

## 5 CEQA Required Conclusions

This section presents a summary of the impacts of the Proposed Project in several subject areas specifically required by the California Environmental Quality Act (CEQA), including growth-inducing impacts, cumulative impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant. These findings are based, in part, on the analysis provided in Chapter 3: Settings, Impacts, and Mitigation Measures.

### 5.1 Growth-Inducing Impacts

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CEQA Guidelines require that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines Section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events, such as natural disasters and business development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project. Business trends are influenced by economic conditions throughout the state and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These and other pressures serve to create policy. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed plan. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the Proposed Project.

#### **PROJECTED GROWTH**

The Proposed Project allows for new residential and non-residential development which will result in an increase in population, housing, and jobs.

## Population

According to the California Department of Finance, the population of the City of Redlands was estimated to be about 68,000 as of 2015 (California Department of Finance), comprising about 3.2 percent of San Bernardino County’s total population of 2,121,088. Under the Proposed Project, as shown in Table 5.1-1, the Planning Area will accommodate a population of approximately 93,624 people at buildout, an increase of about 21 percent over the current population of 77,269. This represents an average annual growth rate of about 1 percent. The projected population total of the City of Redlands under the Proposed Project, 79,013, is less than Southern California Association of Governments’ (SCAG) 2035 population projection of 83,400 (Southern California Association of Governments), thus, the proposed General Plan would not be growth-inducing beyond regional forecasts.

**Table 5.1-1: Projected Residential Population (2035)**

	Redlands			Sphere of Influence			Planning Area Total		
	SFR <sup>1</sup>	MFR <sup>2</sup>	Total	SFR	MFR	Total	SFR	MFR	Total
<b>Residential Buildout (2015)</b>									
Housing Units <sup>3</sup>	19,877	6,872	26,749	2,981	449	3,430	22,858	7,321	30,179
Population <sup>4</sup>			68,049			9,220			77,269
<b>Residential Buildout (2035)</b>									
Housing Units	22,553	8,551	31,105	5,008	449	5,457	27,561	9,000	36,561
Population <sup>5</sup>			79,013			14,611			93,624

Notes:

1. SFR = Single-Family Residential
2. MFR = Multi-Family Residential
3. Data for existing residential housing units was derived from the City’s GIS database as of March 2016.
4. Existing population was calculated assuming 2.65 persons per household in the City of Redlands and 2.80 persons per household in the Sphere of Influence. A vacancy rate of 4% is assumed.
5. Future population was calculated assuming 2.65 persons per household in the City of Redlands and 2.80 persons per household in the Sphere of Influence. A vacancy rate of 5% is assumed.

Sources: City of Redlands, 2016; Dyett & Bhatia, 2017.

## Growth Management

Beginning with Proposition R in 1978, the City of Redlands adopted growth management measures in response to rapid residential development. Residential development peaked during the 1980s, when 20 percent of the current housing stock was constructed in a single decade. Since that period, residential growth has slowed substantially. Also, additional measures have been adopted to establish the City’s growth management system.

### Measure N

Measure N, a growth control ordinance that amended the previous growth management measure (Proposition R), was approved by the voters in 1987. The measure limits the development of

residential dwelling units to 400 units per calendar year. Of the 400 units, 50 units are, by resolution, reserved for single-family homes, duplexes, triplexes, and four-plexes on existing lots, with the remainder to be allocated according to a point system (adopted as Ordinance No. 2036), which emphasizes design amenities. The measure also restricts changing land designations or zoning to a higher density than Rural Estate (R-E) for those lands designated as urban reserve agricultural on June 1, 1987, and limits development on steep slopes.

### **Measure U**

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, implemented restrictions on noise, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. Measure U limits the development potential of this part of Redlands characterized by steep slopes and natural resources.

Measure U amended the Redlands General Plan Land Use Element to “plan for” a housing mix of 75 percent single-family and 25 percent multi-family dwelling units at buildout. The City Council has adopted a clarification of this policy determining that “for-sale” condominiums (which are considered multi-family dwellings by the Census and the Department of Finance) will be considered single-family dwellings for purposes of this calculation. The measure has not proved to be a hindrance for Redlands to achieve its regional housing fair share needs, and Redlands continues to have a certified Housing Element.

