



U.S. Department of Housing and Urban Development

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Liberty Lanes Apartments Project

Responsible Entity: City of Redlands

Grant Recipient (if different than Responsible Entity): A Community of Friends

State/Local Identifier: MC-19-DC-06-0532

Preparer: ECORP Consulting, Inc.

Certifying Officer Name and Title: Felicia Brown – Smith, Housing Project Manager

Grant Recipient (if different than Responsible Entity): A Community of Friends

Consultant (if applicable): ECORP Consulting, Inc.

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Project Location:

The project site is located in the City of Redlands within San Bernardino County. The City is bounded on the north by the Santa Ana River floodplain, the City of Highland, and the San Bernardino Mountains; on the east by the Crafton Hills and the City of Yucaipa; on the south by the Riverside County boundary and the Badlands; and on the west by the City of Loma Linda and the City of San Bernardino.

The project site is located at the southwest corner of West Lugonia Avenue and Texas Street. The project site is currently vacant and unimproved and includes approximately 204,732 square feet of lot area (4.7 acres). The project site is relatively flat, contains no landscaping, and is characterized by non-native ground vegetation that is typically mowed/plowed each year to minimize fire hazard. Surrounding uses include residential uses to the north, south, and east; open space/park to the north; industrial uses to the southwest; and open space/residential uses to the west. The project site is composed of one parcel: Assessor's Parcel Number (APN) 169-021-19.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Proposed Project involves the development of an 80-unit apartment project intended to provide affordable housing for veterans, individuals with special needs, and low-income households. The Proposed Project would be located on the southwest corner of West Lugonia Avenue and Texas Street in the City of Redlands. The 4.7-acre (204,732-square-foot) project site is currently vacant and unimproved, is zoned R-2 (Multiple-Family Residential), and has a General Plan land use designation as Medium Density Residential (MDR).

The Proposed Project would develop six two-story residential buildings (identified as Buildings A1, A2, A3, B, C1, and C2) with a combined total of 77,383 square feet and a one one-story community building with 4,708 square feet. The Proposed Project would include 60 one-bedroom units, 19 two-bedroom units, and 1 three-bedroom unit reserved for an onsite property manager. The one-story community building would contain a management office and amenities for the residents, including a kitchen, television lounge area, computer center, laundry room, and office for supportive services. The Redlands City Council approved the Proposed Project on September 19, 2017.

Architectural Design

The proposed residential buildings would be approximately 32 feet in height to the top of the roof, and the 1-story community building would be approximately 25 feet in height to the top of the roof. Materials would include a mix of concrete tiles, stucco, brick veneer, fiber cement panels and trim, vinyl windows, wood posts, metal railings, metal window shades, decorative window shutters, and plexiglass. These are design materials that already occur within the surrounding single-family residences.

Open Space and Landscaping

The Proposed Project would provide residential outdoor living space as required by the City's zoning standards. Based on the number of units and the unit types, approximately 20,031 square

feet of open space is required. Approximately 32,280 square feet of landscaping and open space is proposed, which includes various forms of ornamental trees, shrubs, and synthetic turf. The Proposed Project would include outdoor recreational amenities for residents, including a picnic and barbeque area, community garden, bocce ball court, tot lot, and fitness trails.

Access

Regional access to the project site would be provided by Interstate 10 (I-10) and I-210. Vehicular access to the project site would be provided from two gated driveways along Texas Street. One driveway would provide entry and exit into the project site, while the other driveway would be restricted to exit only. The residential development would contain an internal circulation network that would provide vehicular access to each of the individual buildings. The Proposed Project would also include sidewalks and pedestrian walkways throughout the site.

Parking

The Proposed Project is utilizing a reduction in normal vehicular parking ratio construction standards in accordance with State density bonus law contained in California Government Code 65915(p)(1), which states: "...upon the request of the developer, a city, county, or city and county shall not require a vehicular parking ratio, inclusive of handicapped and guest parking, of a development meeting the criteria...that exceeds the following ratios: (A) Zero to one bedroom: one onsite parking space (B) Two to three bedrooms: two onsite parking spaces (C) Four and more bedrooms: two and one-half parking spaces" According to the above ratios, the Proposed Project would be required to provide 100 total parking spaces; however, the Proposed Project proposes 108 spaces.

Roadway Improvements

The Proposed Project includes the construction of the following improvements:

West Lugonia Avenue: West Lugonia Avenue would be improved from the western boundary of the project site to Texas Street along the frontage of the project site at its ultimate half-section width as a Major Arterial (106-foot right-of way), in compliance with applicable City standards. This improvement would not include any turn lanes at access points, and will not create a conflict with existing single-family residences on West Lugonia Avenue.

Texas Street: Texas Street is a north-to-south-oriented roadway located along the project site's eastern boundary. Construction of Texas Street from West Lugonia Avenue to the project site's southern boundary along the project site's frontage at its ultimate half-section width as a Minor Arterial (88-foot right-of-way) in compliance with applicable City standards. This improvement would not include any turn lanes at existing access points.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The City of Redlands General Plan Housing Element has identified the need for an additional 2,429 dwelling units by the year 2021 to meet its overall housing needs. The Proposed Project would develop an 80-unit apartment project intended to provide affordable housing for veterans,

individuals with special needs, and low-income households. These additional 80-units would help the City meet its housing needs.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is located at the southwest corner of West Lugonia Avenue and Texas Street in the City of Redlands. The project site is currently vacant and unimproved and includes approximately 204,732 square feet of lot area (4.7 acres). The project site is relatively flat, contains no landscaping, and is characterized by non-native ground vegetation that is typically mowed/plowed each year to minimize fire hazard.

Funding Information

Grant Number	HUD Program	Funding Amount
MC-19-DC-06-0532	HOME Investment Partnership Program (County HOME Loan Fund)	\$1,547,000

Estimated Total HUD Funded Amount: \$1,547,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$41,160,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The closest airport to the project site is the Redlands Municipal Airport, which is located approximately 2.4 miles to the northeast of the project site. The Proposed Project would not be located within an airport land use plan area.</p> <p>The Proposed Project is not within the vicinity of a private airstrip and not within</p>

		<p>an area that would expose residents and workers to a safety hazard.</p> <p>Source: San Bernardino County Airport Land Use Compatibility Plans</p> <p>https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx</p> <p>(See Attachment 1)</p>
<p>Coastal Barrier Resources</p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located approximately 50 miles inland of the Pacific Ocean. Therefore, hazards present as a result of coastal barriers do not exist at the project site.</p> <p>Source: U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper -</p> <p>https://www.fws.gov/cbra/maps/mapper.html</p> <p>(See Attachment 2)</p>
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to FEMA Flood Insurance Rate Map (FIRM) # 06071C8704H, the project site is located in Zone X. Zone X are areas determined to be outside the 0.2 percent annual chance floodplain.</p> <p>Source: FEMA FIRM Map # 06071C8704H Panel 8704 of 9400</p> <p>(See Attachment 3)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176I & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located within the South Coast Air Basin (SCAB), which includes Orange County, and non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the regional agency that provides air quality guidance with jurisdiction over the SCAB, including the City.</p> <p>Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Control Board (CARB) have established ambient air quality standards for common pollutants. These ambient air</p>

		<p>quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O₃) (precursor emissions include nitrogen oxide (NO_x) and reactive organic gases (ROG)), carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SCAB region is designated as a nonattainment area for the federal O₃ and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃, PM₁₀, and PM_{2.5}.</p> <p>Construction and operations emissions were estimated per the SCAQMD CEQA Air Quality Handbook and construction emission factors contained in the California Emissions Estimator Model (CalEEMod). Maximum daily estimated construction emissions would be below the SCAQMD threshold for all modeled air pollutants. Accordingly, emissions of air pollutants during Proposed Project construction would not violate any air quality standard or contribute substantially to an existing air quality violation. Operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. As such, the Proposed Project is in compliance with the Clean Air Act.</p> <p>Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)</p>
Coastal Zone Management	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project site is located 50 miles inland from the Pacific Ocean and therefore is not

Coastal Zone Management Act, sections 307I & (d)		located in a Coastal Zone as defined in the State Coastal Management Plan. The Proposed Project would be in compliance with the Coastal Zone Management Act. Source: California Coastal Commission Coastal Zone Boundary Maps - https://www.coastal.ca.gov/maps/czb/ (See Attachment 5)
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	A review of the Department of Toxic Substances Control's Hazardous Waste and Substances List (Cortese List) and EnviroStor database indicated that the project site is not located on any identified hazardous materials sites. Source: DTSC EnviroStor Database - https://www.envirostor.dtsc.ca.gov/public/ Cortese List - https://dtsc.ca.gov/dtscs-cortese-list/ (See Attachment 6)
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is currently vacant and unimproved and contains non-native, ruderal vegetation. While this parcel was historically used for agricultural purposes, it is currently fallow with non-native vegetation and shoots of remnant agricultural crops. The project site is relatively flat and currently undergoes routine disking for weed abatement, which reduces the amount of ground vegetation. The project site is not located within areas containing valued wildlife habitat. The project site is located in a developed area and does not contain any critical habitat or support any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS). The Proposed Project would be in compliance with the Endangered Species Act.

		Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>A Phase I ESA was conducted for the project site by Andersen Environmental in December 2013. The Phase I ESA was conducted in general accordance with ASTM Standard Practice E 1527-13 and the United States Environmental Protection Agency (USEPA) All Appropriate Inquiries Standard. The Phase I ESA did not identify any relevant issues regarding the presence of underground storage tanks (USTs) or monitoring wells on the project site. The project site is not included on a list of hazardous materials sites. The Phase I ESA concluded that there are no recognized environmental conditions (RECs), historical recognized environmental condition (HRECs), controlled recognized environmental conditions (CRECs) connected to the project site. Additionally, the Proposed Project does not include explosives or flammable hazards.</p> <p>Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)</p>
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project site is not currently used for agricultural operations and is currently designated as “Urban and Built-Up Land” on the State Important Farmland Map. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the project site. Therefore, the Proposed Project would not convert agricultural land to non-agricultural use. The Proposed Project is in compliance with the Farmland Protection Policy Act.</p> <p>Source: California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, San Bernardino</p>

		County Important Farmland 2016, Sheet 2 of 2 (See Attachment 7)
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project site is not located within an area subject to flooding by 100-year flood hazards. According to the Federal Emergency Management Agency flood hazard maps, the project site is located within Zone X, Other Areas. Therefore, the Proposed Project would not place housing within a 100-year flood hazard area or result in structures being constructed that would impede or redirect such flood flows. The Proposed Project would not be subject to severe flooding. According to FEMA Flood Insurance Rate Map (FIRM) # 06071C8704H, the project site is located in Zone X. Zone X are areas determined to be outside the 0.2 percent annual chance floodplain. The Proposed Project would not affect floodplain management.</p> <p>Source: FEMA FIRM Map # 06071C8704H Panel 8704 of 9400 (See Attachment 3)</p>
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>A Cultural Resources Inventory Report was prepared for the Proposed Project by ECORP Consulting, Inc. in January 2014. The following summarizes the results of the report.</p> <p>The project site is currently vacant and has no history of structural development. The project site was historically used for agricultural purposes from sometime prior to 1930 until approximately 1966 and has remained vacant since. The Cultural Resources Inventory Report identified one historic-period archaeological site, a refuse scatter, located on the project site. However, the origin of this refuse is unknown as the project site never contained any buildings or structures. The refuse does not meet the criteria to be listed or eligible as a historic resource under the California Register of Historical Resources</p>

		<p>(CRHR) or the National Register of Historic Places (NRHP). Based on these findings it is anticipated that the Proposed Project has no potential to affect historic resources. As such, the Proposed Project is in compliance with Section 106.</p> <p>Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A noise study was completed for the Proposed Project, which found the noise to be acceptable (not exceeding 65 dB) with the implementation of mitigation measures.</p> <p>Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424the; 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not located on a sole source aquifer area.</p> <p>Source: U.S. EPA Sole Source Aquifers for Drinking Water, Available at https://www.epa.gov/dwssa (See Attachment 8)</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site does not contain wetland habitat. Therefore, the Proposed Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA). The Proposed Project is in compliance with Executive Order 11990.</p> <p>Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project site is not within proximity of a National Wild and Scenic Rivers System river. The project is in compliance with the Wild and Scenic Rivers Act 1968.</p> <p>Source: National Wild and Scenic Rivers System, California - https://www.rivers.gov/california.php</p>

		(See Attachment 9)
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ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No adverse environmental impacts were identified in the Proposed Project's environmental review. Therefore, the Proposed Project would not disproportionately affect minority or low-income populations and is in compliance with Executive Order 12898. Source: City of Redlands, Revised Initial Study Liberty Lane Apartments, July 2017 (See Attachment 4)

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	3	The project site is currently designated by the City's General Plan as MDR (Medium Density Residential), which allows the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated MDR are currently more suitable for development in the low- to mid-level of the permitted density range, which is currently designated at 1 to 15 units per gross acre. The project site is currently zoned as R-2 (Multiple-Family Residential). The Proposed

		<p>Project is consistent with the existing General Plan and zoning designations.</p> <p>The proposed residential buildings would be approximately 32 feet in height to the top of the roof, and the one-story community building would be approximately 25 feet in height to the top of the roof. Materials would include a mix of concrete tiles, stucco, brick veneer, fiber cement panels and trim, vinyl windows, wood posts, metal railings, metal window shades, decorative window shutters, and plexiglass. These are design materials that already occur within the surrounding single-family residences. As such, the Proposed Project's scale and design would be compatible with the existing development in the project area.</p> <p>The visual setting of the project site would change as a result of implementing the Proposed Project. However, based on the design of the Proposed Project and with implementation of Mitigation Measure AES-1 impacts to visual setting of the project site would be minimized.</p> <p>Mitigation Measure:</p> <p>AES-1 To mitigate the exterior sound attenuation wall, the wall shall be constructed with articulation that breaks up the uniform character of a standard block wall and that requires landscaping on the exterior of the wall to create additional visual variety. The wall design and landscaping shall be reviewed and approved by the City to ensure that it provide visual variety that attenuates the uniformity of a standard block wall and integrates this structure into the community design.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Soil Suitability - Expansive soils are surface deposits rich in clays that expand when wet and shrink when dried. When these soils swell, the change in volume can exert detrimental stresses on building foundations and cause structural damage. As indicated in the geotechnical report prepared for the Proposed Project, the soils underlying the project site are considered to have a low expansion potential. To minimize damage due to geologic hazards, design and construction of the Proposed Project would comply with applicable building codes and would adhere to the design recommendations presented within the geotechnical report. Furthermore, the project site is not located within an area subject to potential liquefaction hazards (City of Redlands 2017).</p>

		<p>Slope - The topography of the project site and the surrounding area is relatively flat. No known landslides have occurred near the project site, nor is the project site in the path of any known or potential landslide hazard. The Proposed Project would not introduce any slope features on the site. The risk of ground movement due to slope failure at the project site is low (City of Redlands 2017).</p> <p>Erosion - Construction activities associated with the Proposed Project may result in wind- and water-driven erosion of soils due to grading activities if soil is stockpiled or exposed during construction. However, this impact is considered short-term in nature because the project site would expose soil only during construction activities. Furthermore, the Proposed Project would be subject to the requirements under Section 13.54.170 of the City's Municipal Code to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The Proposed Project's SWPPP includes structural treatment and best management practices (BMPs) to minimize the potential water quality impacts from water-driven erosion during construction. Once construction is completed the project site would be covered with pavement, structures, and landscaping; thereby, reducing the erosion potential of the project site.</p> <p>Drainage and Storm Water Runoff – Onsite runoff up to the 10-year storm would be managed on the project site without release of surface runoff. With proposed design features, the quantity of runoff would not change substantially with implementation of the Proposed Project as surface runoff would be retained and percolated on site. All runoff above the 10-year storm would continue to be conveyed to the project areas storm drain system via streets and gutters to storm drain locations around the project site. The Proposed Project would not result in any substantial change to the existing drainage pattern of the site or the area, nor would it affect the capacity of the existing storm drain system (City of Redlands 2017).</p>
Hazards and Nuisances including Site Safety and Noise	3	<p><u>Construction</u></p> <p>Construction noise represents a short-term increase on the ambient noise levels. Construction-related noise levels are expected to create temporary and intermittent high-level noise conditions at receivers surrounding the project</p>

	<p>site when certain activities occur at the closest point to the nearby receiver locations from the center of project construction activity. The detailed noise analysis completed for the Proposed Project shows that the project-related short-term construction noise levels will approach 73.5 dBA Leq and will satisfy the 85 dBA Leq threshold identified by the by the National Institute for Occupational Safety and Health (City of Redlands 2017). To further minimize the nuisance potential of construction noise Mitigation Measure NOI-1 would be implemented.</p> <p><u>Onsite Exposure to Traffic Noise</u></p> <p>The results of the noise analysis indicate that future vehicle noise from Texas Street and Lugonia Avenue is the principal source of community noise that would affect the project area. The Proposed Project would also generate some background traffic noise impacts from the Proposed Project's internal roads; however, due to the distance, topography and low traffic volume/speeds, traffic noise from these roads would not make a significant contribution to the noise environment. To further reduce the exterior and interior noise levels to satisfy the City of Redlands transportation related CNEL noise criteria for residential development Mitigation Measures NOI-2 and NOI-3 would be implemented.</p> <p><u>Operation</u></p> <p>The proposed multifamily residential uses are not anticipated to substantially contribute the existing ambient noise environment in proximity to the project site. Noise generated by the Proposed Project would result primarily from resident activity, off-site traffic, on-site parking lot vehicle movements, and heating, ventilation, and air conditioning (HVAC) equipment.</p> <p>The on-site traffic noise levels indicate that the multifamily residential buildings adjacent to Texas Street and W. Lugonia would experience exterior noise levels that exceed the City's residential land use noise compatibility criteria and noise standards for multifamily residential development. To satisfy the City's 60 dBA CNEL exterior noise level standards for multifamily residential development, Mitigation Measure NOI-2 would be implemented as part of the Proposed Project. Mitigation</p>
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		<p>Measure NOI-2 includes the construction of a 6.5-foot-high noise barriers for buildings with outdoor living areas (first-floor patios) adjacent to W. Lugonia Avenue and the construction of 5-foot-high noise barriers for buildings with outdoor living areas adjacent to Texas Street.</p> <p>The interior noise levels at the first-floor building facades on the project site are expected to range from 59.0 to 64.8 dBA CNEL, which would exceed the City's 45 dBA CNEL interior noise level standards for multifamily residential buildings. To satisfy the City's interior noise level standards, Mitigation Measure NOI-3 would be implemented as part of the Proposed Project to reduce future interior noise levels. Mitigation Measure NOI-3 includes design specifications for various building elements on the project site, such as windows, doors, and ventilation, to reduce these interior noise levels to acceptable levels.</p> <p>The Proposed Project's operational noise sources are expected to include parking lot vehicle movements, park (tot lot, game, and courtyard) activity, and pad-mounted air conditioning units. The analysis shows that the project-related operational noise levels would satisfy the City of Redlands daytime and nighttime exterior noise level standards at the off-site receiver locations in the project area. Further, the analysis demonstrates that the Proposed Project would not contribute an operational noise level impact to the existing ambient noise environment at any of the nearby sensitive receiver locations. The analysis also shows that the Proposed Project would generate noise levels at on-site receiver locations that satisfy the City of Redlands daytime and nighttime exterior noise level standards (City of Redlands 2017).</p> <p>Mitigation Measures:</p> <p>NOI-1 <u>Increased Noise Levels (Construction)</u></p> <p>Though construction noise is temporary, intermittent and of short duration, and will not present any long-term impacts, the following noise abatement measures would reduce any noise level increases produced by the construction equipment to the nearby noise-sensitive residential land uses:</p>
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		<ul style="list-style-type: none"> • Public notice shall be given prior to initiating construction. This notice shall be provided to all property owners/residents within 100 feet of the Project site and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the Project. The public notice shall encourage the adjacent residences to contact the supervisor in the case of a complaint. Resident's would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or otherwise control the sound source causing the complaint. • If feasible, construct the planned Project 6 and 8-foot high noise barriers at the Project site boundaries prior to the commencement of Project construction activities. This would further reduce the noise levels experienced at the nearby sensitive receiver locations, but is not required. • Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays (City of Redlands Municipal Code, Section 8.06.090 (F)). The Project construction supervisor shall ensure compliance with the permitted construction hours. • During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away
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		<p>from the noise sensitive receptors nearest the Project site.</p> <ul style="list-style-type: none"> • The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction. • Equipment not in use for five minutes shall be shut off. Equipment shall be maintained and operated such that loads are secured from rattling or banging. • Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power. • The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck related noise. • No radios or other sound equipment shall be used at the Project site unless required for emergency response by the contractor. <p><u>NOI-2 Exterior Noise Mitigation</u></p> <p>To satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for multi-family residential development, the construction of 6.5-foot high noise barriers for buildings with outdoor living areas (first floor patios) adjacent to Lugonia Avenue is required. Buildings with outdoor living areas (first floor patios) adjacent to Texas Street will require the construction of 5-foot high noise barriers. Exterior noise levels will approach 58.2 dBA CNEL at open space uses within the Project site, and therefore, no exterior noise abatement is required to satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for open space use. With the recommended noise</p>
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		<p>barriers shown on Exhibit ES-A for multi-family residential units, the mitigated future exterior noise levels will range from 59.0 to 60.0 dBA CNEL. This noise analysis shows that the recommended noise barriers will satisfy the City of Redlands 60 dBA CNEL exterior noise level standards.</p> <p>The recommended noise control barriers shall be constructed so that the top of each wall extends to the recommended height above the pad elevation of the lot it is shielding. The barrier shall provide a weight of at least 4 pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, and a minimum sound transmission loss of 20 dBA. The noise barrier shall be constructed using the following materials. The barrier shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking.</p> <ul style="list-style-type: none"> • Masonry block; • Stucco veneer over wood framing (or foam core), or 1-inch-thick tongue and groove wood of sufficient weight per square foot; • Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot capable of providing a minimum transmission loss of 20 dBA; • Earthen berm; or Any combination of these construction materials. <p>NOI-3 <u>Interior Noise Mitigation</u></p> <p>To satisfy the City of Redlands 45 dBA CNEL interior noise level criteria, buildings facing Texas Street and Lugonia Avenue will require a Noise Reduction (NR) of up to 22.2 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:</p> <ul style="list-style-type: none"> • Windows: All windows and sliding glass doors shall be well fitted, well weather-stripped
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		<p>assemblies and shall have a minimum sound transmission class (STC) rating of 27.</p> <ul style="list-style-type: none"> • Doors: All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick. • Roof: Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one-half inch thick. Ceilings shall be well fitted, well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space. • Attic: Attic vents should be oriented away from Texas Street and Lugonia Avenue. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents. • Ventilation: Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use. A forced air circulation system (e.g. air conditioning) shall be provided which satisfies the requirements of the Uniform Mechanical Code. Wall mounted air conditioners shall not be used. <p>With the recommended interior noise mitigation measures provided in this study, the proposed Liberty Lane Apartments residential Project is expected to meet the City of Redlands 45 dBA CNEL interior noise level standards for residential development.</p> <p><u>NOI-4 Construction Vibration Mitigation Measures</u></p> <p>Though construction is temporary, intermittent and of short duration, and will not present any long-term vibration impacts, the following practices would reduce vibration level increases produced by the construction equipment to the nearby noise-sensitive residential land uses.</p> <ul style="list-style-type: none"> • Large construction equipment shall not be used within 65 feet of residential properties, identified on Exhibit 10-A. As used here, “large construction equipment” means any tracktype bulldozer, grader,
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		<p>or scraper larger than a D-8 Caterpillar bulldozer; equipment without rubber tires; or equipment with a peak-particle velocity (PPV) vibration levels of more than 0.01 in/sec at 50 feet when operated on this site.</p> <ul style="list-style-type: none"> • Notice shall be given to adjacent property owners at least seven calendar days prior to the commencement of Project construction activity.
Energy Consumption	2	The Proposed Project would comply with Title 24 Energy Standards, CALGreen Code, and include landscaping that is designed to minimize water use. The Proposed Project would not have a substantial adverse effect on energy consumption.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	Construction of the Proposed Project would create a nominal number of jobs during construction and operation. However, the Proposed Project is not expected to affect employment trends in the City over a long term. No effect is anticipated from the Proposed Project on employment and income.
Demographic Character Changes, Displacement	2	The Proposed Project would develop an 80-unit apartment project intended to provide affordable housing for veterans, individuals with special needs, and low-income households. As a result, the Proposed Project would increase housing access to a new sector of the population in the City. The Proposed Project would not result in physical barriers or reduced access that would isolate a particular neighborhood or demographic group. The Proposed Project would not conflict with any existing housing and would not displace any people. The Proposed Project would help assist the City of Redlands in meeting its housing needs, which the City estimated would need an additional 2,429 dwelling units by the year 2021 (City of Redlands 2017). No adverse impacts to demographic character changes of displacement of people are expected.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The project site is located on a vacant disturbed lot; therefore, it would not displace educational or cultural facilities. Cultural facilities within the City are accessible from the project site within walking distance and via public transportation. The Proposed Project is located within walking distance to Omnitrans Route 15 bus stop located at the southwest corner of the intersection of Texas Street and Lugonia Avenue. Texonia Park is located at the northwest corner of the intersection of Texas Street and Lugonia Avenue, across the street from the project site. Redlands Apostolic Church is located immediately adjacent to the project site to the south.</p> <p>The Proposed Project would provide affordable housing for veterans, individuals with special needs, and low-income households. Implementation of the Proposed Project would result in an estimated increase of up to 225 residents in the City. This assumption is considered conservative as most the units included in the Proposed Project are one-bedroom units that are likely to be occupied by one person. Furthermore, the Proposed Project would be compatible with the City's land use designation for the site and would not add any uses not already anticipated by the City. Therefore, the potential increase in school age children as a result of the Proposed Project would be served by the existing education facilities in the area.</p>
Commercial Facilities	2	<p>The project site is relatively close to commercial facilities. Home Depot, Citrus Plaza, and Mountain Grove Shopping Center are all located within one mile west of the project site. The project site is vacant and disturbed, therefore, implementation of the Proposed Project would not displace existing retail and commercial services.</p>
Health Care and Social Services	2	<p>The Proposed Project would develop an 80 unit apartment complex to provide affordable housing for veterans, individuals with special needs, and low-income households. Implementation of the Proposed Project would result in an estimated increase of up to 225 residents in the City.</p> <p>There are several health care facilities in the area. Redlands Community Hospital is located approximately three miles</p>

		<p>south of the project site and Kaiser Permanente Redlands Medical Offices is located approximately two miles west of the project site. An office of San Bernardino County's Human Services Department is located approximately 1.5 miles west of the project site. The project site is located within walking distance an OmniTrans bus stop that provides public transportation from the project site to health care and social services.</p>
Solid Waste Disposal / Recycling	2	<p>The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The Proposed Project would comply with the City's waste disposal requirement as well as the California Green Building Code. Operational solid waste is not anticipated to disrupt diversion goals.</p> <p>Solid waste on the project site would be deposited at the California Street Landfill or the San Timoteo Sanitary Landfill. The annual disposal rate at the California Street Landfill is currently 829 tons per day, with a remaining capacity of 6.8 million cubic yards of solid waste. The San Timoteo Sanitary Landfill has an annual disposal rate of 2,000 tons per day with a remaining capacity of approximately 13.6 million cubic yards of solid waste. The Proposed Project would generate approximately 410 pounds of solid waste per day. This estimate is conservative because it does not factor in any recycling or waste diversion programs that would be implemented on the project site. The amount of solid waste that would be generated by the Proposed Project would be within the available capacities of City's existing landfill facilities. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Furthermore, the Project Applicant would also be required to pay applicable development impact fees, including the Solid Waste Fund, to finance ongoing improvements to the City's solid waste facilities.</p>
Waste Water / Sanitary Sewers	2	<p>The project site is within an urban area that is well serviced by City of Redlands sewer and stormwater infrastructure. The City's General Plan provides for sewer and stormwater infrastructure for the approved land uses, and the Proposed Project is compatible with the site's General Plan designation. The Proposed Project would comply with all provisions of the National Pollutant Discharge Elimination System and the City's municipal separate sewer permit (MS4), as enforced by the Regional Water Control Board</p>

		(RWQCB). Because the Proposed Project is consistent with the growth scenario identified in the City's General Plan, no new water or wastewater treatment facilities or the expansion of existing facilities would be required. No effect is anticipated.
Water Supply	2	<p>Grading and construction activities associated with the Proposed Project would require the use of water for dust control and cleanup purposes. The use of water during construction would be short term in nature. Therefore, construction activities are not considered to result in an adverse effect on the existing water system or available water supplies.</p> <p>Operation of the Proposed Project would increase the daily demand for potable water supplied by the City. The Proposed Project is estimated to have a water demand approximately 72,000 gallons per day. According to the 2015 San Bernardino Valley Regional Urban Water Management Plan (UWMP) prepared for the agencies within the San Bernardino Valley Municipal Water District service area, which includes the City of Redlands, the City had a total water demand of 24,322 acre-feet per year (AFY) in 2015, which is approximately 21.7 MGD. The City's projected demand for water would be 33,138 AFY in 2020 and 35,715 AFY in 2040. The Regional UWMP concludes that the water supply is sufficient over the next 20 years to meet these projected demands (City of Redlands 2017). Because the Proposed Project would be consistent with the City's General Plan and zoning land use designations for the site, it would be consistent with the growth projections found within the UWMP. As such, it is expected that the City has sufficient water supplies available to serve the Proposed Project.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The Redlands Fire Department (RFD) provides comprehensive emergency services for the City, including fire, rescue, and emergency medical (paramedic) services, as well as fire prevention and code enforcement functions. Fire Station No. 263, located at 10 W. Pennsylvania Avenue, approximately 0.7 mile northeast of the project site, would serve as the first responder in the event of an emergency. Fire Station No. 264, located at 1270 W. Park Avenue (approximately 1.3 miles southwest of the project site), would provide secondary response for any incident. In the event the units from Fire Stations 263 or 264 are not available, other units would be available</p>

		<p>for dispatch from other RFD fire stations or adjacent jurisdictions. These RFD stations can currently respond to an incident at the project site (such as a vegetation fire) and would continue to provide fire protection services upon implementation of the Proposed Project.</p> <p>Given that the Proposed Project would accommodate up to an estimated 225 new residents to the City, the Proposed Project could increase the demand for RFD services. This marginal increase of people would be within regional growth projections for the City and thus, would not substantially affect provision of fire protection given the location of the Proposed Project in an urbanized area and in close proximity to existing fire stations. The Proposed Project would be compatible with the City's land use designation for the site and would not add any uses not already anticipated by the City. Furthermore, compliance with more current applicable fire code and the building code provisions determines a project's impact on fire services. The Proposed Project would be required to meet all current code provisions to the satisfaction of the City and RFD. As a result, the Proposed Project would be adequately served by existing public services and would not necessitate the provision of new or physically altered governmental facilities. The overall need for fire protection services is not expected to substantially increase over existing conditions.</p>
Parks, Open Space and Recreation	2	<p>The Proposed Project would accommodate up to an estimated 225 residents to the City. While the Proposed Project would provide various onsite recreational amenities and open space areas, it is reasonable to assume that the future residents of the Proposed Project would also utilize recreation and park facilities in the surrounding area, including Texonia Park located directly north of the site across Lugonia Avenue. However, as the Proposed Project would generate a marginal number of residents and would provide various onsite recreational amenities and open space area, a significant increase in demand for existing park or recreational facilities is not anticipated to occur. Any additional demand would be met through payment of the City's Open Space and Park Fees in accordance with the City's Municipal Code to provide funding for park and recreation facilities. No adverse effects to recreational facilities or open space requirements are anticipated.</p>

<p>Transportation and Accessibility</p>	<p>3</p>	<p>Vehicular access to the project site would be provided from two gated driveways along Texas Street. One driveway would provide entry and exit into the project site, while the other driveway would be restricted to exit only. Regional access to the project site would be provided from I-10 and I-210. Local access is provided by surrounding roadways within the vicinity of the project site. The segment of West Lugonia Avenue, which borders the project site along the north, is designated by the City's General Plan as a Major Arterial. The segment of Texas Street, which borders the project site along the east, is designated as a Minor Arterial. The Proposed Project includes improvements to Lugonia Avenue and Texas Street to ensure compliance with applicable City standards for Major and Minor Arterial streets.</p> <p><u>Construction</u></p> <p>The Proposed Project would require the use of haul trucks during site clearing and grading and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The addition of these vehicles to the street system would temporarily contribute to increased traffic in the project vicinity. The haul truck trips, would be required to occur outside of the peak hours and during the permissible hauling hours identified along the haul route to be approved by the City. The Proposed Project's construction trip traffic would be a fraction of the operational traffic (532 trips per day), which would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that Proposed Project-related construction trips could contribute to a significant increase in the overall congestion in the project vicinity. In addition, any truck trips would be limited to the length of time required for the Proposed Project's construction. The City's conditions of approval require that a construction work site traffic control plan be submitted to the City for review and approval prior to the start of any construction work. The Project Applicant would be required to adhere to the construction work site traffic control plan, which would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties.</p>
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	<p><u>Operation</u></p> <p>A traffic study was prepared for the Proposed Project (City of Redlands 2017). The intersection of Texas Street and W. Lugonia Avenue was evaluated based on methodologies consistent with City of Redlands and San Bernardino County Congestion Management Program (CMP) guidelines for Existing, Opening Year, and Horizon Year (2040) traffic conditions. The intersection was found to operate at an acceptable level of service (LOS “C” or better) under all the traffic scenarios, even with the addition of Project related traffic.</p> <p>The City of Redlands and San Bernardino County CMP require the study area to include intersections where a project contributes 50 or more peak hour trips. The Proposed Project does not contribute 50 peak hour trips to any intersection, the intersection of Texas Street and W. Lugonia Avenue was included in the analysis based on consultation with City of Redlands staff during the scoping process as this intersection is adjacent to the project site. As such, the study area identified in the Traffic Study meets and exceeds the jurisdictional traffic study requirements. No roadway improvements in addition to those being constructed by the Proposed Project for project access purposes were assumed in the analysis. Therefore, implementation of Mitigation Measure TRA-1 would minimize potential traffic impacts.</p> <p>The study intersection of Texas Street and W. Lugonia Avenue is currently operating at LOS B during the AM peak hour and LOS C during the PM peak hour. The forecast change in operations during the AM and PM peak hours in comparing the Existing to Existing with Project conditions, as well as Future to Future with Project conditions, would not result in the inability for the study intersections to meet acceptable LOS criteria established by the City through year 2040. Additionally, the Project Applicant would pay the City’s applicable Transportation Impact Fees pursuant to Section 3.54 of the City’s Municipal Code, to finance the construction of the required area transportation improvements. Impacts would be less than significant. Implementation of Mitigation Measure TRA-1 would also be incorporated as part of the Proposed Project, to ensure impacts related to traffic to are minimized.</p>
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		<p>Mitigation Measures:</p> <p>TRA-1 Site adjacent improvements are required in conjunction with the proposed development. The necessary off-site improvement recommendations shall be implemented as described in the Traffic Impact Analysis.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project site is currently vacant and unimproved and contains non-native ruderal vegetation. The project site is relatively flat and currently undergoes routine disking for weed abatement. No riparian habitat or sensitive natural community is located within the project site or in adjacent areas. The project site does not contain streams or wetland habitat (City of Redlands 2017). Implementation of the Proposed Project would not result in adverse effects to natural features including water resources.
Vegetation, Wildlife	2	As previously mentioned, no riparian habitat or sensitive natural community is located within the project site. The project site is also not located in an area containing valued wildlife habitat. The project site is in a developed area and does not contain any critical habitat or support any species identified as a candidate, sensitive, or special-status species. Implementation of the Proposed Project would not result in adverse effects to vegetation or wildlife resources.
Other Factors	N/A	N/A

Additional Studies Performed:

No additional studies were performed beyond those listed in the List of Sources, below.

Field Inspection (Date and completed by): Anne Surdzial, March 16, 2020.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

California Coastal Commission

2020 Coastal Zone Boundary Maps. Available at <https://www.coastal.ca.gov/maps/czb/>. Accessed February 26, 2020.

California Department of Conservation

2016 Division of Land Resource Protection, Farmland Mapping and Monitoring Program, San Bernardino County Important Farmland 2016, Sheet 2 of 2

City of Redlands

- 2017 Revised Initial Study Liberty Lane Apartments. Prepared by Meridian Consultants, LCC. July 2017

[DTSC] California Department of Toxic Substances Control

- 2020a DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). Available at: <https://dtsc.ca.gov/dtscs-cortese-list/>. Accessed on February 26, 2020.
- 2020b EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed on February 26, 2020.

[ECORP] ECORP Consulting, Inc.

- 2015 Updated Biological Resources Assessment in Support of the Texonia Park Apartments Project at the Intersection of Texas Street and West Lugonia Avenue in the City of Redlands, San Bernardino County, California. November.
- 2014 Cultural Resources Inventory for the Texonia Park Apartments Project in the City of Redlands, San Bernardino County, California. January.

[FEMA] Federal Emergency Management Agency

- 2008 FIRM, Flood Insurance Rate Map, San Bernardino County, California and Incorporated Areas, Panel 8704 of 9400. Map Number 06071C8704H. Map revised August 28, 2008.

Rincon Consultants, Inc.

- 2019 Phase I Environmental Site Assessment, Liberty Lane, Southwest Corner of West Lugonia Avenue and Texas Street, Redlands, California. December.

San Bernardino County

- 2020 San Bernardino County Airport Land Use Compatibility Plans. Available at <https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx>. Accessed on February 26, 2020.

U.S. Environmental Protection Agency

- 2020 Sole Source Aquifer Map. Available at <https://www.epa.gov/dwssa>. Accessed on March 16, 2020.

U.S. Fish and Wildlife Service

- 2020 Coastal Barrier Resources System Mapper. Available at <https://www.fws.gov/cbra/maps/mapper.html>. Accessed on February 26, 2020.

List of Permits Obtained:

City of Redlands

- Zone Change from the R-1 (Single-Family Residential) District to R-2 (Multi-Family Residential) District

- Conditional Use Permit (CUP)
- Density Bonus and Incentive/Concession Agreement
- Lot Line Adjustment will be required as a Condition of Approval to adjust lot lines between the project site and an adjacent single-family lot
- Minor Exception Permit will also be required as a Condition of Approval to allow for fences above 4 feet in height

Public Outreach [24 CFR 50.23 & 58.43]: All units at Liberty Lane will be marketed in accordance with Affirmative Fair Housing marketing guidelines, and the property's tenant selection criteria highlighted below. Each applicant may be assigned a case manager who acts as an advocate for the tenant and provides proactive support. The screening process is conducted jointly by the Lead Service Provider and Property Management. With respect to the treatment of applicants, Property Management will not discriminate against any individual or family because of race, color, national origin or ancestry, religion, sex (including gender identity), sexual orientation, age, handicap/disability, medical condition, source of income, marital status or familial status, or any other arbitrary basis. Housing First practices consistent with §112 and §113 will be implemented by the Lead Service Provider (U.S.VETS), Property Management (A Community of Friends) and all others involved in determining applicants' eligibility, minimizing barriers to enter housing and focusing on preventing loss of housing.

ACOF's Property Management staff will provide coordinated and creative outreach efforts to not only identify, but to engage individuals and veterans experiencing homelessness. Six months prior to lease up, we will outreach to various veterans service agencies to encourage them to connect them with the local CES. We will publicize available units on line, in local news bulletins on the VA campus, and in local community newspaper with the encouragement to have all interested individuals and families work with their local CES and get entered into the system.. ACOF will ensure that outreach efforts are comprehensive and cover all of San Bernardino County; share information across outreach teams and sites and in coordination with other systems including law enforcement, hospitals and emergency departments, libraries, and job centers; and partner with local outreach organization such as the San Bernardino Continuum of Care, which conducts street outreach. This coordinated effort will reach individuals and veterans who are not currently accessing housing and ensure they have ample time to be entered into the CES system before lease up of the property begins.

