



A STRATEGIC PLAN FOR THE REDLANDS GENERAL PLAN UPDATE

REPORT ON **GENERAL PLAN UPDATE FOCUS**

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CITY OF REDLANDS

July 2006

**A STRATEGIC PLAN FOR THE
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JULY, 2006

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I Introduction

I.1 PURPOSE

What will Redlands be like in 20 years? How should it change? What qualities should be preserved? How does its history and environment inform the evolving city structure? These questions and others on the future of Redlands have guided a community outreach and analysis program conducted by the City of Redlands as part of preparation of a Strategic Plan for the General Plan Update.

The Strategic Plan—prepared March through July 2006 with wide community input—is the first step in the Redlands General Plan Update process. Findings from the Strategic process are distilled in three reports:

- Report on Community Vision;
- Match of vision with the current General Plan (this report); and
- Scope of Work, with a step-by-step work program – focusing on issues identified through community dialogue – for the General Plan Update

The Report on Community Vision presented Emerging Themes for Redlands’ vision (see Section 2.1 in this report) from stakeholder interviews, public workshop, Planning Commission/City Council workshop, and a mail-in survey sent to one in four households in the City.

This report presents the major issues emerging from community outreach that are likely to be the focus of the General Plan Update, providing the springboard for Scope of Work for the Plan and an Environmental Impact Report. This list of issues should be considered preliminary; it is likely that community participation during the update process, as well as technical analysis of opportunities and challenges, will unearth additional issues.

I.2 REPORT ORGANIZATION

This report includes the following chapters following the Introduction:

- Chapter 2: General Plan Update focus. This presents the Emerging Themes and major General Plan issues.
- Chapter 3: Legal Adequacy Analysis. An analysis of the legal adequacy of Redlands’ current General Plan is presented, to ensure that any existing shortcomings are remediated in the updated General Plan.

2 General Plan Update Focus

The guiding focus for the General Plan Update will be the Emerging Themes that have resulted from community outreach. These themes encapsulate the desires and hopes for Redlands' future, as well as the broad and far-reaching range of issues identified by community members and stakeholders. By serving as a basis for a guiding development vision, the Guiding Themes provide a framework for the General Plan Update. They also will help focus investigation of opportunities and challenges, and serve as a yardstick for evaluating the suitability of land use and circulation alternatives.

This chapter summarizes the Emerging Themes—presented and discussed in detail in the Report on Community Vision—and outlines the major issues for General Plan Update. Several of these issues cut different General Plan elements. Although the updated General Plan will address a comprehensive range of subject matter, resolution of these issues is likely to be the principal focus of analysis and community and decision-maker dialogue.

2.1 EMERGING THEMES

The Emerging Themes for Redlands' future are:

1. **A distinctive community, combining “small town feeling” and leading edge spirit.** Redlands is a distinctive city, especially given the backdrop of an increasingly homogenizing region. It has livable neighborhoods, a charming historic downtown, many exquisitely crafted buildings, defined edges, gracious streets, and prominent civic institutions and culture. These attributes are highly valued and endow the city with much character. At the same time, Redlanders regard the high caliber of culture, enterprise, and academic institutions as core community attributes to be built upon as the city evolves. The Redlands of the future should maintain the small-town feel and capitalize on its spirit of ingenuity.
2. **Development in keeping with the City's heritage, scale, and environment.** Redlanders want development to contribute to their quality of life, enhance the public realm, expand the city's unique offerings, and cultivate environmental and economic sustainability. They are wary of development out of scale and character with the community, especially the emerging large-scale warehousing development in northside that is seen as detrimental to the City's quality of life, providing little economic benefit to the community.

3. **Managed, balanced growth.** Rather than becoming “another Orange County”—rife with sprawl, traffic congestion, and irretrievable loss of open spaces and citrus groves—Redlanders would like growth to be balanced and managed, and channeled into appropriate locations such as in downtown/central Redlands—accomplishing revitalization goals and reducing development pressure in the natural canyons and hillsides to the south. Part of balanced growth involves having the diversity of housing options needed to meet the needs of the younger generation and up-and-coming workforce. Communities in City’s sphere of influence—like Mentone and Crafton—need to be considered in the overall growth distribution strategy. Many residents share the feeling that there has already been “too much growth”, while for others, it is a matter of balance. These concerns need to be discussed further to identify specific issues to be addressed in the General Plan Update

4. **An open space plan that is fair, feasible, and achievable.** Redlands’ open spaces—the hillsides and canyons to the south, drainage systems and the Zanja aqueduct, and citrus groves ringing the city—are widely valued. In the 1995 General Plan, specific policies call for open space preservation, including creating designated open space and establishing the “Emerald Necklace”. However, these policy directives lack clear implementation mechanisms—including funding sources—that balance the desires and concerns of property owners, trail advocates, residents, and developers. Resultantly, this remains a flashpoint in the community, and conflict due to lack of a clear course has led to near paralysis in establishing an open space system, and for development proposals in the canyons.

