

RESOLUTION NO. 6724

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS CERTIFYING THE COMPLETION OF THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED REDEVELOPMENT PLAN FOR THE NORTH REDLANDS REVITALIZATION PROJECT; MAKING WRITTEN FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS; AND ADOPTING A MITIGATION MONITORING PROGRAM

WHEREAS, the Redevelopment Agency of the City of Redlands (the "Agency") is proposing adoption of a redevelopment plan (the "Plan") for the North Redlands Revitalization Project (the "Project" or "Project Area" as applicable), a redevelopment project in accordance with the requirements of the California Community Redevelopment Law (CCRL; California Health and Safety Code Sections 33000 *et seq.*); and

WHEREAS, the City Council of the City of Redlands (the "City Council" and the "City," respectively), pursuant to its Resolution No. 6612 adopted June 5, 2007 designated a survey area and directed the Planning Commission of the City (the "Planning Commission") to select a project area and formulate a preliminary plan in connection with the proposed Plan; and

WHEREAS, the Planning Commission, pursuant to its Resolution No. 1146, adopted September 25, 2007, selected and established that area within the Survey Area shown on the map of the Project Area on file in the office of the City Clerk and incorporated herein, as the boundaries of the proposed Project Area and formulated, approved and adopted the Preliminary Plan, on file in the office of the City Clerk and incorporated herein, for the redevelopment of the Project Area; and

WHEREAS, the Agency, pursuant to its Resolution No. 411 adopted October 16, 2007, accepted the Preliminary Plan and approved the recommendation of the Planning Commission for the boundaries of the Project Area; and

WHEREAS, the Agency caused an Initial Study of the Project to be prepared to evaluate the potential for adverse environmental impacts, concluding that a Program Environmental Impact Report (EIR) would be prepared for the Project, and the Initial Study with a Notice of Preparation was mailed to the State Clearinghouse, responsible and trustee agencies and other interested parties; and

WHEREAS, the Initial Study concluded that implementation of the project would have less than significant or no impacts in the following categories: Aesthetics, Biological Resources, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, and Utilities/Service Systems within the Project Area; and

WHEREAS, the Plan for the Project has been prepared in accordance with the provisions of the CCRL; and

WHEREAS, the Agency, authorized as a "lead agency," prepared a Draft EIR (DEIR) for the adoption of the Plan pursuant to the California Environmental Quality Act (the "CEQA Statutes"; Public Resources Code Section 21000 *et seq.*), the State Guidelines for

Implementation of the California Environmental Quality Act (the "CEQA Guidelines"; Title 14, California Code of Regulations, Section 15000 *et seq.*) And the City's local procedures for implementing CEQA, which hereafter are collectively referred to as CEQA, which DEIR is on file with the City Clerk; and

WHEREAS, all actions required to be taken by applicable law related to the preparation, circulation, and review of the DEIR have been taken; and

WHEREAS, after reviewing the DEIR the Planning Commission, pursuant to its Resolution No. 1159 adopted April 22, 2008, approved and forwarded to the City Council a report finding that the Plan for the Project is in conformity with the City's General Plan, approved the Plan as proposed, and recommended Plan approval and adoption to the Agency and the City Council; and

WHEREAS, public notice having been duly and regularly given as required by law, a full and fair joint public hearing has been held by the Agency and the City Council concerning adoption of the Plan and approval of the Final EIR (FEIR) related thereto, and all interested persons expressing a desire to comment thereon, or object thereto have been heard; and

WHEREAS, the FEIR consists of the DEIR, as revised and supplemented to incorporate all comments received during the public review period, if any, and the responses of the Agency to any such comments, and the Mitigation Monitoring Program; and

WHEREAS, the Agency has reviewed and certified the FEIR, made written findings required by CEQA, adopted a Mitigation Monitoring Program and a Statement of Overriding Considerations with respect to impacts to air quality which cannot be mitigated to a less than significant level, all in the exercise of its independent judgment; and

WHEREAS, copies of all documents and the record of proceedings related to the Agency's approval and certification of the FEIR are on file in the Agency offices, 210 E. Citrus Avenue, Redlands, California, and the FEIR is on file in the offices of the City Clerk, and all such documents are available for public inspection; and

WHEREAS, the City Council has reviewed and considered the FEIR and the Mitigation Monitoring Program with respect to the Plan, and all comments and responses thereto.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDLANDS DOES HEREBY RESOLVE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. The above recitals are true and correct.

Section 2. The Agency has proposed adoption of the Plan for the Project for the purpose of enabling effective redevelopment of the 859.6-acre Project Area. The principal objective of the Project is to help improve the existing conditions of blight that exist within the Project Area. To achieve such objective the Plan contemplates the implementation of select projects and programs to: i) upgrade public facilities and infrastructure; ii) promote and facilitate economic development and job growth; iii) provide additional affordable housing opportunities for eligible persons; and iv) generally improve the quality of life for residents, and business and property owners within the limits of the Project Area, specifically, and generally within the City.