Cumulative Impact Analysis [24 CFR 58.32]: Cumulative impacts may occur when the Proposed Project in conjunction with one or more related projects would yield an impact that is greater than what would occur with the development of only the Proposed Project. With regard to cumulative effects on agricultural, biological, and mineral resources, the project site is located in a developed area; therefore, other developments occurring in the area of the Proposed Project would largely occur on previously disturbed land. Thus, no cumulative impact to these resources would occur. Impacts related to archaeological resources, paleontological resources, and hazards and hazardous materials are generally confined to a specific site and do not affect off-site areas. Potential cumulative effects on air quality, hydrology, noise, public services, and traffic were determined to be determined to be less than significant. Noise and traffic mitigation measures would be implemented to reduce adverse impacts.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]: Alternative sizes and configurations for the project have been reviewed. However, the Proposed Project best meets the purpose and need for housing for veterans, individuals with special needs, and low-income households in the City of Redlands. A larger development could have greater impacts on the human environment, including the nearby single-family residential development. A smaller development would not maximize the potential use of the property for affordable housing and would have similar impacts as the Proposed Project.

No Action Alternative [24 CFR 58.40(e)]: The no action alternative would not develop the project site into an 80-unit apartment complex for veterans, individuals with special needs, and low-income households. It is likely that the project site would remain vacant or be developed into another residential use.

Summary of Findings and Conclusions: The Proposed Project would result in potential adverse impacts related to aesthetics, cultural resources, geological hazards, noise, and traffic. However, mitigation measures have been included in the Proposed Project to reduce adverse impacts. No impacts are potentially significant to the extent that an EIS would be required. The Proposed Project would provide affordable housing for veterans, individuals with special needs, and low-income households, which would help assist the City of Redlands in meeting its housing needs.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

- AES-1** To mitigate the exterior sound attenuation wall, the wall shall be constructed with articulation that breaks up the uniform character of a standard block wall and that requires landscaping on the exterior of the wall to create additional visual variety. The wall design and landscaping shall be reviewed and approved by the City to ensure that it provide visual variety that attenuates the uniformity of a standard block wall and integrates this structure into the community design.
- CUL-1** If there are any changes to Project Site design and/or proposed grades, prior to the issuance of a grading permit, the Applicant shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant and interested tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The Applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the Project Site if the site design and/or proposed grades should be revised in consult with the City of Redlands. In specific circumstances where existing and/or new resources are determined to be unavoidable and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject any future development, erosion or flooding.
- CUL-2** At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project

Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City of Redlands shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project Site. Details in the Plan shall include:
 - a. Project grading and development scheduling.
 - b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists.
 - c. The protocols and stipulations that the Developer, City of Redlands. Tribes and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

CUL-3 In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project archaeologist. The removal of any artifacts from the Project Site will need to be thoroughly inventoried with tribal monitor oversight of the process.
2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Redlands with evidence of same:
 - a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.

- c. A curation agreement with an appropriate qualified repository within San Bernardino County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Bernardino County, to be accompanied by payment of the fees necessary for permanent curation.
- c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the Project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the San Bernardino County Museum by default.
- d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Redlands documenting monitoring activities conducted by the Project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pregrade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Redlands, CHRIS and consulting tribes.

CUL-4 In the event that human remains (or remains that may be human) are discovered at the Project Site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the San Bernardino County Coroner and the City of Redlands Police Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will remain proprietary and not disclosed to the general public. The locations will be documented

by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the Eastern Information Center (EIC), the City of Redlands Development Services Department, and the appropriate Native American Tribe.

CUL-5 In the event that paleontological resources are unearthed during Project subsurface activities, all earth-disturbing work would be temporarily suspended or redirected until a qualified paleontologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. After the resources have been properly addressed, work in the area may resume. With implementation of this standard requirement, no significant impact would occur.

GEO-1 The geotechnical design recommendations provided in Section 7 of the Geotechnical Report or measures deemed equivalent by the geotechnical professional shall be implemented by the Proposed Project. Section 7 identifies specific onsite design measures to address the following geotechnical issues: clearing and grubbing; site preparation; temporary slope and trench excavations; foundations; footings; seismic design parameters (refer to the October 21, 2015 update in which Table 2, 2013 California Building Code Seismic Design Parameters updates these design parameters); concrete slabs-on-grade (including control of vapor migration; pavement sections; drainage control; and soil corrosion. These design measures are hereby incorporated in this measure and shall be implemented during actual construction of the Proposed Project.

NOI-1 Increased Noise Levels (Construction)

Though construction noise is temporary, intermittent and of short duration, and will not present any long-term impacts, the following noise abatement measures would reduce any noise level increases produced by the construction equipment to the nearby noise-sensitive residential land uses:

- Public notice shall be given prior to initiating construction. This notice shall be provided to all property owners/residents within 100 feet of the Project site and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the Project. The public notice shall encourage the adjacent residences to contact the supervisor in the case of a complaint. Resident's would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or otherwise control the sound source causing the complaint.
- If feasible, construct the planned Project 6 and 8-foot high noise barriers at the Project site boundaries prior to the commencement of Project construction

activities. This would further reduce the noise levels experienced at the nearby sensitive receiver locations, but is not required.

- Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays (City of Redlands Municipal Code, Section 8.06.090 (F)). The Project construction supervisor shall ensure compliance with the permitted construction hours.
- During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
- The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction.
- Equipment not in use for five minutes shall be shut off. Equipment shall be maintained and operated such that loads are secured from rattling or banging.
- Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.
- The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck related noise.
- No radios or other sound equipment shall be used at the Project site unless required for emergency response by the contractor.

NOI-2 Exterior Noise Mitigation

To satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for multi-family residential development, the construction of 6.5-foot high noise barriers for buildings with outdoor living areas (first floor patios) adjacent to Lugonia Avenue is required. Buildings with outdoor living areas (first floor patios) adjacent to Texas Street will require the construction of 5-foot high noise barriers. Exterior noise levels will approach 58.2 dBA CNEL at open space uses within the Project site, and therefore, no exterior noise abatement is required to satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for open space use. With the recommended noise barriers shown on Exhibit ES-A for multi-family residential units, the mitigated future exterior noise levels will range from 59.0 to 60.0 dBA CNEL. This noise analysis shows that the recommended noise barriers will satisfy the City of Redlands 60 dBA CNEL exterior noise level standards.

The recommended noise control barriers shall be constructed so that the top of each wall extends to the recommended height above the pad elevation of the lot it is shielding. The barrier shall provide a weight of at least 4 pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, and a minimum sound transmission loss of 20 dBA. The noise barrier shall be constructed using the following materials. The barrier shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking.

- Masonry block;
- Stucco veneer over wood framing (or foam core), or 1-inch-thick tongue and groove wood of sufficient weight per square foot;
- Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot capable of providing a minimum transmission loss of 20 dBA;
- Earthen berm; or Any combination of these construction materials.

NOI-3 Interior Noise Mitigation

To satisfy the City of Redlands 45 dBA CNEL interior noise level criteria, buildings facing Texas Street and Lugonia Avenue will require a Noise Reduction (NR) of up to 22.2 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:

- Windows: All windows and sliding glass doors shall be well fitted, well weather-stripped assemblies and shall have a minimum sound transmission class (STC) rating of 27.

- Doors: All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick.
- Roof: Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one-half inch thick. Ceilings shall be well fitted, well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- Attic: Attic vents should be oriented away from Texas Street and Lugonia Avenue. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents.
- Ventilation: Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use. A forced air circulation system (e.g. air conditioning) shall be provided which satisfies the requirements of the Uniform Mechanical Code. Wall mounted air conditioners shall not be used.

With the recommended interior noise mitigation measures provided in this study, the proposed Liberty Lane Apartments residential Project is expected to meet the City of Redlands 45 dBA CNEL interior noise level standards for residential development.

NOI-4 Construction Vibration Mitigation Measures

Though construction is temporary, intermittent and of short duration, and will not present any long-term vibration impacts, the following practices would reduce vibration level increases produced by the construction equipment to the nearby noise-sensitive residential land uses.

- Large construction equipment shall not be used within 65 feet of residential properties, identified on Exhibit 10-A. As used here, “large construction equipment” means any tracktype bulldozer, grader, or scraper larger than a D-8 Caterpillar bulldozer; equipment without rubber tires; or equipment with a peak-particle velocity (PPV) vibration levels of more than 0.01 in/sec at 50 feet when operated on this site.
- Notice shall be given to adjacent property owners at least seven calendar days prior to the commencement of Project construction activity.

PUB-1 A construction site security plan approved by the police department is required, providing adequate security measures such as lights, video cameras, vehicle transponders, locks, alarms, trained security personnel, fencing etc. The nature of the measures will depend on the specific requirements of the site, and may vary with the different stages of construction. The developer shall be responsible for the compliance of all sub-contractors working on the site. Other impacts associated with

new development are mitigated with the payment of development impact fees, and State established school fees.

TRA-1 Site adjacent improvements are required in conjunction with the proposed development. The necessary off-site improvement recommendations shall be implemented as described in the Traffic Impact Analysis.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: April 30, 2020

Name/Title/Organization: Anne Surdzial, AICP, Vice President, ECORP Consulting, Inc.

Certifying Officer Signature: _____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

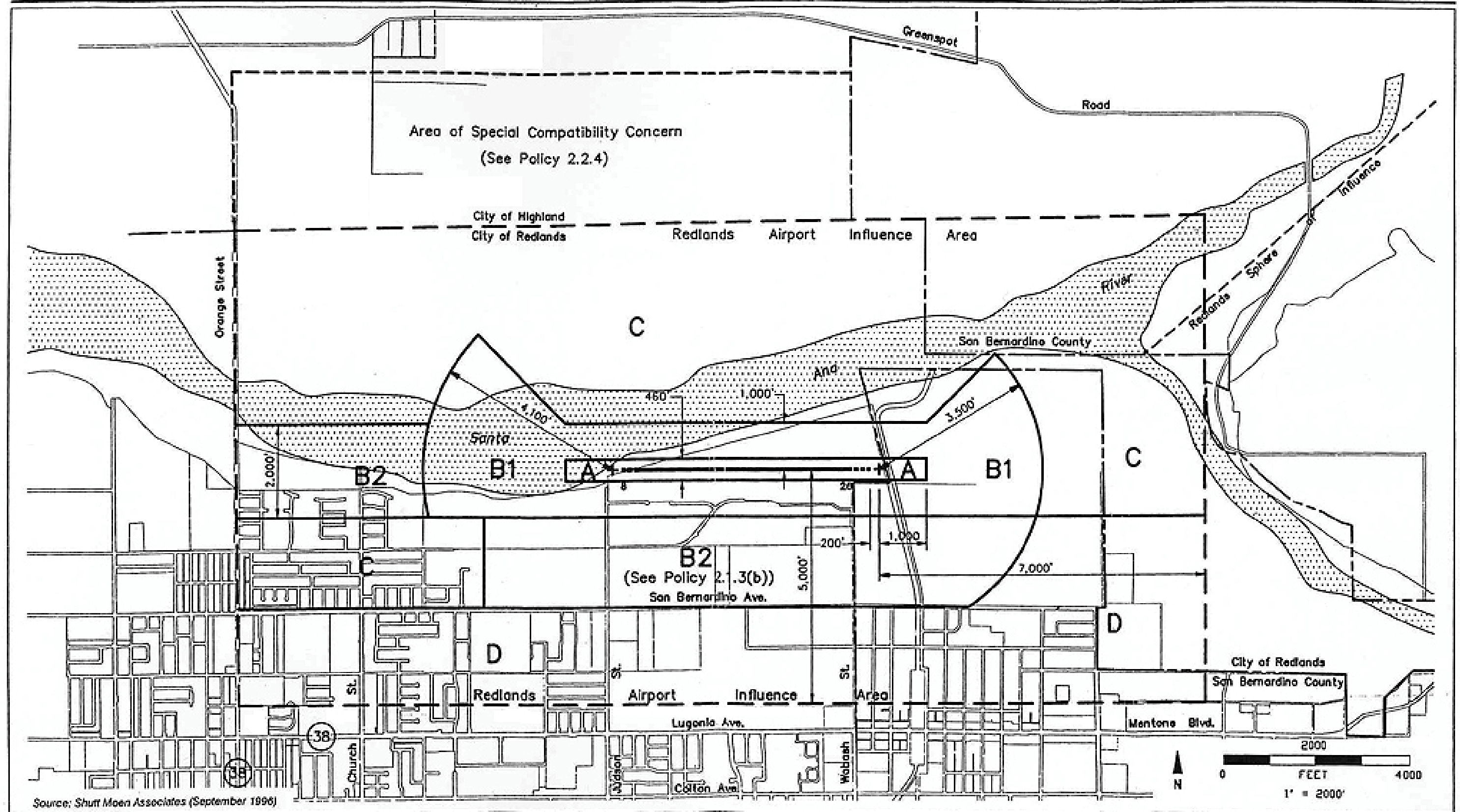
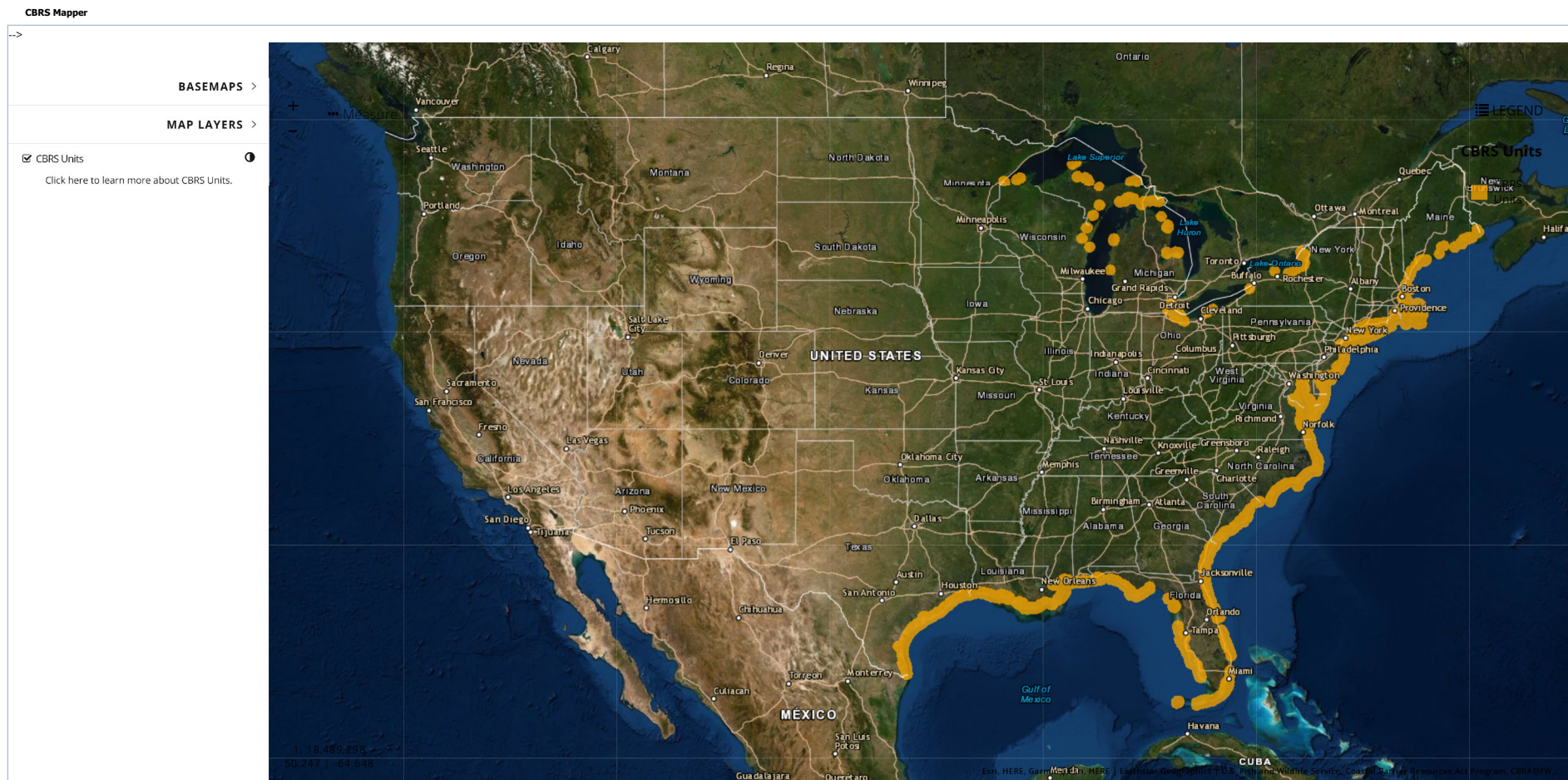


Figure 2A

Compatibility Map
Redlands Municipal Airport



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NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The **community map repository** should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations** (BFEs) and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations tables in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations tables should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Universal Transverse Mercator (UTM) zone 11 North. The **horizontal datum** was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov> or contact the National Geodetic Survey at the following address:

NGS Information Services
NOAA, NNG512
National Geodetic Survey
SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at <http://www.ngs.noaa.gov>.

Base map information shown on this FIRM was derived from digital orthophotography collected by the U.S. Department of Agriculture Farm Service Agency. This imagery was flown in 2005 and was produced with a 1-meter ground sample distance.

This map may reflect more detailed and up-to-date stream channel configurations than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to confirm to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels, community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

Contact the **FEMA Map Service Center** at 1-800-358-9616 for information on available products associated with this FIRM. Available products may include previously issued Letters of Map Change, a Flood Insurance Study report, and/or digital versions of this map. The FEMA Map Service Center may also be reached by Fax at 1-800-358-9620 and its website at <http://msc.fema.gov>.

If you have **questions about this map** or questions concerning the National Flood Insurance Program in general, please call 1-877-FEMA MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov>.



LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently derelict. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

- ZONE X** Areas determined to be outside the 0.2% annual chance floodplain.
- ZONE D** Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone D boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
- Base Flood Elevation line and value; elevation in feet*
- Base Flood Elevation value where uniform within zone; elevation in feet*

* Referenced to the North American Vertical Datum of 1988

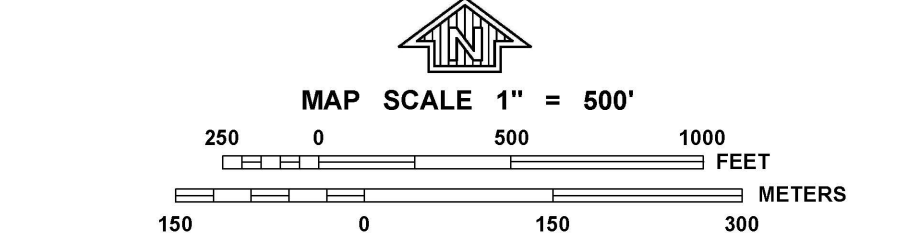
- Cross section line
- Transect line
- Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
- 1000-meter Universal Transverse Mercator grid values, zone 11N
- 5000-foot grid ticks: California State Plane coordinate system, zone V (FIPSZONE 0405), Lambert Conformal Conic projection
- Bench mark (see explanation in Notes to Users section of this FIRM panel)
- River Mile

MAP REPOSITORY
Refer to listing of Map Repositories on Map Index
EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP
March 18, 1996

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
August 28, 2008 - to update corporate limits, to change Base Flood Elevations and Special Flood Hazard Areas, to update map format, to add roads and road names, and to incorporate previously issued Letters of Map Revision.

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.



NATIONAL FLOOD INSURANCE PROGRAM

FEDERAL EMERGENCY MANAGEMENT AGENCY

PANEL 8704H


FIRM
FLOOD INSURANCE RATE MAP

SAN BERNARDINO COUNTY, CALIFORNIA AND INCORPORATED AREAS
PANEL 8704 OF 9400
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
REDLANDS, CITY OF	060279	8704	H
SAN BERNARDINO COUNTY	060270	8704	H

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.



MAP NUMBER
06071C8704H

MAP REVISED
AUGUST 28, 2008

Federal Emergency Management Agency

Revised Initial Study Liberty Lane Apartments

Prepared for:

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

Prepared by:

Meridian Consultants, LCC
910 Hampshire Road, Suite V
Westlake Village, California 91361

With Final Edits by:

Tom Dodson & Associates

July 2017

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1.0 INTRODUCTION

Project Title:	Liberty Lane Apartments
Lead agency name and address:	City of Redlands Development Services Department 35 Cajon Street, Suite 20 Redlands, CA 92373
Contact person and telephone number:	Loralee Farris Principal Planner City of Redlands Development Services Department (909) 798-7555 ext. 4749 lfarris@cityofredlands.org
Project location:	The 4.7-acre Project Site is located on the southwest corner of W. Lugonia Avenue and Texas Street and is identified by Assessor's Parcel Number (APN) 169-021-19.
Project sponsor's name and address:	Chul Gugich A Community of Friends 3701 Wilshire Boulevard, Suite 700 Los Angeles, CA 90010

PROJECT SUMMARY

The City of Redlands ("City") prepared this revised Initial Study (IS) to evaluate the potential environmental impacts associated with the Liberty Lane Apartments Project ("Proposed Project") and address specific issues raised in comments received since the January 2017 circulated draft document. The Project Applicant, A Community of Friends, is seeking to construct, operate, and maintain an 80-unit apartment complex on the Project Site. This Project is being proposed to provide affordable housing for veterans, individuals with special needs, and low-income households. The Project Site is currently vacant and unimproved, and is approximately 4.7 acres (204,732 square feet) in size.

The Proposed Project consists of six 2-story residential buildings containing a mix of one-, two-, and three-bedroom units, and a 1-story community building containing a management office and amenities for the residents. The Proposed Project would also include 108 at-grade parking spaces and approximately 32,280 square feet of

landscaping and open space. The Project Site is currently designated by the City's General Plan as MDR (Medium Density Residential), which would allow between 1 and 15 units per acre. However, the Project Applicant will require the following entitlements to develop the Project as proposed: a zone change from the R-1 (Single-Family Residential) District to R-2 (Multi-Family Residential) District; a Conditional Use Permit (CUP); and a Density Bonus and Incentive/Concession Agreement. Further, a Lot Line Adjustment will be required as a Condition of Approval to adjust lot lines between the Project Site and an adjacent single-family lot. A Minor Exception Permit will also be required as a Condition of Approval to allow for fences above 4 feet in height.

ORGANIZATION OF THE REVISED INITIAL STUDY

This revised IS is organized into seven sections as follows:

- **Section 1, *Introduction***, provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.
- **Section 2, *Environmental Setting***, describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.
- **Section 3, *Project Description***, provides a detailed description of the Proposed Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.
- **Section 4, *Environmental Checklist***, presents the checklist responses and evaluation for each resource topic.
- **Section 5, *Environmental Analysis***, includes an analysis for each resource topic and identifies impacts of implementing the Proposed Project. It also identifies mitigation measures, if applicable.
- **Section 6, *References***, identifies all printed references and individuals cited in this revised Initial Study.
- **Section 7, *List of Preparers***, identifies the individuals who prepared this report and their areas of technical specialty.

Appendices present data supporting the analysis or contents of this revised IS include the following:

- **Appendix A, Air Quality Report**
- **Appendix B, Biology Report**
- **Appendix C, Cultural Resources Report**
- **Appendix D, Geotechnical Report**
- **Appendix E, Greenhouse Gas Report**
- **Appendix F, Phase I Environmental Site Assessment**
- **Appendix G, Preliminary Drainage Report and Supplement to WQMP**

- **Appendix H**, Noise Study
- **Appendix I**, Traffic Study

This revised IS is an analysis prepared by and for the City of Redlands as the Lead Agency to determine whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) is the appropriate environmental determination for this Proposed Project. An MND is prepared for a project when the Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

The analysis in this revised Initial Study identifies some potentially significant impacts on the environment that could result from the Proposed Project, but also finds that these impacts would be reduced to less than significant through the implementation of the identified mitigation measures. Therefore, based on the independent review of this document, the City of Redlands finds the analysis contained herein supports the adoption of an MND for the Proposed Project.

PUBLIC AND AGENCY REVIEW OF THE REVISED DRAFT IS

CEQA requires that the lead agency provide the public and agencies the opportunity to review and comment on a Draft IS. As outlined by CEQA, the City is providing a 20-day period for review and comment on the Draft IS. Upon completion of the public and agency review period, the City, as lead agency, will evaluate comments on environmental issues received from persons who reviewed the Draft IS and prepare written responses. The City will include these comments and responses in a Final IS, along with any changes that will be reviewed and considered for adoption by the City Council.

Interested individuals, organizations, responsible agencies, and other agencies can provide written comments to:

City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373
Loralee Farris, Principal Planner

Comments may also be sent by facsimile to (909) 792-8715, or by email to lfarris@cityofredlands.org. Please put "Liberty Lane Apartments" in the subject line. Agency responses should include the name of a contact person within the commenting agency.

The revised Draft IS is available for review at the following location:

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

2.0 ENVIRONMENTAL SETTING

PROJECT LOCATION

The Project Site is located in the City of Redlands within San Bernardino County, as shown in **Figure 2-1, Regional Location Map**. The City is bound on the north by the Santa Ana River floodplain, the City of Highland, and the San Bernardino Mountains; on the east by the Crafton Hills and the City of Yucaipa; on the south by the Riverside County boundary and the Badlands; and on the west by the City of Loma Linda and the City of San Bernardino.

As shown in **Figure 2-2, Aerial Photograph of the Project Site**, the Project Site is located at the southwest corner of West Lugonia Avenue and Texas Street. The Project Site is currently vacant and unimproved, and includes approximately 204,732 square feet of lot area (4.7 acres). The Project Site is relatively flat, contains no landscaping, and is characterized by non-native ground vegetation that is typically mowed/plowed each year to minimize fire hazard. Surrounding uses include residential uses to the north, south, and east; open space/park to the north; industrial uses to the southwest; and open space/residential uses to the west. The Project Site is composed of one parcel: Assessor's Parcel Number (APN) 169-021-19.

REGIONAL AND LOCAL ACCESS

Regional Access

Primary regional access to the site is provided by Interstate 210 (I-210) and Interstate 10 (I-10). The I-210 runs in a north-south direction west of the Project Site, while I-10 runs in an east-west direction south of the Project Site.

Local Street Access

West Lugonia Avenue, which borders the Project Site to the north, is a two-way street that travels in the east-west direction and provides two travel lanes in each direction. The portion of West Lugonia Avenue bordering the Project Site is designated as a Major Arterial. Texas Street, which borders the Project Site to the east, is a two-way street that travels in the north-south direction and provides one travel lane in each direction. Texas Street is designated as a Minor Arterial.

Public Transit

The City is currently served by Omnitrans, a local bus operator, via bus routes 8, 9, 15, and 19. Bus routes 8 and 9 provide access to the San Bernardino International Airport, Loma Linda, and Mentone. Bus route 15 provides access to the Fontana Metrolink station, San Bernardino, and Highland. Bus route 19 provides access to Yucaipa, Colton, and Fontana. The closest stop the Project Site is for bus route 15, which is adjacent to the site at the intersection of West Lugonia Avenue and Texas Street.

LAND USE AND ZONING DESIGNATIONS

As shown in **Figure 2-3, Land Use Map**, the Project Site is currently designated by the City's General Plan as MDR (Medium Density Residential), which allows the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. Areas designated MDR are currently more suitable for development in the low- to mid-level of the permitted density range, which is currently designated at 1 to 15 units per gross acre. As shown in **Figure 2-4, Zoning Map**, the Project Site is currently zoned as R-1 (Single-Family Residential), which allows single-family residential uses limited to not more than one dwelling unit per lot. The Proposed Project will be consistent with the existing General Plan designation, but includes a zone change to R-2 (Multi-Family Residential) District as one of the Project entitlements.

SURROUNDING LAND USES

The properties surrounding the Project Site include residential, open space, and industrial uses. **Figures 2-3 and 2-4** depict the land use and zoning designation of the Project Site and the surrounding properties.

South: Properties located south of the Project Site include 1-story single-family residences and a community church with related surface parking. Industrial buildings are located southwest of the Project Site. These properties are designated for MDR, Low Density Residential (LDR), and Commercial/Industrial land uses and zoned R-1 and Light Industrial (M-1), respectively.

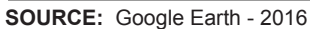
North: Two 1-story single-family residences are directly adjacent to the Project Site on the north. Across West Lugonia Avenue are 1-story single-family residences and the 10.7-acre Texonia Park. These properties are designated for MDR, LDR, and Parks/Golf Course land uses and zoned R-1 and Open Space (O).

West: Properties located west of the Project Site include 1-story single-family residences and vacant land. These properties are designated for MDR and Commercial land uses and zoned R-1 and Agricultural (A-1), respectively.

East: Located east of the Project Site are 1-story single-family residences, which are designated for LDR land uses and zoned R-1.

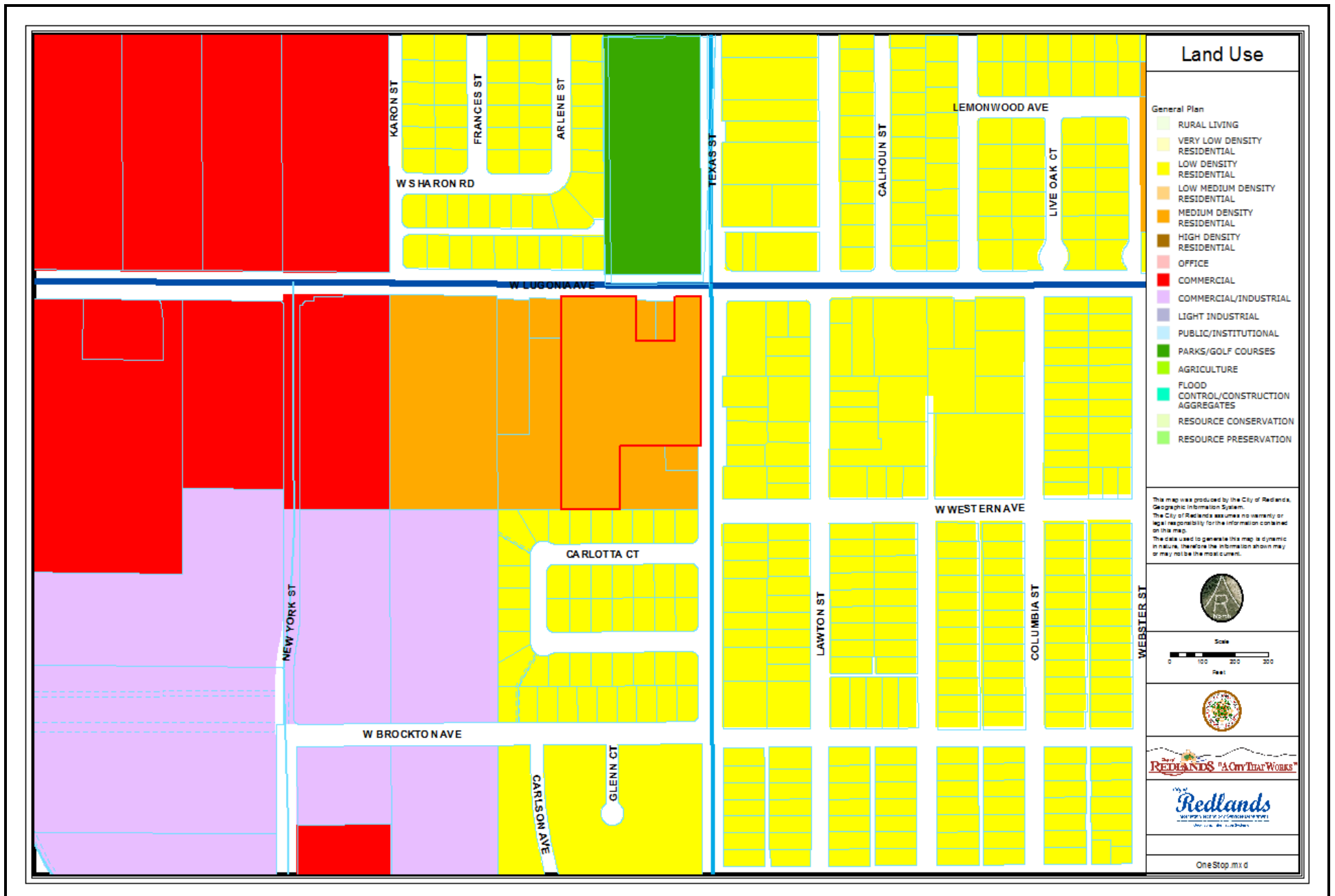


Regional Location Map



Meridian
Consultants

~~576 of 1375~~



SOURCE: City of Redlands

FIGURE 2-3

Tom Dodson & Associates

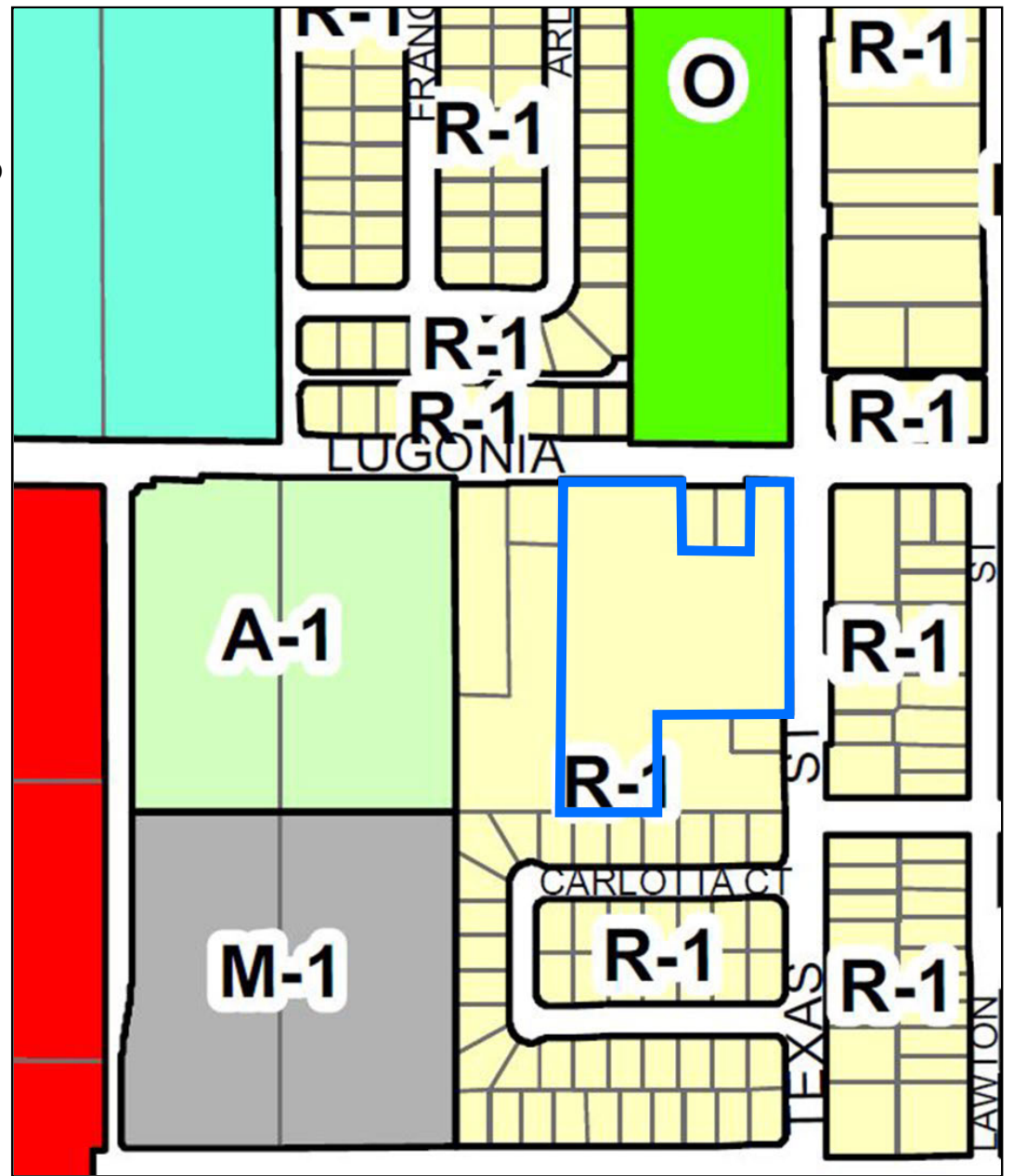
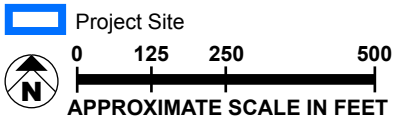
Environmental Consultants
Redlands Regular meeting of 9-19-17

Land Use Map

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Legend

- Single-Family Residential**
PRD/RE,R-R,R-R-A,R-A,R-A-A,R-E,R-S,EV/R-S,R-1,R-1D
- Commercial**
C-1,C-2,C-3,C-4,C-M,P,EV/CG,EV/CR,EV/TC
- Industrial**
I-P,M-1,M-2,M-P,EV/IC,EV/IR,EV/SRP
- Agriculture**
A-1 A-1-20,A-2
- Open Space**
O,EV/OS
- Specific Plan**
CP-1,CP-2,CP-3,CP-4,EV/SD,PD1,PD3,SP23,SP25
SP26,SP29,SP32,SP39,SP41,SP43,SP45,SP47,SP52
SP54,SP55,SP57,SP59,SP60,SP61,SC,TC,TC-H



SOURCE: City of Redlands, Zoning Map, October 2016

FIGURE 2-4

3.0 PROJECT DESCRIPTION

PROPOSED PROJECT

The Proposed Project involves the development of an 80-unit apartment project intended to provide affordable housing for veterans, individuals with special needs, and low-income households. The Project is proposed on the southwest corner of W. Lugonia Avenue and Texas Street in the City of Redlands. The 4.7-acre (204,732-square-foot) Project Site is currently vacant and unimproved, and is zoned R-1 (Single-Family Residential) District, even though the General Plan land use designation has been Medium Density Residential (MDR) since the General Plan was adopted in 1995.

As shown in **Figure 3-1, Proposed Site Plan**, six 2-story residential buildings (identified as Buildings A1, A2, A3, B, C1, and C2) with a combined total of 77,383 square feet and a one 1-story community building with 4,708 square feet are proposed. The Proposed Project would include 60 one-bedroom units, 19 two-bedroom units, and 1 three-bedroom unit reserved for an on-site property manager. The 1-story community building would contain a management office and amenities for the residents, including a kitchen, television lounge area, computer center, laundry room, and office for support services.

ARCHITECTURAL DESIGN

As displayed in **Figure 3-2, Proposed Building Elevations**, the proposed residential buildings would be approximately 32 feet in height to the top of the roof, and the 1-story community building would be approximately 25 feet in height to the top of the roof. Materials would include a mix of concrete tiles, stucco, brick veneer, fiber cement panels and trim, vinyl windows, wood posts, metal railings, metal window shades, decorative window shutters, and plexiglass. These are design materials that already occur within the surrounding single-family residences

OPEN SPACE AND LANDSCAPING

The Proposed Project would provide residential outdoor living space as required by the City's zoning standards. Based on the number of units and the unit types, approximately 20,031 square feet of open space is required. Approximately 32,280 square feet of landscaping and open space is proposed, which includes various forms of ornamental trees, shrubs, and synthetic turf. As shown in **Figure 3-3, Proposed Landscape Plan**, the Proposed Project would include outdoor recreational amenities for residents, including a picnic and barbeque area, community garden, bocce ball court, tot lot, and fitness trails.