Open space planning needs to be considered as part of a broader growth management strategy, with ample attention to a realistic implementation program in part tied to the development process. This planning needs to consider opportunities for a linked trail system of hiking and equestrian activities, while ensuring that private property owners are not unjustly burdened.

5. **A well-maintained park system.** Redlands is blessed with lovely green neighborhood parks. While a few new strategically located parks may improve residents’ accessibility, day-to-day maintenance seems to be more of an issue. Access, park service levels, and facilities meeting the needs of the community’s diverse population should be considered in long-range planning, especially in areas targeted for infill and new development.

6. **A reinvigorated downtown, integrating preservation, thriving commerce, and new housing.** Downtown’s role as the heart of Redlands needs to be reinforced by integrating preservation of its historic character, infusion of varied activity, and reinforcement of its walkable environment and connections to neighborhoods. Mixed uses (retail, restaurants, multi-family housing, office, and civic), a village environment, pedestrian- and transit-orientation (including future Metrolink station), tourism (including one or more hotels), and expanded parking are components of the vision for downtown. Planning for the smaller-scale historic business district needs to be integrated with that of broader downtown—the central city—which includes many development opportunities, with potential to accommodate activity that is complementary and supportive of the historic core. Downtown could also accommodate higher density and non-traditional (such as loft style) housing, which may appeal to many younger community members employed in software and other high-tech establishments. An overwhelming majority of residents would like to see development no taller than three to four stories in height.
7. **Continued efforts to improve Northside neighborhoods.** The City has made important strides in remediating inequities in facilities and services between the areas north and south of I-10. The Northside of the future should have stable neighborhoods with parks, community facilities, and sidewalks. Commercial districts should be revitalized in a manner that is compatible with the scale and character of the neighborhood. Continued new residential development is likely given land availability and flat topography. Projects should be designed for integration with the surrounding community and should provide parks serving the broader neighborhood. Consistent use of compatible streetscape design and street trees in new development will contribute to the overall aesthetic that makes Redlands unique.
8. **Efficient, well-maintained circulation system.** Traffic and congestion are significant issues for residents, and the new General Plan should strategically link land use and transportation to make efficient use of existing capacity. The future circulation system should also emphasize pedestrian paths, bikeways, and transit, connecting neighborhoods, employment districts, and downtown, with coordinated signalization to ensure smooth flow. Streets significantly contribute to people’s day-to-day experience of the city, and more trees along many streets are seen as essential. Rising levels of regional traffic as well as increased reliance

on outlying roads in the city from new development are additional considerations for city circulation planning. Land use planning should reflect the prospect of Metrolink service and a downtown station, in order that people can live within walking distance of the station.

9. **Strong commerce, shopping, and employers reflecting Redlands' progressive culture.** Redlands' history is tied to its role as a center for commerce and agricultural services. The presence of several large employers has been an important driver in the local economy, and the newer restaurants and large retailers in the “doughnut-hole” area are welcome additions. Nevertheless, growth in the local economy has not kept pace with residential development, leading to a number of residents commuting long distances for work. City tax revenues from the current level of economic activity can limit funding for desired maintenance and improvement of municipal facilities and services. Many residents see opportunity—and the necessity—for new high tech, R&D, and environmentally sustainable businesses spurred by the progressive environment created by the presence of institutions like ESRI and University of Redlands. Retail and commercial growth in North Redlands and in downtown is also seen as integral to the City's fiscal health.

Several of these themes echo those of the current General Plan (which are presented in the General Plan in Section 1.90: Themes of the General Plan), which are: Freestanding city, citrus heritage, small town feeling, sense of history, quality in north and south, and revenues to support facilities and services. However, themes in the current General Plan are discussed only briefly, and the links between the themes and the policies is not fully clear. The following section presents major issues the new General Plan will likely have to tackle.

2.2 MAJOR GENERAL PLAN ISSUES

While the updated General Plan will address the full spectrum of issues related to physical development in the Redlands Planning Area, several key issues have been identified by the community that will require focused effort. The General Plan work program should establish a step-by-step process—with input from community members at key stages—involving analysis, alternatives, and policy formulation to resolve these issues in a manner that balances the local diversity of needs and desires.

Major issues, along with a discussion of how they are addressed in the current General Plan, follow.

AMOUNT AND DISTRIBUTION OF GROWTH

Many Redlanders (including about half of the respondents to the survey conducted as part of the outreach) feel that the City has experienced too much growth, while just more than a third believe that the amount of growth has been just about right. On the other hand, there is general acceptance of promoting economic vitality, and infusing new life into downtown with mixed use and residential activity. Additionally, many residents and stakeholders recognize the need for housing for younger residents and the emerging workforce, necessitating at least some incremental development.