Section 3. A DEIR was prepared to evaluate the potential adverse environmental impacts of the Project and to incorporate previously prepared CEQA analyses, as applicable. It was circulated for a 45-day public review and comment period pursuant to CEQA requirements. The FEIR, which includes written comments, if any, and responses to said comments, was prepared and made available for public inspection at the office of the City Clerk prior to the adoption date of the Agency Resolution certifying the FEIR. The FEIR, including comments, responses, and a proposed Mitigation Monitoring Program, makes minor corrections to the DEIR, and incorporates the DEIR and Appendices to the DEIR.

Section 4. The City Council hereby certifies that the FEIR was completed in compliance with CEQA and that the FEIR represents the independent judgment of the City Council. The City Council also hereby certifies that it has reviewed and considered the contents of the FEIR prior to deciding whether to approve the Plan for the Project. The City Council further finds that the public comments and responses, if any, to the DEIR following the public comment period do not constitute significant new information as defined in the Public Resources Code Section 21092.1 and in CEQA Guidelines Section 15088.5.

Section 5. The City Council and the Agency held a duly noticed joint public hearing on the Project and FEIR on June 17, 2008. All interested persons had the opportunity to present both written and oral comments regarding the Project and the DEIR at the hearing. The City Council has considered all comments received on the DEIR, which comments and responses thereto are contained in the FEIR. These actions having been taken, the FEIR is hereby approved, certified and adopted as the Final Environmental Impact Report for the Project and incorporated herein by reference.

Section 6. The findings made in this Resolution are based on the information and evidence set forth in the FEIR and upon other substantial evidence in the record of the proceedings on the Plan and the FEIR, which include, among other things, the City of Redlands General Plan, the East Valley Corridor Specific Plan, and the Redlands zoning regulations. The documents, staff reports, plans, specifications, technical studies and other relevant materials, including, without limitation, the FEIR, that constitute the record of proceedings on which this Resolution is based are on file and available for public examination during normal business hours in the Agency offices, 210 E. Citrus Avenue, Redlands, California. The custodian of said records is the Secretary of the Agency. Additionally, the FEIR is on file and available for public examination during normal business hours in the office of the City Clerk, City of Redlands, 35 Cajon Street, Redlands, California. The custodian of the FEIR is the City Clerk of the City of Redlands.

Section 7. Based upon the Initial Study, the DEIR, the public comments, the FEIR and the record before the City Council, the City Council finds that the Project will not cause significant environmental impacts in the areas of: Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Geology/Soils, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Utilities/Service Systems within the Project Area.

Section 8. Based on the Initial Study, the DEIR, the public comments, the FEIR and the record before the City Council, the City Council declares that there is no evidence before it that the Project has any potential for an adverse effect on wildlife resources or habitats and has rebutted the presumption of adverse effects set forth in the Title 14, California Code of Regulations, Section 753.5(d).

Section 9. Based on the Initial Study, the DEIR, the public comments, the Final EIR, and the record before the City Council, the City Council hereby makes and adopts the CEQA Findings and Statement of Facts as set forth in Exhibit A, attached hereto and incorporated herein by reference. Without limiting the generality of the foregoing sentence, the City Council hereby expressly approves and adopts each of the mitigation measures set forth in the attached Exhibit A, and hereby requires that such mitigation measures shall be implemented in connection with, and are hereby made a part of, the Plan, the Implementation Plan, and the Project. In addition, the City Council acknowledges that it will consider the recommendations contained in the FEIR as it implements specific projects.

Section 10. Based on the foregoing, the City Council hereby finds that the Project may create significant impacts in the areas of Air Quality and Transportation/Traffic. Based on such Findings of Fact and the foregoing adoption and requirement for mitigation measures, which are contained in Exhibit A, the City Council hereby finds that the mitigation measures have been required in, or incorporated into, the Project which will eliminate, or reduce to a level of insignificance, the potentially significant environmental effects of the Project identified in the FEIR, except for impacts to air quality, as fully described in Section 2.4 of the FEIR. With regard to the impacts in Section 2.4, the City Council finds and determines that the Project and the Plan will have a significant environmental effect on Air Quality which cannot be mitigated to a level of insignificance.

Section 11. Based on the foregoing, as to the potentially significant impacts to air quality which are not eliminated or substantially lessened, the City Council hereby adopts the Statement of Overriding Considerations as set forth in Exhibit B hereto and incorporated herein by this reference, and finds, based upon substantial evidence in the record, including but not limited to the Statement of Overriding Considerations, the specific economic, legal, social, technological, and other benefits of the Project outweigh the significant effects to air quality.

Section 12. Exhibit A sets forth, and Section 3.0 of the FEIR more fully describes, a reasonable range of alternatives to the Project, which have been fully considered by the City Council. These alternatives include the "No Project Alternative," the "Financing Alternative," which considers supplanting tax increment revenues with funds from a variety of other programs and sources; and the "Alternative Project Area Alternative," which considers reduction of or enlargement of the Project Area as proposed. As set forth in Sections 9 and 10 of this Resolution, the FEIR identifies feasible mitigation measures for each significant impact in the FEIR that could be mitigated and in Section 11 adopts a Statement of Overriding Considerations for that impact that can not be wholly mitigated to a level of insignificance. The City Council hereby finds that the alternatives described in the FEIR and identified in Exhibit A are not feasible because they would not achieve the basic objectives of the Project, or would do so only to a much smaller degree and would therefore leave unaddressed significant social, physical and economic problems the Project is intended to eliminate. Of the reasons set forth herein in the attached Exhibit A, in the record of the City Council and Agency's proceedings, or in the FEIR, none of the alternatives, including the No Project alternative, is environmentally superior because each would reduce redevelopment and blight removal activities, limit job creation, and constrain the Agency's ability to correct current environmental problems.

