOP for EIR
Date: Monday, October 4, 2021 8:33:23 AM

[NON-EPD]

From: susiwilly@verizon.net [mailto:susiwilly@verizon.net]
Sent: Thursday, September 30, 2021 4:12 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: NOP for EIR

Dear Mr. Foote,

My comment concerning your NOP is that you did a thorough and fair consideration of the applicable subjects. I was so relieved that you saw how concerning this project is for everyone.

I attended the last City Council Meeting on this topic and was appalled at the naivety of some of the speakers. However, it seems like they repeatedly stated that Redlands could be like Rancho Cucamonga, Upland, Riverside, and San Bernardino. Redlands is half the size of all of these cities. People I know moved here because it was a haven. There are already thousands of new apartment buildings. I personally don't believe that stacking people from out of the city who won't actually live here because they work elsewhere is a sham. Building higher is a sham. This town needs to find developers to build homes for single professionals, young couples who want to have a yard for their children, and who are all LOCAL.

I used to review EIRs for Environmental Health as well as the county Fire Department. My inspection territories included Rancho Cucamonga, Ontario, Upland, and Montclair. I can't wait for this one.

We are told to conserve water. Won't adding a significant number of people moving here make our drought worse? These people are all going to need sewer space. Will we need a new treatment plant? The air will get worse. I don't even want to discuss traffic with a City that is famous for having no parking.

I'm late to this project. I retired and let the world go by. But, I'm Woke! Looking into the "Partners", and their

need for 5 story buildings. I am very suspicious about their intentions.

I think your NOP was inspiring. Thank you.

Susan Williams
44 La Verne St.
Redlands, CA
909-353-5148

p.s. I have lived in this city since 1963.

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobrev](#)
Subject: FW: NOP Transit Villages comment
Date: Wednesday, September 15, 2021 6:02:25 PM

[NON-EPD]

-----Original Message-----

From: Julia Lambson [<mailto:jlambson@ymail.com>]
Sent: Saturday, September 11, 2021 4:37 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: NOP Transit Villages

Mr. Foote:

I am writing to express my full support for the Transit Villages plan. I am concerned that a vocal minority of anti-growth advocates will stop the progress Redlands is making in providing much-needed responsible growth for our great city.

My family and I originally located to Redlands in 1968 and we have seen the changes over the years, good and bad. It's inexplicable to me that anyone would oppose the exciting plan to redevelop the eyesore of the Redlands Mall site because of a four story restriction when we have other buildings in Redlands at, over, or near that height. In order to prevent further urban sprawl and loss of surrounding habitat, of course we must begin to build up.

In order to support our important Redlands institutions, like the U of R and ESRI, we need density around the downtown area and in these areas. In order to cut down on traffic, we need to support the our rail station locations and locate housing and services near these locations. This seems like a total no-brainer to me.

As a city, we cannot continue to keep everything the same forever, however much the Baby Boomers and elders may wish it to be so. Baby Boomers, like me, already own the available stock of single-family homes on single-family lots. Our adult children cannot afford homes in Redlands, nor can new professionals or other workers who would like to reside in our city. All of this commercial and residential development will significantly add to our tax revenue base, which we desperately need. I, for one, would love to get street lights and tree trimming on my street sometime in the next decade.

Please resist the no-growth minority and approve the Transit Village plan. You may forward this email to any elected or non-elected official you may wish to. Thank you for your time and for taking these issues into consideration.

Julia Lambson
749 W. Sunset Dr.
Redlands
909-528-9607

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobrev](#)
Subject: FW: Transit Villages NOP comment
Date: Wednesday, September 15, 2021 6:02:41 PM

[NON-EPD]

-----Original Message-----

From: Cindy Holter [<mailto:freedomcin@aol.com>]
Sent: Wednesday, September 15, 2021 12:59 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: Transit Villages

Brian Foote,

Please stop the hi-rises and over building of this great city. We voted years ago to keep Redlands a small town, unique from the OC's & LA's of the state. People have moved here to get away from those types of cities. Those of us that are born & raised here have witnessed a big change, good & bad, unfortunately the regretful mistakes cannot be undone.