Redlands' current (January 2006) population is estimated at 71,086 and local jobs are estimated to number 25,192. The 1995 General Plan sets forth a land use plan that was projected to accommodate a total population of approximately 101,000 (approximately 83,100 are in Redlands and the remainder in Crafton and Mentone) and over 109,000 jobs. In 1997, a voter approved initiative, commonly known as Measure U, amended numerous sections of the General Plan. The population projection at buildout was reduced to 90,000 residents, and jobs at buildout were reduced to approximately 100,000. As illustrated in Table 2-1 below, the 1995 General Plan forecasts for population are somewhat lower than the current SCAG population projection of about 88,800 for 2030 for Redlands, but projected employment buildout significantly outpaces the SCAG 2030 job projection of 48,752.

Table 2-1: Existing and Projected Population and Employment

	<i>Population</i>	<i>Employment</i>
Existing (Redlands City)	71,086 ¹	25,192 ²
SCAG 2030 Projection (Redlands City)	88,842	48,752
1995 Redlands General Plan Development Potential	83,100 (for Redlands)	100,000+ (for Planning Area)

1. Department of Finance (estimate for 2006)

2. SCAG (estimate for 2000)

Because much development has occurred in Redlands over the last 15 years, as well as changes made by Measure U, it is unclear if the projections in the current General Plan still represent an accurate estimate of the buildout potential of the current land

use designations. For example, the Land Use Element indicates General Plan buildout at 90,000 residents, as amended by Measure U: but later indicated buildout at 101,644 residents in General Plan Table 4-1. Regardless, establishment of future land use designations, calculating new development potential, and correlating this with transportation, parks, schools, and other infrastructure needs will be a principal effort of the General Plan Update.

How much (or how little) growth to plan for in the General Plan Update will need to be discussed, taking into consideration Measure U's impact on land use (any change in provisions of Measure U requires voter approval), growth trends and projections (regional and local) and community goals for the environment, economy, and quality of life. Just as important is determining the distribution of future growth, which hinges on issues of open space preservation, the role of the central city, historic preservation, strategic economic development, and correlation between land use and transportation, several of which are addressed in greater detail below.

MANAGING NON-RESIDENTIAL (ESPECIALLY INDUSTRIAL) GROWTH

The Growth Management Element in the current General Plan—reflecting various initiatives passed by the voters over the years—deals largely with residential growth. Policies address pace of residential development and limitations on upzoning of residential densities (as well as issues related to annexation). However, many of the community concerns relate to non-residential growth as well, especially critical given that non-residential development represents the vast majority of recent development that has occurred in Redlands over the past nine years—industrial development itself exceeds all other (residential and non-residential) uses put together (Table 2-2). Redlands' current General Plan assumed very sizable increases in a variety of non-residential uses—5.6 million square feet (s.f.) of commercial uses, 7.6 million s.f. of office space (6.3 million s.f. in North Redlands alone) and 18.4 million s.f. of industrial uses. In reality, there has only been a modest amount of office and commercial growth in the city over the past decade.

The principal community issue with non-residential growth relates to industrial/warehousing development in northwest Redlands, with concerns encompassing both the amount of such growth, as well as its design and impacts on community character and city transportation infrastructure. The new General Plan

¹These numbers as reported in the General Plan; buildout capacity not independently identified as part of this report.

will need to explore this issue, although the City’s options may be limited given voter-approved measures and City agreement with the County currently in place pertaining to the 1,100-acre donut hole area, which lies outside City limits, but where the City provides services in exchange for 90 percent share of sales tax revenue.

ECONOMIC DEVELOPMENT IN SYNCH WITH COMMUNITY CHARACTER

The Redlands community seems cognizant of the need for a strong economy, through creation of quality jobs and establishments. Residents, stakeholders, and decision-makers have expressed support for continued retail and other commercial development that will ensure Redlands’ fiscal vibrancy. There seems to be general consensus on reinforcing commercial uses downtown, with complementary larger retail establishments in the Northside. Economic growth that capitalizes on the presence of major educational, medical, and high technology employers is also favored. However, there is considerable opposition to warehousing development in the Northside, which is seen out of character with Redlands.

Several stakeholders and others have voiced interest in generating tourism and attracting visitors, which is seen as a low-impact industry that may also provide support to historic preservation,

Table 2-2 Building Permits Issued- Square Footage of Uses by Year (1997-2005)

<i>Year</i>	<i>Single Family Units</i>	<i>Multi-Family Units</i>	<i>Retail</i>	<i>Office</i>	<i>Commercial- Hotel, restaurant, fitness center, auto related, mini storage, etc</i>	<i>Institutional- School, church, university, hospital, senior care facility, etc</i>	<i>Industrial</i>
1997	34	0	0	0	24,203	0	14,195
1998	137	0	0	47,708	7,916	105,282	0
1999	147	62	145,956	0	11,769	0	31,638
2000	154	0	0	48,560	2,619	3,815	77,355
2001	218	84	124,090	9,360	23,847	20,357	1,221,186
2002	163	0	8,935	6,379	8,101	19,987	860,778
2003	290	97	21,746	121,504	162,232	43,800	1,351,965
2004	157	116	70,764	33,773	10,150	46,895	26,075
2005	317	55	113,613	142,746	62,496	0	2,547,529
Total	1,617	414	485,104	410,030	313,333	240,136	6,131,441

citrus heritage, and downtown revitalization. Major institutions—such as University of Redlands and software companies—also feel that additional hotel rooms and visitor services would be helpful. The current General Plan does not speak to Redlands potential as a tourist/visitor destination. Assessing these opportunities and identifying realistic but effective implementing mechanisms should be part of the General Plan Update.