DENSITY

The City's General Plan land use designation for the Project Site is currently MDR (Medium Density Residential), which allows for a maximum density of 15 units per gross acre. As previously indicated, the Project Site is 4.7 acres (204,732 square feet). However, the gross area of the Project Site proposed for residential structures (which

excludes the internal street dedication) is 4.47 acres. The Proposed Project includes the development of 80 dwelling units. The Project Applicant is requesting a zone change from R-1 (Single-Family Residential, 0-15 units per acre) to R-2 (Multi-Family Residential, 15 units per acre) and a density bonus and incentive/concession agreement to allow an increase in density of 2.9 dwelling units per acre, for a total of 17.9 dwelling units per acre. The proposed concession agreement states that if the Applicant complies with all of the requirements of California Government Code Section 65915 et seq., the Applicant is eligible to obtain certain incentives and/or concessions from the City, including the waiver or reduction of City development standards.

ACCESS

Regional access to the Project Site will be provided by the I-10 and I-210 Freeways. As shown **Figure 3-1, Proposed Site Plan**, vehicular access to the Project Site would be provided from two gated driveways along Texas Street. One driveway would provide entry and exit into the Project Site, while the other driveway would be restricted to exit only. The residential development would contain an internal circulation network that would provide vehicular access to each of the individual buildings. The Proposed Project would also include sidewalks and pedestrian walkways throughout the site.

PARKING

The Project is utilizing a reduction in normal vehicular parking ratio construction standards in accordance with State density bonus law contained in California Government Code 65915(p)(1), which states: "...upon the request of the developer, a city, county, or city and county shall not require a vehicular parking ratio, inclusive of handicapped and guest parking, of a development meeting the criteria...that exceeds the following ratios: (A) Zero to one bedroom: one onsite parking space (B) Two to three bedrooms: two onsite parking spaces (C) Four and more bedrooms: two and one-half parking spaces" According to the above ratios, the Project would be required to provide 100 total parking spaces; however, the Project proposes 108 spaces.

ROADWAY IMPROVEMENTS

The Project includes the construction of the following improvements:

W. Lugonia Avenue: W. Lugonia Avenue will be improved from the western boundary of the Project Site to Texas Street along the frontage of the Project Site at its ultimate half-section width as a Major Arterial (106-foot right-of-way), in compliance with applicable City standards. This improvement would not include any turn lanes at access points, and will not create a conflict with existing single-family residences on W. Lugonia Ave (See Appendix G, Traffic Study Memo, dated March 22, 2017).

Texas Street: Texas Street is a north-to-south-oriented roadway located along the Project's eastern boundary. Construction of Texas Street from W. Lugonia Avenue to the Project's southern boundary along the Project's

frontage at its ultimate half-section width as a Minor Arterial (88-foot right-of-way) in compliance with applicable City standards. This improvement would not include any turn lanes at existing access points.

CONSTRUCTION

Construction Schedule/Phasing

Construction of the Proposed Project will take approximately 18 months and is currently anticipated to start December 2017, with completion by June 2019. Construction would consist of two primary phases: (1) grading/site preparation, and (2) building construction. The grading/site preparation phase includes removal of the existing vegetation and grading of the site. The building construction/site improvement phase includes the construction of the buildings and installation of the landscaping areas. A breakdown of the construction phases, timelines, and anticipated equipment is provided in **Table 3.0-1, Project Construction Phasing and Equipment**.

Table 3.0-1
Project Construction Phasing and Equipment

Construction Phase	Approximate Duration	Example of Equipment
Grading/Site Preparation	2 months	Grader, rubber tired dozer, water truck, tractor/loader/backhoe
Building Construction/Site Improvements	16 months	Fork lift, crane, generator, tractor/loader/backhoe, welder, cement and mortar mixer, paver, roller, air compressor

Source: A Community of Friends (2016).

Grading and Site Preparation

Grading and site preparation activities would occur over approximately 2 months. This phase would involve grading of the site to create the proper base and slope for the building foundations. Approximately 1,075 cubic yards of soil would be imported during this phase of construction. Traffic management in accordance with City requirements would be provided for all construction truck access to the site. All staging areas will be established on the property, and parking will be onsite and on the adjacent Texas Street roadway segment.

Building Construction and Site Improvements

The building construction phase consists of the construction of above-grade structures and is expected to occur over approximately 16 months. Upon completion of the structures, application of paints and other architectural coatings, finishing, and paving would occur. It is estimated that application of architectural coatings would occur over the final few months of the building construction phase, and paving would occur during the final month of construction.

Street Closures

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment and construction worker parking would be staged on site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City and would conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities. As provided in Section 8.06.090(F) of the City's Municipal Code, the permissible hours of construction within the City are 7:00 AM to 6:00 PM Monday through Saturday. No construction activities are permitted on Sundays or City holidays. The Proposed Project would comply with these restrictions.

Haul Routes

All construction debris would be recycled to the maximum extent feasible. Debris from the site that cannot be recycled or diverted would be hauled to the California Street or San Timoteo Sanitary Landfills, which accept construction and demolition debris from the Project area. The California Street Landfill is located approximately 2.6 miles northwest of the Project Site (approximately 5.2 miles round-trip). The San Timoteo Sanitary Landfill is located approximately 7.5 miles southwest of the Project Site (approximately 15 miles round-trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the soil import would involve haul trucks with a 16-cubic-yard hauling capacity. As previously indicated, the Proposed Project would require the import of approximately 1,075 cubic yards of soil. The Proposed Project would require approximately 67 truck-trips, or approximately 134 round-trip truck trips (over the entire duration of import). Soil import activity is expected to occur over the duration of the grading and site preparation phase.

All haul truck staging will occur either on site or at designated off-site locations and radioed to the Project Site to be filled. The local haul route for the Project Site would utilize the I-10 or I-210 Freeways to access the site via W. Lugonia Avenue or Texas Street, or as otherwise designated by the City of Redlands.

REQUESTED APPROVALS

The application(s) request approval of the following entitlements:

- Zone Change from R-1 (Single-Family Residential) to R-2 (Multi-Family Residential)
- Conditional Use Permit

- Density Bonus and Incentive/Concession Agreement to allow an increase in density of 2.9 dwelling units per acre, for a total of 17.9 dwelling units per acre
- Concessions to reduce the open space dimensions and the separation requirements between buildings and carports
- Lot Line Adjustment to adjust lot lines between the Project Site and the adjacent single-family lot
- Minor Exception Permit to allow for fences greater than 4 feet in height





069-002-16

Redlands Regular meeting of 0-10-17

Proposed Site Plan

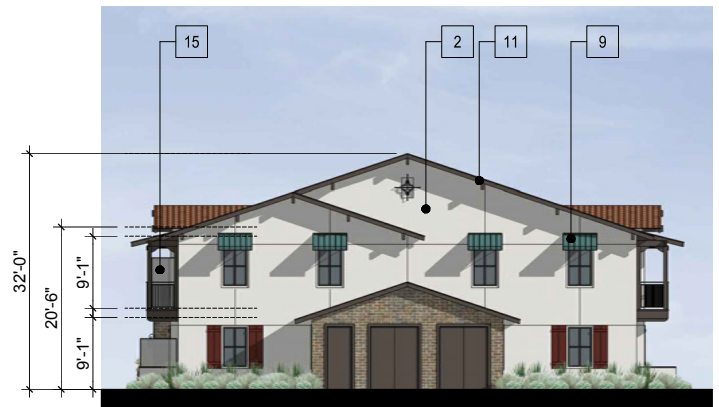
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A. South Elevation

Elevation Keynotes:

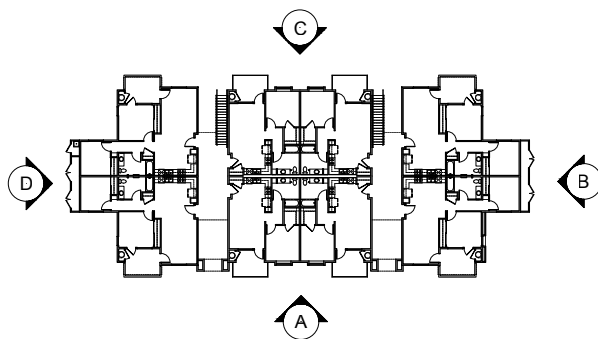
1. Concrete 'S' Tile
2. Stucco
3. Brick Veneer
4. Fiber Cement Panel
5. Fiber Cement Trim
6. Vinyl Window
7. Wood Post
8. Metal Railing
9. Metal Shading Device
10. Decorative Shutters
11. Outlookers
12. Exposed Rafter Tail
13. Shaped Corbel
14. Storefront System
15. Plexi-glass as needed for noise mitigation



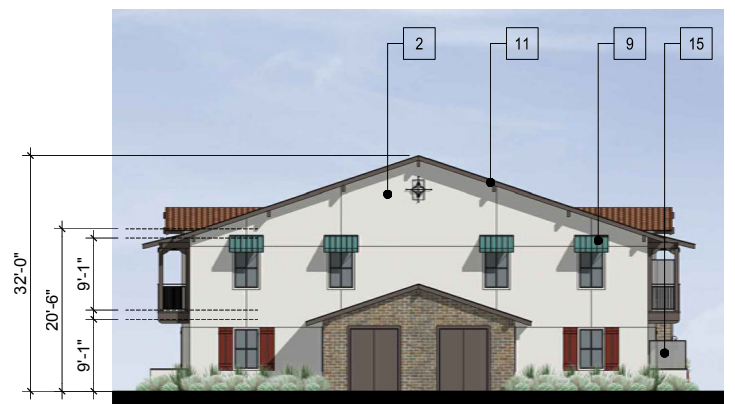
B. East Elevation



C. North Elevation



Key Map - n.t.s.



D. West Elevation

SOURCE: KTGy Group, Inc., Architecture+Planning - August 2016

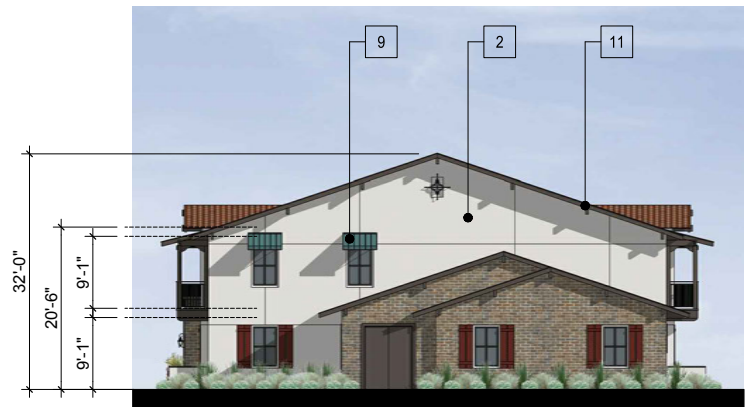
FIGURE 3-2a



A. South Elevation

Elevation Keynotes:

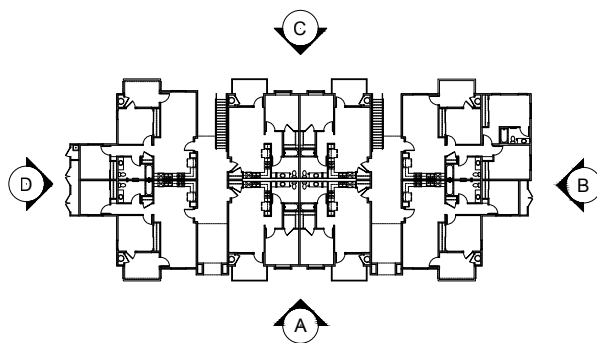
1. Concrete 'S' Tile
2. Stucco
3. Brick Veneer
4. Fiber Cement Panel
5. Fiber Cement Trim
6. Vinyl Window
7. Wood Post
8. Metal Railing
9. Metal Shading Device
10. Decorative Shutters
11. Outlookers
12. Exposed Rafter Tail
13. Shaped Corbel
14. Storefront System



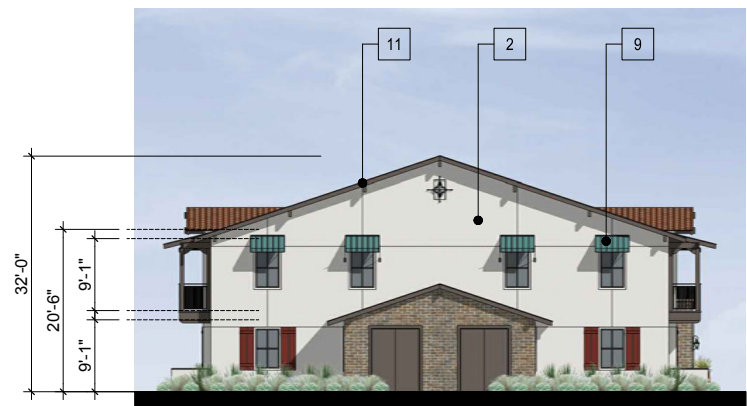
B. East Elevation



C. North Elevation



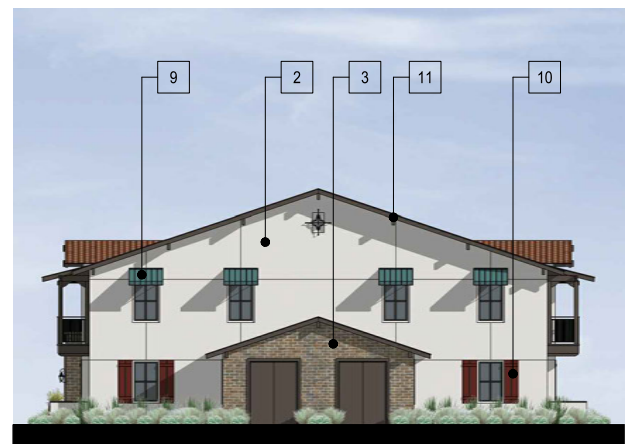
Key Map - n.t.s.



D. West Elevation

SOURCE: KTGy Group, Inc., Architecture+Planning - August 2016

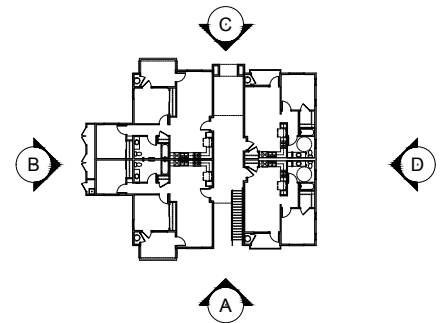
FIGURE 3-2b



B. West Elevation

Elevation Keynotes:

1. Concrete 'S' Tile
2. Stucco
3. Brick Veneer
4. Fiber Cement Panel
5. Fiber Cement Trim
6. Vinyl Window
7. Wood Post
8. Metal Railing
9. Metal Shading Device
10. Decorative Shutters
11. Outlookers
12. Exposed Rafter Tail
13. Shaped Corbel
14. Storefront System



Key Map - n.t.s.



D. East Elevation



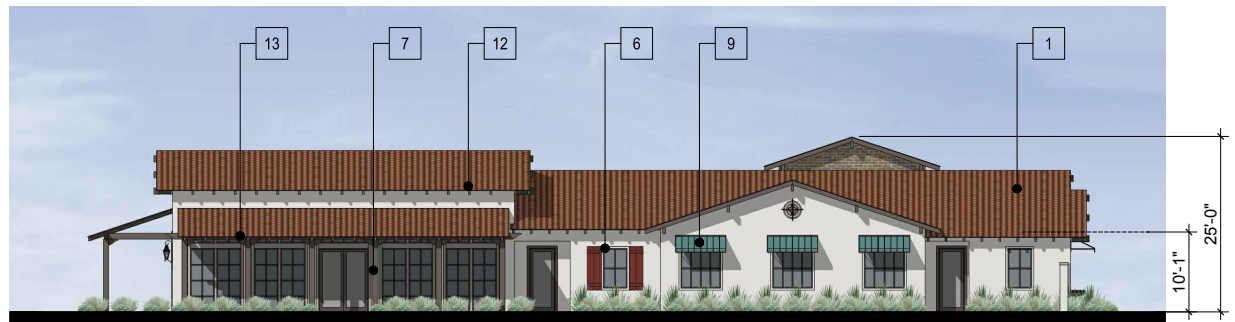
A. South Elevation



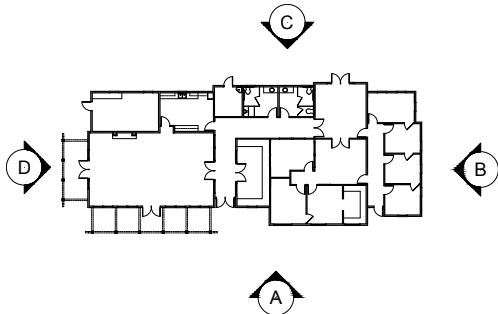
C. North Elevation

SOURCE: KTGy Group, Inc., Architecture+Planning - August 2016

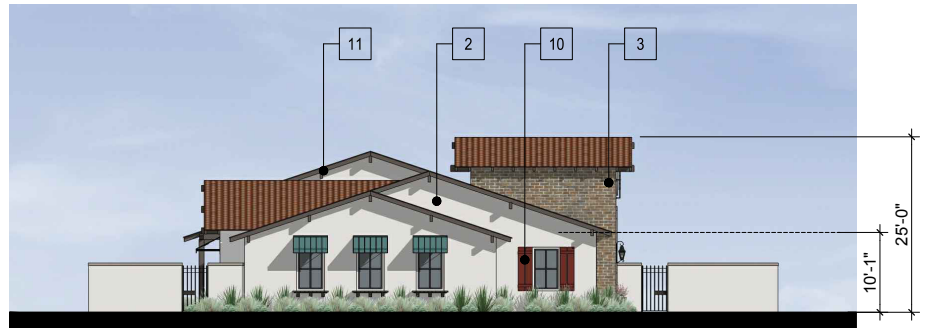
FIGURE 3-2c



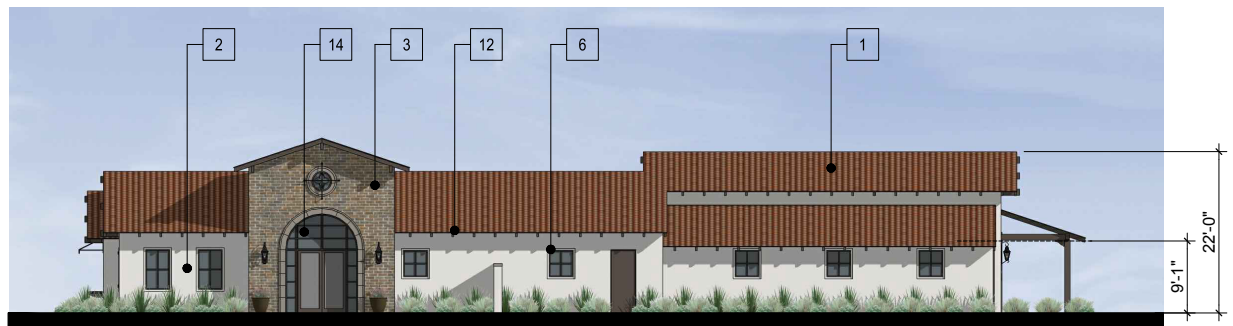
A. South Elevation



Key Map - n.t.s.



B. East Elevation



C. North Elevation

Elevation Keynotes:

1. Concrete 'S' Tile
2. Stucco
3. Brick Veneer
4. Fiber Cement Panel
5. Fiber Cement Trim
6. Vinyl Window
7. Wood Post
8. Metal Railing
9. Metal Shading Device
10. Decorative Shutters
11. Outlookers
12. Exposed Rafter Tail
13. Shaped Corbel
14. Storefront System



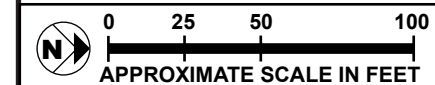
D. West Elevation

SOURCE: KTGy Group, Inc., Architecture+Planning - August 2016

FIGURE 3-2d



PROPOSED PLANT LIST				
SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS
ORNAMENTAL TREES				
	ARBUTUS x MARINA	HYBRID STRAWBERRY TREE	24" BOX	MEDIUM
	BRAHEA ARMATA	MEXICAN BLUE PALM	36" BOX	VERY LOW
	CERCIS C. "FOREST PANSY"	FOREST PANSY REDBUD-STD.	24" BOX	MEDIUM
	CITRUS SPECIES	CITRUS SPECIES	24" BOX	MEDIUM
	CUPANIOPSIS ANACARDIOIDES	CARROTWOOD	36" BOX	MEDIUM
	FIGUS CARICA VAR.	FIGUS VARIETIES	24" BOX	MEDIUM
	KOELERUTERIA BIPINNATA	CHINESE FLAME TREE	36" BOX	MEDIUM
	LAGERSTROEMIA x FAIRIE	TUSCARORA CREPE MYRTLE	36" BOX	MEDIUM
	MAGNOLIA GRANDIFLORA "LITTLE GEM"	DWARF MAGNOLIA	36" BOX	MEDIUM
	OLEA EUROPAEA "SWAN HILL"	SWAN HILL FRUITLESS OLIVE	36" BOX	LOW
	PINUS ELДАРICA	AFGHAN PINE	24" BOX	LOW
	PLATANUS x A. "BLOODGOOD"	LONDON PLANE TREE	36" BOX	LOW
	PISTACIA CHINENSIS	CHINESE PISTACHE	36" BOX	MEDIUM
	PODOCARPUS "ICEE BLUE"	ICEE BLUE PODOCARPUS	24" BOX	MEDIUM
	PUNICA GRANATUM "WONDERFUL"	POMEGRANITE	24" BOX	LOW
	PRUNUS CAROLINIANA BRIGHT & TIGHT	CAROLINA CHERRY - COLUMN	24" BOX	MEDIUM
	TRISTANIA CONFERTA	BRISBANE BOX	36" BOX	MEDIUM
STREET TREES: TO BE COORDINATED WITH CITY STREET TREE PROGRAM				
	LUGONIA AVENUE - 40' O.C. 1/8" WIDE PKWY	PINK TRUMPET TREE	24" BOX	MEDIUM
	TEXAS STREET - 40' O.C. IN 6' WIDE PARKWAY	SOUTHERN MAGNOLIA	36" BOX	MEDIUM
SHRUBS - HYDRO-ZONE 1 NORTH/EAST EXPOSURE				
LARGE SHRUBS (5 GAL. MIN. SIZE at 3' o.c.)				
	ARBUTUS UNEDO	STRAWBERRY TREE		LOW
	LIGUSTRUM J. "TEXANUM"	WAX LEAF PRIVET		MEDIUM
	PHILODENDRON XANADU	PHILODENDRON		MEDIUM
	PITTOSPORUM TOBIRA	TOBIRA		MEDIUM
	PODOCARPUS NERIIFOLIA	MAKI PINE		MEDIUM
MEDIUM SHRUBS (5 GAL. MIN. SIZE at 3' o.c.)				
	ASPARAGUS MEYER	MYERS ASPARAGUS		MEDIUM
	CAMELIA SPECIES	CAMELIA		MEDIUM
	CRASSULA ARGENTEA	JADE PLANT		LOW
	NEPHROLEPIS EXALTATA	SWORD FERN		MEDIUM
SMALL SHRUBS (1 GAL. MIN. SIZE at 24" o.c.)				
	ASPIDISTRA ELATIOR	CAST IRON PLANT		MEDIUM
	OLIVA MINIMA	KAFFIR LILY		LOW
	LINUM CATHARTICUM	GIANT LINUM		MEDIUM
GROUNDCOVERS (FLATTED at 8' o.c.)				
	GAZANIA MITSUI YELLOW	GAZANIA		MEDIUM
	CAMPANULA SPECIES - CUS	BELLFLOWER		MEDIUM
SHRUBS - HYDRO-ZONE 2 SOUTH/WEST EXPOSURE				
LARGE SHRUBS (5 GAL. MIN. SIZE at 3' o.c.)				
	AGAVE SPP.	AGAVE		LOW
	ESCALLONIA FRUTESCENS	ESCALLONIA		MEDIUM
	JUNIPERUS CHINENSIS KAIZUKA	HOLLYWOOD JUNIPER		LOW
	PODOCARPUS NERIIFOLIA	SHRUBBY YEW		MEDIUM
	PITTOSPORUM TOBIRA	TOBIRA		MEDIUM
MEDIUM SHRUBS (5 GAL. MIN. SIZE at 3' o.c.)				
	CALLISTEMON LITTORALIS	DWARF BOTTLEBRUSH		LOW
	LEUCOPHAEA XANADU	CHERRY PINE		LOW
	PHORMIUM TENAX	NEW ZEALAND FLAX		LOW
	RHIPIDOLEPIS SPECIES	INDIA HAWTHORN		MEDIUM
	RHIPIDOLEPIS UMBELLATA "MINOR"	DWARF HAWTHORN		MEDIUM
	VIBURNUM CHINENSIS	VIBURNUM		MEDIUM
SMALL SHRUBS (1 GAL. MIN. SIZE at 24" o.c.)				
	ALOE SPP.	ALOE		LOW
	COPROSMA KIRKII	CREeping COPROSMA		MEDIUM
	ROSMARINUS PROSTRATUS	DWARF ROSEMARY		LOW
	STIPA SPP.	FEATHER GRASS		LOW
GROUNDCOVERS (1 GAL. at 24" o.c.)				
	ACACIA REDOLENS "LOW BOY"	PROSTRATE ACACIA		LOW
	LANTANA x "NEW GOLD"	LANTANA		LOW
	DRYOPTERIS FILIX-MAS	DWARF MOPORUM		LOW
	ROSMARINUS PROSTRATUS	DWARF ROSEMARY		LOW
SHRUBS - HYDRO-ZONE 3 AGRICULTURAL (SUN and SHADE EXPOSURE)				
VEGETABLES				
	ASPARAGUS	ONIONS	FRUIT	
	BEETS	PEAS	BLACKBERRY	
	BROCCOLI	PEPPERS	BLUEBERRY	
	BRUSSEL SPROUTS	RADISH	CURRANT	
	CABBAGE	SPINACH	GRAPES	
	CANTALOUPE	SQUASH	RASPBERRY	
	CARROTS	SWEET POTATOES	STRAWBERRY	
	CAULIFLOWER	TOMATOES		
	OKRA	WATERMELON		
	EGGPLANT	ZUCCHINI		
	MELON			
HERBS				
	BASIL	CHIVE		
	LA VENDER			
	OREGANO			
	ROSEMARY			
	SAGE			
	THYME			
AS AVAILABLE MINIMUM 6-PACK SIZE				
SYNTHETIC TURF				
SYNTHETIC TURF AT SOUTH GAME AREA				



SOURCE: MLS Design Group - August 2016

FIGURE 3-3

4.0 ENVIRONMENTAL CHECKLIST

4.1 SUMMARY

Pursuant to the California Environmental Quality Act (CEQA) Guidelines,¹ an Initial Study is a preliminary environmental analysis prepared by the lead agency to determine whether an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND) is required for a project. The State CEQA Guidelines require that an Initial Study contain a project description; a location map; a description of the environmental setting; an identification of environmental effects by checklist or other similar form; an explanation of environmental effects; a discussion of mitigation for potentially significant environmental effects; an evaluation of the Proposed Project's consistency with existing, applicable land use controls; and the names of persons who prepared the study.

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED


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

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

¹ California Code of Regulations, tit. 14, sec. 15063.

On the basis of this initial evaluation:

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



Signature

7/13/2017

Date

5.0 ENVIRONMENTAL ANALYSIS

A brief explanation for the determination of significance is provided for all impact determinations except “No Impact” determinations that are adequately supported by the information sources the Lead Agency (City of Redlands) cites in the parentheses following each question. A “No Impact” determination is adequately supported if the referenced information sources show that the impact simply does not apply to the Proposed Project (e.g., the project falls outside a fault rupture zone). A “No Impact” determination includes an explanation of its bases relative to project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

Explanations take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the Lead Agency has determined that a physical impact may occur, then the checklist indicates whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant.

“Mitigated Negative Declaration: Less than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

Earlier analyses may be used where, pursuant to the tiering of a program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. In this case, a brief discussion should identify the following:

- a) Earlier Analysis Used. Identify and state where they are available for review.
- b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

The explanation of each issue should identify:

- a) the significance criteria or threshold, if any, used to evaluate each question; and
- b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5.1 AESTHETICS

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
AESTHETICS – Would the project:					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Less than Significant Impact.

The Project Site is located in a developed portion of the City of Redlands with surrounding views generally defined by low-rise single-family residential buildings to the north, south, east, and west. Other surrounding views to the north and west are generally defined by vacant land, mid-rise industrial buildings, and open space uses, including Texonia Park to the north. The Project Site is not within or along a designated scenic corridor or roadway. While the Project Site is within the field of view of surrounding mountain ranges, the existing level of urban development in the foreground of views to the mountains is limited across and beyond the site due to surrounding roadways, structures, and power distribution lines. The site itself consists of a vacant field with non-native vegetation and no significant onsite visual resources, such as rock outcrops or significant trees. The General Plan provides the following summary of visual setting for the project area (North Redlands, Section 11.0, Visual-2): “Citrus Groves, the University of Redlands, and views from the Santa Ana River bluff of the San Bernardino Mountains are important assets in this sector of the City. However, minimum topographic change, uniform, large-scale street grid, longtime market designation for lower priced homes, and little attention to street landscaping, have characterized parts of north Redlands as having a less desirable image.” In the General Plan itself the following comment addresses scenic assets (Section 3.0, Design-1): “Two prominent visual assets are the view from the Santa Ana River Bluff of the San Bernardino Mountains and the University of Redlands.”

To understand the difference in scenic vistas referenced in the General Plan, visual simulations of views from adjacent properties (south of and east of) across the developed site were compiled, and a third view from the Santa Ana River Bluff illustrates the different quality of scenic views. An estimated seven residences currently have views across the site towards the San Bernardino Mountains. Views are otherwise limited by existing adjacent

structures and man-made features in the foreground. The existing views were taken from Station A and Station B, which are shown on **Figure 5.1-1, Stations**. The before and after views from Station A to the north are shown on **Figure 5.1-2, Station "A" (Before and After)** and those from Station B to the northwest are shown on **Figure 5.1-3, Station "B" (Before and No Landscape)**. **Figure 5.1-4, Station "B" (Initial and Mature Landscape)** shows the view across the property to the northwest with initial landscaping and mature landscaping.

Even though existing views show portions of the San Bernardino Mountains visible in the background, these views are highly modified by the man-made features (structures, landscaping, and power distribution lines) in the visual foreground. These views can be compared to the unobstructed view of the San Bernardino Mountains presented in the photo taken at the end of Texas Street (**Figure 5.1-5, Unobstructed View of SBD Mountains**), which is located on the Santa Ana River Bluff. The General Plan was very clear that it is the latter scenic view that is an important scenic vista within the City, not the views from developed areas adjacent to the Project where the San Bernardino Mountains are obscured by man-made features in the foreground of the vista. The final visual simulation shows the cross-sectional internal view of the Liberty Lane development (looking north) identified on **Figure 5.1-1, Stations**. This view (**Figure 5.1-6, Section**) shows that the interior design of the Project will be comparable to the surrounding residential properties.

As the after development photo simulation shows, the Proposed Project will modify or block the adjacent residences (south and east) visual access to the San Bernardino Mountains. However, given the poor quality of the existing view and the General Plan's recognition that development on the relative flat topography of north Redlands does not provide an important scenic vista for the community, the City concludes that this change does not rise to a level of a significant adverse impact. Therefore, as the Project Site and surrounding properties do not have access to any recognized important scenic vista, implementation of the Proposed Project would not interfere with any important, i.e., significant, scenic views. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

The site was used for agricultural purposes several decades ago, yet is currently vacant. The Project Site is relatively flat and undergoes routine disking for weed abatement, thus reducing the amount of ground vegetation during most of the year. The Project Site does not contain any scenic resources, such as native trees, rock outcroppings, or historic buildings that could be damaged by the Proposed Project. As previously discussed, the Project Site is not located within the view corridor of any State scenic highway as the segments of SR 210 and SR 38 near the site are not officially designated. Therefore, the Proposed Project would not impact any scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway. No impact would occur.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant with Mitigation.

The existing visual character of the Project Site is characterized as a vacant and unimproved property with non-native ground vegetation that is annually disked. The Project Site is currently surrounded by suburban residential, industrial, park and open space uses. Surrounding buildings range from 1 to 2 stories in height. Implementation of the Proposed Project would change the visual character of the existing vacant site by introducing six 2-story, multi-family residential buildings and one 1-story community building that would be a maximum of 32 feet in height to the top of the roof. While the proposed buildings would be slightly taller than most of the existing structures immediately adjacent to the Project Site, the height and massing of the Proposed Project would not introduce buildings that are visually incompatible with the surrounding area. Refer to **Figure 5.1-6, Section.**

Implementation of the Proposed Project would be consistent with the existing MDR land use designation and the proposed R-2 zoning classification, which allows for a maximum height 35 feet. The Project will be constructed with setbacks that are designed in accordance with City requirements. The current site plan reflects these required setbacks. The Proposed Project would also provide open space and landscaping along W. Lugonia Avenue and Texas Street to screen views of the new buildings from surrounding uses and enhance the visual character of the existing undeveloped open field.

Furthermore, the Proposed Project would be subject to the City's approval process to ensure consistency with the City's goals, policies, and design guidelines. Concerns have been expressed regarding the installation of the sound attenuation wall around portions of the property that is necessary to reduce noise exposure at the proposed living quarters. The concern is that the walls will create a visual setting that is not consistent with the surrounding community. The wall will only be necessary on the northern and eastern property boundary (adjacent to Lugonia and Texas). Mitigation is provided below requiring installation of the required noise attenuation wall with articulation that breaks up the uniform character of a standard block wall and that requires landscaping on the exterior of the wall to create additional visual variety. The visual setting of the Project Site will change as a result of implementing that Proposed Project. However, based on the design of the Project and with implementation of the design mitigation measure below, the Proposed Project would not substantially degrade the existing visual character or quality of the Project Site. The site would be developed in a manner consistent with the vision of the General Plan, and no significant impact to the visual character of the site and the surrounding area would result. As such, the Proposed Project would not substantially degrade the existing visual character or quality of the Project Site. Impacts would be less than significant.

Mitigation Measure:

- AES-1** To mitigate the exterior sound attenuation wall, the wall shall be constructed with articulation that breaks up the uniform character of a standard block wall and that requires landscaping on the exterior of the wall to create additional visual variety. The wall design and landscaping shall be reviewed and approved by the City to ensure that it provide visual variety that attenuates the uniformity of a standard block wall and integrates this structure into the community design.

d. Less than Significant Impact.

The Proposed Project would introduce new lighting and potential sources of glare on the Project Site. New sources of lighting associated with the Proposed Project would include security and street lighting typical of the surrounding residential development. The Proposed Project would utilize outdoor lighting on the buildings, carports, and within the surface parking areas designed with shielding features directed downwards to reduce light-sourced impacts surrounding the Project Site, particularly to surrounding residential uses. Based on the lighting design incorporated into the Proposed Project, the lighting would not create substantial light and glare impacts based on the location and orientation of the proposed lighting fixtures. The proposed building materials consist of non-reflective, textured surfaces and non-reflective glazed glass on the building exterior, and these materials would not create daytime glare. Potential glare impacts would be less than significant.

Nighttime lighting sources currently exist along W. Lugonia Avenue and Texas Street. The addition of new sources of permanent light from the Proposed Project would increase ambient lighting within the Project area. However, due to the ambient light conditions in the surrounding area, the increase in ambient nighttime lighting in the Project area would not be substantial. The Proposed Project would not include any sources of high-intensity lighting. The introduced sources of lighting would be compatible with existing uses surrounding the Project Site. Additionally, all proposed lighting would be subject to the City's approval process. Impacts to day- and nighttime views would be less than significant.

Mitigation Measures: No mitigation measures are required.



SOURCE: FORMA (Architecture: KTGy)

FIGURE 5.1-1



Before



After

Station "A"
Liberty Lane View Simulation

SOURCE: FORMA (Architecture: KTG)

FIGURE 5.1-2



Before



After
(no landscape)

Station "B"
Liberty Lane View Simulation

SOURCE: FORMA (Architecture: KTGy)

FIGURE 5.1-3



After
(initial landscape)



After
(mature landscape)

Station "B"
Liberty Lane View Simulation

SOURCE: FORMA (Architecture: KTGy)

FIGURE 5.1-4

Tom Dodson & Associates

Environmental Consultants
Redlands Regular meeting of 9-19-17

Station "B"

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FIGURE 5.1-5



Section
Liberty Lane View Simulation

SOURCE: FORMA (Architecture: KTG)

FIGURE 5.1-6

Tom Dodson & Associates

Environmental Consultants
Redlands Regular meeting of 9-19-17

Section

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5.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES – Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. No Impact.

The Project Site is not currently used for agricultural operations and is currently designated as “Urban and Built-Up Land” on the State Important Farmland Map.² There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the Project Site. Accordingly, no impact would occur to farmland.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

Per the Phase I Environmental Site Assessment, the Project Site was used for agricultural purposes from sometime prior to 1930 until approximately 1966; however, it has been vacant since about 1966. Further, the Project Site is located in a developed area within the City. No portion of the Project Site includes any agricultural zoning designations or uses, nor are any proposed for the site. No Williamson Act contracts are in effect for the Project

² California Department of Conservation, Division of Land Resource Protection, “San Bernardino County Important Farmland 2014,” Sheet 2 of 2, March 2016.

Site or surrounding vicinity.³ No conflicts with existing zoning for agricultural use or Williamson Act contract would result from implementing the Proposed Project. No impact or conflict with agricultural use or Williamson Act contract would occur with implementation of the Proposed Project .

Mitigation Measures: No mitigation measures are required.

c. No Impact.

Neither the Project Site or any surrounding land is currently defined or zoned as forest, timberland, or timberland zoned Timberland Production. The land uses surrounding the Project Site include urban residential, industrial, and open space uses. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Mitigation Measures: No mitigation measures are required.

d. No Impact.

As previously discussed, the Project Site is not located within a forest area. No forest land would be converted to non-forest use under the Proposed Project. No impact would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

As previously noted, the Project Site is not designated as either farmland or forestland and does not involve farming or forestry operations. Furthermore, there are no active agriculture or forestry operations near the Project Site. The vacant property located approximately 200 feet west of the Project Site is currently designated by the City's General Plan for Medium Density Residential and Commercial Uses, but is currently zoned Agricultural (A-1). While this vacant property does not appear to contain any active agricultural operations, implementation of the Proposed Project would not interfere with the existing use or the zone classification of this property. Therefore, no such land would be converted to other uses and no impact would occur.

Mitigation Measures: No mitigation measures are required.

3 California Department of Conservation, Division of Land Resource Protection, "San Bernardino County Williamson Act FY 2015/2016," Sheet 2 of 2, 2016.

5.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Air Quality Impact Analysis ("Air Quality Report") prepared by Urban Crossroads dated May 2, 2016 for the Proposed Project. The Air Quality Report is included as **Appendix A** to this Initial Study.

a. Less than Significant Impact.

The Project Site is located within the South Coast Air Basin ("Basin"), which includes Orange County, and non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the regional agency that provides air quality guidance with jurisdiction over the Basin, including the City. The most recently adopted comprehensive plan applicable to the proposed Project is the 2012 AQMP.⁴ The 2016 AQMP was published for public review,⁵ with a revised Draft 2016 AQMP document released in October.⁶ The Draft 2016 AQMP was recently approved by the SCAQMD on March 2017; and California Air Resources Control Board (CARB) approved this document on March 23, 2017. The document was forwarded to the federal Environmental Protection Agency (EPA) on April 27, 2017 and is currently under review for incorporation into the federal State Implementation Plan. (Personal Communication, Michael Kraus, May 30, 2017) Regional growth projections are used by SCAQMD to forecast future emission levels in the Basin. The AQMP is implemented

4 South Coast Air Quality Management District, *Final 2012 Air Quality Management Plan*, February 2013.

5 South Coast Air Quality Management District, *Draft 2016 Air Quality Management Plan*, June 2016.

6 South Coast Air Quality Management District, *Revised Draft 2016 Air Quality Management Plan*, October 2016.

to meet the federal and State emission standards identified in both the Federal Clean Air Act and the California Clean Air Act.