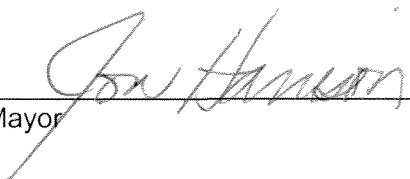
Section 13. The City Council hereby finds and determines that the mitigation measures and the Mitigation Monitoring Program set forth in the FEIR will mitigate or avoid all significant environmental effects that can be feasibly mitigated or avoided. The City Council hereby adopts the Mitigation Monitoring and Reporting Program as set forth in Section 7.0 of the FEIR and attached hereto as Exhibit C and incorporated herein by reference. This program will

be used to monitor the changes and conditions to the Project which has been adopted, or made a condition of Project approval as set forth in Sections 9 and 10 above and in Exhibit A to this Resolution.

Section 14. Upon adoption of the Plan by the City Council, the City Clerk shall cause a Notice of Determination to be filed forthwith in the Office of the County Clerk of the County of San Bernardino and the State Clearinghouse pursuant to CEQA Guidelines Section 15094.

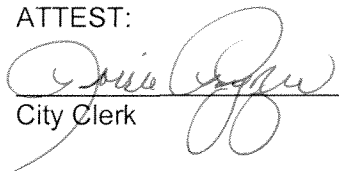
Section 15. The City Clerk shall certify to the passage and adoption of this Resolution and it shall thereupon take immediate effect and be in force.

ADOPTED, SIGNED AND APPROVED this 1st day of July 2008



Mayor

ATTEST:

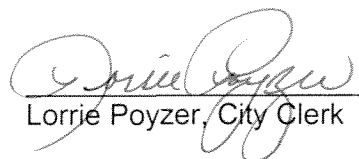


City Clerk

STATE OF CALIFORNIA)
COUNTY OF SAN BERNARDINO) ss.
CITY OF REDLANDS)

I, Lorrie Poyzer, City Clerk of the City of Redlands, hereby certify that Resolution No. 6724 was duly adopted by the City Council of the City of Redlands at a regular meeting thereof held on the 1st day of July, 2008, by the following vote:

AYES: Councilmembers Gilbreath, Gallagher, Aguilar, Bean; Mayor Harrison
NOES: None
ABSENT: None
ABSTAIN: None



Lorrie Poyzer, City Clerk

EXHIBIT A
CEQA
FINDINGS AND STATEMENT OF
FACTS

**FINDINGS OF FACT RELATING TO THE ENVIRONMENTAL IMPACTS
OF THE PROPOSED REDEVELOPMENT PLAN FOR THE
NORTH REDLANDS REVITALIZATION PROJECT**

I. FINDINGS CONCERNING THE SIGNIFICANCE OF SPECIFIC ENVIRONMENTAL IMPACTS IDENTIFIED IN THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT.

Capitalized terms used but not defined in this Exhibit A shall have the meanings given in the Resolution to which this Exhibit A is attached and made part (the "Resolution") or in the Final Program EIR as applicable.

As further provided in the Resolution the mitigation measures set forth below in this Part I of Exhibit A are each expressly approved and adopted by the City Council and the Agency and incorporated into and made requirements of the Project pursuant to the Plan.

As used below in this Part I of Exhibit A, the phrases "insignificant" or "less than significant" or similar words as found in various subsections headed "Level of Significance After Mitigation" mean, for purposes of the CEQA Guidelines, with particular reference to CEQA Guidelines, Section 15091(a)(1), that:

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant effect as identified in the Final EIR.

Please refer to the applicable sections of the Final Program EIR, incorporated herein by reference, for additional information concerning Project impacts and required mitigation measures and further explanation of the rationale for the significance findings set forth below in this Part I of Exhibit A

A. AGRICULTURAL RESOURCES

IMPACTS

AGRICULTURE

Long-term implementation of the Project, consistent with the policies of the General Plan and EVCSP, may contribute to the ultimate conversion of the small remaining amount of Prime Farmland and Farmland of Statewide Importance (77 acres) catalogued in the Revitalization Area to their formally designated urban uses, even as these acres, while undeveloped, are not in active production. City Counsel Resolution No. 5220, adopted October 17, 1995, certifying the EIR for the General Plan pursuant to CEQA requirements found and determined that implementation of the General Plan would result in the "conversion of designated prime farm land to urban uses," a significant unavoidable adverse impact, which could not be mitigated to a level of insignificance. The City Council adopted a Statement of Overriding Considerations, which is final and conclusive with respect to the conversion of agricultural land within the City planning area, including those portions located in the Revitalization area. No land included in the Revitalization Area is under a Williamson Act contract. A total of approximately 95 acres of land within the Revitalization Area has been identified by the DOC as having the

potential to be considered important farmland; however, only the Texas Grove (12.1 acres) is in active agricultural use and it is currently being preserved through existing General Plan land use policies and zoning regulations. The Plan does not alter or in any way modify agricultural land use designations. Such policy change in land use designation is solely within the purview of the General Plan amendment process.