The General Plan should also ensure that visitor-oriented development has minimal impacts on neighborhoods, as while there is support for tourism, this support is not widespread.

Enthusiastic support for downtown revitalization has been a constant theme with all forms of outreach conducted for the update. There is considerable consensus in the community in downtown being a mixed-use environment with stores, restaurants and cafes, new hotels, entertainment, and even housing, in a pedestrian-scaled setting while providing for increased parking. Buildings are envisioned as no taller than three or four stories.

CENTRAL CITY REVITALIZATION

The City's Downtown Specific Plan is focused on the historic area north of Redlands Boulevard which has seen increased vibrancy over the past decade. However, the downtown plan (which was last updated a decade ago) did not foresee a market for new multifamily residential uses. The General Plan Update needs to re-examine land use possibilities for Central Redlands (which would include the Downtown Specific Plan area, but also surrounding land), where many reuse opportunities are present, to foster a vibrant mixed-use walkable district, with a critical mass of both commercial and residential uses. This area may also represent the principal opportunity for housing younger employees—many of whom work in high-technology industries—in both traditional and other (such as loft-style) housing types. Outlining the boundaries of this district would be a first step, which should be sized based on available development opportunities as well as walkability. Land use and mixes, development intensities, and design policies will need to be articulated. Additionally, the General Plan should establish the basis for shared parking, to foster development of one or more parking structures downtown.

DEVELOPMENT IN THE CANYONS AND OPEN SPACE PRESERVATION

Development in the San Timoteo and Live Oak canyons remains a community flashpoint, with divergent interests and viewpoints (see Report on Community Vision, p. 10). Concerted and focused

effort will be required as part of the General Plan Update to resolve several long-standing and inter-related issues: How much growth is appropriate in the canyons? How should this growth be structured (for example, clustered vs. large lots)? How much of the canyons should be public space, and who should pay for it? This effort will require technical work (such as mapping physical constraints and resources) as well as outreach and focused workshops. Because a substantial portion of Live Oak Canyon actually extends outside the Redlands Planning Area, coordination with plans for the surrounding jurisdictions will be required.

The current General Plan contains an extensive set of policies on the Southeast area (that once had a stand-alone area plan, which was repealed when information from that was integrated into the General Plan in 1995). These policies cover issues such as signature ridgeline preservation, landform and grading, as well as habitat conservation, infrastructure, and safety. These policies will need to be reviewed to ensure they continue to represent current community vision, and base-mapping information may need to be updated as appropriate. Policies related to street width and roadway alignments will also need to be examined to ensure consistency with the updated Circulation Element, plans for other areas of the city and surrounding jurisdictions such as Doma Linda, Yucaipa and Riverside County development plans of which are likely to place strong burden on San Timoteo Canyon Road.

CITRUS HERITAGE

Citrus groves contribute greatly to the identity and beauty of Redlands, and there is a pervasive feeling that groves should retain a presence in the future city. Among open space and recreation priorities in the survey conducted for the Strategic Plan, open space for citrus groves and working farms were prioritized second, after open space for scenic beauty/trails. While there is support for citrus preservation, the General Plan will need to establish what needs to be preserved, purpose (aesthetic or as a working enterprise), mechanism for preservation, and long-term viability, corresponding possibly to factors such as residential densities, association with historical events, long-term sustainability, and trends in surrounding cities and communities.

PARKS

While preserving open space and natural areas rank the highest in the community for park and open space priorities, building new parks and maintaining existing ones are overwhelmingly supported as well. Support for parks is likely to be higher among youth, a group underrepresented in the outreach for the Strategic Plan.

The City's current General Plan locates many new parks of varied sizes. Several community members raised a desire to see the City's "Emerald Necklace" completed. While this idea is embodied in the current General Plan, the biggest problem is seen in implementation, specifically, lack of available funding for acquiring, developing, and maintaining new parks. Few park sites have been acquired in the last 10-15 years, despite population increase; thus, there are some structural implementation issues that need to be tackled.

LAND USE/TRANSPORTATION CORRELATION

Traffic and transportation are major issues for residents. One of the principal objectives of the new plan would be to correlate projected growth—both within Redlands and in surrounding jurisdictions—with transportation capacity. The revised Circulation Element should also examine improved signal coordination and providing more pedestrian connections and better sidewalks. The community supports an expanded bikeway network; while the current General Plan includes strategic bikeway improvement policies, many of them have not been realized. An updated bikeway map, integrated with revised street designations, and priorities for improvements, will be helpful.