Measure U also includes traffic level of service standards, seeking to ensure that future growth can be adequately served by the transportation system. Certain types of development are exempted from Measure U, including development on existing lots of record, remodeling of existing single-family homes, development related to rail stations, and development projects Downtown.

### **Public Facilities**

The Planning Area is mostly urbanized and is served by existing streets, utility infrastructure, and service systems. Water supply to the Planning Area is provided by the City of Redlands, which serves the majority of the city and Planning Area, and the Western Heights Water Company, which serves a small portion of the city and Planning Area near the border of Yucaipa. Water supplies for the City of Redlands include entitlements to surface water from Mill Creek and the Santa Ana River, groundwater, recycled water, and imported water from the State Water Project. Water supplies for Western Heights Water Company include groundwater and imported water from the State Water Project when available. The City of Redlands provides sewer and stormwater collection services. Waste collection services are provided by the City of Redlands for areas within city limits. The City’s Quality of Life Department provides residential waste collection, green waste collection for yard waste, and curbside recycling. Hazardous and electronic waste is managed by the Redlands Fire Department, which operates a household hazardous and electronic waste disposal site on a weekly basis. Waste collection for the Mentone and Crafton areas is carried out by private haulers contracted with San Bernardino County. Solid waste from the Planning Area is primarily disposed of at the California Street Landfill operated by the Quality of Life Department and the San Timoteo Sanitary Landfill operated by the County, both within the city limits.

Future development under the Proposed Project could generate additional demand for water and wastewater, stormwater, and solid waste services; however, compliance with federal, State, and local regulations, as well as policies in the Proposed Project would reduce the impacts of the Proposed Project to less than significant levels. The City of Redlands has prepared an urban water management plan, sewer system master plan, and drainage master plan to assess the current and future demands of its service area. Compliance with the City's current grading, drainage, and stormwater regulations would ensure that impacts would be less than significant. Potential impacts on solid waste would be reduced through compliance with SB X7-7, which has been set by CalRecycle to provide 75 percent recycling, composting, or source reduction of solid waste by 2020. Implementation of the Proposed Project policies would assist the city in complying with this new waste reduction goal.

The Redlands Unified School District (RUSD) provides public schools in the Planning Area. At buildout of the Proposed Project, the school-aged population is expected to increase. This increase will impact enrollment totals in RUSD facilities in the Planning Area. The largest increase is projected to be high school enrollment, followed by elementary school enrollment. Middle school enrollment will decrease slightly. Existing middle and high schools would have the capacity to accommodate the projected number of 2035 students. However, existing elementary schools will not have enough room to accommodate the projected increase in elementary school students. RUSD can utilize trailers and temporary classrooms to accommodate students in the interim, but a new school may be required for the long-run. The school district owns land north of Mission Road just outside the Planning Area in Loma Linda, which could be utilized to construct a new facility, if necessary. Policies in the proposed General Plan ensure that school facilities are expanded to meet demand as development occurs. Development of schools would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated.

The City provides parks and recreation facilities, and police and fire protection services. In 2035, with the development of 140.9 acres of proposed parkland as designated in the proposed General Plan, and the addition of 10,355 residents, the ratio would be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people. The proposed General Plan plans for the addition of several parks in the SOI outside of city limits – an area that is underserved by parkland. This increase would improve the ratio of park acres per 1,000 residents in the SOI and the Planning Area as a whole. With about 16,355 new residents expected in the Planning Area in 2035, the 140.9 acres of proposed parkland in Redlands in addition to 55 acres of proposed parkland in the Sphere of Influence outside of city limits would result in a ratio of 6.4 acres per 1,000 residents in the Planning Area as a whole, which would also exceed the City's park standard of 5 acres per 1,000 people.

Population increases may result in increased alarms and call volumes that may negatively impact Fire Department response times unless adequate staffing and facilities are maintained. The Fire Department has determined that it would need to increase the number of fire stations in order to meet increased future service demands, though as of February 2017, there are no plans to do so. Policies of the Proposed Project would keep service demand increases to a minimum. Proposed policies encourage educating the public about fire prevention, providing weed abatement services in the High Fire Severity Areas, requiring adherence to State and local fire codes, and ensuring development minimizes risk from fire hazard. Development impact fees from new development

would serve to ensure that improvements are made in a timely manner so as to avoid the deterioration of existing facilities.