MITIGATION MEASURES

No further mitigation measures are recommended as a condition of Redevelopment Plan Adoption. As a matter of policy, the General Plan promulgates all feasible measures to minimize conflicts between urban and agricultural lands and to preserve important agricultural lands while seeking land for needed future urbanization in a logical manner. However, despite such goals, conversion of agricultural land within the City's corporate boundaries is cumulative, unavoidable and irreversible and therefore could not be feasibly mitigated to a level that is less than significant. In recognition of this, the City Council adopted a Statement of Overriding Considerations with respect to conversion of agricultural land within its planning area, finding that any adverse environmental effects associated with the loss of agricultural land within the City planning was considered to be acceptable.

Additional mitigation measures, as appropriate and necessary, may be added at such time as site-specific projects are proposed from time to time for Agency assistance or participation.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant. The issue of conversion of agricultural land within the City's planning area has been addressed through the General Plan and EVCSP planning processes, and all available feasible mitigation measures have been applied. As to those effects that could not be reduced to a level of insignificance, a Statement of Overriding Consideration was adopted. The Plan for the Project herein identifies no new agricultural acreage that will sustain adverse impacts not previously addressed in the General Plan and specific plan adoption processes.

B. AIR QUALITY

IMPACTS

SHORT-TERM IMPACTS:

Temporary impacts are projected to result from Revitalization Area construction activities, which may include demolition of existing structures and grading, generating fugitive dust. Specific site preparation, including demolition and grading, represent the construction activities that would result in the highest levels of air pollutant emissions associated with construction. The majority of the CO, VOCs and NO_x emissions would generally be generated by heavy construction equipment, while the majority of the PM₁₀ emissions would be from ground disturbance. Air pollutants would not only be emitted by on-site construction equipment but also from off-site haul trucks and construction workers traveling to and from the site. Reactive Organic Gasses (ROG - an ozone precursor) would be released primarily during asphalt laying and the application of architectural coatings. These are likely to be significant impacts.

LONG TERM IMPACTS:

Regional Air Quality: The primary source of regional emissions generated by the proposed Project will also be from motor vehicles. The proposed Project at buildout (30 years) is estimated to generate a net increase of 74,462 new daily trips. Emissions generated by these additional trips, based on SCAQMD's emissions thresholds, are projected to result in a significant regional air quality impact. The Project is consistent with the applicable South Coast Air Quality Management Plan.

MITIGATION MEASURES

SHORT TERM IMPACTS: The following measures shall be considered as potential mitigation measures for short-term air quality impacts when and as specific projects are approved for Agency assistance and at the time of project construction/ reconstruction (but are not recommended as conditions of Redevelopment Plan approval):

Particulate Emission (PM10) Control:

AQ-1: Comply with SCAQMD Rules 402 and 403. During construction of Agency-assisted, site specific projects in the Revitalization Area, property owner/developers and contractors shall comply with SCAQMD Rules 402 and 403 to assist in the reduction of fugitive dust emissions.

Construction Emission Control:

AQ-2: Reduce construction equipment emissions by implementing the following measures:

1. Use low emission mobile construction equipment. Site-specific project property owners/ developers/contractors shall comply with CARB requirements for heavy construction equipment.
2. Maintain construction equipment engines by keeping them tuned.
3. Use low sulfur fuel for stationary construction equipment as required by SCAQMD Rules 431.1 and 431.2.
4. Utilize existing power sources (i.e., power poles) when available. This measure would minimize the use of higher polluting gas or diesel generators.
5. Configure construction parking to minimize traffic interference.
6. Minimize obstruction of through-traffic lanes. Construction should be planned so that lane closures on existing streets are kept to a minimum.
7. Schedule construction operations affecting traffic for off-peak hours to the best extent when possible.
8. Develop a traffic plan to minimize traffic flow interference from construction activities (the plan may include advance public notice of routing, use of public transportation and satellite parking areas with a shuttle service.)

ROG Control Measures:

AQ-3: The following measures should be incorporated into specific project construction, when proposed, to the greatest extent feasible:

1. Minimize the amount of paint used by using pre-coated, pre-colored and naturally colored building materials; and
2. Use high transfer efficiency painting methods such as HVLP (High Volume Low Pressure) sprayers and brushes/rollers where possible.

LONG-TERM

Regional Air Quality Impacts: The following measures, which will be included in the Mitigation Monitoring Program, shall be considered as potential mitigation measures for regional emissions to be imposed when and as specific projects are considered by the Agency (but are not recommended as mandatory conditions of Project approval):

Travel Demand Management (TDM) Measures:

1. Provide adequate ingress and egress at all entrances to public facilities to minimize vehicle idling at curbsides.
2. Provide dedicated turn lanes as appropriate and provide roadway improvements at heavily congested roadways.