Land use planning in the General Plan should also focus on transit oriented development in the vicinity of the planned Metrolink extension to Redlands, which currently extends to San Bernardino, and stations for which are in the process of being finalized.

NORTHSIDE DEVELOPMENT

While equitable Northside/Southside is a theme of the current General Plan, many North Redlands residents—a significant proportion of whom are Hispanic—feel that less than necessary attention continues to be focused on their needs. Over the past few months, the North Redlands Visioning Committee (a group of volunteers) has been working on a North Redlands Vision Plan to "... address issues of public works infrastructure, housing and economic development, historic preservation, urban design, safety and access to services for residents throughout the city which will be included in the City's General Plan Update documents and utilized in the present and future planning of the North Redlands area." Draft recommendations, released March 2006, address issues related to land use, traffic, infrastructure, sidewalk and gutter, historic resources, signage, flood control, and parking. The need for economic development, civic and cultural facilities, and additional park and recreational facilities is also emphasized.

CLEAR POLICY FRAMEWORK WITH IMPLEMENTATION EMPHASIS

While the overall organization and policy structure of the General Plan is clear, the updated Plan can emphasize readability and implementation through:

- **More maps and visualization.** The current General Plan includes few maps illustrating defined areas—such as historic neighborhoods, steep slopes, commercial corridors, etc.—that are subject to targeted policy directives and programs. Increased use of maps and illustrations and less reliance on text can make the General Plan more accessible and useful as an everyday implementation tool.
- **Greater detail on implementation.** In many instances—new parks and bikeways, for example—implementation of General Plan proposals has been limited. Thus, the updated General Plan needs to place a greater emphasis on implementation. Simply expressing a direction or desire may not be sufficient—policies should provide direction on how to achieve the desired result, with a clear road map for achieving the end state. It may be helpful to establish benchmarks in key areas to monitor implementation progress.
- **Increased emphasis on urban design.** There is considerable interest in the community on urban design—how buildings and streets interface, defining the public realm, and guidance for new development, especially in key districts such as downtown, as well as for large-scale commercial development. Design policies in the General Plan can help the community meet its objectives of a small town feeling, and lay a foundation for zoning and development review process with clear articulation of the community’s vision for the future city.

3 General Plan: Legal Adequacy Analysis

The Redlands General Plan, by and large, is consistent with statutory and case law standards for adequacy. Where there are inadequacies, these of a relatively minor nature, and can be easily remediated during the update. The following table provides a more thorough discussion of the requirements, and Redlands General Plan compliance. (Note: Housing Element is not evaluated in the discussion that follows.)

Table 3-1 Analysis of Legal Adequacy of the General Plan

Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
In General	Section 65300 requires that each planning agency shall prepare and each legislative body shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of the land outside its boundaries which in the planning agency’s judgment bears relation to its planning. Chartered cities shall adopt general plans containing the mandatory elements of Section 65302.	<p><i>Twain Harte Homeowners Assn. v. County of Tuolumne</i>, 138 Cal.App.3d 664 (1982) provides that the general plan must “substantially comply” with the requirements of the Government Code, and that “substantial compliance means actual compliance in respect to every reasonable objective of the Statute,” as distinguished from mere technical imperfections of form. (Citing, <i>Camp v. Board of Supervisors</i>, 123 Cal.App.3d 334, 348 (1981)). OPR’s General Plan Guidelines are advisory and not mandatory but they assist the court in determining compliance with general plan laws. (<i>Twain Harte Homeowners Assn. v. County of Tuolumne, supra</i>)</p> <p><i>Kings County Farm Bureau v. City of Hanford</i> 221 Cal. App. 3d 692 (1990) provides that the lack of a mandatory element invalidates a general plan if the missing element is directly involved in a project under review.</p>	The Redlands General Plan includes all State-required elements (the Open Space and Conservation Element combines in one element, as permitted under State law, requirements for Open Space and Conservation elements).

¹ California Government Code West 1983 and Supp. 1991

Table 3-1 Analysis of Legal Adequacy of the General Plan

Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
	<p>Section 65300.5 delineates the legislature’s intent that the “plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies”</p>	<p><i>Sierra Club v. Board of Supervisors of Kern County</i>, 126 Cal.App.3d 698 (1981) provides that the concept of internal consistency, as used in California planning law, means that no policy conflicts exist, either textual or diagrammatic, between the components of an otherwise complete and adequate general plan. A charter city’s general plan must be internally consistent. <i>Garat v. City of Riverside</i>, 2 CA4th 259, 3 CR2d 504 (1991)</p> <p><i>Federation of Hillside & Canyon Assns. v. City of Los Angeles</i> 126 Cal.App.4th 1180 , -- Cal.Rptr.3d (2004), found that a court cannot disturb a general plan based on violation of the internal consistency and correlation requirements unless, based on the evidence before the city council, a reasonable person could not conclude that the plan is internally consistent or correlative. (Cf. <i>A Local & Regional Monitor v. City of Los Angeles</i> (1993) 16 Cal.App.4th 630 , 648.) [126 Cal.App.4th 1196]</p> <p>The statute requires the general plan to be internally consistent, but not necessarily with the objectives of the various elements within the general plan. <i>Cadiz Land Co. v. Rail Cycle</i>, LP 83 CA4th 74, 115, 99 CR2d 378 (2000)</p>	<p>The Redlands General Plan represents an “integrated, internally consistent, and compatible statement of policies.” However, Redlands has experienced many changes over the past 15 years and several policies have been added to the General Plan (chiefly in the Growth Management Element) since the comprehensive update.</p> <p>One of the principal objectives of the General Plan Update will be to ensure that the revised General Plan represents an integrated set of policies that reflect the City’s vision for its future. A key component of this will be ensuring consistency between Growth Management policies and the General Plan holding capacity.</p>