In order to accommodate increases in demand from a growing population and meet service standards in the future, the Redlands Police Department expects that it will also need to grow. Meeting facilities needs for an expanded Police Department would likely require new construction or physically altering an existing facility. Development impact fees from new development would serve to ensure that improvements are made in a timely manner so as to avoid the deterioration of existing facilities. Proposed General Plan policies aim to mitigate increases in demand for police services. Policies include those that encourage physical planning and community design practices that promote safety, as well as policies that include residents in community safety efforts.

### **Increase in Regional Housing Demand**

As the employment base in the Planning Area continues to increase, due to proposed General Plan land uses and policies that foster employment, more people may be drawn to the Planning Area and surrounding areas. As a result, housing demand may increase in both the Planning Area and other adjacent areas that are within commuting distance.

The proposed General Plan is projected to result in the development of approximately 4,700 single-family housing units and about 1,700 multi-family housing units, for an increase of about 6,400 new dwelling units by the year 2035, resulting in a total of 36,600 units in the Planning Area when added to the existing housing stock. Within the City of Redlands, a projected total of 31,100 housing units would exist in 2035, an increase of about 4,400 units. The additional housing would help meet some of the increased housing need.

SCAG projected approximately 31,600 households in Redlands in 2035. Most of the housing needs of this projected population would be met by housing units provided in Redlands under the proposed General Plan. For those households in excess of the number of housing units projected, housing needs would likely be met in the SOI outside of Redlands' current city limits.

Dividing the proposed General Plan buildout population for Redlands of 79,013 by the assumed persons per household calculation of 2.65 results in 29,850 total projected households. Applying the same persons per household to SCAG's 2035 population projection for Redlands would result in an estimate of 31,500 households. Regional household projections were not available for the portion of the Planning Area outside of city limits.

To ensure that housing is available to meet the needs of future residents under the proposed General Plan, the City would continue to use its Housing Element, last updated in 2014, to assess its supply of housing and provide policies and programs to ensure that the community continues to meet its fair share of regional housing needs.

### **Jobs/Housing Ratio**

A city's jobs/employment ratio (jobs to employed residents) would be 1.0 if the number of jobs in the city equaled the number of employed residents. In theory, such a balance would eliminate the need for extensive commuting. More realistically, a balance means that in-commuting and out-commuting are matched, leading to efficient use of the transportation system, particularly during

peak hours. The current jobs/employment ratio in the City of Redlands is 0.89, which means that there are 0.89 jobs for every employed resident in the City. Based on development projected under the proposed General Plan, this ratio is expected to increase to 1.20. The jobs/employment ratio for the Planning Area is 0.82 and would be expected to increase to 1.07. Table 5.1-2 shows projected changes in the jobs-to-employed residents ratio between 2016 and 2035.

**Table 5.1-2: Jobs-to-Employed Residents Ratio in Redlands, 2016 -2035**

	Redlands		Sphere of Influence outside of City Limits		Planning Area	
	2016 <sup>1</sup>	2035 <sup>2</sup>	2016 <sup>3</sup>	2035 <sup>2</sup>	2016	2035
Jobs	27,248	42,769	1,276	2,244	28,524	45,013
Population	68,049	79,013	9,220	14,611	77,269	93,624
Employed Residents <sup>7</sup>	30,546	35,556	4,149	6,575	34,695	42,131
Jobs/ Employed Residents	0.89	1.20	0.31	0.34	0.82	1.07

Notes:

1. 2016 Jobs Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2013), Primary Jobs 2013. 2016 Employed Residents Source: American Community Survey, 2013. 2016 population was calculated assuming 2.65 persons per household in the City of Redlands and 2.80 persons per household in the Sphere of Influence. A vacancy rate of 4% is assumed.
2. 2035 jobs based on application of land uses shown on the proposed land use map on vacant and underutilized sites, and the resultant jobs that would arise from the development of these sites. Population was calculated assuming 2.65 persons per household in Redlands and 2.80 persons per household in the Sphere of Influence. A vacancy rate of 5% is assumed for future housing units.
3. 2016 jobs in SOI includes only those quantified for the Mentone CDP, which includes Mentone and much (not all) of Crafton. 2016 population was calculated assuming 2.80 persons per household in the Sphere of Influence. A vacancy rate of 4% is assumed for existing housing units.
7. SCAG does not provide projection estimates of employed residents, but instead projects total number of residents. Therefore, the ratio of employed residents to the total number of residents in Redlands from 2013 – 0.45 – was applied to total population projections for 2035 to generate an estimate of employed residents. Additionally, because SCAG does not estimate the number of employed residents in the Sphere of Influence, this ratio of 0.45 was used to estimate the jobs/employed resident ratio.