Projects that are consistent with the projections of employment and population forecasts identified by SCAG's adopted Growth Forecasts are considered consistent with the AQMP growth projections because the Growth Management chapter forms the basis of the land use and transportation control portions of the AQMP. Because impacts with respect to population, housing, and employment would be less than significant, the Project would not conflict with the AQMP (refer to **Section 5.13, Population and Housing**). Furthermore, construction and operation of the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

Construction Emissions

The Proposed Project includes the construction of an 80-unit multifamily residential development on an approximately 4.7-acre site. Construction of the Proposed Project would take approximately 18 months and would occur over two main phases: (1) grading/site preparation, and (2) building construction/site improvements. Construction emissions were estimated per the SCAQMD CEQA Air Quality Handbook and construction emission factors contained in the California Emissions Estimator Model (CalEEMod). The emission calculations assume the use of standard construction practices, such as compliance with SCAQMD Rule 403—Fugitive Dust, which requires all unpaved demolition and construction areas to be wetted at least three times a day during excavation and construction to minimize the generation of fugitive dust.

It should be noted that the construction timeline has been updated since the preparation of the original Air Quality Report found in **Appendix A**. Construction was originally expected to commence in early 2016 and continue through late 2017. However, as indicated in **Section 3.0, Project Description**, construction of the Proposed Project is now anticipated to start in December 2017 and be completed by June 2019. The anticipated construction timeline has been shifted with the phasing schedule and length of construction remaining unchanged. For purposes of this analysis, the modeling provided within the Air Quality Report is presented herein for construction years 2016 through 2017, which represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as the analysis year increases. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet, which also represents a "worst-case" scenario of actual construction equipment that will likely be used during construction activities.

The maximum daily emissions during Proposed Project construction are presented in **Table 5.3-1, Maximum Construction Emissions (pounds/day)**. At the time the original Air Quality Report was prepared, the Project site earthwork quantities were expected to balance (no import/export of soil). According to the updated grading plan dated October 6, 2016, the Project Site is now expected to require 1,075 cubic yards of soil import. The updated construction emissions associated with the Project are shown on **Table 5.3-1**. As such, the addition of soil quantity to the "Grading" phase would not alter any of the findings made in the previous Air Quality Report as it does not contribute to or alter the maximum daily emissions. Therefore, no significant impacts would occur. Maximum daily emissions of air pollutants that would result from construction activities were estimated to be 6.92 pounds per day of volatile organic compounds (VOC), 54.73 pounds per day of nitrous oxides (NOx), 42.35 pounds per day of carbon monoxide (CO), 0.05 pounds per day of sulfur dioxide (SO₂), 10.19 pounds per day of PM₁₀, and 6.63 pounds per day of PM_{2.5}. Each of these estimates is compared to the applicable SCAQMD mass daily emission thresholds for construction activities in **Table 5.3-1**. Maximum daily estimated emissions would be below the SCAQMD threshold for all modeled air pollutants. Accordingly, emissions of air pollutants during Proposed Project construction would not violate any air quality standard or contribute substantially to an existing air quality violation. Impacts would be less than significant.

Table 5.3-1
Maximum Construction Emissions (pounds/day)

Year	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
2016	6.92	54.73	42.35	0.05	10.19	6.63
2017	6.50	33.09	28.78	0.05	3.26	2.34
Maximum Daily Emissions	6.92	54.73	42.35	0.05	10.19	6.63
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No

*Air Emissions Model Results are presented in **Appendix A**.*

Note:

Abbreviations: CO = carbon monoxide; NOx, = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.

Operational Emissions

Operational emissions would be generated by both stationary and mobile sources generated by normal day-to-day activities on the Project Site after occupancy. Stationary emissions would be generated by the consumption of natural gas for space and water heating equipment. Mobile emissions would be generated by motor vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed

Project were prepared utilizing CalEEMod as recommended by the SCAQMD. The results of these calculations are presented in **Table 5.3-2, Maximum Operational Emissions (pounds/day)**.

Table 5.3-2
Maximum Operational Emissions
(pounds/day)

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
Maximum	4.99	7.0	31.23	0.06	4.11	1.28
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

*Notes: Refer to Air Quality Modeling in **Appendix A**. CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides. Construction assumptions (equipment, schedule, etc. based on information found in **Section 3.0, Project Description**.*

As shown in **Table 5.3-2**, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, operational emissions associated with the Proposed Project would be less than significant based on the applicable SCAQMD thresholds.

Mitigation Measures: No mitigation measures are required. Note that to reduce construction emissions to the extent feasible consistent with AQMP requirements, the Proposed Project will implement dust control measures as required by Rule 403.

c. Less than Significant Impact.

As shown in **Table 5.3-1** and **Table 5.3-2**, all emissions associated with the Proposed Project would not exceed the SCAMQD threshold values and would, therefore, not result in a cumulatively considerable net increase of any criteria pollutant. Accordingly, the Proposed Project would not contribute to a cumulatively considerable net increase in ozone, PM10, or PM2.5. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The nearest sensitive receptors to the Project Site are the residential uses located immediately adjacent to the north, south, and west of the Project Site.

The SCAQMD has developed localized significance thresholds (LSTs), based on the amount of pounds of emissions per day a project will generate, that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD,⁷ apply to projects that are less than or equal to 5 acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA). For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 and Rule 403.1—Fugitive Dust. For PM_{2.5}, LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD’s 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 35, which includes East San Bernardino. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are residential uses directly to the north, south, and west of the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 82 feet have been used to address the potential localized air quality impacts associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase.

Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table 5.3-3, Localized Significance Threshold (LST) Worst-Case Emissions (pounds/day)**, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a 5-acre site in SRA 35. The closest distance used to determine the mass-rate emissions from the screening tables is 25 meters (82 feet). Localized air quality impacts from construction activities to the off-site sensitive receptors would be less than significant.

7 South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, June 2003; rev. October 21, 2009.

Table 5.3-3
Localized Significance Threshold (LST) Worst-Case Emissions
(pounds/day)

Source	NO_x	CO	PM10	PM2.5
Construction				
Total mitigated maximum emissions	55.16	31.38	5.84	4.17
LST threshold	270	2,075	14	8
Threshold Exceeded?	No	No	No	No
Operational				
Area/Energy emissions	0.67	8.02	0.36	0.22
LST threshold	270	2,075	4	3
Threshold Exceeded?	No	No	No	No

Note: CO = carbon monoxide; NO_x = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below LOS C, and for any intersection operating at LOS D or worse where the project would increase the V/C ratio by 2 percent or more. The Proposed Project would not generate the volume of traffic required to generate a CO hotspot. Given that the Proposed Project would neither worsen the LOS of any intersection below C nor increase the V/C ratio by 2 percent or more for an intersection rated D or worse, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants

As the Proposed Project consists of a residential development containing multifamily apartment units, the Proposed Project would not include any land uses that would involve the use, storage, or processing of substantial quantities of carcinogenic or non-carcinogenic toxic air contaminants (TACs), and no toxic airborne emissions would typically result from Project implementation.

During short-term construction activities, the Proposed Project would generate some diesel particulate matter (DPM). Notwithstanding that, given the size of the Proposed Project, the relatively small amount of equipment,

and relative short duration of activity, any DPM generated from construction activity would be negligible and not result in any significant health risks and no further evaluation is required. Therefore, impacts associated with the release of TACs would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact.

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills. Land uses that are more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

The Proposed Project does not include any land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Proposed Project may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste associated with the Proposed Project's operational uses. These odors would be typical of most construction sites and would be localized and generally confined to the construction area. Standard construction requirements and techniques would minimize odor impacts throughout duration of construction activities on the Project Site. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. The City requires that Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The Proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with construction and operation of the Proposed Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
BIOLOGICAL RESOURCES – Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the UPDATED Biological Resources Assessment in Support of the Texonia Park Apartments Project at the Intersection of Texas Street and West Lugonia Avenue in the City of Redlands, Bernardino County, California prepared by ECORP Consulting, Inc. dated November 18, 2015 for the Proposed Project. This report is included as **Appendix B** to this Initial Study.

a. No Impact.

The Project Site is currently vacant and unimproved and contains non-native, ruderal vegetation. While this parcel was historically used for agricultural purposes, it is currently fallow with non-native vegetation and shoots of remnant agricultural crops. The Project Site is relatively flat and currently undergoes routine disking for weed abatement, which reduces the amount of ground vegetation. The Project Site is not located within areas

containing valued wildlife habitat.⁸ The Project Site is located in a developed area and does not contain any critical habitat or support any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS). No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

The Project Site is currently vacant and unimproved and contains non-native ground vegetation that undergoes routine disking for weed abatement. The surrounding area is developed with various urban uses and some open space. No riparian habitat or sensitive natural community is located in the surrounding area or on the Project Site. No impact would occur.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

The Project Site is neither near nor does it contain wetland habitat or a blue-line stream. Therefore, the Proposed Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA), through direct removal, filling, hydrological interruption, or other means.⁹ No impact would occur.

Mitigation Measures: No mitigation measures are required.

d. No Impact.

The Proposed Project is located within a developed area that is not conducive to wildlife movement. The nearest wildlife corridor to the Project Site is the Santa Ana River, which is approximately 1.25 miles to the north.¹⁰ As such, the Proposed Project is not anticipated to impede any wildlife movement corridors or nursery sites. No impact would occur.

Mitigation Measures: No mitigation measures are required.

⁸ City of Redlands, *General Plan*, "Open Space and Conservation Element," October 1995, Figure 7.2.

⁹ United States Environmental Protection Agency, Clean Water Act Section 404, accessed November 2016.

¹⁰ City of Redlands, *General Plan*, "Open Space and Conservation Element," October 1995, Figure 7.2.

e. No Impact.

The Project Site is characterized by non-native ground vegetation that undergoes routine disking for weed abatement. There are also no existing trees on the Project Site. The Project Site is not a valued wildlife habitat and does not contain any biological resources of significance. As such, implementation of the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. No Impact.

No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan applies to this portion of the City. Consequently, implementation of the Proposed Project would not conflict with the provisions of any adopted conservation plan. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
CULTURAL RESOURCES – Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Cultural Resources Inventory Report ("Cultural Report") prepared by ECORP Consulting, Inc. dated January 2014 for the Proposed Project. The Cultural Report is included as **Appendix C** to this Initial Study.

a. No Impact.

CEQA Guidelines Section 15064.5(b)(1) states that “substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The Project Site is currently vacant and has no history of structural development. The Project Site was historically used for agricultural purposes from sometime prior to 1930 until approximately 1966, and has remained vacant since. The Cultural Report identified one historic-period archaeological site, a refuse scatter, located on the Project Site. However, the origin of this refuse is unknown as the Project Site never contained any buildings or structures. The refuse does not meet the criteria to be listed or eligible as a historic resource under the California Register of Historical Resources (CRHR), nor does it meet the definition of a historical resource under CEQA, due to the lack of association with historical events or important persons, lack of distinctive architectural characteristics, lack of previously recorded prehistoric sites within the Project vicinity, and the low sensitivity of archaeological resources within the Project area. Therefore, the Proposed Project would not involve any activities that would cause a substantial adverse change to a historic resource. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant with Mitigation.

Results of a record search conducted at the SBAIC indicate that one previous cultural resources investigation for the Seven Oaks Dam Water Systems Project indicated that two cultural resources consisting of water conveyance systems were recorded within the boundaries of the Project area. These are the South Fork Ditch, Sunnyside Division (PSBR-21H) and the South Fork of the Santa Ana Ditch (PSBR-28H). The mapped path of these waterways were approximate and based on earlier written accounts from several local history books. This report, as well as the site records, state that nothing presently remains of these two ditches. No physical evidence of these sites remained on the property to indicate their existence and they were not located in a field survey. One historic-period archaeological site, a refuse scatter, was identified during the field survey, appearing to be the result of the disposal of refuse over the course of many years which was subsequently scattered by plowing. The origin of the refuse is unknown and cannot be related to any specific household or context.

Due to the lack of known buildings or structures on the Project Site, there is no evidence of any historic period occupation of the site. The Cultural Study thereby considers the archaeological sensitivity of the Project Site to be low. However, as the Project Site has never been developed, there is a low potential for construction activities to unearth undocumented archaeological resources, including unknown tribal cultural resources.

An archaeological monitor, in consultation with interested tribes, during grading, excavation and ground disturbing activities on the site will be required through mitigation. This is a contingency mitigation measure incorporated to address the accidental exposure of unknown subsurface cultural resources. In the event that archaeological resources are accidentally unearthed during grading and excavation activities, all earth-disturbing work would be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. After the resources have been addressed appropriately, work in the area may resume. As concluded during the AB 52 Consultation process with the Soboba Band of Luiseño Indians (refer to **Section 5.17, Tribal Cultural Resources**), the extent of tribal cultural resources on the Project Site is currently unknown. Implementation of mitigation measures **CUL-1, CUL-2, CUL-3, and CUL-4** shall be incorporated as part of the Proposed Project, to ensure impacts to potential cultural resources, including tribal cultural resources, are reduced to a level of less than significant level.

Mitigation Measures: The following mitigation measures are proposed to reduce impacts to a less than significant level.

- CUL-1** If there are any changes to Project Site design and/or proposed grades, prior to the issuance of a grading permit, the Applicant shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant and

interested tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The Applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the Project Site if the site design and/or proposed grades should be revised in consult with the City of Redlands. In specific circumstances where existing and/or new resources are determined to be unavoidable and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject any future development, erosion or flooding.

CUL-2 At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City of Redlands shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project Site. Details in the Plan shall include:
 - a. Project grading and development scheduling.
 - b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists.
 - c. The protocols and stipulations that the Developer, City of Redlands. Tribes and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

CUL-3 In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project archaeologist. The removal of any artifacts from the Project Site will need to be thoroughly inventoried with tribal monitor oversight of the process.

2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Redlands with evidence of same:
 - a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.
 - b. A curation agreement with an appropriate qualified repository within San Bernardino County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Bernardino County, to be accompanied by payment of the fees necessary for permanent curation.
 - c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the Project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the San Bernardino County Museum by default.
 - d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Redlands documenting monitoring activities conducted by the Project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Redlands, CHRIS and consulting tribes.

CUL-4 In the event that human remains (or remains that may be human) are discovered at the Project Site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the San Bernardino County Coroner and the City of Redlands Police Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains

are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will remain proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the Eastern Information Center (EIC), the City of Redlands Development Services Department, and the appropriate Native American Tribe.

c. Less than Significant with Mitigation.

The City's General Plan recognizes that paleontological resources may be present on land that has not been previously graded or disturbed within the City.¹¹ The Project Site is currently vacant and unimproved and does not contain any unique geologic features. The site has been disturbed to some degree by previous agricultural use and currently undergoes routine disking for weed abatement. Although no paleontological resources are known to exist on the Project Site, there is a possibility for construction activities to unearth undocumented paleontological resources. Implementation of mitigation measure **CUL-5** shall be incorporated as part of the Proposed Project, to ensure impacts to potential paleontological resources is reduced to a level of less than significant level.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level..

CUL-5 In the event that paleontological resources are unearthed during Project subsurface activities, all earth-disturbing work would be temporarily suspended or redirected until a qualified paleontologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. After the resources have been properly addressed, work in the area may resume. With implementation of this standard requirement, no significant impact would occur.

d. Less than Significant with Mitigation.

No known burial sites exist within the vicinity of the Project Site or surrounding area, nor are there any conditions that suggest human remains are likely to be found on the Project Site. Impacts would be potentially significant if

¹¹ City of Redlands, *General Plan*, "Open Space and Conservation Element," October 1995.

human remains are encountered during excavation and grading activities. However, mitigation measure **CUL-4** shall be incorporated as part of the Proposed Project. **CUL-4** identifies that the Project Applicant shall adhere to State Health and Safety Code Section 7050.5, which requires that no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin and disposition, pursuant to Public Resources Code Sections 5097.94 and 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify and coordinate with the Tribal Historic Preservation Officer (THPO) to evaluate the significance of the materials. The THPO will then contact the most likely Native American descendants, who will then serve as consultants on how to proceed with the remains (i.e., avoid removal or reburial). With implementation of mitigation measure **CUL-4**, impacts would be less than significant.

Mitigation Measures: Implementation of mitigation measure **CUL-4** shall be implemented to reduce impacts to a less than significant level.

5.6 GEOLOGY AND SOILS

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

Discussion

The following section summarizes and incorporates by reference information from the Geotechnical Engineering Report, dated December 23, 2013 (“Geotechnical Report”) prepared by Tetra Tech BAS GeoScience for the Proposed Project. The section also includes information presented in an addendum to the Geotechnical Report, which is dated October 21, 2015. The Geotechnical Report and addendum are included as **Appendix D** to this Initial Study.

a. (i) No Impact.

According to the City's General Plan, the Project Site is not located within an established Alquist-Priolo Earthquake Fault Zone.¹² The closest active faults to the Project Site are the San Andreas Fault and the San Jacinto Fault, which are located approximately 4.2 miles to the northeast and 4.3 to the southwest, respectively. The Crafton Hills Fault is also located approximately 5.8 miles to the southeast. Based on the available geologic data including the Geotechnical Report (**Appendix D**, Page 8), no active or potentially active faults with the potential for surface fault rupture are located directly beneath or projecting toward the Project Site. Therefore, the potential for surface rupture because of fault plane displacement at the Project Site is considered unlikely. No impact would occur.

Mitigation Measures: No mitigation measures are required.

a.(ii) Less than Significant with Mitigation.

The Project Site could be subject to strong ground shaking in the event of an earthquake originating along one of the faults listed as active or potentially active in the Southern California area, and more specifically referenced under paragraph a.i. This hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects, including strong seismic ground shaking. Compliance with applicable building codes and adherence to design recommendations presented within the Geotechnical Report would minimize structural damage to buildings and ensure human safety in the event of a moderate or major earthquake. The following mitigation measure requires implementation of the design measures in the Geotechnical Report, **Appendix D**. With implementation of these design measures the Geotechnical Report (**Appendix D**) concludes that: "Based upon the results of the field exploration and engineering analyses, it is Tt-BASg's opinion that the proposed construction is feasible from a geotechnical standpoint, provided that the recommendations contained in this report are incorporated into the design plans and implemented during construction." Therefore, impacts related to strong seismic ground shaking are concluded to be less than significant.

Mitigation Measure:

- GEO-1** The geotechnical design recommendations provided in Section 7 of the Geotechnical Report (**Appendix D** of the Initial Study) or measures deemed equivalent by the geotechnical professional shall be implemented by the Proposed Project. Section 7 identifies specific onsite design measures to address the following geotechnical issues: clearing and grubbing; site preparation; temporary slope and trench excavations; foundations; footings; seismic design parameters (refer to the October 21, 2015 Update in **Appendix D** in which Table 2, 2013

¹² City of Redlands, *General Plan*, "Health and Safety Element," October 1995, Figure 8.3.

California Building Code Seismic Design Parameters updates these design parameters); concrete slabs-on-grade (including control of vapor migration; pavement sections; drainage control; and soil corrosion. These design measures are hereby incorporated in this measure and shall be implemented during actual construction of the Proposed Project.

a.(iii) Less than Significant Impact.

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense ground shaking during earthquakes. Liquefaction is generally known to occur in saturated or near-saturated cohesionless soils at depths shallower than about 50 feet. The Project Site is generally underlain by medium dense to dense sandy materials including poorly graded sand and silty sand. The Project Site is not located within an area subject to potential liquefaction hazards.¹³ Additionally, as indicated in the Geotechnical Report, groundwater was not encountered in the field exploratory borings, and is estimated to be at least 100 feet below grade. Therefore, liquefaction potential at the site is considered minimal, and dynamic settlement of the on-site soils is anticipated to be negligible. Impacts related to liquefaction and other seismic-related ground failure would be less than significant.

Mitigation Measures: No mitigation measures are required.

a.(iv) No Impact.

The topography of the Project Site and the surrounding area is flat and, thus, devoid of any distinctive landforms. No known landslides have occurred near the Project Site, nor is the Project Site in the path of any known or potential landslide hazard. The Proposed Project would not introduce any slope features on the site. The risk of ground movement due to slope failure for the Project as defined is low. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

Construction activities associated with the Proposed Project may result in wind- and water-driven erosion of soils due to grading activities if soil is stockpiled or exposed during construction. However, this impact is considered short-term in nature because the site would expose soil only during construction activities, which would then be covered with pavement, structures, and landscaping upon completion of construction. The applicant would be required to adhere to South Coast Air Quality Management District (SCAQMD) Rule 403—Fugitive Dust, which contains mandatory requirements to reduce the impact related to wind-related soil erosion to less than significant.

¹³ City of Redlands, *General Plan*, "Health and Safety Element," October 1995, Figure 8.3.

The Proposed Project would be subject to the requirements under Section 13.54.170 of the City's Municipal Code to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), containing structural treatment and best management practices (BMPs) appropriate and applicable to the Proposed Project to ensure that potential water quality impacts from water-driven erosion during construction would be less than significant level. The Project Applicant would also be required to comply with the City's building permit regulations, including the approval of a grading plan.

Implementation of the Proposed Project would result in a change of pervious surfaces to impervious surfaces across the Project Site. As shown in **Figure 3-3, Proposed Landscape Plan**, the landscaping plan proposes various pervious vegetative surfaces throughout the site, as well as the placement of bioretention basins along the western boundary of the site that would allow water to percolate on site. According to the Project engineer, onsite runoff up to the 10-year storm will be managed on the site without release of surface runoff. Refer to **Appendix D**. With proposed design features, the quantity of runoff would not change substantially with implementation of the Project as surface runoff would be retained and percolated on site. All runoff above the 10-year storm would continue to be conveyed to the area storm drain system via streets and gutters to storm drain locations around the site. As a result, the Proposed Project would not result in any substantial change to the existing drainage pattern of the site or the area, nor would it affect the capacity of the existing storm drain system and impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The relatively flat topography of the Project Site minimizes both stability problems and the potential for lurching, which is earth movement at right angles to a cliff or steep slope during ground shaking. As previously discussed, the potential for hazards such as landslides and liquefaction is considered low. Liquefaction may also cause lateral spreading. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. However, if lateral containment is present for those zones, then no significant risk of lateral spreading will be present. Given that the liquefaction potential at the Project Site is low, earthquake-induced lateral spreading is also not considered to be a significant seismic hazard at the site.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Proposed Project would not involve any dewatering activities that could cause ground subsidence on the Project Site. Therefore, the potential for ground collapse and other adverse effects due to subsidence at the Project Site is considered low.

Further, to minimize damage due to geologic hazards, design, and construction of the Proposed Project would be required to comply with applicable building codes and . Compliance with these standards, as well as adherence to the design recommendations presented within the Geotechnical Report (refer to mitigation measure **GEO-1**), such as the incorporation of site preparation guidelines and foundation design parameters, would minimize impacts related to exposure to hazards including landslides, lateral spreading, subsidence, liquefaction, and collapse. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Expansive soils are surface deposits rich in clays that expand when wet and shrink when dried. When these soils swell, the change in volume can exert detrimental stresses on building foundations and cause structural damage. As indicated in the Geotechnical Report, the soils underlying the Project Site are considered to have a low expansion potential. To minimize damage due to geologic hazards, design and construction of the Proposed Project would comply with applicable building codes and would adhere to the design recommendations presented within the Geotechnical Report. Therefore, impacts related to expansive soil would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

Development of the Proposed Project would not require the installation of a septic tank or alternative wastewater disposal system. Thus, no adverse impact would occur.

Mitigation Measures: No mitigation measures are required.

5.7 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS – Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Greenhouse Gas Analysis ("Greenhouse Gas Report") prepared by Urban Crossroads dated May 2, 2016 for the Proposed Project. The Greenhouse Gas Report is included as **Appendix E** to this Initial Study.

a. Less than Significant Impact.

The principal greenhouse gases (GHGs) are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB), the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020.

Neither the SCAQMD nor the CEQA Guidelines Amendments adopted by the Natural Resources Agency on December 30, 2009, provide any adopted thresholds of significance for addressing a project's GHG emissions. As such, a screening threshold of 3,000 MTCO₂e per year is applied, which is a widely accepted screening threshold used by the County of San Bernardino and numerous cities in the South Coast Air Basin. The 3,000 MTCO₂e screening threshold is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for nonindustrial projects, as described in SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required.

The Proposed Project would result in short-term emissions of GHGs during construction. Site-specific or Project-specific data were used in the CalEEMod model where available, as provided in **Appendix E**. Although GHGs are generated during construction and are accordingly considered one-time emissions, consideration of construction-

related GHG emissions allows for evaluation of all the long-term GHG emissions associated with a project. Therefore, current practice is to annualize construction-related GHG emissions over a project's lifetime to include these emissions as part of a project's total emissions. A project's lifetime has generally been defined as 30 years. In accordance with this methodology, the estimated Proposed Project's construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions.

Operational emissions would be generated by both area and mobile sources because of normal day-to-day activities. Area source emissions would be generated by the consumption of natural gas for space and water heating devices. Area source emissions are based on emission factors contained in the CalEEMod model. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The Proposed Project would also result in indirect GHG emissions due to electricity demand, water consumption, and waste generation. The emission factor for CO₂ due to electrical demand from Southern California Edison was selected in the CalEEMod model. Electricity consumption was based on default data found in CalEEMod for the respective land use types.

The annual net GHG emissions associated with the construction and operation of the Proposed Project are provided below in **Table 5.7-1, Estimated Operational Greenhouse Gas Emissions**. The sum of the direct and indirect emissions associated with the Proposed Project is compared with the SCAQMD's proposed interim threshold of significance for all land use projects, which is 3,000 MTCO₂e per year.

Table 5.7-1
Estimated Operational Greenhouse Gas Emissions

Emissions Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	NO _x	Total CO ₂ e
Construction (amortized)	24.67	4.93e-3	-	24.78
Operational (mobile) sources*	767.40	0.03	-	768.01
Area sources	20.56	1.75e-3	3.50e-4	20.71
Energy	141.33	5.69e-3	1.99e-3	142.07
Waste	7.47	0.44	-	16.74
Water	26.91	0.17	4.29e-3	31.83
Annual Total CO₂e (All Sources)		1,004.14		
SCAQMD Screening Threshold		3,000		
Threshold Exceeded?		No		

Source: Emissions calculations are provided in **Appendix E, Greenhouse Gas Report**.

It should be noted that the construction timeline has been updated since the preparation of the Greenhouse Gas Report, which assumed that the Proposed Project would be constructed with full occupancy by 2017. However, as

indicated in **Section 3.0, Project Description**, construction of the Proposed Project is now anticipated to start in December 2017 and be completed by June 2019. The anticipated construction timeline has been shifted with the phasing schedule and length of construction remaining unchanged. For the purposes of this analysis, the modeling provided within the Greenhouse Gas Report is presented herein.

The Proposed Project would result in approximately 25.0 MTCO₂e during construction. Operational emissions of GHGs, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, hearth combustion, and generation of solid waste and wastewater, were calculated to be approximately 979.36 MTCO₂e per year following the completion of construction. The GHG emissions that would result from Project implementation are substantially below the recommended SCAQMD interim annual threshold of 3,000 MTCO₂e. Accordingly, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The California State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In December 2008, CARB adopted the Climate Change Scoping Plan ("Scoping Plan"), which details strategies to meet that goal. The Scoping Plan instructs local governments to establish sustainable community strategies to reduce GHG emissions associated with transportation, energy, and water, as required under Senate Bill 375. Planning efforts that lead to reduced vehicle trips while preserving personal mobility should be undertaken in addition to programs and designs that enhance and complement land use and transit strategies.

The Scoping Plan was updated in 2013 and determined that statewide emissions had been reduced by approximately 15 percent from 1990 levels by 2012. In addition to describing the success of efforts to reduce GHG emissions, the update provides further recommendations for energy-efficiency measures in buildings, such as maximizing the use of energy efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes.

In addition to the measures listed in the Scoping Plan, other State offices have provided recommended measures that would assist lead agencies in determining consistency with the state's GHG reduction goals. The California Attorney General's Office (AGO) has stated that lead agencies can play an important role in "moving the State away from 'business as usual' and toward a low-carbon future." The AGO has released a guidance document that provides information to lead agencies that may be helpful in carrying out their duties under CEQA with respect to GHGs and climate change impacts. Provided in the document are measures that can be included as Project design

features, required changes to the Project, or mitigation measures at the Project level and at the general-plan level. The measures are not intended to be exhaustive and are not applicable for every project or general plan. The AGO affirms that “the decision of whether to approve a project—as proposed or with required changes or mitigation—is for the local agency, exercising its informed judgment in compliance with the law and balancing a variety of public objectives.”

The Proposed Project would emit fewer net GHG emissions than the 3,000 MTCO₂e per year threshold of significance identified by the SCAQMD. The Proposed Project would incorporate measures that reduce GHG emissions compared to a conventional project of similar size and scope. The Proposed Project would implement low-flow toilet and faucets, as well as high-efficiency lighting. Moreover, the Proposed Project is located in an urban area and would not significantly increase traffic in the area, as discussed in the traffic analysis (**Appendix I**). These measures and features are consistent with existing recommendations to reduce GHG emissions consistent with the goals of AB 32. Therefore, the Proposed Project would result in less than significant impacts and is considered consistent with applicable plans.

Mitigation Measures: No mitigation measures are required.

5.8 HAZARDS AND HAZARDOUS MATERIALS

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

Discussion

The following section summarizes and incorporates by reference information from the Phase I Environmental Site Assessment Report ("Phase I ESA") prepared by Anderson Environmental dated December 11, 2013 for the Proposed Project. The Phase I ESA is included as **Appendix F** to this Initial Study.

a. Less than Significant Impact.

The Proposed Project would include the construction of an 80-unit apartment complex. The proposed residential uses would not involve the routine use, transport, or disposal of significant amounts of hazardous materials, but may involve the use of small amounts of cleaning products and related materials that may be categorized as

hazardous. The limited use of various pesticides and fertilizers may also be occur to support landscape maintenance. These materials would be used and stored on the Project Site in accordance with applicable federal, State, and local regulations. Additionally, the City of Redlands Fire Department and the San Bernardino County Fire Department have the authority to perform inspections and enforce state and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. As such, the Proposed Project would not create a significant hazard to the public or the environment from the use of small residential quantities of hazardous materials, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The Project Site is currently vacant and has no history of structural development. The Project Site was used for agricultural purposes sometime prior to 1930 until approximately 1966, and has remained vacant since then. The potential presence of asbestos-containing materials, lead-based paint, and mold is considered unlikely because there are no structures on the Project Site. Since the Project Site is not located within proximity to any active or abandoned oil wells or landfills, the potential for methane is considered low. As the Project Site was historically used for agricultural purposes, there may be potential to encounter agricultural chemicals such as pesticides, herbicides, and fertilizers. However, the Phase I ESA concluded that there are no recognized environmental conditions (RECs), historic recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) connected to the Project Site.

The transport, storage, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Such compliance would ensure that all potentially hazardous materials at the construction site are used and handled in an appropriate manner, and would minimize the potential for safety impacts to occur or to avoid accidental hazardous spills. All spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations regarding the cleanup and disposal of the contaminant released. All hazardous waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Furthermore, hazardous material impacts typically occur in a local or site-specific context. Although other foreseeable developments within the area will likely increase the potential to disturb existing contamination, the handling of hazardous materials would be required to adhere to applicable federal, State, and local requirements that regulate work and public safety. Therefore, impacts of the Proposed Project would not have the potential to create a significant hazard to the public or environment through reasonably foreseeable upset and accident

conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The closest school the Project Site is Lugonia Elementary School, located at 202 E. Pennsylvania Avenue, approximately 0.5 miles northeast of the Project site. The Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

As noted earlier, a Phase I ESA was conducted for the Project Site by Andersen Environmental in December 2013. The Phase I ESA was conducted in general accordance with ASTM Standard Practice E 1527-13 and the United States Environmental Protection Agency (USEPA) All Appropriate Inquiries Standard. The Phase I ESA did not identify any relevant issues regarding the presence of underground storage tanks (USTs) or monitoring wells on the Project Site. The Project Site is not included on a list of hazardous materials sites. The Phase I ESA concluded that there are no recognized RECs, HRECs, CRECs connected to the Project Site. Impacts would be less than significant.

A comment was received on the Initial Study raising concerns about the site's proximity to the Teledyne Battery Products facility (located south of the Project Site). A discussion of the Teledyne Battery Products facility, which is located approximately 600 feet to the south of the Project Site, is found on pages 16 and 17 of the Phase I ESA. The Phase I ESA identifies that environmental studies were previously conducted at the facility under two administrative processes: Resource Conservation and Recovery Act (RCRA) closure and RCRA corrective action. These environmental studies were carried out in relation to the historical handling and storage of hazardous materials or wastes at several locations at this facility. The Phase I indicates that the Department of Toxic Substances Control (DTSC) required cleanup via excavation of small areas of lead residues at the Acid Scrubber Water Storage Tanks and Waste Water Treatment Plant. Sampling conducted after excavation indicated that the levels of lead remaining after the excavation are below health-based levels for unrestricted, residential land use. The DTSC investigation indicated that contamination in the soil did not reach groundwater and considers Teledyne to have taken all necessary actions to remediate the site to unrestricted, residential land use.

As directly stated by the Phase I ESA, "Based on the relative distance, and current regulatory oversight, the release at this site is not expected to represent a significant environmental concern for the subject property." Therefore,

based on information and verification provided by the Phase I ESA, the Draft IS concluded that there are no recognized environmental conditions (RECs), historic recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) connected to the Project Site. The IS does not specifically address the Teledyne Battery Products facility, located at 840 West Brockton Avenue, as the Phase I ESA did not identify any risk associated with this facility to the proposed development.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

The closest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 2.4 miles to the northeast of the Project Site. The Proposed Project would not be located within an airport land use plan area or within 2 miles of a public airport or public use airport. As such, there would be no safety hazards or conflicts with the existing operations of the Redlands Municipal Airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. No Impact.

The Proposed Project is not within the vicinity of a private airstrip and not within an area that would expose residents and workers to a safety hazard. No impact would occur.

Mitigation Measures: No mitigation measures are required.

g. Less than Significant Impact.

The Project Site borders W. Lugonia Avenue, which is identified by the City as a potential emergency evacuation route.¹⁴ Another emergency evacuation route within proximity of the Project Site includes the I-10, which is located approximately 0.5 miles to the south. These routes are main thoroughfares to be used by emergency response services during an emergency and, if the situation warrants, the evacuation of an area. Construction of the Project may require temporary and/or partial street closures on the adjacent streets due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. However, as a condition of approval, the construction contractor would be required to notify the City of Redlands Police and Fire Departments if construction activities would impede movement for first emergency response vehicles. The Project Applicant would also be required to develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and

¹⁴ City of Redlands, *General Plan*, "Health and Safety Element," October 1995.

pedestrians, location of nearest hospitals, and fire stations. Implementation of these requirements would be incorporated as a typical condition of approval. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

h. No Impact.

The Project area is not located in a designated wildland area that may contain substantial wildland fire risks or hazards. In addition, the City does not identify the Project Site to be located within a City-designated Fire Hazard Area.¹⁵ The Proposed Project would not result in impacts related to exposing people or structures to adverse effects from wildfires. No impact would occur.

Mitigation Measures: No mitigation measures are required.

15 City of Redlands, *General Plan*, "Health and Safety Element," October 1995, Figure 8.1.

5.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY – Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Be subject to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the “Preliminary Drainage Report and Supplement to WQMP” (“Drainage Study”) prepared by DCI Engineering, Inc. dated February 22, 2016 (received by the City of May 19, 2016) for the Proposed Project. The Drainage Study is included as **Appendix G** to this Initial Study.

a. Less than Significant Impact.

Grading activities associated with construction may temporarily increase the amount of suspended solids from surface flows derived from the Project Site during a concurrent storm event due to sheet erosion of exposed soil. In addition, during excavation and grading, contaminated soils may be exposed and/or disturbed; this could impact surface water quality through contact during storm events. The Project Applicant would be required to satisfy all applicable requirements of Section 13.52 of the City's Municipal Code, at the time of construction to the satisfaction of the City. These requirements include preparation of a Stormwater Pollution Prevention Plan (SWPPP) containing structural treatment and source control measures appropriate and applicable to the Proposed Project. The SWPPP must incorporate best management practices (BMPs) by requiring control of pollutant discharges to reduce pollutants. Examples of BMPs that may be implemented during site grading and construction of the Proposed Project could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences. Preparation of the SWPPP would be incorporated as a condition of approval in accordance with the City's Municipal Code. Implementation of BMPs would ensure that Santa Ana Regional Water Quality Control Board (RWQCB) water quality standards are met during construction activities of the Proposed Project. Therefore, no significant impact during construction would occur.

After construction, the Proposed Project would increase the intensity of activities on the site and would likely result in an increase in typical urban pollutants generated by motor vehicle use on roadways adjacent to the Project Site, and the maintenance and operation of landscaped areas. Stormwater quality is generally affected by the length of time since the last rainfall, rainfall intensity, urban uses of the area and quantity of transported sediment. Typical urban water quality pollutants usually result from motor vehicle operations; oil and grease residues; fertilizer/pesticide uses; human/animal littering; careless material storage; and poor handling and property management. The majority of pollutant loads are usually washed away during the first flush of the storm occurring after the dry-season period. The Proposed Project would incorporate design features, such as landscaping and on-site bioretention basins which would satisfy the performance standards identified in Section 15.54.160 of the City's Municipal Code.

Urban pollutants have the potential to degrade water quality. However, the quality of runoff from the Project Site would be subject to Section 401 of the CWA under the National Pollutant Discharge Elimination System (NPDES). The RWQCB issues NPDES permits to regulate waste discharged to "waters of the nation," which includes reservoirs, lakes, and their tributary waters. Waste discharges include discharges of stormwater and construction surface water runoff from a Project. The Project Applicant would pay applicable NPDES program fees in accordance with Section 13.54.300 of the City's Municipal Code. Further, prior to issuance of the grading permit, the Applicant is required to prepare a final Water Quality Management Plan (WQMP) for review and approval. The WQMP will consist of the post construction Best Management Practices (BMPs) prepared in accordance with the requirements

and guidelines of the San Bernardino County stormwater runoff management guidelines. Therefore, impacts related to water quality and stormwater discharge would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The Project Site currently vacant and unimproved and contains non-native vegetation. The Proposed Project would not require the use of groundwater at the Project Site. Potable water would be supplied by the City, which draws its water supplies from a blend of local groundwater, local surface water, and imported water from the San Bernardino Valley Municipal Water District, for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the Proposed Project would not require direct additions or withdrawals of groundwater that would deplete existing supplies. As indicated in the Geotechnical Report, groundwater is estimated to be at least 100 feet below grade. The Proposed Project would therefore not involve excavations that would result in the interception of existing aquifers or penetration of the existing water table.

Implementation of the Proposed Project would result in conversion of the current pervious surface of the site to primarily impervious surfaces across the Project Site. The Proposed Project would incorporate design features, such as landscaping and on-site bioretention basins which would treat stormwater runoff on site prior to discharge to surrounding storm drain system. The bioretention basins will also facilitate storage and percolation of onsite runoff to the regional aquifer. The Project area is not a significant source of groundwater for public water supplies. Though stormwater may percolate into the ground under existing conditions, the proposed changes would not be of a magnitude (4+ acres) to result in demonstrable reduction in groundwater recharge, particularly with the installation of bioretention basins that will facilitate percolation after development.