Magnificent buildings torn down & the orange groves replaced by houses & big box buildings are permanent. The increased population is affecting traffic, air pollution, noise, parking, etc.

Keep Redlands the Emerald Jewel of the Inland Empire & keep the height of the buildings to 3 stories max.

Sincerely,
Cindy Pratt Holter

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobrev](#)
Subject: FW: TVSP Comment
Date: Monday, September 20, 2021 8:41:52 AM

[NON-EPD]

FYI

Brian Foote, AICP
Planning Manager/City Planner
City of Redlands | Planning Division

-----Original Message-----

From: RICHARD O DONNELL [<mailto:rodon79932@aol.com>]
Sent: Friday, September 17, 2021 1:48 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject: TVSP Comment

The Redlands Transit Village Specific Plan builds up expectations with clever mapping and pretty graphics. But because the target area has a serious problem with flooding, the TVSP puts the cart before the horse on a large scale.

It seems apparent that the real intent is to get approval of this grand scheme, and then say that the expensive infrastructure upgrades are necessary because the grand scheme was approved. It is roughly the same approach used to push for the the Transit Villages in the first place. That began long ago with a plan to build an extraordinarily expensive railroad connecting Redlands to San Bernardino. Then, because the railroad was coming, the City had to expand building around the stations. Then the height allowances which were originally permitted for buildings with a 'direct connection' to the stations had to be expanded to buildings within 'walking distance'. Given an inch, a quarter mile radius was taken.

This plan should be in two parts, an infrastructure plan and a building plan. If the infrastructure costs were honestly presented to the people of Redlands, they could decide if they want to accept that substantial burden. If there are private, state or federal funds that figure in to the deal, show us the money. Regarding funding, the TVSP in its current format seems to favor the words 'explore' and 'consider'.

The building plan should be judged on its own merits. There is much to consider. It changes the town.
But first, who pays?

From: [Brian Foote](#)
To: [Meaghan Truman](#)
Cc: [Konnie Dobreva](#)
Subject: FW: TVSP eir comment
Date: Tuesday, September 28, 2021 8:23:43 AM

[NON-EPD]

From: Lynda Stewart [mailto:tjsangel8285@gmail.com]
Sent: Monday, September 27, 2021 7:34 PM
To: Brian Foote <bfoote@cityofredlands.org>
Subject:

I so don't like the idea of losing our view of the mountains.

From: [merry.smith](#)
To: [Brian.Foote](#)
Subject: High rises downtown
Date: Friday, September 3, 2021 10:37:10 AM

Brian,

PLEASE respect the wishes of the majority of the registered voters in Redlands, as per measure G and the number of signatures collected on the recent petition, and DO NOT allow buildings taller than 3 stories downtown. At a recent city council meeting, it became optimistically apparent that a compromise could be reached. Even tho I personally think taller than 3 stories is a mistake at any of the three stations, at least compromise with no taller than 3 stories downtown.

It was a mistake to years ago tear down the LaPosada Hotel where the Redlands Mall stands and there is no doubt in my mind that a 4 or 5 story monstrosity downtown will be a regrettable mistake in the eyes of future generations.

Merry Smith

Get [Outlook for iOS](#)

From: [Royce](#)
To: [Brian Foote](#)
Subject: Random Thought
Date: Saturday, September 4, 2021 9:10:45 PM

1. Since when is a high rise part of a village?

From: [RICHARD O DONNELL](#)
To: bfoote@cityofredlands.org
Subject: TVSP Comment
Date: Wednesday, September 1, 2021 7:53:38 AM

The Transit Villages Specific Plan is a blatant violation of the restrictions of Measure U, the voter approved initiative. The TVSP builds on the foundation of City Council Resolution 7173. That action used limited interpretive powers granted to the Council to bypass the stated intentions of the citizens of Redlands.

If the TVSP was submitted to a popular vote it would fail.

Richard O'Donnell