Sources: American Community Survey, 2013; SCAG 2016 Draft RTP, 2015; Dyett & Bhatia, 2017.

As shown in Table 5.1-2 above, the 2016 jobs to employment balance in Redlands is 0.11 away from being perfectly balanced, while the projected 2035 jobs to employment balance is 0.20 away from being perfectly balanced. The 2016 total is more balanced than the 2035 total. The projected jobs-to-employment ratio of 1.20 suggests that there would be more jobs than employed residents in the City of Redlands at buildout, resulting in a relative inflow of people during the workday as well as a potential increase in pressure for housing for employees and their families. The Proposed Project seeks to create a balanced community, with retail uses, parks, transit-oriented-development, and other features to accommodate population growth. However, any increase in jobs in the Planning Area has the potential to induce growth or lead to growth pressure or pressure on services in surrounding communities.

## 5.2 Cumulative Impacts

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CEQA requires that an EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” Furthermore, the analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence” (CEQA Guidelines Section 15130(b)).

In order to assess cumulative impacts, an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. The Proposed Project represents the cumulative development scenario for the reasonably foreseeable future in the Planning Area. This future scenario incorporates the likely effects of surrounding regional growth.

### **CUMULATIVE ANALYSIS PROVIDED IN CHAPTER 3**

Several analyses presented in Chapter 3: Settings, Impacts, and Mitigation Measures represent cumulative analyses of issues over the proposed General Plan time horizon to 2035 because they combine the anticipated effects of the proposed General Plan with anticipated effects of regional growth and development. By their nature, the air quality; transportation; noise; and energy, greenhouse gas (GHG) emissions, and climate change analyses presented in Chapter 3 represent a cumulative analysis, because the effects specific to the Proposed Project cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, analyses for these topics reflect not just growth in the Planning Area, but growth elsewhere in the region as well. The cumulative conclusions are summarized there, and where applicable, significant unavoidable impacts are listed in Section 5.3. Other cumulative impacts are identified below and within the relevant sections of Chapter 3.

### **OTHER CUMULATIVE IMPACTS**

For some issue areas evaluated as direct impacts in Chapter 3, concurrent implementation of the Proposed Project, specifically the proposed General Plan, along with regional growth and development, may result in cumulative impacts; however, due to various factors, the Proposed Project’s contribution would not be cumulatively considerable. These include:

- **Cumulative Changes to Land Use Character.** Land use changes that would alter the scale, density, and character of urban areas and neighborhoods could change the visual character of areas in the region. However, the proposed General Plan seeks to ensure that Redlands’ small-town character would be maintained through the scale of development and other components of visual compatibility, and promotes planning practices that foster greater connections between neighborhoods and uses. Various proposed policies emphasize the importance of neighborhood identities, promoting the area’s citrus and agricultural heritages, and preserving historic architecture. Given such policies, the Proposed Project’s contribution to this potentially significant cumulative impact is not cumulatively considerable.

- **Cumulative Effects on Water Quality.** The proposed General Plan, in combination with regional growth and development, could increase impervious surfaces resulting in a greater chance of flood and potential impacts to water quality. However, given the near built-out nature of Redlands, proposed low-density and open space land uses in undeveloped areas, and proposed General Plan policies designed to improve stormwater management and reduce stormwater pollution, the Proposed Project's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- **Cumulative Effects on Biological Resources.** Increased noise, light, and habitat disturbance resulting from urban development both within the Planning Area as well as in adjacent jurisdictions could adversely affect biological resources such as migratory birds and other wildlife species. However, with applicable policies in place as described in the direct impact analysis in Chapter 3, the project's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- **Cumulative Increases in Hazardous Materials.** The increase in local population and employment could result in the increased use of hazardous household, commercial, and industrial materials, as well as a cumulative increase in exposure to risk associated with accidental release of hazardous materials into the environment. However, city, State, and federal regulations, such as those that control the production, use, and transportation of hazardous materials, and proposed General Plan policies addressing potential risks from hazardous materials would apply to development countywide; therefore, the Proposed Project's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- **Cumulative Effects on Historical Resources.** The accommodation of future growth also constitutes a very low likelihood that future development will encounter challenges associated with known and unknown historic resources. However, there is the possibility of cumulative impacts to historical resources in the future in the context of regional growth and development. The City of Redlands cannot be sure that all cumulative impacts on such historical resources can be mitigated to less than significant levels. Consequently, the proposed General Plan may have the potential to contribute to cumulative impacts to these historic resources. However, with implementation of proposed General Plan policies and State and federal law, the Proposed Project's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- **Cumulative Effects on Geology and Soils.** The Planning Area is located in a seismically active region, and future development could expose additional people and structures to potentially adverse effects associated with earthquakes, including seismic ground shaking and seismic-related ground failure. However, site-specific geotechnical reports that would be required for future development projects would determine how each development could be designed to minimize exposure of people to these effects similar to how existing projects have been built. Given mandatory compliance with existing State and local building codes, ordinances and proposed General Plan policies, the cumulative impact resulting from future development of the Proposed Project combined with other past, present, or probable future projects, would be less than cumulatively considerable.