Therefore, the Proposed Project would not substantially deplete groundwater supplies directly or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c-d. Less than Significant Impact.

The Project Site is located in a developed area of the City, and no streams or river courses are located on or within the Project vicinity. While the Proposed Project would change the existing pervious characteristics of the site, the Proposed Project would not substantially increase site runoff or result any changes in the local drainage patterns. As outlined in **Appendix G**, the onsite drainage system includes retention of the increase in runoff for the entire 10-year storm with the assumption that no flows will be able to leave the site during peak flow. Flows above the

10-year storm will be discharged over the curb in spillways to the street section and from there into the area drainage system. The Proposed Project would implement a SWPPP and WQMP, both of which include BMPs to control stormwater discharges, and would incorporate BMPs such as landscaping and on-site bioretention basins to treat stormwater runoff on site prior to discharge to surrounding storm drains. Therefore, the Proposed Project would not involve any construction or ground disturbing activities that could alter the existing drainage pattern that would result in the substantial erosion, siltation, or flooding on- or off the Project site. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact.

As previously mentioned, the Proposed Project would incorporate bioretention basins to collect on-site stormwater runoff and maintain water quality in accordance with Section 15.54.160 of the City's Municipal Code. The Proposed Project would not exceed the capacity of existing drainage systems because of retention of runoff up to the 10-year storm and subsequent controlled runoff from the Project Site for larger storms. Collected runoff from the Project Site would be directed towards the existing storm drains within the Project vicinity, which currently have adequate capacity. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any urban pollutants generated on the Project Site would be subject to the requirements and regulations of the NPDES, which the Proposed Project would be required to meet. The Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. No Impact.

As a typical multifamily residential development, the Proposed Project would not include potential sources of contaminants which could potentially degrade water quality and would comply with all federal, State, and local regulations governing stormwater discharge. No impact would occur.

Mitigation Measures: No mitigation measures are required.

g-h. No Impact.

The Project Site is not located within an area subject to flooding by 100-year flood hazards.¹⁶ According to the Federal Emergency Management Agency flood hazard maps, the Project Site is located within Zone X, Other Areas.¹⁷ Therefore, the Proposed Project would not place housing within a 100-year flood hazard area or result in structures being constructed that would impede or redirect such flood flows. The Proposed Project would not be subject to severe flooding. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

i. No Impact.

The closest significant dams to the Project Site include the East Highland Reservoir (located approximately 4.1 miles northeast), the Seven Oaks Dam in the San Bernardino Mountains (located approximately 6.1 miles northeast), and the Bear Valley Dam (located approximately 17 miles northeast). Based on the location and distances of these three dams, the Project Site is not located within a potential inundation area. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. No impact would occur.

Mitigation Measures: No mitigation measures are required.

j. No Impact.

Tsunamis are large-scale sea waves produced from tectonic activities along the ocean floor. Seiches are freestanding or oscillatory waves associated with large enclosed or semi-enclosed bodies of water. Given that the Project Site is not located near the ocean or any large enclosed or semi-enclosed bodies of water, the Proposed Project would not be located within designated tsunami or seiche zones. Debris and mudflows are typically a hazard experienced in the floodplains of streams that drain very steep hillsides within the watershed. The Project Site is essentially flat and not located on a floodplain. These types of hazards are not expected to impact the Proposed Project because the Project Site would not place people or structures at risk of inundation by seiche, tsunami, or mudflow. No impact would occur.

Mitigation Measures: No mitigation measures are required.

16 City of Redlands, *General Plan*, "Health and Safety Element," October 1995, Figure 8.2.

17 United States Department of Homeland Security, Federal Emergency Management Agency, Map No. 06071C8704H, 2008.

5.10 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
LAND USE AND PLANNING – Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Less than Significant Impact.

The Project Site is located within a developed portion of the City and is consistent with the existing physical arrangement of the properties within the vicinity of the site. The Proposed Project would provide new multifamily residential uses within the City, as consistent with the General Plan MDR land use designation for the Project Site, which allows the development of attached, detached, and/or mixed residential uses with a range of densities and housing types. A change of zone (to Multifamily Residential, R-2) is required because the current zone classification (R-1, Single Family Residential) has remained the same since the City General Plan was adopted in 1995. When the Redlands General Plan was adopted it appears that the MDR land uses were established as a transition to Industrial use designations to the south and the General Commercial designations to the west. The densities allowed within the R-2 District are consistent with the densities permitted under the General Plan MDR land use designation for the Project Site. As such, the proposed multifamily residential uses under the requested R-2 District zone change would be consistent with the General Plan designation. The Project Site itself is an infill development parcel and its development will not physically divide any established community. No established community would be divided as the residential character of the neighborhood would continue to be residential. Nor would there be a disruption of access between land use types as a result of the Proposed Project. Impacts would be less than significant under this issue.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The General Plan land use designation for the Project Site is currently MDR (Medium Density Residential), which allows the development of attached, detached, and/or mixed residential uses with a range of densities and

housing types. The zoning designation for the Project Site is currently R-1 (Single-Family Residential) District, which allows single-family residential uses limited to not more than one dwelling unit per lot.

The Project Applicant is requesting a zone change from R-1 District to R-2 (Multiple-Family Residential) District to allow development of the proposed multifamily residential project. The R-2 District allows a density of 3,000 square feet of lot area per dwelling unit.¹⁸ The densities allowed within the R-2 District are consistent with the densities permitted under the MDR land use designation for the Project Site. Based on the size of the Project Site (approximately 204,732 square feet), the R-2 District would permit a total of 69 dwelling units. The Project Applicant is requesting a density bonus and incentive/concession agreement to allow an increase in density of 2.9 dwelling units per acre for a total of 17.9 dwelling units per acre. Under this standard, up to 85 dwelling units would be allowed on the Project Site. The approval of the incentive/concession agreement and Conditional Use Permit (CUP) would permit the construction of the 80 multifamily residential units proposed by the Project.

The Proposed Project would be designed in accordance with the City's design guidelines to ensure massing and scale compatibility with surrounding uses. Refer to the visual simulations in Subchapter 5.1, Aesthetics. The Proposed Project would be consistent with the maximum building height of 35 feet permitted by the R-2 zoning designation. The proposed residential buildings would be approximately 32 feet in height to the top of the roof, and the 1-story community building would be approximately 25 feet in height to the top of the roof. While the proposed buildings would be slightly taller than the existing structures immediately adjacent to the Project Site, the height and massing of the Proposed Project would not introduce buildings that are incompatible with the surrounding residential neighborhoods. Finally, based on the Proposed Project design and setbacks, second story balconies will not overlook adjacent residential backyards and existing privacy will be maintained for these adjacent residents.

Furthermore, substantial setbacks would be provided in proximity to adjacent residential uses to the north, south, and east of the Project Site. The Proposed Project would also provide open space and landscaping throughout the Project Site to soften and screen views of the new buildings from surrounding uses.

As such, implementation of the Proposed Project would not conflict with the City's General Plan or zoning designations for the Project Site. The Proposed Project would introduce multifamily uses that have been designed for visual compatibility and consistency with the surrounding land uses. The issue of land use compatibility has been raised in comments received on the Initial Study. Compatibility is generally defined as "capable of living together harmoniously." (Webster's New World Dictionary) When discussing land use compatibility, the key issue is whether the activity patterns of a new or proposed use will occur in a manner that is harmonious with existing uses. Even though the density of the Proposed Project is higher than the surrounding single-family residences, the

¹⁸ City of Redlands, Municipal Code, tit. 18, sec. 18.52, R-2 Multiple-Family Residential District.

activity patterns will be the same. These residential activity patterns include: minimal night time activity associated with the persons residing within the multifamily complex; any school age children will travel to schools in the local area; residents will either go to work or reside in their units or use the onsite recreation areas; residents will use personal automobiles or local mass transit in the same manner as existing residents; and with the onsite management the evening outdoor activities will be controlled as well or better than at the existing residences. Further, based on the analysis of issues that characterize potential land use conflicts, the Proposed Project will: not generate air emissions that are significant; the Project will not generate noise levels that would exceed existing residential thresholds; the Project would not generate excessive runoff that could cause local flooding; and the Project would not generate traffic that would lower Levels of Service below the City's acceptable thresholds for local roadways. Thus, even though the residential use proposed for the Project Site will be at a higher residential density, the fully developed Project will function in a harmonious manner with the existing uses. Therefore, the Proposed Project will not result in a significant conflict or incompatibility with the applicable land use plan nor with the existing neighborhood. The use will be residential and consistent with the existing surrounding community, only at a higher density.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan applies to this portion of the City. Consequently, implementation of the Proposed Project would not conflict with the provisions of any adopted conservation plan. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.11 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
MINERAL RESOURCES – Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. No Impact.

The Santa Ana Wash, which adjoins the City along its northern boundary about one mile north of the Project Site, contains high-quality construction aggregates that have been mined for almost a century. According to the City's General Plan, the Project Site occurs within an area that has been classified as Mineral Resource Zone 2 (MRZ-2),¹⁹ which are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. Policy 7.42c of the City's General Plan identifies that MRZ areas outside the Santa Ana Wash be designated for agricultural or urban use. As the Project Site is located outside the Santa Ana Wash, the City's General Plan designation and zoning classification do not permit mining activities on the Project Site. Therefore, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

As previously discussed, the Proposed Project is not located within an area permitted by the City's General Plan for mining extraction. Therefore, the Proposed Project would not result in the loss of availability of locally important mineral resource recover site. No impact would occur.

Mitigation Measures: No mitigation measures are required.

¹⁹ City of Redlands, *General Plan*, "Open Space and Conservation Element," October 1995.

5.12 NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
NOISE – Would the project:				
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Noise Impact Analysis, ("Noise Study") prepared by Urban Crossroads dated June 9, 2017 for the Proposed Project. The updated Noise Study is included as **Appendix H** to this Initial Study (Liberty Lane Apartments Noise Impact Analysis, City of Redlands). The updated Noise Study has been expanded to address issues raised in comments on the original Initial Study and certain sections of the Study are utilized in the following analysis to ensure accuracy and consistency with the Study. For a discussion of the science and methodologies associated with the topic of noise and regulatory setting, please refer to Chapters 2 and 3 of the Noise Study.

Existing Background Noise

To assess the existing noise level environment, two 24-hour noise level measurements were taken at sensitive receiver locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. **Figure 5.12-1, Noise Measurement Locations** provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing

noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Wednesday, June 8, 2016. Appendix 5.1 of **Appendix H** includes study area photos.

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and data loggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (18)(ref: Appendix H)

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources.*(6)(ref: Appendix H) Further, FTA guidance states, *that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.*(5)(ref: Appendix H)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence.(5)(ref: Appendix H) In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.



SOURCE: Urban Crossroads, Noise Impact Analysis dated June 2017

FIGURE 5.12-1

The noise measurements presented below focus on the average or equivalent sound levels (Leq). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. **Table 5.12-1, 24-Hour Ambient Noise Level Measurements** identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. Appendix 5.2 of **Appendix H** provides a summary of the existing hourly ambient noise levels described below:

- Location L1 represents the noise levels at the northern Project site boundary adjacent to Lugonia Avenue. The noise level measurements collected show an overall 24-hour exterior noise level of 71.7 dBA CNEL. The hourly noise levels measured at location L1 ranged from 67.5 to 69.7 dBA Leq during the daytime hours and from 59.8 to 67.0 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 68.5 dBA Leq with an average nighttime noise level of 63.7 dBA Leq.
- Location L2 represents the noise levels at the eastern Project site boundary adjacent to Texas Street. The noise level measurements collected show an overall 24-hour exterior noise level of 66.3 dBA CNEL. The hourly noise levels measured at location L2 ranged from 60.6 to 65.9 dBA Leq during the daytime hours and from 50.6 to 63.1 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 63.1 dBA Leq with an average nighttime noise level of 58.4 dBA Leq.

Table 5.12-1 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of **Appendix H** provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L₁, L₂, L₅, L₈, L₂₅, L₅₀, L₉₀, L₉₅, and L₉₉ percentile noise levels observed during the daytime and nighttime periods.

The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network. This includes the auto and truck activities on Texas Street and Lugonia Avenue. The 24-hour existing noise level measurements shown on **Table 5.12-1** present the worst-case existing unmitigated ambient noise conditions. The background noise data indicate that due to transportation-related noise on Lugonia and Texas, existing sound levels exceed the City's 60 dBA threshold for residential neighborhoods.

Table 5.12-1

24-hour Ambient Noise Level Measurements

Location ¹	Description	Energy Average Hourly Noise Level (dBA Leq) ²		CNEL
		Daytime	Nighttime	
L1	Located at the northern Project site boundary on Lugonia Avenue.	68.5	63.7	71.7
L2	Located at the eastern Project site boundary on Texas Street.	63.1	58.4	66.3

¹ See Exhibit 5-A for the noise level measurement locations.

² The long-term 24-hour measurement printouts are included in Appendix 5.2.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Summary of Noise Significance Thresholds for the Proposed Project

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. **Table 5.12-2** shows the significance criteria summary matrix.

On-Site Traffic

- If the on-site transportation-related noise levels at the residential homes within the Project site exceed the 60 dBA CNEL exterior noise level standard and the 45 dBA CNEL interior noise level standard for residential use (City of Redlands General Plan Noise Element Table 9.2).

Operational Noise

- If Project-related operational (stationary source) noise levels exceed the exterior 60 dBA L_{50} daytime or 50 dBA L_{50} nighttime noise level standards at nearby sensitive residential land uses. These standards shall not be exceeded for a cumulative period of 30 minutes (L_{50}), or cannot exceed 65 dBA (daytime) or 55 dBA (nighttime) for a cumulative period of more than 15 minutes (L_{25}) in any hour, or 70 dBA (daytime) or 60 dBA (nighttime) for a cumulative period of more than 5 minutes (L_8) in any hour, or 75 dBA (daytime) or 65 dBA (nighttime) for a cumulative period of more than 1 minute (L_2) in any hour, or 80 dBA (daytime) or 70 dBA (nighttime) at any time (L_{max}) (City of Redlands Municipal Code, Section 8.06.070(B) & (C)); or

Table 5.12-2

Significance Criteria Summary

Analysis	Land Use	Source	Condition(s)	Significance Criteria	
				Daytime	Nighttime
On-Site Traffic Noise	Noise-Sensitive	City of Redlands ¹	Exterior Noise Level Standard	60 dBA CNEL	
			Interior Noise Level Standard	45 dBA CNEL	
Operational Noise		City of Redlands ²	≥ 30 Minutes L ₅₀	60	50
			≥ 15 Minutes L ₂₅	65	55
			≥ 5 Minutes L ₈	70	60
			≥ 1 Minute L ₂	75	65
			Anytime L _{max}	80	70
			FICON ³	if ambient is < 60 dBA	≥ 5 dBA Project increase
		if ambient is 60 - 65 dBA		≥ 3 dBA Project increase	
		if ambient is > 65 dBA		≥ 1.5 dBA Project increase	
Construction Noise		City of Redlands ⁴	Permitted hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays.		
			Noise Level Threshold	85 dBA Leq	n/a
			Vibration Level Threshold	0.01 in/sec RMS	n/a

¹ Source: City of Redlands General Plan Noise Element, Table 9.2.

² Source: City of Redlands Municipal Code, Chapter 8.06 (Appendix 3.1).

³ Source: FICON, 1992.

⁴ Source: City of Redlands Municipal Code, Section 8.06.090 (F) for construction noise; and Section 8.06.020 for vibration (Appendix 3.1). Construction noise level threshold based on the NIOSH Criteria for Recommended Standard: Occupational Noise Exposure, June 1998.

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.; "n/a" = No nighttime construction activity is permitted and therefore, no nighttime construction noise level threshold is identified.

- If the existing ambient noise levels at the nearby noise-sensitive receivers near the Project site:
 - are less than 60 dBA and the Project creates a *readily perceptible* 5 dBA or greater Project-related noise level increase; or
 - range from 60 to 65 dBA and the Project creates a *barely perceptible* 3 dBA or greater Project-related noise level increase; or
 - already exceed 65 dBA, and the Project creates a community noise level impact of greater than 1.5 dBA (FICON, 1992).

Construction Noise

- If Project-related construction activities:
 - occur at any time other than the permitted hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays (City of Redlands Municipal Code, Section 8.06.090(F)); or
 - create noise levels which exceed the 85 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations (NIOSH, Criteria for Recommended Standard: Occupational Noise Exposure).
- If short-term Project generated construction vibration levels exceed the City of Redlands acceptable vibration standard of 0.01 in/sec (RMS) at sensitive receiver locations (City of Redlands Municipal Code, Section 8.06.020).

a. Less than Significant with Mitigation.**Construction**

Construction noise represents a short-term increase on the ambient noise levels. Construction-related noise levels are expected to create temporary and intermittent high-level noise conditions at receivers surrounding the Project site when certain activities occur at the closest point to the nearby receiver locations from the center of Project construction activity. Using sample reference noise levels to represent the construction activities of the Liberty Lane Apartments site, the analysis in **Appendix H** estimates the Project-related construction noise levels at nearby sensitive receiver locations. The detailed noise analysis in **Appendix H** shows that the Project-related short-term construction noise levels will approach 73.5 dBA Leq and will satisfy the 85 dBA Leq threshold identified by the by the National Institute for Occupational Safety and Health.²⁰ Therefore, the construction of the Project will result in a *less than significant* noise level impact. Implementation of mitigation measure **NOI-1** shall be incorporated as part of the Proposed Project to reduce construction noise impacts to the maximum extent feasible and to a level of less than significant.

NOI-1 Increased Noise Levels (Construction)

Though construction noise is temporary, intermittent and of short duration, and will not present any long-term impacts, the following noise abatement measures would reduce any noise level

²⁰ Leq = Equivalent Sound Level.

increases produced by the construction equipment to the nearby noise-sensitive residential land uses:

- Public notice shall be given prior to initiating construction. This notice shall be provided to all property owners/residents within 100 feet of the Project site and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the Project. The public notice shall encourage the adjacent residences to contact the supervisor in the case of a complaint. Resident's would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or otherwise control the sound source causing the complaint.
- If feasible, construct the planned Project 6 and 8-foot high noise barriers at the Project site boundaries prior to the commencement of Project construction activities. This would further reduce the noise levels experienced at the nearby sensitive receiver locations, but is not required.
- Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays (City of Redlands Municipal Code, Section 8.06.090 (F)). The Project construction supervisor shall ensure compliance with the permitted construction hours.
- During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
- The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction.
- Equipment not in use for five minutes shall be shut off.

- Equipment shall be maintained and operated such that loads are secured from rattling or banging.
- Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.
- The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.
- No radios or other sound equipment shall be used at the Project site unless required for emergency response by the contractor.

Onsite Exposure to Traffic Noise

The results of this analysis indicate that future vehicle noise from Texas Street and Lugonia Avenue is the principal source of community noise that will impact the Project Site. The Project will also experience some background traffic noise impacts from the Project's internal roads; however, due to the distance, topography and low traffic volume/speeds, traffic noise from these roads will not make a significant contribution to the noise environment. The following on-site noise mitigation measures recommended in this noise analysis have been designed to reduce the exterior and interior noise levels to satisfy the City of Redlands transportation related CNEL noise criteria for residential development. With the recommended noise mitigation measures shown on Exhibit ES-A (**Appendix H**), the on-site noise impacts will be less than significant.

NOI-2 Exterior Noise Mitigation

To satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for multi-family residential development, the construction of 6.5-foot high noise barriers for buildings with outdoor living areas (first floor patios) adjacent to Lugonia Avenue is required. Buildings with outdoor living areas (first floor patios) adjacent to Texas Street will require the construction of 5-foot high noise barriers. Exterior noise levels will approach 58.2 dBA CNEL at open space uses within the Project site, and therefore, no exterior noise abatement is required to satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for open space use. With the recommended noise barriers shown on Exhibit ES-A for multi-family residential units, the mitigated future exterior noise levels will range from 59.0 to 60.0 dBA CNEL. This noise analysis

shows that the recommended noise barriers will satisfy the City of Redlands 60 dBA CNEL exterior noise level standards.

The recommended noise control barriers shall be constructed so that the top of each wall extends to the recommended height above the pad elevation of the lot it is shielding. The barrier shall provide a weight of at least 4 pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, and a minimum sound transmission loss of 20 dBA. The noise barrier shall be constructed using the following materials. The barrier shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking.

- Masonry block;
- Stucco veneer over wood framing (or foam core), or 1-inch-thick tongue and groove wood of sufficient weight per square foot;
- Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot capable of providing a minimum transmission loss of 20 dBA;
- Earthen berm; or
- Any combination of these construction materials.

NOI-3 Interior Noise Mitigation

To satisfy the City of Redlands 45 dBA CNEL interior noise level criteria, buildings facing Texas Street and Lugonia Avenue will require a Noise Reduction (NR) of up to 22.2 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:

- Windows: All windows and sliding glass doors shall be well fitted, well weather-stripped assemblies and shall have a minimum sound transmission class (STC) rating of 27.
- Doors: All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick.
- Roof: Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one-half inch thick. Ceilings shall be well fitted, well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.

- Attic: Attic vents should be oriented away from Texas Street and Lugonia Avenue. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents.
- Ventilation: Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use. A forced air circulation system (e.g. air conditioning) shall be provided which satisfies the requirements of the Uniform Mechanical Code. Wall mounted air conditioners shall not be used.

With the recommended interior noise mitigation measures provided in this study, the proposed Liberty Lane Apartments residential Project is expected to meet the City of Redlands 45 dBA CNEL interior noise level standards for residential development.

Operation

The Project Site is located within an urbanized area with surrounding residential, agricultural, open space, and industrial uses with ambient daytime noise levels ranging from 63.1 dBA Leq to 68.5 dBA Leq and nighttime noise levels ranging from 58.4 dBA Leq to 63.7 dBA Leq. The existing on-site traffic noise levels along W. Lugonia Avenue and Texas Street range from 62.9 to 67.8 dBA CNEL.²¹ The proposed multifamily residential uses are not anticipated to substantially contribute the existing ambient noise environment in proximity to the Project Site. Noise generated by the Proposed Project would result primarily from resident activity, off-site traffic, on-site parking lot vehicle movements, and heating, ventilation, and air conditioning (HVAC) equipment. A discussion of noise level impacts associated with operation of the Proposed Project area provided below.

On-Site Traffic

It is expected that the primary source of noise impacts to the Project Site will be traffic noise from Texas Street and W. Lugonia Avenue. The Project Site would also experience some background traffic noise impacts from the Project's internal streets; however, due to the distance, topography and low traffic volume/speed, traffic noise associated with these internal streets would not make a significant contribution to the noise environment.

The City's General Plan provides specific noise level standards for land use designations that are used to regulate traffic related noise level impacts for noise sensitive uses. The Noise Study was prepared to satisfy the City's residential land use noise compatibility criteria and noise standards, which establish an external noise level standard of less than 60 dBA CNEL and an interior noise level standard of less than 45 dBA CNEL.

²¹ dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level.

Exterior Noise Levels

As shown in **Table 5.12-3, Exterior Noise Levels**, the on-site traffic noise levels indicate that the multifamily residential buildings adjacent to Texas Street and W. Lugonia would experience exterior noise levels that exceed the City's residential land use noise compatibility criteria and noise standards for multifamily residential development.

Table 5.12-3
Exterior Noise Levels

Building	Ambient Noise Level (dBA CNEL)	Mitigated Noise Level (dBA CNEL)	Barrier Height (Feet)
Building along W. Lugonia Avenue	67.8	60.0	6.5
Building along Texas Street	62.9	59.0	5.0

Source: Urban Crossroads, Noise Impact Analysis, March 23, 2017.

To satisfy the City's 60 dBA CNEL exterior noise level standards for multifamily residential development, mitigation measure **NOI-2** shall be implemented as part of the Proposed Project to reduce future exterior noise levels to between 59.0 and 60.0 dBA CNEL. Mitigation measure **NOI-2** includes the construction of a 6.5-foot-high noise barriers for buildings with outdoor living areas (first-floor patios) adjacent to W. Lugonia Avenue and the construction of 5-foot-high noise barriers for buildings with outdoor living areas adjacent to Texas Street. Implementation of mitigation measure **NOI-2** would reduce future exterior noise levels between 59.0 and 60.0 dBA CNEL, which would be less than significant.

Interior Noise Levels

As provided in the Noise Study, the interior noise levels at the first-floor building facades on the Project Site are expected to range from 59.0 to 64.8 dBA CNEL, which would exceed the City's 45 dBA CNEL interior noise level standards for multifamily residential buildings. To satisfy the City's interior noise level standards, mitigation measure **NOI-3** shall be implemented as part of the Proposed Project to reduce future interior noise levels. Mitigation measure **NOI-3** includes design specifications for various building elements on the Project Site, such as windows, doors, and ventilation, to reduce these interior noise levels to acceptable levels. Implementation of mitigation measure **NOI-3** would reduce potential impacts to a level of less than significant.

Operational Noise

For noise-sensitive residential properties, the City of Redlands Municipal Code, Chapter 8.06, identifies operational noise level limits for the daytime (7:00 AM to 10:00 PM) hours of 60 dBA L_{50} and 50 dBA L_{50} during the nighttime

(10:00 PM to 7:00 AM) hours.²² Section 8.06.070(B) states that these standards shall apply for a cumulative period of 30 minutes in any hour, as well as plus 5 dBA cannot be exceeded for a cumulative period of more than 15 minutes in any hour, or the standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour, or the standard plus 15 dBA for a cumulative period of more than 1 minute in any hour, or the standard plus 20 dBA for any period of time.

Using reference noise levels to represent the potential noise sources within the Liberty Lane Apartments site, the analysis in **Appendix H** estimates the Project-related operational (stationary-source) noise levels at the nearby noise-sensitive receiver locations. The Project-related operational noise sources are expected to include: parking lot vehicle movements, park (tot lot, game, and courtyard) activity, and pad-mounted air conditioning units. The analysis shows that the Project-related operational noise levels will satisfy the City of Redlands daytime and nighttime exterior noise level standards at the off-site receiver locations in the Project study area. Further, the analysis in **Appendix H** demonstrates that the Project will not contribute an operational noise level impact to the existing ambient noise environment at any of the nearby sensitive receiver locations. Therefore, the operational noise level impacts associated with the proposed Project activities, such as the parking lot vehicle movements, park (tot lot, game, and courtyard) activity, and pad-mounted air conditioning units will be *less than significant*.

Further analysis is provided in **Appendix H** for Project operational noise levels at the future on-site residential receiver locations of the Project. Based on the analysis, the Project's operational noise sources (parking lot vehicle movements, park (tot lot, game, and courtyard) activity, and pad-mounted air conditioning units) will generate noise levels at on-site receiver locations that satisfy the City of Redlands daytime and nighttime exterior noise level standards.

Additional short-term noise events, such as trash collection, may occur on the Project site during the daytime hours of 7:00 a.m. to 10:00 p.m. However, these short-term noise events are expected to take place in the parking lot areas that are largely blocked by the planned building structures. In addition, these short-term noise events will likely be limited to a few minutes of noise activity near any one receiver location during the typical 15-hour daytime noise conditions, as compared to the on-going, simultaneous operational activities analyzed in this noise study.

The results of this Liberty Lane Apartments Noise Impact Analysis are summarized below based on the significance criteria in presented above. **Table 5.12-4** shows the findings of significance for each potential noise impact before and after any needed mitigation measures.

²² L₅₀ = the noise levels equaled or exceeded during 50 percent.

Table 5.12-4
Noise Impact Significance Summary

Analysis	Report Section	Significance	
		Without Mitigation	With Mitigation
On-Site Traffic Noise	7	<i>Potentially Significant</i>	<i>Less Than Significant</i>
Operational Noise	9	<i>Less Than Significant</i>	<i>n/a</i>
Construction Noise	10	<i>Less Than Significant</i>	<i>n/a</i>
Construction Vibration		<i>Potentially Significant</i>	<i>Less Than Significant</i>

"n/a" = No mitigation required since the impact will be less than significant.

b. Less than Significant with Mitigation.

Vibration is sound radiated through the ground. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response. The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The Proposed Project would be constructed using typical construction techniques. Based on reference vibration levels provided by the Federal Transit Administration (FTA), a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 feet. At distances ranging from 45 to 196 feet from the Project site, construction vibration velocity levels are expected to approach peak-particle velocities (PPV) of 0.04 in/sec at nearby sensitive receiver locations. To assess the human perception of vibration levels in PPV, the velocities are converted to root-mean-square (RMS) vibration levels based on the Caltrans *Transportation and Construction Vibration Guidance Manual* conversion factor of 0.71. (4)(ref: Appendix H) These projected vibration levels would exceed the City's vibration standard of 0.01 inches per second, which would be a potentially significant impact.²³ Therefore, a 65-foot setback distance for large construction equipment and loaded trucks, as

²³ City of Redlands, Municipal Code, ch. 8.06, Community Noise Control.

shown on Exhibit 10-A of **Appendix H**, is required to reduce the vibration levels experienced at receiver locations R4, R5, R7, and R8. Based on the City of Redlands vibration standards, the proposed Project construction activities will satisfy the City of Redlands vibration standard of 0.01 in/sec RMS at all the nearby sensitive receiver locations during Project construction with the incorporation of the vibration mitigation measures identified in this noise study. Therefore, the Project-related vibration impacts represent a *less than significant* impact during the worst-case construction activities at the Project site after mitigation.

Further, the vibration levels due to Project construction do not represent vibration levels capable of causing building damage to nearby residential homes. The FTA identifies construction vibration levels capable of building damage ranging from 0.12 to 0.5 in/sec PPV. (5)(ref: Appendix H) The peak Project-construction vibration levels after mitigation will approach 0.02 in/sec PPV and will not exceed the FTA vibration levels for building damage at the residential homes near the Project site. Further, the levels at the site of the closest sensitive receivers are unlikely to be sustained during the entire construction period, but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Construction at the Project site will be restricted to daytime hours consistent with City requirements thereby eliminating potential vibration impact during the sensitive nighttime hours.

NOI-4 Construction Vibration Mitigation Measures

Though construction is temporary, intermittent and of short duration, and will not present any long-term vibration impacts, the following practices would reduce vibration level increases produced by the construction equipment to the nearby noise-sensitive residential land uses.

- Large construction equipment shall not be used within 65 feet of residential properties, identified on Exhibit 10-A. As used here, “large construction equipment” means any track-type bulldozer, grader, or scraper larger than a D-8 Caterpillar bulldozer; equipment without rubber tires; or equipment with a peak-particle velocity (PPV) vibration levels of more than 0.01 in/sec at 50 feet when operated on this site.
- Notice shall be given to adjacent property owners at least seven calendar days prior to the commencement of Project construction activity.

In regards to operational ground-borne vibration impacts, the Proposed Project would introduce uses typical of a multifamily residential development. The proposed multifamily residential uses would be limited to mechanical HVAC equipment that would not generate excessive ground-borne vibration or ground-borne noise. Ground-borne vibration levels from automobile traffic associated with the Proposed Project would generally be overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. However, due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced

ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. As such, ground-borne vibration and noise levels associated with operation of the Proposed Project would be less than significant.

c. Less than Significant with Mitigation.

As stated above, the construction phase of the Proposed Project would be considered temporary and with implementation of mitigation measure **NOI-1** would not result in a substantial permanent increase in the ambient noise levels in the Proposed Project's vicinity. The Proposed Project would not generate any uses that would result in a permanent increase in ambient noise levels. Further, with implementation of mitigation measures **NOI-2 and NOI-3**, the Proposed Project would satisfy the City's 45 dBA CNEL interior and 60 dBA CNEL exterior noise level standards.

d. Less than Significant with Mitigation.

As stated above in discussion 5.12.a, the Proposed Project would generate temporary elevated noise levels due to the construction phase of the Proposed Project. While construction activities would generate short-term noise, the proximity of construction activities to the nearby sensitive uses to the north, south, and west of the Project site would result in potentially significant impacts. Implementation of mitigation measure **NOI-1** would reduce impacts to a level of less than significant.

e. No Impact.

The closest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 2.4 miles to the northeast of the Project Site. Therefore, the Proposed Project would not be located within an airport land use plan or within 2 miles of a public airport or public use airport. The Project would not expose people residing or working in the area to excessive noise levels. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. No Impact.

The Proposed Project is not within the vicinity of a private airstrip. Therefore, the Proposed Project would not expose people residing or working in the Project area to excessive noise levels. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.13 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
POPULATION AND HOUSING – Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Less than Significant Impact.

According to the United State Census, the City had an estimated population of 71,035 people, with an average household size of 2.81 people per household.²⁴ Implementation of the Proposed Project would result in an increase of up to an estimated 225 residents in the City. This assumption is considered conservative as most the units proposed by the Project are one-bedroom units that are likely to be occupied by one person. Nonetheless, the overall increase in housing units and population would be consistent with the Southern California Association of Government's (SCAG) forecast of 7,600 additional households and approximately 15,900 people in the City between 2012 and 2040.²⁵ Additionally, the City's recently adopted General Plan Housing Element states that the City will require an additional 2,429 dwelling units by the year 2021 to meet its overall housing needs.²⁶ Development of the 80 multifamily residential units proposed under the Project would help assist the City in meeting its housing needs. This increase in housing units and population would not have any significant effect on any local or regional growth projections. Lastly, the Project Site is designated for multifamily residential development and will be rezoned to be consistent with this designation. Also the site is located in a developed area surrounded by other residential, institutional, and open space uses. Therefore, the Proposed Project would not accelerate development in an undeveloped area, nor would build-out result in an adverse physical change in the environment or introduce unplanned infrastructure not previously evaluated by the City's General Plan. Impacts would be less than significant.

²⁴ United States Census Bureau, *QuickFacts*, <http://www.census.gov/quickfacts/table/PST045215/00>, accessed November 2016.

²⁵ Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: Demographics and Growth Forecast*, April 2016.

²⁶ City of Redlands, *General Plan Update*, "2013-2021 Housing Element," February 2014.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

No residential dwelling units currently exist on the Project Site. Therefore, no housing or residential populations would be displaced by implementation of the Proposed Project, and the construction of replacement housing elsewhere would not be necessary. No impact would occur.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

The Proposed Project would not conflict with any existing housing and would not displace any people. As such, the Proposed Project would not require the construction of replacement housing elsewhere. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.14 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Less than Significant Impact.

The Redlands Fire Department (RFD) provides comprehensive emergency services for the City, including fire, rescue, and emergency medical (paramedic) services, as well as fire prevention and code enforcement functions. Fire Station No. 263, located at 10 W. Pennsylvania Avenue, approximately 0.7 miles northeast of the Project Site, would serve as the first responder in the event of an emergency. Fire Station No. 264, located at 1270 W. Park Avenue (approximately 1.3 miles southwest of the Project Site), would provide secondary response for any incident. In the event the units from Fire Station Nos. 263 or 264 are not available, other units would be available for dispatch from other RFD fire stations or adjacent jurisdictions. These RFD stations can currently respond to an incident at the Project Site (such as a vegetation fire) and would continue to provide fire protection services upon implementation of the Proposed Project.

Given that the Proposed Project would generate up to an estimated 225 new residents to the City, the Proposed Project could potentially increase the demand for RFD services. This marginal increase of people would be within regional growth projections for the City and thus, would not substantially affect provision of fire protection given the location of the Proposed Project in an urbanized area and close proximity to existing fire stations. The Proposed Project would be compatible with the City's land use designation for the site and would not add any uses not already anticipated by the City.

Furthermore, compliance with more current applicable fire code and the building code provisions determines a project's impact on fire services. The Proposed Project would be required to meet all current code provisions to the satisfaction of the City and RFD. As a result, the Proposed Project would be adequately served by existing public services and would not necessitate the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and is therefore not anticipated to result in

substantial adverse impacts. The overall need for fire protection services is not expected to substantially increase. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant with Mitigation.

The Redlands Police Department (RPD) provides police protection services to the Project Site from its station at 1270 W. Park Avenue, Building C, approximately 1.3 miles to the southwest. The Proposed Project would generate up to an estimated 225 new residents to the City. This marginal increase of people would be within regional growth projections for the City and thus, would not substantially affect provision of police protection given the location of the Proposed Project in an urbanized area and its proximity to existing police protection services and patrol routes. Furthermore, construction of the Proposed Project would incorporate various security features, such as fencing, surveillance cameras, onsite management and security lighting, to minimize trespassing, vandalism, and other attractive uses that could place an additional demand on RPD. As such, the Proposed Project would not result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The overall need for police protection services would not increase substantially as a result of the Proposed Project.

Development of the site may entail the storage of building equipment and materials on-site overnight directly related to construction activities. The storage of equipment and materials could potentially result in theft or vandalism if adequate measures are not taken. Mitigation Measure PUB-1 will reduce any potential impact on police services to a less than significant level.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

- PUB-1** A construction site security plan approved by the police department is required, providing adequate security measures such as lights, video cameras, vehicle transponders, locks, alarms, trained security personnel, fencing etc. The nature of the measures will depend on the specific requirements of the site, and may vary with the different stages of construction. The developer shall be responsible for the compliance of all sub-contractors working on the site. Other impacts associated with new development are mitigated with the payment of development impact fees, and State established school fees.

c. Less than Significant Impact.

A significant impact would occur if the Proposed Project would result in substantial population growth, which could generate a demand for school facilities that would exceed the capacity of the Redlands Unified School District (RUSD). The Project area is currently served by the following RUSD public schools: Kingsbury Elementary School, Clement Middle School, and Citrus Valley High School. The Proposed Project is intended to provide affordable housing for veterans, individuals with special needs, and low-income households, and is not anticipated to generate a substantial number of students that would impact current RUSD operating capacities. The Project Applicant would be required to pay the applicable school facility fees to RUSD based on RUSD's current fee schedule for new residential construction prior to the issuance of buildings permits to provide funds to ensure adequate school facilities are available. Pursuant to Government Code Section 65996, payment of school fees constitutes the exclusive means of both "considering" and "mitigating" impacts on school facilities. As such, compliance with this statutory requirement would result in less than significant impacts.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

The Proposed Project would generate up to an estimated 225 residents to the City. While the Proposed Project would provide various on-site recreational amenities and open space areas, it is reasonable to assume that the future residents of the Proposed Project would utilize recreation and park facilities in the surrounding area, including the Texonia Park located directly north of the site across W. Lugonia Avenue. However, as the Proposed Project would generate a marginal number of residents and would provide various on-site recreational amenities and open space area, a significant increase in demand for existing park or recreational facilities is not anticipated to occur. Any additional demand would be met through payment of the City's Open Space and Park Fees in accordance with the City's Municipal Code to provide funding for park and recreation facilities.²⁷ Thus, recreation facility impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact.

The Proposed Project would not create any significant increase in demand for library services. In accordance with the requirements of the City's Municipal Code, the Project Applicant would be required to pay the City's Public

²⁷ City of Redlands, Municipal Code, sec. 3.32.020, Open Space and Park Fees.

Facilities Fee to finance the City's public facilities, including libraries.²⁸ Payment of the impact fee would result in a less than significant impact to library facilities.

Mitigation Measures: No mitigation measures are required.

5.15 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
RECREATION – Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Less than Significant Impact.

The Proposed Project would generate a marginal increase in new City residents. Approximately 32,280 square feet of landscaping and open space would be installed as part of the Project, which would include outdoor recreational amenities for residents such as a picnic and barbeque area, community garden, bocce ball court, tot lot, and fitness trails. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future residents of the Proposed Project would utilize recreation and park facilities in the surrounding area, particularly Texonia Park which is less than a block from the site. The Project Applicant would be required to pay the City's Open Space and Park Fee to provide funding for public facilities, including parks and recreational facilities.²⁹ Payment of this impact fee would result in a less than significant impact to park and recreational facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

²⁸ City of Redlands, Municipal Code, sec. 3.60, Public Facilities Fees.