Energy Efficiency Measures

3. Improve thermal integrity of the buildings and reduce thermal load with automated time clocks or occupant sensors.
4. Install energy efficient lighting.
5. Capture waste heat and reemploy it in nonresidential buildings (applicable commercial buildings).
6. Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits.
7. Provide lighter color roofing and road materials and tree planting programs to comply with the AQMP Miscellaneous Sources MSC-01 measure.
8. Synchronize traffic signals.
9. Introduce window glazing, wall insulation and efficient ventilation methods.

Although not recommended as a condition of Plan adoption, it is recommended that all available new emission control technologies be reviewed and considered for mitigation measures at the time new site specific projects are proposed. Additional mitigation measures, as appropriate and necessary, may be added at such time as site-specific projects are proposed from time to time for Agency assistance or participation.

C. TRANSPORTATION/TRAFFIC

IMPACTS

The Plan proposes no specific design site projects in the Revitalization Area, or other Agency-assisted construction/reconstruction activities because no tax increment funds

are yet available to fund such projects. However, based strictly on General Plan buildout calculations (Table 1 of the Final Program EIR), it is reasonable to conclude that the Project would contribute to the increased AM and PM peak hour trips, at least on some roadway segments, as anticipated by the General Plan EIR.

The General Plan EIR determined that General Plan buildout in the entire City planning area may result in significant traffic impacts despite roadway improvements specified in the General Plan Circulation Element, including an increase in ADTs, impacts to existing residential units fronting on arterials and higher volumes of traffic on residential collector streets. The General Plan EIR determined that such impacts would be reduced by the following Circulation Element guiding and implementing policies: i) maintaining a LOS C or better level of roadway service; ii) monitoring traffic levels of service; iii) implementing roadway improvements; iv) coordinating freeway and highway requirements with Caltrans; v) levying fees on new developments for roadway improvements; vi) keeping certain roadway classifications below specified average daily trip volumes; v) supporting SANBAG's CMP; and vi) establishing a comprehensive network of bicycle and pedestrian routes, among other things. The General Plan EIR concluded significant traffic impacts would accompany growth toward General Plan buildout and also concluded that the impacts of development of the East Valley Corridor and resulting increase of employment, which would rely for access mainly on existing street and freeway systems, could only be partially mitigated at the General Plan level.

The City Council, in certifying the General Plan EIR, and based on the information and analysis contained therein, made the finding that although policies included in the General Plan would provide various types of mitigation measures to reduce impacts on traffic, implementation of the General Plan may result in significant unavoidable adverse impacts based on the following: i) traffic LOS might be E or F on several arterial streets segments and on segments of I-10 and SR-30 despite roadway improvements specified in the Circulation Element; and ii) direct impacts as a result of the General Plan would include an increase in average daily trips, impacts to residential units fronting onto arterials and high volume traffic on residential collector streets; all impacts which can not be feasibly avoided. Consequently, the City Council adopted a Statement of Overriding Considerations, finding that the benefits of the updated General Plan guiding and implementing policies in the City planning area outweigh the impact related to traffic and any adverse environmental effects associated with this impact are considered to be acceptable.

MITIGATION MEASURES

The following mitigation measure is recommended as a condition of Project adoption:

T-1: Upon submission of an application for a site-specific development project within the Revitalization Area to the City, and pursuant to applicable local, regional, State and federal threshold requirements, applicant shall conduct a traffic analysis to determine the project's actual impact on Revitalization Area affected intersections and/or roadway segments. Scope of the analysis can be as simple as a trip generation study for small developments, or a full-scope analysis for larger developments. The traffic analysis will be used to determine whether the following mitigation measures, among others, are adequate or appropriate to mitigate the impacts of the project, or whether a greater or lesser mitigation requirement is needed:

Recommended Mitigation for Cumulative Impacts

In addition to mitigation measures required to address direct specific project impacts, depending on the results of the site-specific study and based on the City's traffic impact significance standards, a project may be required to implement one or more of the following measures to mitigate the project's impacts and improve the overall operation of traffic in the Revitalization Area:

- Add and/or reconfigure lanes at intersections that operate at an unacceptable levels of service
- Require new development to provide adequate on-site loading and unloading areas for truck deliveries
- Require new development to provide adequate on-site parking
- Restrict and/or eliminate on-street parking as appropriate
- Consolidate curb cuts and driveway accesses between individual parcels
- Add raised medians or other center divider treatments to restrict left turns at driveways and unsignalized intersections to right turns in and out only
- Implement signal synchronization along main corridors
- Participate in a fair-share funding mechanism, such as a traffic impact fee program, an improvement benefit district, or other program, as established by the City.
- Enhance existing street lighting

Additional mitigation measures, as appropriate and necessary, may be added at such time as site-specific projects are proposed from time to time for Agency assistance or participation.

II. FINDINGS CONCERNING THE PROJECT ALTERNATIVES

The following are summaries of alternatives to the Project, as currently proposed, which are examined in more detail in Section 3.0 of the Final Program EIR.