Table 3-1 Analysis of Legal Adequacy of the General Plan

Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
	<p>Section 65300.7 provides that, due to the diversity of the state’s communities and their residents, implementation of statutory requirements should “accommodate local conditions and circumstances, while meeting its minimum requirements.”</p>	<p>Generally, courts have ignored this language in determining a plan’s compliance with statutory requirements. The statutory language implies, however, that the Legislature intended to encourage periodic review of changed conditions and circumstances. “A city is not required to periodically revise its general plan other than its housing element.... [fn28] This conclusion does not preclude a court from looking at the results of a public entity’s failure to update its entire plan or any parts thereof, i.e., the failure to update a plan and/or its parts may cause a general plan or mandatory element to not be in compliance with the statutory requirements (“legally inadequate”) which, in turn, if properly challenged in a timely manner, may subject the entity to an attack on its validity pursuant to those proceedings provided in section 65750 et seq.” <i>Garat v. City of Riverside</i>, 2 CA4th 259, 3 CR2d 504 (1991).</p>	<p>The Redlands General Plan accommodates local conditions and circumstances.</p>
<p>In General</p>	<p>Section 65301 provides that the general plan may be adopted in any format, as a single document or group of documents, with specificity of each element reflecting local conditions and circumstances, except in regard to the mandatory housing element of Section 65302(c), which must be strictly adhered to. The legislative body may adopt all or part of a plan of another public agency if the plan of the other agency is sufficiently detailed and its contents are appropriate.</p>	<p><i>Kings County</i> provides that documents outside of the City’s general plan cannot be considered if the plan does not make specific reference to them.</p>	<p>All of the elements in the Redlands General Plan (including the Housing Element) are integrated into one document.</p>
	<p>Section 65302 provides that the general plan shall consist of a statement of development policies and shall include diagrams and text setting forth objectives, principles, standards, and plan proposals.</p>	<p>A parcel-specific map is not required, only a diagram of general locations illustrating the plan’s policies. (Attorney General Opinion No. 83-804, March 7, 1984)</p>	<p>Meets requirement.</p>

Table 3-1 Analysis of Legal Adequacy of the General Plan

<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
	<p>Section 65352 requires cities and counties before adopting or substantially amending a general plan to refer the proposed action to the following entities:</p> <ul style="list-style-type: none"> • Any city, county or special district within the abutting area that may be significantly affected by the proposed action; • Any K-12 school or school district within the area covered by the proposed action; • The local agency formation commission; • The areawide planning agency; • Any federal agency if its lands within the jurisdiction may be affected by the action; • Any public water system with 3,000 or more connections that serves customers within the area; • Any California Native American tribes on the Native American Heritage Commission’s contact list with traditional lands within the city or county’s jurisdiction. 		<p>These agencies should be consulted during the course of the General Plan Update.</p>

Table 3-1 Analysis of Legal Adequacy of the General Plan

Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
Land Use Element	<p>Section 65302(a) requires that the plan designate the proposed general distribution, location, and extent of the uses of land for housing, business, industry, open space (including agricultural, natural resources, and enjoyment of scenic beauty), education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land.</p>	<p><i>Concerned Citizens of Calaveras County v. Board of Supervisors of Calaveras County</i>, 166 Cal. App.3d 90 (1985) states that “‘proposed’ means intended uses rather than actual uses.”</p> <p><i>Concerned Citizens</i> specifically provides that only future, not existing, solid waste disposal sites be identified in the plan.</p> <p><i>United Outdoor Advertising Co. v. Business, Transportation and Housing Agency</i>, 44 Cal. 3d 242 (1988) found that using a circle to designate a community did not adequately delineate a well-defined geographic area. However, a county plan that contains a generalized land use map and delegates specific land use interpretations to community plans complies with the statute. <i>Las Virgenes Homeowners Association v. Los Angeles County</i> 177 Cal.App.3d 310 (1986)</p> <p>The land use element must include designations for lands within a city’s sphere of influence but outside its boundaries and rezoning of these lands must be consistent with the general plan. <i>City of Irvine v Irvine Citizens Against Dev.</i> 25 CA4th 868, 879, 30 CR2d 797 (1994).</p> <p><i>Hernandez v. City of Encinitas</i> 28 CA4th 1048, 33 CR2d 875 (1994) found that a land use element expressing a desire to preserve the residential character of the community was not inconsistent with a housing element policy encouraging a wide range of housing because the general plan included adequate land uses that provided for a variety of housing needs.</p> <p>A land use designation was inconsistent with other portions of the land use element that allowed the designated land use only when the land was adjacent to land designated for certain other land use categories. <i>Families Unafraid to Uphold Rural El Dorado County v Board of Supervisors</i> 62 CA4th 1332, 74 CR2d 1 (1998)</p>	Meets this requirement.