²⁹ City of Redlands, Municipal Code, sec. 3.32.020, Open Space and Park Fees.

b. Less than Significant Impact.

A significant impact may occur if the Proposed Project would include the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As stated previously, it is reasonable to assume that the future residents of the Proposed Project would utilize recreation and park facilities in the surrounding area. Although the Proposed Project could place some marginal additional demand on the City's existing park facilities, the increase in overall recreational demand would be met through a combination of the proposed on-site recreational amenities and payment of the City's Open Space and Park Fee. Therefore, the Proposed Project is not anticipated to create a significant demand on park facilities that would by itself result in the construction of a new park. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.16 Transportation and Traffic

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
TRANSPORTATION/TRAFFIC – Would the project:				
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Traffic Impact Analysis ("Traffic Study") prepared by Urban Crossroads dated January 29, 2016 for the Proposed Project. The Traffic Study is included as **Appendix I** to this Initial Study. It should be noted that the construction timeline has been updated since the preparation of the Traffic Study, which assumed that the Proposed Project would be constructed with fully occupancy by 2017. However, as indicated in **Section 3.0, Project Description**, construction of the Proposed Project is now anticipated to start in December 2017 and be completed by June 2019. For the purposes of this analysis, the modeling provided within the Traffic Study is presented herein. Due to comments received on the draft Initial Study regarding traffic at the intersection of Texas and Lugonia, the City requested additional information from the traffic consultant. This new information was submitted in a May 24, 2017 Focused Traffic Assessment. It is also incorporated into **Appendix I**.

a. Less than Significant with Mitigation.

Vehicular access to the site would be provided from two gated driveways along Texas Street. One driveway would provide entry and exit into the Project Site, while the other driveway would be restricted to exit only. Regional access to the Project Site would be provided from the I-210 and I-10 freeways. Local access is provided by surrounding roadways within the vicinity of the Project Site. The segment of W. Lugonia Avenue, which borders the Project Site along the north, is designated by the City's General Plan as a Major Arterial. The segment of Texas Street, which borders the Project Site along the east, is designated as a Minor Arterial. As described in **Section 3.0, Project Description**, the Proposed Project would include improvements to W. Lugonia Avenue and Texas Street to ensure compliance with applicable City standards for Major and Minor Arterial streets.

The City requires the operation of unsignalized intersections be evaluated using the methodology described in Chapter 17 of the 2000 Highway Capacity Manual. The intersection Level of Service (LOS) rating is based on an intersection's average control delay, expressed in seconds per vehicle, which are found in **Table 5.16-1, Level of Service Definitions for Intersections**. The City has set the goal for acceptable LOS as LOS C or better, for study area intersections.

Table 5.16-1
Level of Service Definitions for Intersections

LOS	Description	Average Control Delay Per Vehicle (seconds)
A	Little or no delays	0–10.00
B	Short traffic delays	10.01–15.00
C	Average traffic delays	15.01–25.00
D	Long traffic delays	25.01–35.00
E	Very long traffic delays	35.01–50.00
F	Extreme traffic delays with intersection capacity exceeded	> 50.00

Source: Highway Capacity Model, Chapter 17, 2000 (refer to Appendix I).

Estimated Trip Generation

Trip-generation estimates for the Proposed Project were calculated using the trip generation rates contained in *Trip Generation, 9th Edition* (Institute of Transportation Engineers, 2012).³⁰ **Table 5.16-2, Trip Generation Estimates—Daily Trips**, summarizes the trip generation rates used to arrive at the Proposed Project's trip generation estimates for the daily peak-hour periods.

³⁰ Institute of Transportation Engineers, *Trip Generation Manual*, 9th ed., 2012.

Table 5.16-2
Trip Generation Estimates—Daily Trips

Land Use	Size	AM Peak-Hour Volumes			PM Peak-Hour Volumes					Daily Trips	
		Rate	In	Out	Total	Rate	In	Out	Total	Rate	Total
Apartments	80 units	0.51	8	33	41	0.62	32	17	50	6.65	532
Total Trip Generation			8	33	41	—	32	17	50	—	532

Source: Urban Crossroads, Traffic Impact Analysis, January 29, 2016 (refer to Appendix I).

As shown in **Table 5.16-2**, the Proposed Project would generate a net total of approximately 532 trip-ends per day with 41 AM peak hour trips (8 inbound trips and 33 outbound trips) and 50 PM peak hour trips (32 inbound trips and 17 outbound trips). The Traffic Study analyzed the Proposed Project's forecasted traffic impacts, including existing conditions, existing plus Project conditions, opening year (2017) with and without Project conditions, and horizon year (2040) conditions with and without the Proposed Project.

Construction Traffic

The Proposed Project would require the use of haul trucks during site clearing and grading and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The addition of these vehicles to the street system would contribute to increased traffic in the Project vicinity. The haul truck trips, would be required to occur outside of the peak hours and during the permissible hauling hours identified along the haul route to be approved by the City. The Proposed Project's construction trip traffic would be a fraction of the operational traffic (532 per day), which would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that Project-related construction trips could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. A construction work site traffic control plan would be submitted to the City for review and approval prior to the start of any construction work as a condition of approval. The Project Applicant would be required to adhere to the construction work site traffic control plan, which would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties.

Operational Traffic

Pursuant to the City's traffic study requirements, three study locations were analyzed in coordination with the City for inclusion in the traffic analysis. The analyzed locations are identified in the Traffic Study and correspond to locations where potential traffic impacts from the Proposed Project are most likely to occur. The intersections identified for analysis are as follows:

1. Texas Street / W. Lugonia Avenue
2. Texas Street / Driveway 1 (future intersection)
3. Texas Street / Driveway 2 (future intersection)

Project Impacts

Existing Conditions without Project

As discussed in the Traffic Study, the intersection operations analysis of existing conditions without the Proposed Project indicates that the existing study area intersection of Texas Street and W. Lugonia Avenue is currently operating at an acceptable LOS B during the AM peak hour and LOS C during the PM peak hour. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections were not analyzed because these are future intersections resulting from the Proposed Project.

Existing Conditions with Project

Traffic volumes for existing conditions with the Proposed Project were derived by adding the trip generation estimates to the existing traffic conditions. As discussed in the Traffic Study, the addition of Project-generated trips would not impact the ability for the existing study area intersections to operate at acceptable LOS C or better during the AM and PM peak hours. Texas Street and W. Lugonia Avenue would operate at an acceptable LOS B during the AM peak hour and LOS C during the PM peak hour. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections would both operate at an acceptable LOS B during the AM and PM peak hours.

Because concerns were expressed by residents about the effects on the circulation system, the traffic engineer was commissioned to perform more current traffic counts. These were conducted on May 11, 2017. The new traffic counts are provided in Table 1 of the May 24, 2017 Urban Crossroads Focused Traffic Assessment letter. There was a slight increase in the traffic volumes at the Texas/Lugonia intersection compared to the original traffic study, but the intersection was found to be currently operating at an acceptable LOS (LOS C) and will continue to operate at an acceptable LOS with the addition of Project traffic. To ensure the LOS calculations were valid, field observations were also conducted. These observations verified that the peak hour operations showed no issues and turn pockets provided adequate storage for left-turning vehicles on Lugonia. The Traffic Assessment concluded “we conclude that the new traffic counts and field observations support the analysis results previously presented in the 2016 Traffic Study

Opening Year (2017) Conditions without Project

As previously indicated, the Traffic Study originally analyzed the forecasted traffic with and without the Proposed Project for the year 2017. The LOS calculations were conducted for the study intersections to evaluate their operations without the Proposed Project, including the proposed roadway improvements. During the Opening Year (2017) Conditions without the Proposed Project, Texas Street and W. Lugonia Avenue would operate at an

acceptable LOS C during the AM and PM peak hours. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections were not analyzed because these are future intersections resulting from the Proposed Project.

Opening Year (2017) Conditions with Project

The Traffic Study analyzed the forecasted traffic operations with the Proposed Project for the year 2017, which included the proposed roadway improvements. During the Opening Year (2017) Conditions with the Proposed Project, Texas Street and W. Lugonia Avenue would continue to operate at LOS C during the AM and PM peak hours. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections would both operate at an acceptable LOS B during the AM peak hour and LOS C during the PM peak hour.

Horizon Year (2040) Conditions without Project

The operations of the study intersections were evaluated under Horizon Year (2040) without the Proposed Project, including the proposed roadway improvements. The Traffic Study identified that the Texas Street and W. Lugonia Avenue intersection would operate at an acceptable LOS C during both the AM and PM peak hours. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections were not analyzed because these are future intersections resulting from the Proposed Project.

Horizon Year (2040) Conditions with Project

The Traffic Study analyzed the forecasted traffic operations with the Proposed Project for the horizon year 2040, which included the proposed roadway improvements. During the Opening Year (2040) Conditions with the Proposed Project, Texas Street and W. Lugonia Avenue would continue to operate at LOS C during the AM and PM peak hours. The Texas Street and Driveway 1 and Texas Street and Driveway 2 intersections would both operate at an acceptable LOS C during both the AM and PM peak hours.

As previously identified, the study intersection of Texas Street and W. Lugonia Avenue is currently operating at LOS B during the AM peak hour and LOS C during the PM peak hour. The forecast change in operations during the AM and PM peak hours in comparing the Existing to Existing with Project conditions, as well as Future to Future with Project conditions, would not result in the inability for the study intersections to meet acceptable LOS criteria established by the City through year 2040. Additionally, the Project Applicant would pay the City's applicable Transportation Impact Fees pursuant to Section 3.54 of the City's Municipal Code, to finance the construction of the required area transportation improvements. Impacts would be less than significant. Implementation of mitigation measure **MM TRA-1** shall be incorporated as part of the Proposed Project, to ensure impacts related to traffic to be reduced to a level of less than significant level.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

- TRA-1** Site adjacent improvements are required in conjunction with the proposed development. The necessary off-site improvement recommendations shall be implemented as described in the Traffic Impact Analysis.

In conclusion the intersection of Texas Street and W. Lugonia Avenue was evaluated based on methodologies consistent with City of Redlands and San Bernardino County Congestion Management Program (CMP) guidelines for Existing (2015), Opening Year (2017), and Horizon Year (2040) traffic conditions. The intersection was found to operate at an acceptable level of service (LOS "C" or better) under all the traffic scenarios, even with the addition of Project related traffic.

The City of Redlands and San Bernardino County CMP require the study area to include intersections where a project contributes 50 or more peak hour trips. The Proposed Project does not contribute 50 peak hour trips to any intersection, the intersection of Texas Street and W. Lugonia Avenue was included in the analysis based on consultation with City of Redlands staff during the scoping process as this intersection is adjacent to the Project Site. As such, the study area identified in the Traffic Study meets and exceeds the jurisdictional traffic study requirements. No "roadway improvements" in addition to those being constructed by the Proposed Project for project access purposes were assumed in the analysis. Therefore, as identified in the preceding text, implementation of mitigation measure **TRA-1** will reduce potential traffic impacts to a less than significant level.

b. Less than Significant Impact.

The City and the San Bernardino County Congestion Management Program (CMP) utilize the criterion that intersection-monitoring locations must be examined if a project would add 50 or more trips during either the weekday AM or PM peak hours. While the Proposed Project would not add 50 or more peak hour trips to the intersection of Texas Street and W. Lugonia Avenue, it was included in this analysis because it is adjacent to the Project Site. As previously discussed in **Section 5.16a**, the Proposed Project would not generate traffic that would result in intersection operations that do not meet acceptable LOS criteria established by the City. Furthermore, the Project Applicant would pay applicant development impact fees to finance the construction of the required area transportation improvements. Therefore, the Proposed Project would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

This impact threshold would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. Access to the Project Site would only require ground transportation. No air traffic demand would be created or affected by the Proposed Project. No impact would occur.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

The Proposed Project would include two new vehicular access driveways to the Project Site along Texas Street, as well as improvements to the portions of W. Lugonia Avenue and Texas Street along the site's frontages as consistent with the City's designated roadway classifications. If not properly designed and constructed, these improvements could potentially conflict with adjacent land uses or interfere with vehicular and pedestrian circulation in the Project area. However, the Proposed Project would not include unusual or hazardous design features. The Proposed Project will be properly designed and constructed pursuant to City standards to ensure consistency between land uses and the safety of vehicular and pedestrian circulation in the Project area. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact.

As previously discussed in **Section 4.8, Hazards and Hazardous Materials**, the Proposed Project borders W. Lugonia Avenue, which is identified by the City as a potential emergency evacuation route.³¹ Development of the Project Site may require temporary and/or partial street closures due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns and/or impede public access or travel upon public rights-of-way.

The Proposed Project would satisfy the emergency response requirements of the RFD through development of an emergency response plan. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals and fire stations. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to review requirements of the RFD and the RPD to ensure that all access roads, driveways, and parking areas would remain accessible to

31 City of Redlands, *General Plan*, "Health and Safety Element," October 1995.

emergency service vehicles. The Proposed Project would not be expected to result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. No Impact.

Omnitrans provides local bus service within the City of Redlands. Additionally, there is a planned Class III bikeway along Texas Street and a pedestrian access along W. Lugonia Avenue. The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes, including those previously identified. Therefore, the Proposed Project would not conflict with the City's adopted policies or programs supporting alternative modes of transportation. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.17 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Tribal Cultural Resources – Would the project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The following section summarizes and incorporates by reference information from the Cultural Resources Inventory Report (“Cultural Report”), dated January 2014, prepared by ECORP Consulting, Inc. for the Proposed Project. The Cultural Report is included as **Appendix C** to this Initial Study. This section also provides information gathered through the AB 52 Consultation process.

a.(i) No Impact

As discussed in **Section 5.5, Cultural Resources**, the Project Site is currently vacant and has no history of structural development. The Project Site was historically used for agricultural purposes sometime prior to 1930 until approximately 1966, and has remained vacant since. The Cultural Report identified one historic-period archaeological site, a refuse scatter, located on the Project Site. However, the origin of this refuse is unknown because the Project Site never contained any buildings or structures. The refuse does not meet the criteria to be listed or eligible as a historic resource under the California Register of Historical Resources (CRHR), nor does it meet the definition of a historical resource under CEQA. Therefore, the Proposed Project would not involve any activities that would cause a substantial adverse change to a historic resource. No impact would occur.

Mitigation Measures: No mitigation measures are required.

a.(ii) Less than Significant with Mitigation.

As discussed in the Cultural Report, a Sacred Lands File Search was conducted in December 2013 with the Native American Heritage Commission (NAHC) to determine whether there are sensitive or sacred Native American Resources that could be affected by the Proposed Project. The results of the search from the NAHC did not indicate the presence of any known Native American resources within 0.5 miles of the Project Site.

AB 52 established a formal consultation process for California Native American tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074 as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The NAHC provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in or near the Project site. The City notified five (5) tribes who had requested notification under AB52 (San Manuel Band of Mission Indians, Soboba Band of Luiseño Indians, Morongo Band of Mission Indians, Gabrieleño Band of Mission Indians, and Torres Martinez Desert Cahuilla Indians on September 19, 2016 and received responses from the San Manuel Band of Mission Indians, Soboba Band of Luiseño Indians, and the Morongo Band of Mission Indians. During consultation, tribes advised that archaeological and tribal monitoring be required to mitigate the potential impact to tribal resources to a less than significant level.

Mitigation Measures: Implementation of mitigation measures **CUL-1, CUL-2, CUL-3, and CUL-4** shall be implemented to reduce impacts to a less than significant level.

5.18 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS – Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Less than Significant Impact.

Under Section 401 of the CWA, the RWQCB issues NPDES permits to regulate waste discharged to “waters of the nation,” which includes reservoirs, lakes and their tributary waters. Waste discharges include discharges of stormwater and construction-related discharges. A construction project resulting in the disturbance of more than 1 acre requires a NPDES permit. As discussed in **Section 5.9, Hydrology and Water Quality**, the Project Applicant would be required to satisfy all applicable requirements of Section 13.52 of the City's Municipal Code, at the time of construction to the satisfaction of the City. **Appendix G** outlines the onsite drainage and water quality management proposals for the Project Site. These requirements include preparation of a SWPPP and WQMP containing structural treatment and source control measures appropriate and applicable to the Proposed Project. The SWPPP and WQMP would incorporate BMPs by requiring controls of pollutant discharges to reduce pollutants. The Project Applicant would also pay applicable NPDES program fees in accordance with Section 13.54.300 of the City's Municipal Code. As such, the Proposed Project would comply with the waste discharge prohibitions and

water quality objectives established by the RWQCB. These prohibitions and objectives would be incorporated into the Proposed Project as a project design feature. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

No new sources of water supply, such as groundwater, are required to meet the Proposed Project's water demand. Potable water would be supplied by the City, which draws its water supplies from a blend of local groundwater, local surface water, and imported water from the San Bernardino Valley Municipal Water District. The City operates and maintains a water distribution system with nearly 400 miles of pipeline, with a maximum capacity of 54.5 million gallons.³² The City treats its primary water sources within the Henry Tate Water Treatment Plant, which has the design capacity to treat 20 million gallons per day (MGD), before being distributed throughout its service area.³³ Wastewater is treated at the City's Wastewater Treatment Plant, which currently treats approximately 5.6 MGD and has a design capacity to treat 9 MGD.³⁴

Water serving the Proposed Project would be treated by existing extraction and treatment facilities. Based on the generation of approximately 225 residents, the Proposed Project is estimated to have a daily water demand of 72,000 gallons per day.³⁵ This estimate is conservative and adherence to current standards, including the Green Building Code, would likely reduce this estimate. Given the available capacities of the City's Water and Wastewater Treatment Facilities as outlined in the Regional Urban Water Management Plan, the Proposed Project would not require the construction of new facilities or expansion of existing facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The Proposed Project would not produce substantial amounts of additional runoff to the existing stormwater drainage facilities. As discussed in **Section 5.9**, the Proposed Project would incorporate design features, such as landscaping and on-site bioretention basins which would collect stormwater runoff on site or deliver excess runoff to surrounding storm drains. Any impacts to the stormwater drainage system would be mitigated through

32 City of Redlands, Municipal Utilities & Engineering, "Water System," <http://www.cityofredlands.org/water/system>, accessed March 2017.

33 City of Redlands, Municipal Utilities & Engineering, "Water System," <http://www.cityofredlands.org/water/system>, accessed March 2017.

34 San Bernardino Valley Municipal Water District, 2015 San Bernardino Valley Regional Urban Water Management Plan, June 2016.

35 The City currently has an average consumption per capita of approximately 320 gallons per day.

payment of the City's Storm Drain Facilities Fee³⁶ prior to issuance of building permits. As a result, the Proposed Project would not require any substantial changes to the existing drainage pattern of the Project Site or surrounding area, nor would it affect the capacity of the existing storm drain system. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Grading and construction activities associated with the Proposed Project would require the use of water for dust control and cleanup purposes. The use of water during construction would be short term in nature. Therefore, construction activities are not considered to result in a significant impact on the existing water system or available water supplies.

Operation of the Proposed Project would increase the daily demand for potable water supplied by the City. As previously discussed, the Proposed Project is estimated to have a water demand approximately 72,000 gallons per day. According to the 2015 San Bernardino Valley Regional Urban Water Management Plan (UWMP) prepared for the agencies within the San Bernardino Valley Municipal Water District service area, which includes the City of Redlands, the City had a total water demand of 24,322 acre-feet per year (AFY) in 2015, which is approximately 21.7 MGD. The City's projected demand for water would be 33,138 AFY in 2020 and 35,715 AFY in 2040.³⁷ The Regional UWMP concludes that the water supply is sufficient over the next 20 years to meet these projected demands.³⁸ Because the Proposed Project would be consistent with the City's land use designations for the site, it would be consistent with the growth projections found within the UWMP. As such, it is expected that the City has sufficient water supplies available to serve the Proposed Project.

Furthermore, the Proposed Project would adhere to current standards, including the Green Building Code, to reduce demand on local water supplies. The Project Applicant would also pay applicable development impact fees, including the Water Source Acquisition Charge, to finance ongoing improvements to the City's water supply resources and offset the Proposed Project's incremental impacts.³⁹ Therefore, impacts to local water supply services would be less than significant.

Mitigation Measures: No mitigation measures are required.

36 City of Redlands, Municipal Code, sec. 3.56, Storm Drain Facilities Fees.

37 San Bernardino Valley Municipal Water District, 2015 San Bernardino Valley Regional Urban Water Management Plan, June 2016.

38 San Bernardino Valley Municipal Water District, 2015 San Bernardino Valley Regional Urban Water Management Plan, June 2016.

39 City of Redlands, Municipal Code, sec. 13.40.020, Water Source Acquisition Fund.

e. Less than Significant Impact.

The Redlands Wastewater Treatment Facility currently processes 5.6 million gallons of wastewater per day, with a maximum capacity of 9 million gallons of wastewater per day.⁴⁰ As previously discussed, the Proposed Project is estimated to have a water demand of approximately 72,000 gallons per day, which is a conservative estimate of the projected wastewater generation. As such, the remaining capacity of the City's Wastewater Treatment Facility is sufficient to accommodate wastewater that would be generated by the Proposed Project. The Project Applicant would also be required to pay applicable development impact fees, including the Sewer Service Fund, to finance ongoing improvements to the City's domestic sewage system.⁴¹ Because the payment of this fee is required to reduce the impact of the Proposed Project on sewer line capacity, the impact of the Proposed Project on the existing sewage conveyance system would be reduced to a less than significant level.

Mitigation Measures: No mitigation measures are required.

f-g. Less than Significant Impact.

Solid waste on the Project Site would be deposited at the California Street Landfill or the San Timoteo Sanitary Landfill. The annual disposal rate at the California Street Landfill is currently 829 tons per day, with a remaining capacity of 6.8 million cubic yards of solid waste.⁴² The San Timoteo Sanitary Landfill has an annual disposal rate of 2,000 tons per day with a remaining capacity of approximately 13.6 million cubic yards of solid waste.⁴³ The Proposed Project would generate approximately 410 pounds of solid waste per day.⁴⁴ This estimate is conservative because it does not factor in any recycling or waste diversion programs that would be implemented on the Project Site. The amount of solid waste that would be generated by the Proposed Project would be within the available capacities of City's existing landfill facilities. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Furthermore, the Project Applicant would also be required to pay applicable development impact fees, including the Solid Waste Fund, to finance ongoing improvements to the City's solid waste facilities.⁴⁵ Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

40 San Bernardino Valley Municipal Water District, 2015 San Bernardino Valley Regional Urban Water Management Plan, June 2016.

41 City of Redlands, Municipal Code, sec. 13.62, Sewer Service Fund.

42 CalRecycle, "Facility/Site Summary Details: California Street Landfill (36-AA-0017)," <http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0017/Detail/>, accessed November 2016.

43 CalRecycle, "Facility/Site Summary Details: San Timoteo Sanitary Landfill (36-AA-0087)," <http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0087/Detail/>, accessed November 2016.

44 CalRecycle, "Estimated Solid Waste Generation Rates," <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, accessed March 2017.

45 City of Redlands, Municipal Code, sec. 13.66, Solid Waste Fund.

5.19 MANDATORY FINDINGS OF SIGNIFICANCE

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

Discussion

a. Less than Significant Impact.

The Project Site is located within an urbanized area that is surrounded by urban residential, agricultural, open space, and industrial uses. The Project Site is vacant and unimproved and currently undergoes routine disking for weed abatement, thus reducing the amount of ground vegetation. No native vegetation or habitat exists on the site or within the Project vicinity. In addition, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. As such, the Proposed Project would not have the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Furthermore, the Proposed Project would not have the potential to eliminate important examples of major periods of California history or prehistory, including historical, archaeological, or paleontological resources. Therefore, the Proposed Project would not result in significant environmental impacts that have the potential to degrade the quality of the environment. Contingency mitigation is incorporated in this document to address accidental exposure of subsurface archaeological resources and tribal cultural resources. With implementation of these measures, cultural resources impacts would be less than significant.

Mitigation Measures: Mitigation measures **CUL-1** through **CUL-4**.

b. Less than Significant Impact.

Cumulative impacts may occur when the Proposed Project in conjunction with one or more related projects would yield an impact that is greater than what would occur with the development of only the Proposed Project. With regard to cumulative effects on agricultural, biological, and mineral resources, the Project Site is located in a developed area; therefore, other developments occurring in the area of the Proposed Project would largely occur on previously disturbed land. Thus, no cumulative impact to these resources would occur. Impacts related to archaeological resources, paleontological resources, and hazards and hazardous materials are generally confined to a specific site and do not affect off-site areas. Potential cumulative effects on air quality, hydrology, noise, public services, and traffic were determined to be less than significant. Impacts would be less than significant.

Mitigation Measures: Noise mitigation measures **NOI-1** through **NOI-4** and **TRA-1** will be implemented to control adverse impacts under these issue categories.

c. Less than Significant with Mitigation.

A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted in **Sections 5.1** through **5.18**.

Mitigation Measures: Refer to the individual sections for the list of mitigation measures are required.

Based on the analysis in this Initial Study, the proposed Liberty Lane Apartment Project is not forecast to cause any significant adverse environmental impacts to any of the environmental resource issues evaluated in this Initial Study. The City of Redlands proposes to adopt a Negative Declaration with mitigation as the appropriate environmental determination for this Project to comply with the California Environmental Quality Act. A 20-day Notice of Intent to Adopt a Negative Declaration will be distributed in conjunction with this Initial Study and after reviewing any comments received on the Initial Study, the City will respond to comments and, if justified on the whole of the record, the City will consider adopting a Mitigated Negative Declaration at a future meeting. The date of such meeting has not yet been determined, but any parties that submit comments will be notified of the meeting date.

6.0 REFERENCES

The following documents and information were used in the preparation of this Initial Study:

California Code of Regulations, Title 14, Sections 15063.

California Department of Conservation, Division of Land Resource Protection, San Bernardino County Important Farmland 2014, Sheet 2 of 2, March 2016.

California Department of Conservation, Division of Land Resource Protection, San Bernardino County Williamson Act FY 2015/2016, Sheet 2 of 2, 2016.

CalRecycle, Facility/Site Summary Details: California Street Landfill (36-AA-0017),
<http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0017/Detail/>, accessed November 2016.

CalRecycle, Facility/Site Summary Details: San Timoteo Sanitary Landfill (36-AA-0087),
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City of Redlands, General Plan, Open Space and Conservation Element, October 1995.

City of Redlands, Municipal Code, Section 3.32.020—Open Space and Park Fees.

City of Redlands, Municipal Code, Section 3.56—Storm Drain Facilities Fees.

City of Redlands, Municipal Code, Section 3.60—Public Facilities Fees.

City of Redlands, Municipal Code, Section 13.40.020—Water Source Acquisition Fund.

City of Redlands, Municipal Code, Section 13.62—Sewer Service Fund.

City of Redlands, Municipal Code, Section 13.66—Solid Waste Fund.

City of Redlands, Municipal Code, tit. 18, sec. 18.52 – R-2 Multiple-Family Residential District.

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South Coast Air Quality Management District, Draft 2016 Air Quality Management Plan, June 2016.

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Revised October 21, 2009.

South Coast Air Quality Management District, Revised Draft 2016 Air Quality Management Plan, October 2016.

United States Census Bureau, QuickFacts, <http://www.census.gov/quickfacts/table/PST045215/00>, accessed
November 2016.

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United States Department of Homeland Security, Federal Emergency Management Agency, Map No.
06071C8704H, 2008.

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8.0 MITIGATION MEASURES AND MITIGATION MONITORING AND REPORTING PROGRAM

AESTHETICS

- AES-1** To mitigate the exterior sound attenuation wall, the wall shall be constructed with articulation that breaks up the uniform character of a standard block wall and that requires landscaping on the exterior of the wall to create additional visual variety. The wall design and landscaping shall be reviewed and approved by the City to ensure that it provide visual variety that attenuates the uniformity of a standard block wall and integrates this structure into the community design.

The design of the wall shall be submitted to the City Development Services Department, Planning Division, for review and approval. Installation of the fence in accordance with the approved design shall be reviewed by City field inspectors and verification documented in the project file.

CULTURAL RESOURCES

- CUL-1** If there are any changes to Project Site design and/or proposed grades, prior to the issuance of a grading permit, the Applicant shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant and interested tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The Applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the Project Site if the site design and/or proposed grades should be revised in consult with the City of Redlands. In specific circumstances where existing and/or new resources are determined to be unavoidable and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject any future development, erosion or flooding.

To be monitored by the Development Services Department, Planning Division, and the Municipal Utilities and Engineering Department, prior to issuance of a grading permit.

- CUL-2** At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a

Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City of Redlands shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project Site. Details in the Plan shall include:
 - a. Project grading and development scheduling;
 - b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists; and
 - c. The protocols and stipulations that the Developer, City of Redlands. Tribes and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

To be monitored by the Development Services Department, Planning Division, through receipt of a copy of a signed contract between the developer and a qualified archaeologist, and a copy of the Archaeological Monitoring Plan prior to issuance of a grading permit.

CUL-3 In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project archaeologist. The removal of any artifacts from the Project Site will need to be thoroughly inventoried with tribal monitor oversight of the process.

2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Redlands with evidence of same:
 - a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.
 - b. A curation agreement with an appropriate qualified repository within San Bernardino County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Bernardino County, to be accompanied by payment of the fees necessary for permanent curation.
 - c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the Project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the San Bernardino County Museum by default.
 - d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Redlands documenting monitoring activities conducted by the Project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Redlands, CHRIS and consulting tribes.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project.

CUL-4 In the event that human remains (or remains that may be human) are discovered at the Project Site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the San Bernardino County Coroner and the City of Redlands Police Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will remain proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the Eastern Information Center (EIC), the City of Redlands Development Services Department, and the appropriate Native American Tribe.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project.

CUL-5 In the event that paleontological resources are unearthed during Project subsurface activities, all earth-disturbing work would be temporarily suspended or redirected until a qualified paleontologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. After the resources have been properly addressed, work in the area may resume. With implementation of this standard requirement, no significant impact would occur.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project.

GEOLOGY AND SOILS

GEO-1 The geotechnical design recommendations provided in Section 7 of the Geotechnical Report (**Appendix D** of the Initial Study) or measures deemed equivalent by the geotechnical professional shall be implemented by the Proposed Project. Section 7 identifies specific onsite design measures to address the following geotechnical issues: clearing and grubbing; site preparation; temporary slope and trench excavations; foundations; footings; seismic design parameters (refer to the October 21, 2015 Update in **Appendix D** in which Table 2, 2013 California Building Code Seismic Design Parameters updates these design parameters); concrete slabs-on-grade (including control of vapor migration; pavement sections; drainage control; and soil corrosion. These design measures are hereby incorporated in this measure and shall be implemented during actual construction of the Proposed Project.

The geotechnical design recommendations shall be incorporated into the project design prior to initiating construction and design requirements shall be incorporated into all project features prior to construction and these design measures/requirements shall be implemented during construction. Installation of the design measures in accordance with the approved design shall be reviewed by City field inspectors and verification documented in the project file.

NOISE

NOI-1 Increased Noise Levels (Construction)

Though construction noise is temporary, intermittent and of short duration, and will not present any long-term impacts, the following noise abatement measures would reduce any noise level increases produced by the construction equipment to the nearby noise-sensitive residential land uses:

- Public notice shall be given prior to initiating construction. This notice shall be provided to all property owners/residents within 100 feet of the Project site and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the Project. The public notice shall encourage the adjacent

residences to contact the supervisor in the case of a complaint. Resident's would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or otherwise control the sound source causing the complaint.

- If feasible, construct the planned Project 6 and 8-foot high noise barriers at the Project site boundaries prior to the commencement of Project construction activities. This would further reduce the noise levels experienced at the nearby sensitive receiver locations, but is not required.
- Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays (City of Redlands Municipal Code, Section 8.06.090 (F)). The Project construction supervisor shall ensure compliance with the permitted construction hours.
- During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
- The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction.
- Equipment not in use for five minutes shall be shut off.
- Equipment shall be maintained and operated such that loads are secured from rattling or banging.
- Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.

- The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.
- No radios or other sound equipment shall be used at the Project site unless required for emergency response by the contractor.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, and satisfied through notes on the approved grading and construction plans and implementation during construction of the project.

NOI-2 Exterior Noise Mitigation

To satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for multi-family residential development, the construction of 6.5-foot high noise barriers for buildings with outdoor living areas (first floor patios) adjacent to Lugonia Avenue is required. Buildings with outdoor living areas (first floor patios) adjacent to Texas Street will require the construction of 5-foot high noise barriers. Exterior noise levels will approach 58.2 dBA CNEL at open space uses within the Project site, and therefore, no exterior noise abatement is required to satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for open space use. With the recommended noise barriers shown on Exhibit ES-A for multi-family residential units, the mitigated future exterior noise levels will range from 59.0 to 60.0 dBA CNEL. This noise analysis shows that the recommended noise barriers will satisfy the City of Redlands 60 dBA CNEL exterior noise level standards.

The recommended noise control barriers shall be constructed so that the top of each wall extends to the recommended height above the pad elevation of the lot it is shielding. The barrier shall provide a weight of at least 4 pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, and a minimum sound transmission loss of 20 dBA. The noise barrier shall be constructed using the following materials. The barrier shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking.

- Masonry block;
- Stucco veneer over wood framing (or foam core), or 1-inch-thick tongue and groove wood of sufficient weight per square foot;
- Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot capable of providing a minimum transmission loss of 20 dBA;
- Earthen berm; or
- Any combination of these construction materials.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, demonstrated on construction plans prior to issuance of a building permit and monitored during construction of the project for compliance with approved plans.

NOI-3 Interior Noise Mitigation

To satisfy the City of Redlands 45 dBA CNEL interior noise level criteria, buildings facing Texas Street and Lugonia Avenue will require a Noise Reduction (NR) of up to 22.2 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:

- Windows: All windows and sliding glass doors shall be well fitted, well weather-stripped assemblies and shall have a minimum sound transmission class (STC) rating of 27.
- Doors: All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick.
- Roof: Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one-half inch thick. Ceilings shall be well fitted, well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- Attic: Attic vents should be oriented away from Texas Street and Lugonia Avenue. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents.

- Ventilation: Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use. A forced air circulation system (e.g. air conditioning) shall be provided which satisfies the requirements of the Uniform Mechanical Code. Wall mounted air conditioners shall not be used.

With the recommended interior noise mitigation measures provided in this study, the proposed Liberty Lane Apartments residential Project is expected to meet the City of Redlands 45 dBA CNEL interior noise level standards for residential development.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, demonstrated on construction plans prior to issuance of a building permit and monitored during construction of the project for compliance with approved plans.

NOI-4 Construction Vibration Mitigation Measures

Though construction is temporary, intermittent and of short duration, and will not present any long-term vibration impacts, the following practices would reduce vibration level increases produced by the construction equipment to the nearby noise-sensitive residential land uses.

- Large construction equipment shall not be used within 65 feet of residential properties, identified on Exhibit 10-A. As used here, “large construction equipment” means any track-type bulldozer, grader, or scraper larger than a D-8 Caterpillar bulldozer; equipment without rubber tires; or equipment with a peak-particle velocity (PPV) vibration levels of more than 0.01 in/sec at 50 feet when operated on this site.
- Notice shall be given to adjacent property owners at least seven calendar days prior to the commencement of Project construction activity.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, demonstrated on construction plans prior to issuance of a building permit and monitored during construction of the project for compliance with approved plans.

PUBLIC SERVICES

- PUB-1** A construction site security plan approved by the police department is required, providing adequate security measures such as lights, video cameras, vehicle transponders, locks,

alarms, trained security personnel, fencing etc. The nature of the measures will depend on the specific requirements of the site, and may vary with the different stages of construction. The developer shall be responsible for the compliance of all sub-contractors working on the site. Other impacts associated with new development are mitigated with the payment of development impact fees, and State established school fees.

To be monitored by the Police Department, Development Services Department, Building and Safety Division, and Municipal Utilities and Engineering Department and completed prior to issuance of a grading and building permit.

TRANSPORTATION / TRAFFIC

TRA-1 Site adjacent improvements are required in conjunction with the proposed development. The necessary off-site improvement recommendations shall be implemented as described in the Traffic Impact Analysis.

To be monitored by the Planning Division of the Development Services Department, Building and Safety Division, and Municipal Utilities and Engineering Department and completed prior to Certificate of Occupancy.



MEMORANDUM

September 11, 2017

From: Tom Dodson

To: Ms. Lorelee Farris, Principal Planner

Subject: Completion of the Mitigated Negative Declaration for the Revised Initial Study Liberty Lane Apartments

The City of Redlands (City) published the Revised Initial Study Liberty Lane Apartments for public review on July 17, 2017. This document received 19 written comments on the proposed Initial Study/Mitigated Negative Declaration (IS/MND) for the Liberty Lane Apartment Project. CEQA requires a Negative Declaration to consist of the Initial Study, copies of the comments, any responses to comments as compiled on the following pages; and any other project-related material prepared to address issues evaluated in the Initial Study.

For this project, the original Initial Study will be utilized as one component of the Final Mitigated Negative Declaration package. The attached responses to comments, combined with the Initial Study and the Mitigation Monitoring and Reporting Program, constitute the Final IS/MND package that will be used by the City to consider the environmental effects of implementing the proposed project.

The following parties submitted comments. These letters are addressed in the attached Responses to Comments:

1. OmniTrans
2. Rosy M. Macias
3. San Manuel Band of Mission Indians
4. Pam Brown-Hinds/Dwight Willett
5. Dorene Isenberg
6. Christine Roque
7. Nonie Kleinhans
8. San Bernardino County, Dept. of Public Works
9. Alaina Edgett
10. Alexander Magallanes, Alejanda Galindo-Magallanes, Matania Magallanes and Laurie Cosme
11. Dr. Alexander Magallanes
12. Ediberto Flores II
13. Joe Gonzales
14. American Legion Philip Marmolijo Post 650
15. American Legion Petition
16. John F. Prentice – Eadie & Payne
17. Abigail Smith, Esq., Law Offices of Abigail Smith

Because mitigation measures are required for this project to reduce potentially significant impacts to a less than significant level, the Mitigation Monitoring and Reporting Program (MMRP) attached to this package is required to be adopted as part of this Final MND package.

The MMRP has been incorporated by reference to this package for approval and implementation. The City's consideration of the proposed project and adoption of the Mitigated Negative Declaration will occur at a public hearing on this project to consider the project entitlements.

Do not hesitate to give me a call if you have any questions regarding the contents of this package.

A handwritten signature in black ink, appearing to read "Tom Dodson". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Dodson".

Tom Dodson
Attachments

COMMENT LETTER #1



1700 W. Fifth St.
San Bernardino, CA 92411
909-379-7100
www.omnitrans.org

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

July 18, 2017

Ms. Farris,

Thank you for providing Omnitrans the opportunity to comment on the Notice of Intent to Adopt an MND for the Liberty Lanes Apartments.

1-1 The site plan in the IS document denotes bus stop amenities being installed at Omnitrans' existing Route 15 bus stop on Lugonia at Texas. I would also advise providing pedestrian connections, such as pedestrian gates, at strategic points along the perimeter of the site for residents to take a direct path of travel to the bus stop.

1-2 There are design guidelines for bus stops on Omnitrans' website at <http://design.omnitrans.org/>. I am also happy to meet or review plans; I can be contacted at (909) 379-7256 or anna.jaiswal@omnitrans.org.

I look forward to providing any assistance I can with this beneficial project.

Sincerely,

A handwritten signature in black ink that reads "Anna Jaiswal". The signature is written in a cursive, flowing style.