NO PROJECT ALTERNATIVE

Under the "No Project Alternative," the Redevelopment Plan would not be adopted. No actions would be taken by the Agency to remediate blighting conditions and stimulate additional private investment in or for the benefit of the Revitalization Area. No Agency-facilitated actions would be taken to fund infrastructure and facility improvements or to sponsor neighborhood revitalization and business development in the Revitalization Area. This alternative would, for an indeterminable period of time, avoid or delay some of the potential environmental side effects that could be generated from select redevelopment projects in the Revitalization Area, such as incremental traffic increases or loss of agricultural acreage. The No Project Alternative would cause less physical

impact on the environment, at least for some period of time, because the Agency would not be promoting and assisting new and intensified land uses and other ancillary activities in the Revitalization Area, which could result in slower, less orderly growth as a result of existing physical deficiencies.

The No Project Alternative will deprive the Agency of the means to ameliorate existing adverse physical blight conditions through redevelopment. The No Project Alternative is not environmentally superior to the Project because, in the end, it does not avoid the cumulative impacts of continued urbanization in the Revitalization Area, while it denies the Revitalization Area the environmental benefits associated with Agency-facilitated activities such as structures rehabilitation, redevelopment of underutilized parcels, accelerated recycling of non-conforming land uses to General Plan designated land uses, infrastructure and community facilities improvements, increased economic development and increased, improved and preserved affordable housing for eligible very low-, lower- and moderate-income persons and families.

ALTERNATIVE REVITALIZATION AREA ALTERNATIVE

An "Alternative Revitalization Area Alternative," one that would consist of either more or fewer parcels than that number selected for the Project, does not take into consideration that the Revitalization Area, as proposed, was selected based upon existing conditions and an identified need for redevelopment.

Expanding the Revitalization Area to include parcels that do not exhibit blighting conditions and/or are not essential to the effective redevelopment of the Revitalization Area in accordance with the CCRL, is not permitted by the CCRL; therefore, an expanded Revitalization Area alternative is not feasible, as a matter of law, and is not considered.

Reducing the Revitalization Area's size (the "Reduced Revitalization Area Alternative") by eliminating various developed or undeveloped assessed property would diminish the Agency's ability to address conditions of deficiency and disuse within the area. Redevelopment of the Revitalization Area with the boundaries as proposed is environmentally superior because blighting conditions will be addressed throughout the entire area qualified for Agency assistance, mitigating adverse environmental impacts now present, and as may occur in the future. The Reduced Revitalization Area Alternative is environmentally less desirable because it would allow the adverse effect of blighting conditions to continue indefinitely in those areas excluded from the Project.

LIMITED REDEVELOPMENT ACTIVITIES ALTERNATIVE

This alternative would require the reduction of Agency activities and/or authority within the Revitalization Area. Such a limitation would reduce the likelihood that needed improvements and facilities would be provided. Additionally, tax increment funding would be severely restricted. Also, if activities were limited, problems of blight would continue, which would adversely affect and discourage investment in the Revitalization Area. In the final analysis, the Limited Redevelopment Activities Alternative is not an environmentally superior alternative to the Project because the environmental benefits of a limited redevelopment activity, such as, for example: 1) a decrease in short-term impacts from reconstruction/construction activities, or 2) a decrease in long-term impacts, are outweighed by the concomitant negative impacts that would result from

limited redevelopment activity such as, for example: 1) increased impacts on existing public facilities without upgrading those facilities or 2) restrictions on the Agency's ability to mitigate infrastructure deficiencies and undertake aesthetic improvements in the Revitalization Area.

FINANCING ALTERNATIVE

Various financing programs, as an alternative to Redevelopment Plan adoption, might include Revenue Bonds, Community Development Block Grant funds, Economic Development Administration funds, special assessment districts, such as Infrastructure Financing Districts (IFDs), and/or other County, State and federal assistance and funding programs, some of which are currently being used, as available and permitted by law. Although most of these programs may be used to supplement the tax increment financing enabled by the CCRL through redevelopment, each financing program, taken alone, has inherent limitations and disadvantages; therefore, reliance on any of these sources as a sole financing tool is not considered feasible. Existing disadvantages associated with the Financing Alternative would jeopardize the Plan's long-term implementation and prevent the Agency from being able to effect positive economic and physical changes within the Revitalization Area. Therefore, this alternative would allow existing conditions of deficiency, which negatively affect the proper utilization of the Revitalization Area, to continue without a substantial means of abatement. In contrast, adoption of the Plan will lead to a steadily available source of funding through tax increment revenues for an extended period of time. Additionally, to obtain increased benefits, the Redevelopment Plan authorizes the Agency to take advantage of all available financing sources and programs allowed by law, in addition to its tax increment receipts in order to effect redevelopment of the Revitalization Area. Moreover, the CCRL requires that the Agency give consideration to alternative financing sources when it proposes to provide public facilities and improvements with tax increment revenues, in effect causing the examination of alternative financing sources throughout the term of the Plan.

CONCLUSION

The Agency's primary goal is to eliminate blight within the Revitalization Area. The No Project Alternative will not achieve this goal, because blight in the Revitalization Area could not be addressed through Agency redevelopment assistance. The Financing Alternative, the Limited Redevelopment Activities Alternative and the Reduced Revitalization Area Alternative would each achieve the Agency's goal in part, but the ultimate success of the Agency's redevelopment effort would be limited by the specific constraints imposed by each alternative. In the end, all alternatives to the Project, including the No Project Alternative, fall short of achieving the Agency's goal of neighborhood revitalization and economic improvement through blight elimination in the Revitalization Area.