These types of impacts are not limited to the Planning Area but are characteristic of any area that is experiencing population and employment growth.

## **5.3 Significant and Unavoidable Impacts**

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Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program. Chapter 3 identified the following significant unavoidable impacts when comparing the Proposed Project to existing conditions:

### **AGRICULTURAL RESOURCES**

Implementation of the Proposed Project, specifically the proposed General Plan, would allow for the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique farmland to non-agricultural uses. Under the proposed General Plan, future development could impact about 200 acres of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (important farmland) designated by the Farmland Mapping and Monitoring Program (FMMP) program currently under cultivation throughout the Planning Area. The affected important farmland is mainly located where non-contiguous agricultural uses are interspersed with more intensive uses, such as in the East Valley Corridor Specific Plan area, along Mentone Boulevard, among residential development near the Redlands Municipal Airport, and among residential uses along Wabash Avenue and Marion Avenue. If a project proposes urban uses on these sites, it would result in conversion of agricultural lands, which would be considered significant. Additional Prime Farmland, Farmland of Statewide Importance, and Unique Farmland is located throughout the Planning Area, but the remainder has either previously been developed, or would be protected or allowed to continue under Agriculture, Open Space, Rural Living, Hillside Conservation, Resource Conservation, or Very Low Density Residential land use designations under the proposed General Plan, and so would not be significantly impacted. In addition, as residential uses would not be permitted within the 500-foot Air Quality Management District buffer along Interstate 210 (I-210), the portion of farmland located within the buffer would be protected from development.

Although policies in the proposed General Plan seek to promote agricultural uses and preserve agricultural character throughout the Planning Area, the loss of Prime Farmland, Farmland of Statewide Importance, or Unique farmland due to conversion would be considered a significant impact. As no feasible mitigation measures have been identified, the impact would be significant and unavoidable.

### **AIR QUALITY**

Development under the Proposed Project, specifically the proposed General Plan, could violate air quality standards or contribute substantially to an existing or projected air quality violation. The South Coast Air Basin (SCAB) has been designated as a nonattainment area for the State ozone (O<sub>3</sub>) and particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) standards. The SCAB is also designated as a nonattainment area for the federal O<sub>3</sub> and PM<sub>2.5</sub> and is in attainment/maintenance for the federal PM<sub>10</sub>, carbon monoxide (CO), and nitrogen dioxide (NO<sub>2</sub>) standards.

Construction activities associated with the proposed General Plan would cause short-term emissions of criteria air pollutants. Due to the scale of development activity associated with buildout

of the proposed General Plan, construction emissions would likely exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds. In accordance with the SCAQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SCAB. Emissions of VOC and NO<sub>x</sub> are precursors to the formation of O<sub>3</sub>. In addition, NO<sub>x</sub> is a precursor to the formation of particulate matter. Therefore, the proposed General Plan would cumulatively contribute to the nonattainment designations of the Basin for O<sub>3</sub> and particulate matter. Air quality related to construction must be addressed on a project-by-project basis.

For this EIR, it is not possible to determine whether the scale and phasing of individual projects would exceed the SCAQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and the CARB's Airborne Toxic Control Measures), mitigation imposed at the project level may include extension of construction schedules and/or use of special equipment. Existing City policies and regulations and proposed General Plan principles and actions are intended to minimize impacts associated with nonattainment criteria pollutants. While these regulations and policies would reduce impacts associated with construction activities, there is no guarantee emissions would be mitigated below SCAQMD thresholds. Therefore, impacts would remain significant and unavoidable during construction.