Anna Jaiswal
Development Planning Manager



RESPONSES TO COMMENTS
LETTER #1
OMNITRANS

- 1-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Currently, public sidewalks provide direct access to the Omnitrans bus stops/benches on the north and south sides of Lugonia Avenue west of the Texas Street intersection (directly north of the project site). The City will review additional pedestrian access to the Omnitrans Route 15 bus stops on Lugonia Avenue, and discuss the need for any additional pedestrian gates along the property perimeter. If justified, additional gates will be incorporated into the project design.
- 1-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. This information has been made available to the site developer to utilize in the design of bus stop amenities.

Dear Ms. Loralee Jarris:

(Principle Planner City of Redlands Development Services Department)

2-1 I am Rosy, Maria a 62 year resident of the Northside and a 35yr retired Social Worker for DPSS and a member of the Northside Impact Committee. I am 85 years young. I am Writing to you to voice my concerns and impact of the Liberty Lane Apartment Project which is to be located on the Southwest Corner of N. Lugonia and Texas Street. You are proposing to a Zone change from Single family Residential (R-1) District to a Multiple Family Residential (R-2) District.

2-2 We and I do believe I speak for many residents around our neighborhood you propose to bring in as you stated a "Very LOW and LOW Income Housing" units. We are middle class Americans that have struggled and established our neighborhoods on respect to a Good and Decent park where children play and practice sports and family's gather for fun on a daily basis to Church's among the neighborhoods do established families with children that play, that walk and participate in and around that area. So you to propose a "Very LOW and LOW Income Housing"

RESPONSES TO COMMENTS
LETTER #2
MS. ROSY M. MACIAS

- 2-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please note that the Liberty Lane site is designated in the General Plan for Multiple Family Residential use (MDR) and has been so designated since 1995 when the pertinent General Plan was adopted. Refer to the Land Use Section discussion in the text of the Initial Study on page 5.0-50 for more detailed information.
- 2-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. This comment states a common theme among many of the commenters. This theme essentially concludes that because the future residents of Liberty Lane may be different than the existing residents of the area, the project may jeopardize the existing pattern of life within the neighborhood. This comment incorporates an unstated assumption that because the project will host individuals of a different economic class, it will conflict with the neighborhood's "middle class" lifestyle. There is no factual foundation for this assumption. Simply because a household with a disabled or challenged person qualifies as low income or very low income, it does not mean that the lifestyle will differ from "middle class" lifestyle. The future residents at Liberty Lane will have the opportunity to attend church in the project area; to use the beautiful park facilities at Texonia Park; to access immediately adjacent mass transit (bus stop at Lugonia and Texas); and to use commercial shopping opportunities in nearby downtown Redlands and Citrus Plaza. Given the onsite management services to be provided at Liberty Lane for future residents, the assumptions about type of behavior in this comment appear to be based on opinions about economics and social issues, and not an environmental issue. Economic and social impacts (if any) that do not contribute to or are not caused by physical changes in the environment do not constitute substantial evidence of a potentially significant effect on the environment (per CEQA Guidelines section 15064(f)(6)).

To establish homes for Veterans and although it is not stated with mental disabilities and war attributed symptoms and individual with special needs and as you stated "Very Low to LOW Income Housing" is asking us to jeopardize our children, our churches, our homes and our neighborhoods to countless issues that might arise NO but will arise because of this proposed project/zone change.

2-2
cont.

Do not get me wrong the proposed idea is great, but not in this single family Residential neighborhood. With all the vacant properties that Redlands Township has, the proposed project could be redirected to another area. Where it could be monitored and no neighborhood issues could and would arise.

2-3

We are not a wealthy people neighborhood but we have worked and are a proud neighborhood that has worked hard to maintain our neighborhoods and properties. For you to propose this change to this multiple family zone (neighborhood) and we all know what comes with "LOW Income Housing" not to mention "Very Low Income with Special Needs" as you stated will bring in mentally disturbed, drugs, alcohol

2-4

- 2-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The City will be able to monitor activities at Liberty Lane as it could at any location, and one of the project's objectives is to place the future residents of Liberty Lane in a healthy neighborhood to assist with healing and integration into the community (neighborhood), and no "neighborhood issues" unspecified" in the comment are anticipated.
- 2-4 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The proposed operation of the Liberty Lane project is designed to provide controls over the behaviors listed in this comment. There is no evidence that low income or very low income households will create any different or more severe effects on the neighborhood than middle income households. As such, assuming that these behaviors will occur at this facility is not appropriate. Economic and social impacts (if any) that do not contribute to or are not caused by physical changes in the environment do not constitute substantial evidence of a potentially significant effect on the environment (per CEQA Guidelines section 15064(f)(6)).

2-4
cont

and dirty trash and debris that we all know will come. Because it is inevitable because that is what it is and we all know that.

2-5

You proposed to accommodate the homeless and special needs and Veterans (possibly those with PTSD status or other mental illness) is directly putting us in harms way.

2-6

Our neighborhoods are safe
our neighborhoods are clean and
our neighborhoods are of single family status.

2-7

Please do not jeopardize our livelihood and our very proud neighborhoods. I know there is another alternative to redirect this Liberty Lane Apartments Project like to the Northwest side of Alabama/Lugonia Streets where they have erected Apartment Living at its finest.

Respectfully,

Mrs Rosy Macias

Rosy M. Macias
505 W. Brockton Ave
Redlands CA 92374
(909) 793-3893

- 2-5 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please refer to the preceding four responses.
- 2-6 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 2-7 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

COMMENT LETTER #3

Farris, Lorelee

From: Jessica Mauck <JMauck@sanmanuel-nsn.gov>
Sent: Tuesday, August 01, 2017 10:03 AM
To: Lorelee Farris
Subject: RE: AB 52 Notification - Density Bonus and Incentive/Concession Agreement, Zone Change No. 448, Conditional Use Permit No. 1045

Hi Lorelee,

3-1

Thank you for your response. The former Director of this department responded to ECORP with no concerns regarding the project, so I will follow that lead. SMBMI does not have any concerns with the project's implementation, as planned, at this time. However, SMBMI requests that the following language be made a part of the project/permit/plan conditions:

3-2

1. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.
2. In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, so as to provide Tribal input.
3. If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop an cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment.
 - a. All in-field investigations, assessments, and/or data recovery enacted pursuant to the finalized Treatment Plan shall be monitored by a San Manuel Band of Mission Indians Tribal Participant(s).
 - b. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.

Note: San Manuel Band of Mission Indians realizes that there may be additional tribes claiming cultural affiliation to the area; however, San Manuel Band of Mission Indians can only speak for itself. The Tribe has no objection if the agency, developer, and/or archaeologist wishes to consult with other tribes in addition to SMBMI and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

3-3

Please provide the final copy of the project/permit/plan conditions so that SMBMI may review the included language. This communication concludes SMBMI's input on this project, at this time, and no additional consultation pursuant to CEQA is required unless there is an unanticipated discovery of cultural resources during project implementation. If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience.

Respectfully,

Jessica Mauck

RESPONSES TO COMMENTS
LETTER #3
SAN MANUEL BAND OF MISSION INDIANS

- 3-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 3-2 Please refer to cultural resources mitigation measures CUL-1 through CUL-4 in the Initial Study. The City deems these measures comparable or more stringent than the three measures identified in this comment.
- 3-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. A copy of these responses combined with the Initial Study fully address the San Manuel comments. These responses will be provided to the Band prior to the City Council hearing on this matter. Please note, however, that the consultation in accordance with State law has concluded with the environmental review process for this project. Any future notification(s) to tribal representatives during the construction phase of the project would not be the same as 'Consultation' as defined in Public Resources Code (PRC) Sections 21080.3.1 or 21080.3.2. PRC Section 21080.3.1(d) provides for a distinct beginning period for a Consultation; and PRC Section 21080.3.2(b) provides for a distinct ending period for Consultation. Given the lack of any information or evidence indicating any potential effect on tribal cultural resources, the mitigation measures proposed are the appropriate level of monitoring and notice during the construction phase of this project. Any future notifications that may occur related to this project should not be considered a new, on-going, or re-opened 'Consultation' as defined in PRC Sections 21080.3.1 or 21080.3.2.

COMMENT LETTER #4

Farris, Lorelee

From: Paulette Brown-Hinds <pbrownhinds@me.com>
Sent: Sunday, August 06, 2017 10:43 AM
To: Lorelee Farris
Subject: Liberty Lane Letter - Dwight Willett
Attachments: Liberty Lane Letter.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Ms. Farris,

Please accept this letter on behalf of my uncle, Dwight Willett. He is technology challenged and asked that I send it on his behalf.

Thank you,

Paulette Brown-Hinds

DWIGHT WILLETT
Garden Avenue
Redlands

August 4, 2017

RE: Adoption of a Mitigated Negative Declaration, Liberty Lane Apartments

Ms. Lorelee Farris
City of Redlands
Planning Department

Dear Ms. Farris,

4-1 I am writing to support the adoption of the Mitigated Negative Declaration for Liberty Lane planned housing community for veterans — especially homeless veterans — to be developed in Redlands. As a veteran of the Korean War and almost 40-year resident of this city, I couldn't be more proud to support this project.

4-2 Not only will the apartments house those former military personnel who, like me, were willing to give their lives for this country. It will provide support services that will help them leave productive lives. As a retired behavioral health professional, I know just how important those social services are for our former servicemen and women.

4-3 I look forward to attending the groundbreaking, and while I can no longer wear my uniform, I will joyfully stand among my fellow veterans and salute the city for providing a safe and comfortable place for our now homeless heroes.

Dwight Willett
Resident, City of Redlands
909/793-3572

**RESPONSES TO COMMENTS
LETTER #4
PAULETTE BROWN-HINDS/DWIGHT WILLETT**

- 4-1 This general comment is in support of the project. No comments are provided regarding the environmental documents. Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 4-2 This comment also expresses support for the social and behavioral services of the proposed project. No comments are provided regarding the environmental documents.
- 4-3 See response to 4-1 above.

COMMENT LETTER #5

Farris, Lorelee

From: Isenberg, Dorene <Dorene_Isenberg@redlands.edu>
Sent: Sunday, August 06, 2017 6:22 PM
To: Lorelee Farris
Subject: Comments on the Liberty Lane Apt. Project (CUP #1045)
Attachments: Liberty Lane Project-8-6-17.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Farris,
Please see the attached letter for my comments on the project.
my best,
Dorene Isenberg

Dorene Isenberg
Professor of Economics
University of Redlands
Redlands, CA 92373

909 748 8566 (o)

Ms. Lorelee Farris
Principal Planner
City of Redlands Development Services Department
Redlands, CA 92373

Dear Ms. Farris:


5-1 I'm writing to respond to the City of Redlands's recommendation to go forward with its Mitigated Negative Declaration (MND) on the proposed Liberty Lane Apartments Project. This project which proposes to offer housing to veterans, individuals with special needs, and low-income households has the potential to meet the needs of several groups of Redlands residents. In and of itself, the project has merit, but the site of the proposed project works against 1) the current zoning designation of the area and 2) meeting the needs of the groups outlined by being situated in a part of the city that can't offer proper access to commercial establishments needed for their everyday lives.

5-2 The current zoning of the project site is a true reflection of the neighborhoods in the area. The neighborhoods are filled with single-family homes, so developing an 80-unit apartment complex in their midst, changes the very nature of these families' neighborhoods. At the same time, it puts the residents of the proposed apartment complex into a position in which transportation, which for low-income, many older veterans, and individuals with special needs means mass transit, is not properly available. It's extremely odd given the city's current planning around the Arrow, which is scheduled to arrive in Redlands around 2020, that this project is not being situated so that the inhabitants of the apartment complex would have access to the transportation proposed in the new transit corridors. For instance, situating the apartment complex on some of the undeveloped area off of Eureka Street by Oriental Ave. would allow the residents of the complex to shop for food at the nearby Sprouts; utilize the Beaver Clinic for healthcare and the new Urgent Care at Redlands Blvd. and Eureka for after-hours care; and have easy access to the shops in downtown Redlands. Along with easier access to commercial establishments, there's an easier access to bus transit and, eventually, the Arrow.

5-3

5-4 Redlands is doing a great job as it prepares for its future transportation changes. It needs now to include ideas of residential dwellings that would also fit into these city transformations. Dumping our veterans, low-income families, and residents with special needs in an R-1 area that would not be able to meet their needs is a disservice to them and to the families who currently live in this area. Redlands can do much better.

Respectfully,


Dorene Isenberg
Professor of Economics
University of Redlands

RESPONSES TO COMMENTS
LETTER #5
DORENE ISENBERG

- 5-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please note that the Liberty Lane site is designated in the General Plan for Multiple Family Residential use (MDR) and has been so designated since 1995 when the pertinent General Plan was adopted. Refer to the Land Use Section discussion in the text of the Initial Study on page 5.0-50 for more detailed information. The proposed change in zoning classification will be fully consistent with the City's General Plan, the overall guidance document for land uses in the City. The future residents at Liberty Lane will have the opportunity to attend church in the project area; to use the beautiful park facilities at Texonia Park; to access immediately adjacent mass transit (bus stop at Lugonia and Texas); and to use commercial shopping opportunities in downtown Redlands and Citrus Plaza. Both public mass transit and onsite transport will be able to make these two primary commercial shopping locations accessible to future residents within a few minutes. Omnitrans Route #15 passes on Lugonia Ave. directly in front of the project site, and also provides direct access to the Transit Center in downtown Redlands for connections to other local and regional transit options (including Omnitrans Route #19 which provides direct access to the Loma Linda VA Medical Center and Loma Linda University Medical Center). Seniors and persons with disabilities may also utilize Omnitrans' Access ADA Service as well as discounted programs such as RIDE Taxi & Lyft Program for medical appointments, work, grocery shopping and other trips that may be difficult to make on public transportation.
- 5-2 Please refer to the preceding response and comment letter #1. OmniTrans mass transit is readily available at this site and can connect Liberty Lane residents to most locations in the San Bernardino Valley. Also, there will be onsite vans to transport residents to medical or other appointments and shopping areas. Thus, mass transit is fully available and probably in closer proximity than most other locations (within 100 feet of the Liberty Lane property).
- 5-3 See response 5-1 above. Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Mass transit access would not necessarily be closer at the referenced location, but the site would be a much busier and noisier site than the proposed project site.
- 5-4 The subject property is an appropriate and suitable location for the proposed project, and adjacent to major transportation thoroughfares which provide easy access to nearby commercial areas and services (discussed in detail in the Transportation and the Land Use sections of the Initial Study). Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

COMMENT LETTER #6

Farris, Lorelee

From: Christine Roque <roque.christine@gmail.com>
Sent: Monday, August 07, 2017 11:45 PM
To: Lorelee Farris
Cc: Jeanne Donaldson
Subject: Liberty Lane Apartments
Attachments: CCPC2.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Farris,

Attached our my comments for the proposed Liberty Lane Apartments.

Thank you,

Christine Roque

Monday, August 7, 2017,

Dear Mayor Foster and City Council Members,

6-1 I oppose the Liberty Lane Apartments being proposed for the southwest corner of Lugonia Avenue and Texas Street. Even with the mitigations being offered, this proposed project as it stands will have a significant effect on the environment, the families who live in the surrounding neighborhoods, and the residents themselves.

6-2 According to the ACOF website, 31 out of 40 A Community of Friends' properties have 50 or fewer units on each site. This number is significantly less than the proposed 80 units for Liberty Lane Apartments. In fact, if approved 80 units will be the highest number of units for ACOF to date. Why does our single family residential neighborhood alone or Redlands for that matter have to absorb a project with such a high density on so little acreage? 17.9 units per acre is considered High Density per the general plan. The ideal project(s) would be smaller with far less units equitably situated throughout Redlands. The Housing Authority of the County of San Bernardino is also a partner in this proposed project and our Northwest Redlands neighborhood also known as the Lugonia planning area has a proliferation of Housing Authority projects in comparison to other planning areas in Redlands. The three sites, The Housing Authority on the corner of Texas and Brockton, Vista del Sol, and Valencia Grove Phase I are all within less than a mile of each other. This type of housing should be distributed equitably throughout Redlands.

There are so many unknowns that go along with a project of this type and density.

- 6-3 1. *How can it be guaranteed that this project will house Veterans in perpetuity? What happens when grants are no longer funded?*
- 6-4 2. *How many homeless Veterans with severe and persistent mental illness and substance addiction currently live at existing Redlands' Housing Authorities? As an alternative site, can the housing authority use their property at the corner of Orange and Lugonia? As an additional alternative location, couldn't the County of San Bernardino use a portion of their land located on California between Redlands Boulevard and Orange Avenue as this area is much closer to the VA hospital?*
- 6-5 3. *What is Redlands' current homeless count? Of this number how many are Veterans? How many of the Veterans to be housed at Liberty Lane have ties to Redlands? How many will come from outside cities, counties, and/or states? What is the process/plan if residents have to be evicted? Where will they end up? Can the City be held liable for these evictions? What percentage of LLA residents are expected to stay 5 years? 10 years plus? What are the determinants that will show improvements and success?*

RESPONSES TO COMMENTS
LETTER #6
CHRISTINE ROQUE

- 6-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Contrary to the statement about significant effects in this comment, the responses to subsequent comments and the Initial Study itself demonstrate that the proposed Liberty Lane project does not cause significant adverse impacts.
- 6-2 These comments are noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please note that the Liberty Lane site is designated in the General Plan for "Multiple Family Residential (MDR)" land uses and has been so designated since 1995 when the current General Plan was adopted. Refer to the Land Use Section discussion in the text of the Initial Study on page 5.0-50 for more detailed information. The proposed change in zoning classification will be fully consistent with the City's General Plan, the overall guidance document for land uses in the City. Thus, the proposed Liberty Lane project is consistent with the City General Plan and the property is not being singled-out for development at higher density. The City General Plan allows a density of 15 units per acre at this location and the Project Description on page 3.0-2 and the Land Use discussion on page 5.0-51 describe the basis for the 2.9 additional units based on a density bonus for providing low income housing in compliance with Chapter 18.228 of the Redlands Municipal Code and a density concession based on compliance with California Government Code Section 65915 *et sec*. Thus, the overall density is consistent with the City's General Plan.
- 6-3 The majority of the financing for the Liberty Lane project will be provided by public sources of funding (Federal, State and County sources). Each funding source has a regulatory agreement that is recorded against the property that stipulates how the funding will be used, who it will serve and how long the obligations stay in place. Liberty Lane has been awarded specific funding from the State of California and the federal government that require the project serve veterans.
- Most funding sources proposed for Liberty Lane impose these requirements for 55 years. When that time period is up, A Community of Friends has indicated they will seek extension of the loans, which will leave these requirements in place for several more decades or as determined by the State.
- 6-4 Data on the number of homeless veterans with personal challenges currently residing in affordable housing units provided by the Redlands Housing Authority of San Bernardino County was not immediately available. Residents, however, who are residing in housing, would not qualify as being homeless. There is no evidence that data related to the demographics of residents residing in Housing Authority of San Bernardino County developments would represent or affect the proposed project. Alternative siting would require the authorization of separate independent property owners, funding commitments, and local zoning requirements.

- 6-5 Pursuant to the *San Bernardino County 2017 Homeless County and Subpopulation Survey: Preliminary Report* formulated from data from an annual Point-In-Time survey organized by the Office of Homeless Services, a branch of the San Bernardino County's Department of Behavioral Health indicated that the homeless population within the City of Redlands was 164 individuals. City-specific data on the total percentage of the veteran subpopulation were not available in the report, however, the County-wide percentage documented 9.6% of the homeless population were veterans. The project will provide affordable housing to veterans and low income families that are homeless or at risk of homelessness.

If an eviction of a resident is required, the property management company would administer a formal, legal process of eviction proceedings. Eviction proceedings are not processed by the City of Redlands. The service provider (U.S. Vets) has indicated that provider staff will engage the tenant and determine a corrective course of action before moving toward an eviction. Corrective action will consist of the tenant meeting with his/her Case Manager and, as necessary, being placed on a behavioral contract. If the corrective actions are ultimately unsuccessful, eviction proceedings commence. Based on discussions with other providers of veterans housing, evictions are rare because having a home and the supporting services is a very high priority for residents once they occupy such a facility. US Vets will work in conjunction with the property manager. A US Vets outreach specialist and housing specialist may work with the VA and/or the Housing Authority to determine placement in a new facility, apartment, or program for the evicted veteran household. The goal is to connect the veteran with other housing resources so he/she does not enter into homelessness. Offenses that might require immediate eviction include fighting, aggressive behavior and onsite drug and alcohol use.

US Vets, the service provider, estimates up to 60% of veteran households will be living at Liberty Lane after 5 years. Those who don't stay generally move to another housing situation, which may include: unifying with family members and purchasing or renting a different home. Determinants of success may be specific to the resident but the most frequently used determinant of success by the service provider is stability in housing or the duration a resident stays in housing.

- 6-6 | 4. *Where does Texonia Park rank amongst other parks in Redlands? What will be the effect (impacts) on recreation at Texonia Park?*
- 6-7 | 5. *Being that Liberty Lane Apartments will serve a unique population, what are the certifications, training, education levels and experience of staff members? Will staff be trained in basic CPR and first aid? What will be the size of the US Vets staff and the ratio to residents? Which services and treatment plans will be mandatory and required of residents? If the 24/7 hotline is used, from where are the staff dispatched? Why couldn't on-site social support (behavioral and medical) service specialists with a staff to resident ratio that benefits the residents reside on site? Some of the data and/or responses seem to be missing from the MOU between ACOF and US Vets, why? What will be the pet policy? What will be the policy for service dogs? What mitigations will be put into place to alleviate noise from potential barking dogs? If the resident is no longer capable of caring for their pet, what happens to the animal?*
- 6-8 | 6. *How do entities like ACOF and/or affiliates benefit from affordable housing projects? Did/will the City of Redlands make a financial contribution in either monetary form and/or some type of waiver/concession? How do tax credits for low income housing work and who benefits/profits from these tax credits? What other incentives are involved? Does this explain the need for such high density-80 units? How will the city benefit either monetarily or in any other fashion? Why are most projects of this type located in lower income neighborhoods versus more affluent neighborhoods? Will any off-site improvements be required of the developer?*
- 6-9 | 7. *What are the numbers/type of calls to police and fire in other cities where A Community of Friends operate similar projects with the proposed population- formerly homeless individuals with severe and persistent mental illness and substance addiction? What are the numbers/types of calls to the Redlands Police and Fire where similar albeit smaller facilities within the city are located? What days/hours would the site's proposed trained security personnel be on duty?*
- 6-10 | 8. *Can the tap water be safely used and consumed by the adjacent neighbors of Teledyne? Is there a lead smelter at Teledyne? How many incidents (accidents/fires/spills and such) have taken place at Teledyne since 1967? Are there any current hazards/violations related to Teledyne? Should there be some type of accident at Teledyne, what is ACOF's evacuation or shelter in place plan? Could there potentially be any problems with medications interacting with lead and/or the underground Lockheed plume? Are there any studies on how Agent Orange and other medical and psychiatric conditions might be affected by lead exposure?*

- 6-6 The population forecast for the Liberty Lane apartment project is a maximum of 225 persons, based on the City's average population. However with 60 single-bedroom units, 19 two-bedroom units and one three bedroom unit, the actual population may range between 102 and 225 persons on the site. Actual use of Texonia Park by Liberty Lane residents cannot be accurately forecast, but Texonia Park provides about 10 acres of open space that is at times heavily used by organized recreation activities, but is publicly available for any resident of the area. The project incorporates extensive recreation and open space assets onsite and this fact in conjunction with payment of the City's park and recreation impact fee (refer to page 5.0-75), will fully offset the park and recreation demand by the proposed project.
- 6-7 This question does not make any statement about environmental effects or the environmental documents. Economic and social impacts (such as staffing, social support services in the project, pet policies) that do not contribute to or are not caused by physical changes in the environment do not constitute substantial evidence of a potentially significant effect on the environment (per CEQA Guidelines section 15064(f)(6)), therefore are not discussed in the Initial Study.

U.S. VETS', the service provider, has indicated that their staff allocated to this project will have, at a minimum, a Bachelors Degree in Social Work or Masters in Social Work. The project and case managers will be supervised by a licensed therapist. U.S. VETS's staff is uniquely sensitive to the special needs of veterans and understand the culture shared by veterans. The U.S. VETS Service Delivery Model mirrors the population served by taking into account as many variables as possible, including: language, cultural/ethnic identification, gender, age, educational level and socioeconomic status.

U.S. VETS staff receive monthly veteran-related training which include the following topics: Housing First, Motivational Interviewing, Trauma-Informed Care, SSI/SSDI Outreach, Access, and Recovery (SOAR), Post-Traumatic Stress Disorder, Traumatic Brain Injury, Combat Trauma, Sexual Trauma, Suicide Prevention, Boundaries & Ethics, etc. Additionally, staff gain knowledge of the resources readily available to address veterans' needs by participating in workshops, collaborative meetings, Stand Down Events, and Resource Fairs. The service provider has indicated that all staff are CPR and First Aid Certified.

The applicant has indicated that there are a total of 3.5 full time equivalent (FTE) case managers assigned to this project and the apartment complex is estimated to house up to 59 veterans and their family members. If 59 individuals will need veteran-related services, the ratio will be approximately 17 veterans to every case manager.

In addition to the 3.5 FTE onsite case managers, additional support staff from US Vets will include: Executive Director to provide oversight, Program Manager to ensure program and facilities are up to U.S.VETS standards, a Clinical Director (LMFT) will provide clinical oversight, a part-time driver, and Workforce Team (Job Developer and Coordinator) to provide "Back to Work" services to help the veterans secure employment should they require these services.

Pursuant to the applicant, tenant services at Liberty Lane are provided free of charge and on an at-will basis, meaning tenants are not contractually required to participate in services. However, US Vets, the service provider, will foster a positive living environment where tenants are encouraged to participate and the benefits of participation are expressed.

Every tenant will be assigned a Case Manager who will work with the veteran household to complete an Individual Housing Stability Plan (IHSP) to identify goals and prioritize needed services. These IHSP are revisited every 30 days. Meetings with the tenants are held regularly to address barriers to maintaining housing and to develop an individual plan focused on housing stability. Motivational interviewing skills are utilized to help tenants work towards achieving their goals. For residents who have experienced trauma, Trauma Informed Care principles are applied and staff are trained to recognize the effects of trauma and how to foster a safe environment while helping the tenant to rebuild a sense of empowerment.

Services may include: case management, crisis intervention, career development, job training, life skills related workshops, mainstream benefits acquisition, financial management assistance, peer mentoring, medical and mental health care coordination including substance abuse treatment, counseling, and overall comprehensive support.

If the 24/7 hotline is used, two on-site Property Managers, a U.S.VETS Program Manager, Veteran Service Coordinator, and/or Executive Director will be able to respond. The San Bernardino County Department of Behavioral Health will also have an assigned team of services staff able to respond on a 24-hour basis.

US Vets promotes a therapeutic community that allows the camaraderie of the veteran culture to flourish. Peer-to-peer support is encouraged through a mentoring program, support groups, resident council, and community activities.

The applicant has indicated that Liberty Lane will not accept pets. However, Liberty Lane will remain in compliance with regulations regarding tenant rights to utilize and maintain animals which provide assistance to people with disabilities under Title II of the Americans with Disabilities Act, the Fair Housing Amendments Act of 1988, and Section 504 of the Rehabilitation Act of 1973. If an animal is deemed a service dog then the tenant will complete the Assistance Animal Lease Addendum. The program participant must comply with all the rules, terms and conditions of the agreement such as: excessive barking will not be tolerated; keeping the animal clean and on a leash at all-times; the animal must be with the veteran at all times; the veteran must pick up after the animal; the veteran is to keep the apartment clean and free of animal feces or urination. If a resident is no longer capable of caring for their service animal, the priority would be having the animal adopted or given to another disabled veteran through assistance of the Humane Society.

- 6-8 A Community of Friends was incorporated as a 501c3 nonprofit organization in 1988 with a mission to end homelessness through the provision of quality permanent supportive housing for people with mental illness. ACOF is a public benefit corporation which means it is not organized or operated for the benefit of private interests. Any net earnings by ACOF are used to further the mission of the organization and may not benefit any private individual or shareholder.

The Low Income Housing Tax Credit (LIHTC) is a program administered by the Internal Revenue Service and is responsible for providing financing for the majority of affordable housing built in the United States. An equity investor (usually a corporation, bank or group of investors) commits capital funds to an affordable housing project in exchange for tax credits. The tax credits can be utilized by the investor(s) over the course of a 10-year credit period. In the State of California, the LIHTC program is overseen by the California Tax Credit Allocation Committee (CTAC), a State agency that determines

which affordable housing projects will receive an allocation of tax credits. The affordable housing developer (in this case, A Community of Friends) does not benefit from the tax credits themselves, but does use the capital funds committed by the investor to help pay for the cost of the affordable housing project.

The City offers development incentives in accordance with State law, which are available to all applicants making requests for density bonus submitted in accordance with State law. Regarding off-site improvements, standard conditions of approval and development impact fees (where applicable) will be attached to the project, and typical of-site improvements will be required as for any other multi-family development. A financial contribution by the City of Redlands is not included or proposed for the project.

Pursuant to the applicant, the number of units at Liberty Lane was determined by considering a number of factors, some of which are:

- General Plan and zoning designation of the site.
- Ensuring rental income generated covers operational costs.
- Meeting a housing need in the community for affordable housing, as indicated in the City's General Plan Housing Element.

The project has been conditioned to provide off-site improvements. These improvements include the following:

- Street dedication to provide for a 53 foot half street right-of-way width for Lugonia Avenue and 44 foot half street right-of-way width for Texas Street, along project frontages.
- A 35 foot radius curb return and pedestrian ramp at the corner of Texas Street and Lugonia Avenue.
- Curb and gutter along Lugonia Avenue and Texas Street frontages
- Rehabilitation of Lugonia Avenue and Texas Street from new curb and gutter to the street centerline.
- Sidewalks and ramps at curb returns along entire project frontage
- LED ornamental street lights along Lugonia Avenue and Texas Street
- Street trees planted along Lugonia Avenue and Texas Street
- Bus stop shelter and pad on Lugonia Avenue
- Fire hydrants as required by the Fire Department
- Storm drain along Lugonia Avenue and Texas Street, along project frontage
- Undergrounding of power poles below 66KV and relocation of power poles that are 66KV or greater.
- Payment of traffic-related Development Impact Fees

- 6-9 Police and fire calls and City emergency services are discussed in the Public Services section of the Initial Study (pages 5.0-72 to 5.0-75). As the project will result in a slight increase to the number of City residents, a slight increase in calls for service can be expected (although existing City staffing and equipment levels can adequately serve the project). Based on discussions with comparable providers in other cities, emergency calls are typically not increased due to the onsite professional services. The applicant will be required to pay all development impact fees, which have been established by the City to fund public facilities, including police and fire. Mitigation measure PUB-1 has been incorporated into the project, which requires a construction site security. Any impact would be less than significant.

- 6-10 As indicated on pages 5.0-42 and -43, the historic contamination at the Teledyne facility in Redlands (about 600 feet south of the project site) has been removed and it was determined that the lead contamination had not reached the groundwater table. Potable water throughout the City is provided from wells that generally produce high quality water, but certain wells do require treatment units to remove specific pollutants, none associated with Teledyne or lead contamination. The City's "tap" water currently meets all drinking water quality standards and can be safely used and consumed. Teledyne uses lead materials, but does not have a lead smelter. As indicated in the Initial Study, the Phase 1 Environmental Site Assessment, there are no known hazards/violations related to Teledyne operations. As indicated in the preceding text, the potable water delivered to all residents by the City Water Department meets drinking water quality standards and should not have any interactions with medications. Finally, there is no unusual exposure to lead at the project site, so concerns raised for interactions with future residents health is not an issue of environmental concern. The 2017 City of Redlands Consumer Confidence Report has been attached as reference which provides the results of the City's water quality tests from samples taken at various locations in throughout the water system in accordance with state and federal laws. The project has been conditioned to develop an emergency plan and post on the property as required by applicable local, state and federal laws. Attachment 1 contains the relevant Envirostor data base for the Teledyne facility and the current South Coast Air Quality Management District facility information for the Teledyne facility. In both cases the data indicate the facility is in compliance with all management requirements for facility operations. Attachment 2 provides the most current City Water Department compliance report indicating water quality complies with current drinking water standards.

- 6-11 9. *What are the specific neighborhood “amenities” that will benefit the residents of the proposed project? Is the monthly meeting for the proposed project’s participants and/or current residents living adjacent to the proposed project? Since planning of this project did not include the surrounding neighborhood, how will the City ensure that ACOF and Barker Management and any other entity related to the Liberty Lane Apartments will proactively assist the surrounding neighbors in resolving potential problems and concerns?*
- 6-12 10. *Will the developer and/or units and/or some other entity related to Liberty Lane Apartments be given special water, sewer, and/or trash rates?*

Aesthetics

6-13 The Revised Initial Study (July 2017) says “Citrus Groves, the University of Redlands, and views from the Santa Ana River bluff of the San Bernardino Mountains are important assets in this sector of the City. However, minimum topographic change, uniform, large-scale street grid, longtime market designation for lower priced homes, and little attention to street landscaping, have characterized parts of north Redlands as having a less desirable image.” First of all, I could not find this language in the general plan and second of all these types of statements show the inequity that exists between planning areas. Our neighborhood values open space and scenic vistas just as much as any other.

6-14 The photos show there will be a significant impact on the scenic vistas from a large majority of the homes in the adjacent neighborhood. Whether the view is whole or in part really makes no difference. Our local mountains as a backdrop are part of the Redlands identity. The findings of this IS pertaining to Aesthetics seem to be inadequate and unmitigable.

6-15 The Revised Initial Study (July 2017) says “Surrounding buildings range from 1 to 2 stories in height.” All buildings and homes adjacent to the proposed site are single story. The 6 buildings plus community building are visually incompatible with the surrounding area and this project would not enhance the visual character of the current open space.

6-16 Because of the addition of new lighting and glare associated with this proposed project, a marking of less than significant impact seems to be inadequate. What are the proposed mitigations for the introduction of lighting, glare, and heat?

Air Quality

6-17 The Revised Initial Study (July 2017) says “The most recently adopted comprehensive plan applicable to the proposed Project is the 2012 AQMP.⁴ The 2016 AQMP was published for public review,⁵ with a revised Draft 2016 AQMP document released in October.⁶ The Draft 2016 AQMP was recently approved by the SCAQMD on March 2017; and California Air

- 6-11 Proposed outdoor amenities within the complex includes fitness trail with personal fitness stations, BBQs, bocce ball court, courtyards with bench seating and umbrellas, a community garden, a “farm to fork” dining area with raised garden beds, festival lighting, and seating, and a tot lot with overhead shade structure. The community building will house offices for supportive services, including a case manager, residential services coordinator, and will provide tenant outreach and engagement, group activities (including social activities, health and fitness activities, neighborhood watch committee), life skills classes, financial literacy and money management classes and other services which will be voluntary and offered free of charge to the tenants. The floor plan for the community building also calls out a laundry room, community room with adjacent kitchen facility, and a tech room with computers.

Neighborhood amenities that will benefit the residents of Liberty Lane:

- Immediate access to public transit: Omnitrans bus service Route 15
- Easy access to freeways
- Proximity to Texonia Park
- Proximity to Shopping and restaurants
- Loma Linda VA Clinic a few miles away (approx. 15 minutes by car and 30 minutes by public transit)
- Redlands Community Center and Boys and Girls Club a half-mile away
- Public Schools nearby

Pursuant to the applicant, there will be monthly meetings at the building for all tenants. A Community of Friends has indicated they will hold regular meetings with the adjacent community as needed.

A Community of Friends will be required to put in place a "complaint response community relations" program. Part of that program includes designating a representative of the development to serve as a liaison to the City and surrounding community to coordinate efforts with the police department and attempt to resolve any neighborhood complaints.

- 6-12 There will not be special water, sewer, and/or trash rates for the Liberty Lane Apartments. Rates will follow the established City rate structure, as approved by the City Council.
- 6-13 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The cited text is from the General Plan Master Environmental Assessment, on page 2 of Section 11.0, Visual 2. The intent in referencing this statement is to identify areas of North Redlands that may have City recognized important scenic views. In reviewing the identified important views, the cited text draws a distinction between the views from the bluff (near the Santa Ana River) and those from the developed areas within North Redlands. The difference between scenic views, as characterized by the cited text, is clearly shown by comparing the views from Figure 5.1-1 and Figure 5.1-5. The important scenic view is clearly from the bluff and the highly modified view that was deemed not to be as important is shown on Figure 5.1-1. Individuals may appreciate the highly disturbed scenic views shown on Figure 5.1-1, but it is clear that the important scenic view from a CEQA standpoint occurs where man-made features do not obstruct the view to the San Bernardino Mountains.

- 6-14 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. First, the statement that the majority of homes in the neighborhood will have their views affected is incorrect. Visual access to the disturbed scenic view will be substantially modified for three residences south of the site. For the remainder of the homes to the east and south, their views will be slightly modified, but access to the disturbed scenic view of the San Bernardino and San Gabriel Mountains will be maintained. In weighing the significance of the impact on scenic views, the highly disturbed quality of the scenic view to the mountains and the few residences affected by the change in view were evaluated and the City concluded that the scenic view impact does not rise to a level of significant adverse impact.
- 6-15 The residences in the surrounding area and other structures (such as the church to the south) are taller than single family residences. The visual representations of the future development, Figure 3-2 and 3-3 and Figure 5.1-6, show structure with building mass distributed over the site in a manner that resembles single-family residential development in the surrounding area. Based on the design of the structures and the landscape plan, the development can be considered a visual asset to the neighborhood, not a significant adverse impact.
- 6-16 The level of lighting in the neighborhood is already high due to street lighting and light from existing residences, security lights, etc. A photometric plan for the project will be required as part of plan check review to ensure on-site lighting is in compliance with conditions of approval. This includes a requirement that light not spill over onto adjacent properties. Thus, the lighting for the project will be consistent with the surrounding properties and no mitigation was required.
- 6-17 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The 2016 AQMP does not alter the evaluation process for determining consistency with regional planning documents or conformance with the SCAQMD's CEQA significant thresholds. The analysis in the Initial Study of the project's consistency with the regional planning documents is accurate and the proposed project is consistent with the regional growth thresholds.

6-17
cont.

Resources Control Board (CARB) approved this document on March 23, 2017. The document was forwarded to the federal Environmental Protection Agency (EPA) on April 27, 2017 and is currently under review for incorporation into the federal State Implementation Plan. (Personal Communication, Michael Kraus, May 30, 2017)” The AQMP 2016 seems to be the most relevant document when it comes to air quality thus it seems inadequate to use an out dated one, especially when it comes to the well-being of those living in a disadvantaged community.

6-18

The Revised Initial Study (July 2017) says, “The nearest sensitive receptors to the Project Site are the residential uses located immediately adjacent to the north, south, and west of the Project Site.” and “The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are residential uses directly to the north, south, and west of the Project Site.” There are residential uses to the east as well, why are they not considered sensitive receptors?

6-19

The Revised Initial Study (July 2017) says, “With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO).” The two proposed driveways located on Texas Street will generate stop and go congestion even with the one proposed “pork chop” mitigation. As mentioned in the IS, intersections are more vulnerable to Carbon Monoxide. Furthermore, this busy intersection has no turn signals when traveling north and south on Texas Street. Thus, a CO hotspot analysis should be completed.