EXHIBIT B

STATEMENT OF OVERRIDING CONSIDERATIONS

STATEMENT OF OVERRIDING CONSIDERATIONS

Capitalized terms used but not defined in this Exhibit B shall have the meanings given in the Resolution to which this Exhibit is attached and made a part, or the Final Program EIR, as applicable.

As detailed in Section 2.4 of the Final Program EIR, the Project is expected to create a significant, unavoidable and adverse impact on Air Quality, even after adoption and implementation of all relevant mitigation measures. This Exhibit B constitutes the Statement of Overriding Considerations of the City Council and Agency in connection with the significant, unavoidable and adverse impacts of the Project on Air Quality, made in accordance with CEQA Guidelines, Section 15093.

The City Council and Agency have carefully and independently considered the significant, unavoidable and adverse impacts to Air Quality in deciding whether to approve the Project. Although the City Council and Agency believe that the unavoidable impacts will be lessened by the mitigation measures incorporated into the Project, each recognizes that approval of the Project will nonetheless result in certain unavoidable and potentially irreversible effects.

The City Council and Agency have weighed the benefits to the community of the Project against its environmental risks. The City Council and Agency each specifically find that, to the extent that any adverse or potentially adverse impact has not been mitigated to a level of insignificance, that specific economic, social, legal, environmental, technological or other benefits of the project outweigh the significant effects on the environment. Furthermore, the City Council and Agency each find that any and each of the following considerations is sufficient to approve the Project despite any one or more of the unavoidable impacts to Air Quality identified; that each of the overriding considerations is adopted with respect to each of the impacts individually; and that each consideration is severable from any other consideration should one or more considerations be shown to be legally insufficient for any reason. The following considerations support approval of the Project:

1. The Project will remedy, remove and prevent physical and economic blighting influences which are present in the Project Area.
2. The Project will encourage increased employment and business opportunities through environmental and economic improvements resulting from the redevelopment activities.
3. The Project will provide for the rehabilitation of commercial and manufacturing structures and residential dwelling units.
4. The Project will revitalize neighborhoods by providing for participation in the redevelopment of property by owners who agree to so participate in conformity with the Plan.
5. The Project will provide public infrastructure improvements and community facilities, such as the installation, construction and/or reconstruction of streets, utilities, public buildings, facilities, structures, street lighting, landscaping and other improvements which are necessary for the effective redevelopment of the Project Area.
6. The Project will increase, improve and preserve the community's supply of affordable housing available to eligible families and persons.

7. The Project will encourage the redevelopment of the Project Area through the cooperation of private enterprise and public agencies.
8. Implementation of the Redevelopment Plan will ensure the development and redevelopment of the Project Area in a manner consistent with the goals and policies of the City's General Plan and the EVCSP, as applicable.
9. Implementation of the Redevelopment Plan will protect the safety of people living and working within the Project Area by improving the seismic safety features of existing buildings and infrastructure.

The documents and reports in the administrative record of these proceedings, which support the foregoing considerations and which the City Council and Agency have each considered in support thereof, are the following:

1. Redevelopment Plan (Included in Tab 2 of the Joint Public Hearing Evidentiary Record).
2. The Final Program Environmental Impact Report (Included in Tab 3 of the Joint Public Hearing Evidentiary Record).
3. The Agency's Report to the City Council (Included in Tab 4 of the Joint Public Hearing Evidentiary Record).
4. The Planning Commission's Report on Conformity with the City's General Plan (Included in Tab 5 of the Joint Public Hearing Evidentiary Record).

EXHIBIT C

MITIGATION MONITORING & REPORTING PROGRAM

The following Mitigation Monitoring & Reporting Program is excerpted from Section 7.3.3 of the Final Program EIR for the Project.

NORTH REDLANDS REVITALIZATION PROJECT (A REDEVELOPMENT PROJECT) MITIGATION MONITORING & REPORTING PROGRAM				
MITIGATION MEASURES	RESPONSIBLE ENTIT(IES)	ENFORCEMENT AGENC(IES)	MONITORING PHASE(S)	MONITORING AGENC(IES)
7.3.3.1 AIR QUALITY SHORT TERM IMPACTS: The following measures shall be considered as potential mitigation measures for short-term air quality impacts when and as specific projects are approved for Agency assistance and at the time of project construction/ reconstruction (but are not recommended as conditions of Redevelopment Plan approval): Particulate Emission (PM10) Control: AQ-1: Comply with SCAQMD Rules 402 and 403. During construction of Agency-assisted, site specific projects in the Revitalization Area, property owner/developers and contractors shall comply with SCAQMD Rules 402 and 403 to assist in the reduction of fugitive dust emissions. Construction Emission Control: AQ-2. Reduce construction equipment emissions by implementing the following measures: 1. Use low emission mobile construction equipment. Site-specific project property owners/ developers/contractors shall comply with CARB requirements for heavy construction equipment. 2. Maintain construction equipment engines by keeping them tuned. 3. Use low sulfur fuel for stationary construction equipment as required by SCAQMD Rules 431.1 and 431.2. 4. Utilize existing power sources (i.e., power poles) when available. This measure would minimize the use of higher polluting gas or diesel generators. 5. Configure construction parking to minimize traffic interference. 6. Minimize obstruction of through-traffic lanes. Construction should be planned so that lane closures on existing streets are kept to a minimum. 7. Schedule construction operations affecting traffic for off-peak hours to the best extent when possible. 8. Develop a traffic plan to minimize traffic flow interference from construction activities (the plan may include advance public notice of routing, use of public transportation and satellite parking areas with a shuttle service.) ROG Control Measures: AQ-3. The following measures should be incorporated into specific project construction, when proposed, to the greatest extent feasible: 1. Minimize the amount of paint used by using pre-coated, pre-colored and naturally colored building materials; and 2. Use high transfer efficiency painting methods such as HVLP (High Volume Low Pressure) sprayers and brushes/rollers where possible.	Project Applicant Developer Redeveloper	City of Redlands Redevelopment Agency of the City of Redlands South Coast Air Quality Management District	Pre-Construction Construction	Redlands Community Development Department South Coast Air Quality Management District