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<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
Land Use Element	Section 65302(a) requires that the land use element include statements of population density and building intensity recommended for territory covered by the plan.	<p><i>Twain Harte Homeowners Assn. v. Tuolumne County</i>, 138 Cal.App.3d 664 (1982) holds that quantifiable standards of population density must be provided for each land use category contained in the plan. Population density may not be defined in dwellings per acre, unless a basis of correlation between dwellings/acre and people/acre is defined in the plan. Population density requirements might apply to both residential and non-residential land uses.</p> <p><i>Twain Harte</i> also provides that intensity standards be defined for each of the land use categories contained in the plan; intensity standards may not be synonymous with population density; and intensity standards may not simply employ general use captions such as “neighborhood-commercial” or “service-industrial.” Minimum lot size requirements are insufficient intensity standards because height and size limitations and restrictions on the types of buildings and their uses are needed.</p>	The General Plan includes standards for residential density (housing units per acre) and non-residential development intensity (floor area ratios); therefore, it meets this requirement.
	Section 65302(a) requires identification of areas subject to flooding (reviewed annually).		Included (Figure 8.2)

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<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
	<p>Section 65302(a) also requires that in a land use category that provides for timber production, that those parcels comply with the California Timberland Productivity Act of 1982.</p> <p>The land uses category should also consider the impact of new growth on military readiness activities to be carried out on military bases.</p>		N/A
	<p>Section 65863 prohibits any reduction of the residential density to a lower residential density that is below the density that was used by the Department of Housing and Community Development in determining compliance with housing element law without written findings supported by substantial evidence that the reduction is consistent with the adopted general plan, including the housing element, and the jurisdiction’s share of the regional housing need, as specified.</p>		N/A. However, this requirement would be useful to keep in mind if lowering of residential densities anywhere in the City is contemplated.
Circulation Element	<p>Section 65302(b) requires that the circulation element consist of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports and other public utilities and facilities.</p>		Complies with the requirements.

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Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
	<p>Section 65302(b) mandates that existing and proposed circulation elements be correlated with the land use element of the general plan.</p>	<p><i>Concerned Citizens</i> (pp. 100-103) holds that the road system proposed in the circulation element must be “closely, systematically, and reciprocally related to the land element of the plan.” The general plan cannot identify shortcomings in the circulation system, report that no remedy exists, and then claim it correlates with a land use element which calls for population increases. The land use element must discuss potentially inadequate roads and contain “proposals” to restrict growth if the road system is overwhelmed. A standard should be adopted to restrict development if roads become inadequate. A “proposal” to lobby for increased funds to cope with identified problems associated with anticipated development is insufficient.</p> <p><i>Twain Harte</i> (p. 700) provides that the circulation element must discuss changes on the demands on various roadways as the result of changes in uses of land resulting from implementation of the plan.</p>	<p>The General Plan specified both existing intersection LOS and buildout LOS (Table 5.2), as well as LOS policies (5.20a-c). It may be helpful to have a map showing intersection LOS standards to help visualize policies better. Additionally, while the General Plan includes policies for improvements of specific roadways, a comprehensive list of improvements necessary to accommodate future General Plan buildout will be helpful (the General Plan includes future roadway volumes as well as LOS standards).</p> <p>It is also difficult to distinguish between collector and arterials (major and minor) in General Plan Figure 4-1.</p> <p>The General Plan should also evaluate reasonable expectations on adherence to standards (such as for Sunset Boulevard). Special standards may be needed for streets in older areas that are already built out with no room for widening of streets.</p>

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<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
<p>Conservation Element</p>	<p>Section 65302(d) specifies an element for conservation, development, and utilization of natural resources including, among other resources, local minerals, the management of which is discussed in the Public Resources Code, at sections 2762-4. The General Plan must also address hydraulic force, forests, soils, rivers, harbors, fisheries and wildlife.</p> <p>The conservation element shall consider the effect of development within the jurisdiction, as described in the land use element, on natural resources located on public lands, including military installations.</p> <p>Aspects dealing with water must be developed in coordination with any countywide, district, or city agencies responsible for water issues. Coordination shall include the discussion and evaluation of any water supply and demand information in the urban water management plan and other information submitted by the water agency that is described in Section 65352.5.</p> <p>Other aspects of the element are optional.</p>	<p>An initiative that made existing open space and agricultural land subject to a resource management plan is not internally inconsistent because both policies sought to preserve open space lands and to minimize the effects of future development on open space and environmental qualities. <i>Shea Homes Ltd. Partnership v. County of Alameda</i> 110 CA4th 1246, 1271, 2 CR3d 739 (2003)</p>	<p>The Conservation Element is combined with the Open Space Element, and addresses requirements related to open space for conservation and for construction aggregate production.</p> <p>The Conservation Element will need to include The Mining and Habitat Conservation Plan, known as Plan B, for the Santa Ana River wash area, currently in process of being finalized.</p>