Long-term air emission impacts are those associated with area sources and mobile sources involving any change related to the proposed General Plan. In addition to the short-term construction emissions, buildout of the proposed General Plan would also generate long-term air emissions. These long-term emissions are primarily mobile source emissions that would result from vehicle trips and VMT associated with buildout of the proposed General Plan. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions. Operational emissions associated with the additional development that would occur under buildout conditions of the General Plan, would exceed the SCAQMD's significance threshold for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>; therefore, impacts would be potentially significant. Future development under the Proposed Project would be required to comply with State and federal regulations, and the proposed General Plan principles and actions; however, there is no guarantee emissions would be mitigated below SCAQMD thresholds. Proposed General Plan principles and actions, would reduce impacts associated with long-term operational criteria pollutant emissions; however, impacts would remain significant and unavoidable during operation.

## **TRANSPORTATION**

Implementation of the Proposed Project, specifically the proposed General Plan, could result in conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

For intersections and roadway segments, if all roadway improvements in the proposed General Plan were implemented, impacts would be less than significant. However, because eight of the proposed improvements would be located on facilities partially or fully controlled by other jurisdictions, the

City of Redlands could not guarantee implementation. Therefore, some impacts could occur that would be significant and unavoidable. In addition, four freeway segments were determined to experience significant and unavoidable impacts. The impacts on the freeway system are not in the City's control as these would occur due to regional growth and would occur with or without the implementation of the General Plan. Overall, the Proposed Project would have a significant and unavoidable impact.

Implementation of the General Plan would also potentially conflict with an applicable congestion management program (CMP) including, but not limited to level of service standards and travel demand measures, or standards established by the county congestion management agency for designated roads or highways. Some improvements included the proposed General Plan to reduce this impact are partially or fully within the control of other jurisdictions and thus cannot be guaranteed by the City of Redlands. Without the proposed improvements, the LOS would worsen at a roadway segment already operating at LOS F, resulting in a potentially significant and unavoidable impact.

## **5.4 Significant Irreversible Environmental Change**

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CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land or waterways. Irretrievable commitments of non-renewable resources associated with the proposed General Plan include:

### **WATER CONSUMPTION**

New development under the Proposed Project, specifically the proposed General Plan, would increase the demand for water supplies for residential, commercial, agricultural, and industrial uses. It would place a greater demand on the City of Redlands municipal water supply and the Western Heights Water Company, which derive water supply from local groundwater basins, surface waters from Mill Creek and the Santa Ana River, and the State Water Project watershed in Northern California, in addition to recycled water supplies. This increased demand for public water represents an irreversible environmental change.

### **ENERGY SOURCES**

New development under the Proposed Project, specifically the proposed General Plan, would result in increased energy use, in the form of new buildings and transportation. Both residential and nonresidential developments use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Use of these types of energy for new development would result in the overall increased use of nonrenewable energy resources. This represents an irreversible environmental change.

## **CONSTRUCTION-RELATED IMPACTS**

Irreversible environmental changes could also occur during the course of constructing development projects allowed under the Proposed Project, specifically the proposed General Plan. New construction would result in the consumption of building materials, such as lumber, sand, and gravel for construction. Construction aggregate used in development projects may be extracted from within the Planning Area, where mineral resources have been designated as regionally significant. Depletion of non-renewable resources that supply building materials would represent an irreversible environmental change.

## **LOSS OF IMPORTANT FARMLAND**

Some new development allowed under the Proposed Project, specifically the proposed General Plan, may take place on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as classified by the California Farmland Mapping and Monitoring Program. These designations identify high quality agricultural resources, and the loss of these resources due to conversion of designated land to non-agricultural uses may be considered an irreversible environmental change.

## **5.5 Impacts Found Not to Be Significant**

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CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant. Chapter 3 of this EIR discusses all potential impacts, regardless of their magnitude. A similar level of analysis is provided for impacts found to be less than significant as impacts found to be significant and unavoidable. Significance of an impact is assessed in relation to the significance criteria provided in each section in Chapter 3. A summary of all impacts is provided in the Executive Summary of this EIR.