NORTH REDLANDS REVITALIZATION PROJECT (A REDEVELOPMENT PROJECT) MITIGATION MONITORING & REPORTING PROGRAM

MITIGATION MEASURES	RESPONSIBLE ENTIT(IES)	ENFORCEMENT AGENC(IES)	MONITORING PHASE(S)	MONITORING AGENC(IES)
7.3.3.1 AIR QUALITY LONG-TERM <u>Regional Air Quality Impacts:</u> The following measures, which will be included in the Mitigation Monitoring Program, shall be considered as potential mitigation measures for regional emissions to be imposed when and as specific projects are considered by the Agency (but are not recommended as mandatory conditions of Project approval): Travel Demand Management (TDM) Measures: 1. Provide adequate ingress and egress at all entrances to public facilities to minimize vehicle idling at curbsides. 2. Provide dedicated turn lanes as appropriate and provide roadway improvements at heavily congested roadways. Energy Efficiency Measures 3. Improve thermal integrity of the buildings and reduce thermal load with automated time clocks or occupant sensors. 4. Install energy efficient lighting. 5. Capture waste heat and reemploy it in nonresidential buildings (applicable commercial buildings). 6. Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits. 7. Provide lighter color roofing and road materials and tree planting programs to comply with the AQMP Miscellaneous Sources MSC-01 measure. 8. Synchronize traffic signals. 9. Introduce window glazing, wall insulation and efficient ventilation methods. Although not recommended as a condition of Plan adoption, it is recommended that all available new emission control technologies be reviewed and considered for mitigation measures at the time new site specific projects are proposed. Additional mitigation measures, as appropriate and necessary, may be added at such time as site-specific projects are proposed from time to time for Agency assistance or participation.	Project Applicant Developer Redeveloper	City of Redlands Redevelopment Agency of the City of Redlands South Coast Air Quality Management District	Pre-Construction Construction Operation	Redlands Community Development Department South Coast Air Quality Management District

NORTH REDLANDS REVITALIZATION PROJECT (A REDEVELOPMENT PROJECT MITIGATION MONITORING & REPORTING PROGRAM)

MITIGATION MEASURES	RESPONSIBLE ENTIT(IES)	ENFORCEMENT AGENC(IES)	MONITORING PHASE(S)	MONITORING AGENC(IES)
7.3.3.2 TRANSPORTATION TRAFFIC The following mitigation measure is recommended as a condition of Project adoption: T-1. Upon submission of an application for a site-specific development project within the Revitalization Area to the City, and pursuant to applicable local, regional, State and federal threshold requirements, applicant shall conduct a traffic analysis to determine the project's actual impact on Revitalization Area affected intersections and/or roadway segments. Scope of the analysis can be as simple as a trip generation study for small developments, or a full-scope analysis for larger developments. The traffic analysis will be used to determine whether the following mitigation measures, among others, are adequate or appropriate to mitigate the impacts of the project, or whether a greater or lesser mitigation requirement is needed: Recommended Mitigation for Cumulative Impacts In addition to mitigation measures required to address direct specific project impacts, depending on the results of the site-specific study and based on the City's traffic impact significance standards, a project may be required to implement one or more of the following measures to mitigate the project's impacts and improve the overall operation of traffic in the Revitalization Area: • Add and/or reconfigure lanes at intersections that operate at an unacceptable levels of service • Require new development to provide adequate on-site loading and unloading areas for truck deliveries • Require new development to provide adequate on-site parking • Restrict and/or eliminate on-street parking as appropriate • Consolidate curb cuts and driveway accesses between individual parcels • Add raised medians or other center divider treatments to restrict left turns at driveways and unsignalized intersections to right turns in and out only • Implement signal synchronization along main corridors • Participate in a fair-share funding mechanism, such as a traffic impact fee program, an improvement benefit district, or other program, as established by the City. • Enhance existing street lighting Additional mitigation measures, as appropriate and necessary, may be added at such time as site-specific projects are proposed from time to time for Agency assistance or participation.	Project Applicant Developer Redeveloper	City of Redlands Redevelopment Agency of the City of Redland	Pre-Construction Construction Operation	City Community Development Department Caltrans