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Subject	Statutory Requirement per California Government Code ¹	Judicial Standard	Redlands General Plan
Open Space Element	<p>Section 65302(e) mandates compliance with Article 10.5 (Section 65560 et seq.) which requires adoption of a plan for comprehensive and long range preservation and conservation of open space, containing an action program consisting of specific programs to be pursued in implementing the open space plan. Any action affecting open space must be consistent with the local open space plan.</p>	<p><i>Save El Toro Assn. v. Days</i>, 74 Cal. App. 3d 64 (1977), requires presence of an open space land inventory as an implied prerequisite to adoption of an open space plan; with no plan, no building permits or zoning ordinances may be approved.</p> <p><i>Sierra Club v. Kern County</i>, 126 Cal. App. 3d 698 (1981), holds that the open space element has equal legal standing to all other elements of the general plan, and therefore it cannot be subordinated through use of a “takes precedence” clause contained in the land use element.</p> <p>An initiative that made existing open space and agricultural land subject to a resource management plan is not internally inconsistent because both policies sought to preserve open space lands and to minimize the effects of future development on open space and environmental qualities. <i>Shea Homes Ltd. Partnership v. County of Alameda</i> 110 CA4th 1246, 1271, 2 CR3d 739 (2003)</p>	<p>The Open Space and Conservation Element is comprehensive, and addresses park and recreational open space.</p>
Noise Element	<p>Section 65302(f) requires an identification and analysis/ quantification (to the extent practicable) of current and projected noise levels of:</p> <ul style="list-style-type: none"> • Highways and freeways • Primary arterials and major local streets • Railroads and rapid transit • Airports • Local industrial plants 	<p><i>Camp</i> (p. 352) provides that a noise element not quantifying noise levels in the required technical nomenclature (CNEL, Ldn); not inventorying current and expected noise contours, and not supported by monitoring data is invalid.</p>	<p>Existing noise contours are not included in the Plan, but are included in the MEA/EIR (Figure 14.2); this should be referenced or included in the new Plan. The General Plan does include future noise based on land use buildout, and incorporates noise from the Redlands Municipal Airport.</p>
	<p>Noise “contours” derived from all of these (above) sources must be shown using CNEL or Ldn measurements. Contours must be prepared on the basis of noise modeling techniques.</p>		<p>See above.</p>

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<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
	Noise contours must be used as a guide to establish a land use pattern which minimizes excessive noise exposure for community residents.	<i>Neighborhood Action Group v. County of Calaveras</i> , 156 Cal. App. 3d 1176, 203 Cal. Rptr. 401 (1984) provides that a quantitative inventory of existing noise must be compared to that added by a particular project and measured against the policy statements and standards required in the general plan.	See above.
	The element must contain implementation measures and possible solutions to existing and foreseeable noise problems.		Included in the element.
	The noise element should serve as a guideline for compliance with State noise insulation standards.		Included in the element.
Safety Element	Section 65302(g) requires mapping of known seismic, other geologic, and fire hazards, including identifying evacuation routes, peakload water requirements, and minimum road widths and clearances.	This element has not been the subject of review since the Safety and Seismic elements were combined in 1985. Prior to that, the court in <i>Neighborhood Action Group</i> held that a permit could not be invalidated due to inconsistency of the Safety Element unless the permit was related to that element.	The General Plan includes a comprehensive discussion of safety issues. While evacuation routes are not mapped, there is reference to the City Emergency Management Plan, which should be checked to ensure that it includes this information.

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<i>Subject</i>	<i>Statutory Requirement per California Government Code¹</i>	<i>Judicial Standard</i>	<i>Redlands General Plan</i>
	<p>Section 65302.5 requires cities and counties to submit a draft of the safety element or amendment and any technical studies to the Division of Mines and Geology. Counties that include state responsibility areas and cities or counties that contain a very high fire hazard severity zone must submit a draft of the safety element to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county. In 1989, the California legislature amended the Safety Element of the statute to require cities to consult the Division of Mines and Geology of the Department of Conservation and the Office of Emergency Services prior to preparing or revising its Safety Element. The city legislature must consider the Division's findings in adopting a general plan.</p>		N/A
	<p>A city may adopt a county's safety element if it is sufficiently detailed and contains appropriate policies and programs.</p>	Not applicable.	N/A