Biological Resources

6-20

The updated Biological Resources Assessment (November 18, 2015) says, “*Burrowing Owl If Project-related ground disturbance occurs during breeding season (February 1 through August 31), impacts to this species could occur including destruction of burrows and nests and impacts to individual burrowing owls. In order to prevent impacts to burrowing owls, it is recommended that a pre-construction focused burrowing owl survey be conducted on the Project site and within a 500-foot buffer around the site no more than 14 days prior to the start of Project activities. The surveys should be conducted according to the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). If owls are detected during the pre-construction survey and may be affected by the project, then passive relocation of the owls is recommended to be conducted during the non-breeding season (September 1 through January 31).* Passive relocation of owls during the non-breeding season shall follow the standard accepted protocol (use of one-way doors and collapsing of empty burrows) and will need to be conducted in accordance with CDFW regulations. Due to their protection under the federally-regulated MBTA, Project-related impacts to burrowing owls, their nests, and their active burrows shall not occur during the burrowing owl breeding season, which extends from February 1 through August 31, annually (CDFW 2012). If owls are determined to be present on the site and construction activities will be conducted during the breeding season then it may be necessary to informally consult with CDFW on the

- 6-18 The analysis for air quality impacts assesses the closest sensitive receptors to be conservative, since sensitive receptors at a greater distance would experience less direct impact from a project. The residences to the east are also sensitive receptors, but at a greater distance than the immediately adjacent residences north of and adjacent to the project site.
- 6-19 Background Carbon Monoxide (CO) concentrations are very low in the project area. Refer to Table 2.3 of Appendix A (Air Quality) in the Initial Study (less than 1/2 the CO air quality standards). It literally takes tens of thousands of vehicles at a stop to create a CO violation in the Inland Empire. The number of vehicles is far below this threshold and no CO analysis is required. The potential for a CO violation at the entrance and exit to the site is negligible to zero.
- 6-20 The most important fact overlooked in this comment is that there is no natural habitat onsite and no sensitive species, including burrowing owl or nesting birds. Therefore, there is no potential for adverse impact to biological resources. However, this comment raises potential impacts to burrowing owl and nesting birds, which are both protected by existing laws. When a law is in place to protect a species, adding mitigation measures is not needed. The developer must follow the law in this instance and both burrowing owl and nesting birds must be protected prior to initiating ground disturbance.

appropriate measures that may be implemented to reduce and/or eliminate impacts to this species.

Nesting Birds Bird nests were not identified on the Project site during the biological resources assessment, primarily because the survey was conducted outside of the nesting season. While the Project site does not support suitable nesting habitat for songbirds and raptors, suitable habitat in the form of trees and shrubs located immediately adjacent to the property do provide suitable nesting habitat for songbirds and raptors. Noise and dust from construction near active nests can disturb nesting birds. Breeding songbirds and raptors are protected under both the MBTA and the California FGC (Sections 3503, 3503.5, 3513, and 3800) and shall therefore not be subjected to take (as defined in California FGC) during the breeding bird season, which typically runs from February 15 through August 31. It is recommended that Project construction activities occur outside of the breeding bird season to avoid impacts to breeding birds at the Project site.

However, if Project activities are slated to begin during the breeding season, there are several measures that may be required in order to protect native, nongame birds and their nests. If construction activities occur within the bird breeding season then pre-construction nesting surveys shall be conducted no more than three days prior to the start of construction by a qualified biologist. *The nest surveys should include the Project site and areas immediately adjacent to the site that could potentially be affected by project activities such as noise, human activity, dust, etc.* If active bird nests are found on or immediately adjacent to the Project site, then the qualified biologist will establish an appropriate buffer zone the active nests, typically a 250-foot radius for songbirds and a 500-foot radius for raptors. Project activities will need to be avoided within the buffer zone until the nest is deemed no longer active by the biologist. Weekly nesting surveys and biological monitoring may be necessary if nesting birds are found on or adjacent to the Project site. However, due to the existence of frequent noise, heavy traffic, dogs, and human activities already occurring in these areas surrounding the property, it is unlikely the buffers would need to be as large as mentioned above. Regardless, it would be important to document the nesting birds' responses and behavior to ensure that Project activities do not result in the failure of a nest." The lack of mitigations are inadequate for this section even though the biological report recommends certain measures be taken before construction and during construction of the proposed site. Please, note italics were added by me.

Geology and Soils

The Revised Initial Study (July 2017) says "The following section summarizes and incorporates by reference information from the Geotechnical Engineering Report, dated December 23, 2013 ("Geotechnical Report") prepared by Tetra Tech BAS GeoScience for the Proposed Project. The section also includes information presented in an addendum to the Geotechnical Report, which is dated October 21, 2015. The Geotechnical Report and addendum are included as Appendix D to this Initial Study." The addendum says that little has changed from the original study and in fact closes by saying, "This report is an update and addendum to the referenced Geotechnical Engineering Report dated December 23, 2013, and is intended to address issues specific to the

6-21
cont.

planned construction for the subject project. Consequently, it cannot be considered an independent document, as it does not contain adequate background information. Thus, this document is directed only to the personnel with detailed knowledge of the subject project and should be used only in conjunction with the referenced geotechnical reports.” So it seems like the “update” is a moot point and the Geotechnical Report may be out of date and thus inadequate.

Greenhouse Gas Emissions

6-22

The Revised Initial Study (July 2017) says “Although GHGs are generated during construction and are accordingly considered one-time emissions, consideration of construction-related GHG emissions allows for evaluation of all the long-term GHG emissions associated with a project. Therefore, current practice is to annualize construction-related GHG emissions over a project’s lifetime to include these emissions as part of a project’s total emissions. A project’s lifetime has generally been defined as 30 years. In accordance with this methodology, the estimated Proposed Project’s construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions.” Although greenhouse gases (“carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O)”) will be emitted through emissions of vehicles traveling to and from the project site, air conditioning units, generated electrical power, and in numerous other ways, it seems that construction greenhouse gases would be more concentrated. Thus, the information and mitigations found in this IS seem to be deficient when it comes to construction greenhouse gases.

6-23

This section specifically mentions many recommendations and rules and regulations to reduce greenhouse gases, yet no mitigations are offered. In addition, this section is vague and general and thus inadequate. The following website may be helpful in formulating specific mitigation measures for this proposed project: <https://oag.ca.gov/environment/communities>
The website states, “California is a leader in enacting laws specific to environmental justice, including a law directing funding for greenhouse gas reduction measures to disadvantaged communities and another that requires environmental justice to be addressed in local governments planning (see CEQA below).” It goes on to say, “One of those tools is the [California Environmental Quality Act \(CEQA\)](#), which requires government, in permitting new projects, consider potentially significant environmental impacts on communities already burdened with pollution.

Also, see <https://oag.ca.gov/environment/climate-change/unequal-impacts>

Land Use and Planning

6-24

The Revised Initial Study (July 2017) says “The Project Site itself is an infill development parcel and its development will not physically divide any established community. No established community would be divided as the residential character of the neighborhood would continue to be residential. Nor would there be a disruption of access between land use types as a result of the

- 6-21 The site geology is a factual condition. The geology facts are defined in the original Geology report and the Addendum was provided to determine if any geologic conditions since the original report was had changed. The geology facts substantiate the site has no geotechnical constraints other than regional seismic groundshaking. The design requirements to address such regional groundshaking are included in the Geology technical report. The geology data base for the project site is not out of date and is fully adequate to address structural concerns for the proposed buildings as part of the project. There is clearly no unavoidable significant adverse geology impact at this site and design measures are deemed adequate by the City for the type of proposed structures.
- 6-22 SCAQMD has established an evaluation methodology that is outlined in detail on pages 27 and 28 of Appendix D. The analysis in Appendix D follows this outline and clearly demonstrates that the project's Greenhouse Gas (GHG) emissions are approximately 1/3 of the SCAQMD's significance threshold. There is no deficiency in the analysis or findings regarding GHG emissions.
- 6-23 First, no mitigation is required because the emissions are less than significant. Second, the project incorporates those GHG emission reduction measures pertinent to a small multifamily residential project, i.e., Title 24 Energy Standards, CALGreen Code, landscaping that is designed to minimize water use, and very close proximity to mass transit.
- 6-24 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The division of a community refers to a physical barrier that in some way prevents continued interaction of the residents in the neighborhood. An obvious example is a freeway that divides a community into two segments. The proposed project occupies a discrete parcel of land that when developed will not modify or prevent interaction of the existing residents from one another. The primary means of movement with the neighborhood is along Texas and Lugonia and the existing patterns of movement and communication will not be altered by the proposed project. In fact, by providing sidewalks and landscaping along the property boundary on Texas and Lugonia enhance the ability to physically move along these roadways. As clearly described in the Initial Study, the proposed project does not introduce a new use into the neighborhood, such as a commercial or industrial use. The future apartment dwellers will have essentially the same activity patterns as the existing residents, which are clearly described on page 5.0-50 thru -52. Therefore, the proposed project is an infill project that will not divide the established neighborhood

6-24
cont.

Proposed Project. Impacts would be less than significant under this issue.” An 80 unit apartment complex being squeezed onto 4.7 acres of land situated on current open space in between several single family, low density residential homes does divide an established community. Many of the families living in the Lugonia planning area have lived here for well over a century. In fact, to me, this statement is insulting to our community. Mitigations measures are inadequate.

6-25

Harmony is such a subjective term. There could be architectural harmony which is visual, but it might only be a facade. There is the proposed Harmony development in Highland, which some people don’t find harmonious. High density (0-27 units) does not mix well/is not harmonious with single family, low density residential, especially when it is infill property.

6-26

Finally, I found little information on transitions/buffers between existing uses (adjacent homes) and proposed use. Again, I point out the following from the draft Redlands General Plan 2035.

Under Small Town Feeling and Community Cohesion it states, 2-A.15 “Through development standards, ensure smooth transitions for neighborhoods that border one another so that neighborhoods maintain their unique qualities while being compatible with one another.”

6-27

Under Growth Management it states, 4-A.3 “Ensure that infill development compliments existing development in use, design, and scale, and that it supports cohesion and integration of the city’s development pattern.” This proposed project’s density and two driveways will create additional traffic and congestion at an already highly impacted intersection.

Population and Housing

6-28

The Revised Initial Study (July 2017) says “Implementation of the Proposed Project would result in an increase of up to an estimated 225 residents in the City. This assumption is considered conservative as most the units proposed by the Project are one-bedroom units that are likely to be occupied by one person.” If it is likely that only one person will be in the 60 one bedroom apartments, then that equals 60 people. $225 \text{ residents} - 60 \text{ residents} = 165 \text{ residents}$. According to plan, there will be 19 two bedroom apartments and so I will use the same assumptions as above, one person per bedroom. $19 \times 2 = 38$ and $60 + 38 = 98 \text{ residents}$. So how would one calculate 225 residents? Let even assume that a family of four will live in the 19 two bedroom apartments. $19 \times 4 = 76$ and $60 + 76 = 136 \text{ residents}$, which is almost one hundred less residents than 225 residents. Still the calculations make no sense. These calculations are inadequate. Now $2.81 \times 80 \text{ units} = 224.8$ which gets closer to the number of 225. But would there be on-site harmony if nearly 3 people lived in a one bedroom unit? Would this discontent spill over into surrounding neighborhoods?

Transportation and Traffic

6-29

The focused traffic assessment seems to be minimal and deficient. As mentioned before, the addition of two driveways on Texas Street is going to cause more congestion at the intersection of Texas and Lugonia. The mitigations are not adequate.

- 6-25 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The comparison to the Harmony development (over 3,000 residential units) is inaccurate and would not be an appropriate comparative analysis. Please refer to the response to comment 6-24. Multifamily residential uses can mix well with existing single-family residential uses, as demonstrated at numerous locations within the City of Redlands, for example along Orange Street, and as indicated in the preceding response the residential use/activity patterns are essentially the same
- 6-26 The transitions and buffers are addressed in the Project Description of the Initial Study and on pages 5.-51 and -52 of the analysis. The compatibility issue is fully addressed on these pages.
- 6-27 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. This statement is inaccurate. The traffic study (Appendix G) clearly indicates that the local intersection is operating now and will operate in the future consistent with the City's desired Level of Service.
- 6-28 The forecast number of future residents is typically based on the average number of residents per unit within a City; hence, the number based on this method of forecast is 225 persons. The qualifying statement is simply to show that due to the type of units and the type of future occupants, actual occupancy may be substantially less than the 225 persons. However, the 225 person value is used in making the impact forecast relative to future growth within the City. The issue of the number of future residents will be controlled by the City and the developer. It might be possible to fit a family of three (parents and one child) into a one bedroom unit, but assigning a family of more than two persons to such a unit is not anticipated at this residential complex.
- 6-29 The ingress and egress onto Texas Street was evaluated in the traffic study (Appendix G) and the professional analysis determined that the flow of traffic on Texas and at all four segments of the Texas intersection with Lugonia will flow at an acceptable Level of Service. This was verified by taking a second set of counts in the neighborhood. No party has identified any specific congestion issue or inadequacy of traffic flow in the project area in contrast to the professional findings (twice) that traffic will flow in a manner accepted as adequate by the City.

6-30 | The memorandum by Tom Dodson and Associates dated April 24, 2017 says, “We will also work with Urban Crossroads to bring actual data from an existing comparable facility in El Monte to discuss actual traffic effects.” I did not see this study. Where in El Monte is the comparable facility located?

6-31 | Finally, traffic generated from the proposed Harmony project in Highland should be studied/included in the cumulative development total. It is believed that due to the high density many vehicles will use our surrounding arterial and local streets to get to the freeways.

Other

6-32 | There seems to be some inconsistencies throughout the revised Initial Study and the appendices in as sometimes the project area and its surroundings are described as suburban and other times as urban. I consider downtown Los Angeles to be urbanized. What are the planning land use definitions for urban versus suburban versus rural?

6-33 | Also, some of the studies seem to be antiquated.

6-34 | Please, be advised I may submit additional comments prior to the upcoming city council meeting.

6-35 | Thank you for your consideration. I hope you will join me in protecting individuals and families that often have little say in the political process and land planning issues/uses that takes place in their community.

Sincerely,

Christine Roque

- 6-30 The traffic engineer utilized unaltered trip generation from the project to make the circulation system impact analysis. When it did not cause an adverse impact to the local circulation system as a result of the second analysis, the possibility of using data from an existing comparable facility to reduce onsite trip generation was deemed unnecessary. It is probable that the impact on the circulation system is over predicted, but it still does not cause a significant effect on the local circulation system.
- 6-31 There are no traffic studies or other predictions that future Harmony traffic will have a measurable effect on traffic at the Texas and Lugonia intersection. There are several roads accessing the freeway on ramps to the east along Judson, Church or Orange Street. The potential impact identified in this comment does not have technical merit.
- 6-32 The term urban-suburban is based on the fact that the project neighborhood is a residential neighborhood, but as noted in your previous comments, the local circulation system directly ties this neighborhood to the more urbanized portions of Downtown and Citrus Plaza, less than one mile distant. The whole of the City of Redlands comprises a mostly developed area with suburban components, such as the project neighborhood (which citywide is generally referred to as an “urban” area without regard to density of development).
- 6-33 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Where necessary certain studies were updated, but since many of the basic environmental characteristics of the site do not change over short periods, for example, geology and soils, the City concluded that it was not necessary to update them.
- 6-34 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 6-35 The comment is noted and will be made available to the Redlands City Council for consideration at public hearings prior to any decision on the proposed project.

COMMENT LETTER #7

Farris, Lorelee

From: mozzarella121 . <mozzarella12@gmail.com>
Sent: Monday, August 07, 2017 8:30 PM
To: Lorelee Farris
Subject: LLA

Follow Up Flag: Follow up
Flag Status: Flagged

Hi,

I am writing regarding my concerns about the proposed Liberty Lane Apartments.

I think it would obviously be a great project if certain problems were to be addressed.

First off, it has three populations, all of whom have their own problems and needs, which sometimes are conflicting in the same location. The location itself has problems--how can you fit 80 units in such a small space, particularly those who might be suffering from issues that compel them to be homeless in the first place? Additionally, the project is in an area where there seems to be an excessive number of low income projects as it is. Is this really conducive to enabling the homeless population to improve? And what happens to the residents who might be negatively impacted by such a large segment of the homeless population in our town being congregated in one section?

Will it cause additional homeless to move to Redlands so that they might have the opportunity to be on the waiting list? Where are we going to put them?

couldn't the project be split and smaller sections be placed in different parts of town?

I have written before with some additional recommendations that I think would be beneficial to the project and have not heard back yet. These include:

1. meeting rooms at the facility for twelve-step program meetings (these could also be made available to the public)
2. facilities for pets and companion animals, including training from the local community center that could be held at the LLA
3. a social worker onsite to help the residents get whatever aid they need
4. a computer room to help them research, obtain computer skills, possibly look for jobs
5. a community garden (not onsite as the property is probably contaminated from the nearby Teledyne plant) as this is extremely beneficial for vets w/PTSD and a farmers market so that they can exchange their food with the neighborhood
6. classes held there as well as at the community center

Will there be drug testing of the residents? Will there be a requirement that they are not allowed guns? I don't know if these can be mandatory rules, but it seems that they should be and there should be a means of enforcing the rules by the staff rather than by city personnel.

RESPONSES TO COMMENTS
LETTER #7
NONIE KLEINHANS

- 7-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 7-2 The project location does not have any physical constraints. The eighty units fit well on the property; allow adequate open space and buffers from adjacent residential uses; provide for onsite recreational activities; and for parking. Refer to the project design elements described in the Project Description and as discussed in the Land Use Section, Subchapter 5.10. It is not clear what area is being referred to when the term “excessive number of low income projects” is mentioned. A review of the surrounding neighborhood indicates that a mix of uses occur (churches, park, single family residential, multiple family residential and undeveloped areas). The project proponent has concluded that the proposed facilities and programs in conjunction with surrounding physical assets (church, mass transit, proximity to commercial areas to the west and southeast) will be supportive of improvement in the population served. There appears to be an assumption that negative behavior of homeless will persist once they are in a residential setting and receiving support to assist them to control or reject such behavior. The environment being established by the proposed project is intended to integrate the veterans/homeless back into the community (so some individuals would no longer be considered transient or homeless).
- 7-3 There is no information regarding movement by homeless into another community, so it is not possible determine whether such migrations may or may not occur. However based on this consultant’s direct experience with the homeless in the City of San Bernardino, most homeless, (including some veterans), have home territories beyond which they do not wander. Another point regarding this comment is that the City does not control the transient homeless population, except when the law is possibly broken, so the homeless individual will control his/her location in the future.
- 7-4 The applicant has selected the project site and submitted plans for the 80 unit complex. Since employed staff members are required at the site, splitting it into smaller sections might not be economically feasible for the owner/applicant. Also, assembly of three sites could be substantially more expensive.
- 7-5 On-site amenities will be provided according to the submitted plans for the project. However, please note that the suggested items are not elements required by the Redlands Municipal Code. As designed, the community building within the project will provide a community room with attached kitchen facilities, a tech room with computers, as well as house offices for supportive services, including a case manager and residential services coordinator that will provide tenant outreach and engagement, group activities (including social activities, health and fitness activities, neighborhood watch committee), life skills classes, financial literacy and money management classes and other services which will be voluntary and offered free of charge to the tenants. The site plan includes outdoor amenities including a fitness trail with personal fitness stations, BBQs, bocce ball court, courtyards with bench seating and umbrellas, a community garden irrigated with potable water, a “farm to fork” dining area with raised garden beds, festival lighting, and seating, and a tot lot with overhead shade structure. See response 6-7 regarding pets.

- 7-6 The comment is noted and will be made available to the developer for further consideration. However, please note that the suggested items would be at the sole discretion of the owner/operator of the project.

- 7-7 Who pays for the water? Are they going to be charged the same rates as the rest of the residents in the city? What schools will the residents be attending and how will the residents or the actual developer be contributing to the school usage--through property taxes, a special assessment, what or are the other residents of the town expected to subsidize this while the developer receives a \$2.6 million grant from the VA? Should not the city receive a similar grant if there are residents who are going to be using the school system?
- 7-8 Additionally, how is the city going to be reimbursed for the usage of the park that is right next store? I imagine that many residents in that area will be afraid to use the park as much as they have in the past if such a large project is put in. Since the project will then be the major beneficiary of the park, should not the city be reimbursed for that?
- 7-9 Additionally, has it been determined that there will be an additional user or usage fee if there are excessive calls to the police or for ambulance services? Who will pay for that? Will it then be the residents of the city who are already looking at increased "ambulance fees" and utility bills? Should not there be a carve-out for these anticipated costs in the amount provided by the VA?
- 7-10 Have you looked at similar projects with similar populations, size of populations and size of the actual facility to determine what the anticipated usage for ambulance, fire and police services will be? Is there a differential in police and ambulance calls for such projects when the project is located in a blighted area? Has this factor been put into the calculation to determine the costs of this project? I think the people in the project will be more at risk when there are 3 sets of populations; there are a projected 200+ people, some of them with mental health issues crammed into less than 5 acres; and the site itself is in a stressed community. It seems as though these elements should be factored into the cost of this project.

Thank you,

Nonie Kleinhans
1311 College Ave
Redlands, CA



Virus-free. www.avg.com

- 7-7 The owner of the complex will pay for water. The City has standard water rates for multifamily residential developments. According to Redlands Unified School District boundary maps, any students residing in the development would be located within the boundary areas for Kingsbury Elementary School, Moore Middle School, and Citrus Valley High School. The project must pay the standard school fees per residential unit and through property taxes.
- 7-8 The project will pay standard City development impact fees, which includes a park and recreation fee. For potential use at Texonia Park please refer to response to comment 6-6. Texonia Park receives consistent levels of use under existing conditions and the future residents at Liberty Lane will have the opportunity to use Park facilities. However, the project will be part of an existing substantial demand, not the “major beneficiary” of the Park. As noted the project incorporates extensive onsite recreation facilities to meet the needs of the future residents which should lower overall demand from the future residents.
- 7-9 Again, this comment makes an assumption without any supporting evidence that there will be “excessive” calls or demand on emergency services. The project will pay property taxes commensurate with the number of units and value of the property. The City may establish additional fees citywide, but no specific fees have yet been identified.
- 7-10 No evidence was provided to conclude that providing affordable housing to veterans and low income families would place the residents in the project at risk. The development will include social services and classes to support residents, as well as transportation to any needed medical services. The California Fair Employment and Housing Act prohibits discrimination in all aspects of housing (rental, lease, terms and conditions, etc.) for persons with disabilities. Disability is defined as “a physical or mental impairment that limits the individual in performing one or more major life activity.”

Police and fire calls and City emergency services are discussed in the Public Services section of the Initial Study (pages 5.0-72 to 5.0-75). As the project will result in a slight increase to the number of City residents, a slight increase in calls for service can be expected (although existing City staffing and equipment levels can adequately serve the project). Any impact would be less than significant. Based on discussions with other providers of housing for veterans and low income families where extensive onsite staff support is provided, the number of emergency calls does not substantially increase. This is because of onsite staff responding to such needs and because the future residents are so pleased with their new environment that they restrain behavior that could result in the need for such emergency services.

COMMENT LETTER #8

Farris, Lorelee

From: Egle, Patrick <Patrick.Egle@dpw.sbcounty.gov>
Sent: Monday, August 07, 2017 3:02 PM
To: Lorelee Farris
Subject: CEQA – NOTICE OF AVAILABILITY OF A MITIGATED NEGATIVE DECLARATION FOR THE LIBERTY LANE APARTMENTS FOR THE CITY OF REDLANDS
Attachments: Comments.pdf

Ms. Farris:

Please find attached our comments for the above referenced project.

Thank you,

PATRICK M. EGLE

Planner III

Environmental Management Division

Department of Public Works

825 E. Third Street, Room 123

San Bernardino, CA. 92415-0835

Phone: 909-387-1865

Fax: 909-387-7876



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Department of Public Works

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

www.SBCounty.gov

Kevin Blakeslee, P.E.
Director

TRANSMITTED VIA EMAIL

August 7, 2017

City of Redlands
Attn: Lorelee Farris
35 Cajon Street, Suite 20
Redlands, CA. 92373

File: 10(ENV)-4.01

**RE: CEQA – NOTICE OF AVAILABILITY OF A MITIGATED NEGATIVE DECLARATION
FOR THE LIBERTY LANE APARTMENTS FOR THE CITY OF REDLANDS**

Dear Ms. Farris:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on July 17, 2017** and pursuant to our review, the following comments are provided:

GENERAL COMMENTS

8-1

1. The project is subject to the Comprehensive Storm Drain Plan No. 4, dated February 2013. Any modification made to the existing drainage should be reviewed and approved by the City Engineer. If you have any questions, please contact David Lovell in the Flood Control Planning Division at 909-387-8120.

8-2

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael R. Perry".

Michael R. Perry
Supervising Planner
Environmental Management

MRP:PE:SR
Email: lfarris@cityofredlands.org

BOARD OF SUPERVISORS

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Interim Chief Executive Officer
743 of 1375

Redlands Regular meeting of 9-19-17

**RESPONSES TO COMMENTS
LETTER #8
SAN BERNARDINO COUNTY
DEPARTMENT OF PUBLIC WORKS**

- 8-1 The onsite drainage system design captures runoff and detains most of it on the property. Refer to the Appendix G of the Initial Study which provides the detailed drainage design information. No changes to the existing drainage of the project area are anticipated based on the findings in Appendix G.
- 8-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The County Department of Public Works will be copied on all future project-related notices.

COMMENT LETTER #9

RECEIVED

AUG 07 2017

REDLANDS CITY CLERK

Alaina Edgett
Fernwood Drive
Redlands, CA

August 2, 2017

RE: Adoption of a Mitigated Negative Declaration -- Liberty Lane Apartments

Ms. Lorelee Farris
City of Redlands
Planning Department

Dear Ms. Farris,

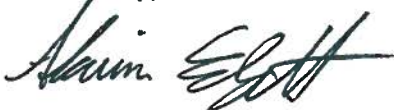
9-1 I am writing to support the adoption of the Mitigated Negative Declaration for Liberty Lane. As a mother and resident of this city, I couldn't be more proud to support this project. This planned housing community for veterans, especially homeless veterans, will be of great benefit to the community once it is developed.

Not only will the apartments house the brave veterans, like many of my family and friends, were willing to give their lives for this country, but it is also poised to provide additional support services that will help them lead productive lives.

9-2 While employed at Esri, Inc., I have become more inspired to help and more empathetic to the living conditions of those around me. It is this empathy that has continued to build my support for this project.

I anxiously await the start of construction where we, as a community, can provide for those who were willing to provide for us when it was most important.

Sincerely,



Alaina Edgett
Resident, City of Redlands

909-475-7661

RESPONSES TO COMMENTS
LETTER #9
ALAINA EDGETT

- 9-1 This comment in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 9-2 This comment in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

COMMENT LETTER #10

RECEIVED

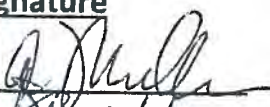
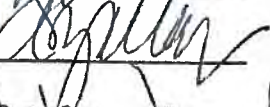
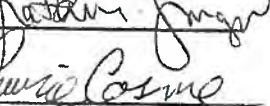
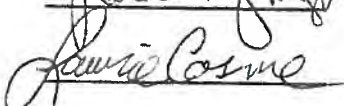
Concerned Citizens of Redlands

AUG 07 2017

We the undersigned are concerned with the proposed project **Liberty Lane Apartments** that's being proposed for the southwest corner of **Lugonia Avenue** and **Texas Street** in the town of Redlands, CA. **We oppose the project moving forward for the following reasons:**

10-1

- Land use (high density apartments adjacent to single family residential)
- Density of dwelling units (80 units on 4.7 acres with up to 225 people; 68 of the units are designated for seriously mentally ill adults)
- Increase in traffic and air pollution at an already impacted intersection (532 day trips)

	<u>Name (Print)</u>	<u>Signature</u>	<u>Address</u>
1.	Alexander Magallanes		619 Palo Alto Dr., Redlands, CA 92371
2.	Alejandro G. Magallanes		619 Palo Alto Dr., Redlands, CA 92371
3.	Natania Magallanes		619 Palo Alto Dr., Redlands, CA 92371
4.	Laurie Cosme		342 S. 4th St., Redlands, CA 92371
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			

Our email: concernedcitizensofredlands@gmail.com

RESPONSES TO COMMENTS
LETTER #10
ALEXANDER MAGALLANES, ALEJANDA GALINDO-MAGALLANES,
MATANIA MAGALLANES, AND LAURIE COSME

- 10-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Each of the issues raised in this petition (land use, density, air pollution and traffic) has been addressed in detail in the Initial Study, and have been evaluated in previous comments (please refer to the following responses to comments: 5-1, 5-2, 6-2, 6-6, 6-17, 6-18, 6-19, 6-24, 6-25, 6-26, 6-27, 6-28, 6-29 and 7-2). Fundamentally, the residential activities associated with an apartment complex are the same as for single family residences, except at a slightly higher intensity. The density of this project is consistent with the General Plan and based on the overall analysis in the Initial Study, the use of this site for higher density multifamily use is not forecast to cause any significant land use incompatibility impacts. Further, the air and traffic data in the Initial Study clearly demonstrate that air and traffic impacts associated with the project will be less than significant.

COMMENT LETTER #11

August 4, 2017

City of Redlands
Mayor Paul Foster
Mayor ProTem Paul Barich
Council Member Pat Gilbreath
Council Member Jon Harrison
Council Member Eddie Tejeda

Re: Opposition of proposed Liberty Lane Apartments
Southwest Corner of Texas Street and Lugonia Avenue

Dear Mayor Foster, Mayor ProTem Barich and Council Members:

11-1 I am writing this letter in opposition of the proposed Liberty Lane Apartments to be located at the southwest corner of Texas Street and Lugonia Avenue. I believe our homeless veterans need housing, but not the large number of units proposed and not at that location.

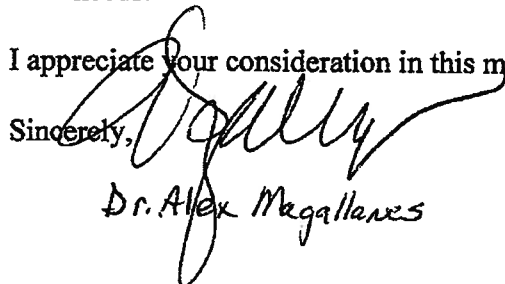
11-2 I am against this project because it is piling 225 homeless veterans into 80 units. This will create problems for the veterans that have been identified as having severe and persistent mental illness and are alcohol or drug addicted. It appears this is more like a treatment facility than housing for veterans that will be embraced by a community. The 8-foot block wall surrounding the apartments will make it look as though they are locked in and not part of a community. Our homeless veterans with complex issues require smaller number of units or larger residential homes (five-bedroom) within a neighborhood so they can feel as though they belong. How can we believe that putting 225 homeless veterans in 80 units will provide them the quality of life and support they need? The homeless veterans, with complex medical and psychiatric problems, need to be closer to the VA Hospital and other providers.

11-3 Also, I am against the location because it is across from Texonia Park that is used by youths involved in sports. I am afraid that the homeless veterans will be crossing the extremely busy street of Lugonia which can place them in danger of being hit. Cars drive very fast and there is a lot of traffic. With this proposed project, it will place 532 additional trips of traffic on top of the congestion that already exist. Additionally, how can we put an 80-unit apartment buildings in a neighborhood of single residential homes?

11-4 If, the 80-unit apartment buildings need to be built, then the developer needs to find a better location. They need to find a location better suited that will provide supportive housing for homeless veterans near the supportive services and medical facilities specializing in meeting their needs.

I appreciate your consideration in this matter,

Sincerely,



Dr. Alex Magallanes

**RESPONSES TO COMMENTS
LETTER #11
DR. ALEXANDER MAGALLANES**

- 11-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Refer to response to comment 10-1 which along with the other referenced responses addresses the concern regarding density. The project site has been designated for MDR use in the General Plan for over 20 years. The analysis in the Initial Study documents that development at the proposed intensity will not result in any significant adverse impacts, with implementation of mitigation measures and project design measures. In particular, land use compatibility can be maintained through these project design features, the available neighborhood resources (churches, park, and mass transit) and the onsite services being offered.
- 11-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. For the reasons outlined in response to comments numbers 6-6 and 6-25, it is highly unlikely that there will be 225 persons residing in the project. Regardless, there are some statements in this comment that are presented as fact, when they are actually assumptions. The site developer has implemented other similar projects and has had success in minimizing offsite conflicts and creating a quality of life that supports the residents. There will not be an 8-foot high block wall around the whole property. In fact the taller wall can be a mix of berm and block wall. Such a fence is needed where offsite noise will intrude onto the property (primarily on the north side near Lugonia). Along Texas Street at the front of the project site, fencing will be a mix of berm, block wall and wrought iron fence. The landscape design in this area will create a visually appealing and welcoming approach to the project site.
- 11-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. What is not stated in this comment is the Lugonia/Texas intersection is controlled with a signal, and has marked crosswalks in all four directions. Future crossings of Lugonia will be protected by this signal which can have the signal timing adjusted to provide adequate time to cross this roadway. This is a manageable issue that will not pose a significant impact, and there is no evidence that persons (from the project site or the broader neighborhood) crossing at this intersection is any more hazardous than any other intersection. Also note, that if needed for handicapped individuals, the project will maintain vans that can move residents from the project site to the Texonia Park.
- 11-4 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The proposed multifamily land use is consistent with the existing General Plan land use designation for the project site.

COMMENT LETTER #12

RECEIVED

AUG 07 2017

August 6, 2017

REDLANDS CITY CLERK

To: Mayor Paul Foster and Redlands City Council Members

12-1 My name is Ediberto Flores II. I have been a resident and citizen of the City of Redlands for over 60 years. I am writing this letter, as a member of the community, to express opposition to the proposed Liberty Lane Apartments to be located at the southwest corner of Texas Street and Lugonia Avenue here in Redlands.

12-2 I am both puzzled and disturbed that no consideration was given to the families and citizens that reside in the neighborhood, which in fact are the community, concerning the proposed project. Considering that this project would exacerbate multiple problems in a predominately single family neighborhood from increased traffic, increased risk for higher crime and disturbances, and a potentially higher caseload for emergency services, it seems as though the council has not thoroughly investigated these implications before moving forward with such an important decision.

12-3 I am deeply grateful for how our military veterans have served us and the country. In fact, I am co-founder and chairman of the Northside Impact Committee, a local non-profit organization here in Redlands. We host an Annual Recognition and Scholarship Awards event at which time we honor our veterans with our Military Recognition awards, bestowed upon families of some of our fallen soldiers and to our veterans in the community. But my gratitude drives me to seek a better solution for those who suffer because of their service. This project is not the right solution for them or the community. The sheer density of residents living within an inadequate space (225 residents in 80 units) is not suitable or beneficial for those who suffer from psychiatric disorders and addictions and only disrupts recovery, which heightens community concern.

12-4 Moreover, the community park across the street from the proposed project, Texonia Park, is used by families to celebrate kids birthdays, for picnics/social gatherings, and used by community youth sports teams to conduct weekly practice and games. Parents are extremely concerned that families and their children will be put in harm's way, understanding that the severe mentally ill residents will live directly across the park and will eventually congregate at the park.

12-5 In light of inadequacy and short-sightedness of Liberty Lane project, I request that our elected officials at the Redlands City Council immediately cease and desist with this proposed project. It is neither good for our struggling veterans nor the local community.

12-6 Respectfully, I ask our city council to not forsake the voices of its constituents but to try and understand our concerns. As it is, there is much confusion as we in the community are not receiving adequate answers from you or even let into the conversation as to whether this is a good idea or not. I ask that fair, respectful, compassionate and equal representation be given to your constituents in this area.

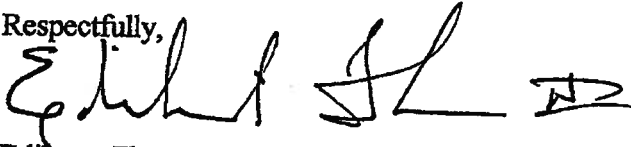
RESPONSES TO COMMENTS
LETTER #12
EDIBERTO FLORES II

- 12-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 12-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Each of the issues raised in this letter (land use, density, air pollution and traffic) discussed in detail in the Initial Study, and have been evaluated in previous comments (please refer to the following responses to comments: 5-1, 5-2, 6-2, 6-6, 6-17, 6-18, 6-19, 6-24, 6-25, 6-26, 6-27, 6-28, 6-29 and 7-2. Fundamentally, the residential activities associated with an apartment complex are the same as for single family residences, except at a slightly higher intensity. The density of this project is consistent with the General Plan and based on the overall analysis in the Initial Study, the use of this site for higher density multifamily use is not forecast to cause any significant land use incompatibility impacts. Further, the traffic data in the Initial Study (Appendix G of the Initial Study) clearly demonstrate that air and traffic impacts associated with the project will be less than significant. The purpose of having onsite services to support the veterans and other residents is to minimize the need for emergency services.
- 12-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please refer to response to comments 6-6 and 6-28 which addresses the density issue.
- 12-4 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The supervision of the residents is designed to minimize the threats described in this comment.
- 12-5 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 12-6 The comment is noted and will be made available to the Redlands City Council for consideration in public hearings prior to a decision on the proposed project.

12-7

I plead with you not to submit to the pressure or influence of the interests of your fellow politicians over against the best interests of your constituents and the community. I urge you to use your office and policy making powers to promote an environment where the citizens of Redlands can dwell in safety and flourish.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ediberto Flores II', followed by a stylized flourish or mark.

Ediberto Flores II, CER-Representative

939 Calhoun Street, Redlands, CA 92374

(909) 798-7130

- 12-7 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

COMMENT LETTER #13

RECEIVED

AUG 07 2017

REDLANDS CITY CLERK

August 5, 2017

Mayor Paul Foster
Mayor Pro Tem Paul Barich
Councilmember Pat Gilbreath
Councilmember Jon Harrison
Councilmember Eddie Tejeda
City of Redlands
35 Cajon Street, Suite 200
Redlands, CA 92373

Re: Opposition to Proposed Liberty Lane Apartments
Southwest Corner of Texas Street and Lugonia Avenue

Dear Mayor Foster, Mayor Pro Tem Barich, and City Council:

13-1

I am writing to you to let you know that I am **against** the proposed project. As you know, I have lived in North Redlands all my life and have been active for just about as long. During my lifetime, I have witnessed and felt the segregation, discrimination, and police brutality on residents of the Northside. My oral history taken by Robert Gonzales dated February 14, 1995, has all the information. Additionally, my involvement has been citywide as I have been on the Parks and Recreation Commission for more than 20 years. The City of Redlands is my home and I care about what happens here.

13-2

This project for homeless veterans is in a **bad location**. For many years I have advocated to bring Texonia Park up to the standards of other parks in the City. Now, we have children, youth, adults, seniors, and entire families who enjoy the park. They like the way it looks and the way it makes them feel – safe.

13-3

Why are you wanting to approve the project for homeless veterans across the street from a park? I read that the homeless veterans that will be living there have a lot of problems with drug and alcohol addiction and suffer from mental illness as well as medical conditions. The problem with this is not that they have mental and physical illness or that they have addictions but that there will be

RESPONSES TO COMMENTS
LETTER #13
JOE GONZALES

- 13-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 13-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The residents will be under supervision and even under current circumstances homeless persons (which will no longer be transient with implementation of this project) have a right to use park and recreation facilities, such as Texonia Park.
- 13-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Access to park and recreation facilities is a positive benefit for the future residents of the Liberty Lane project. The project includes onsite open space and recreation, but the proximity to the park can enhance the local environment for the project's future residents. For discussion regarding the site density refer to responses to comments 6-6 and 6-28.

13-3
cont.

more than 225 in 80 units. That is too many with this problem in one part of town. How can you guarantee that they will take their medication? What will happen if they don't? Shouldn't the veterans be closer to the services they need?

13-4

I support veterans and have always been involved in activities that help them. We need to help the homeless veterans in Redlands. How can we have housing next to the Teledyne Battery Factory? They have had fires, they release hazardous chemicals into the air, there is lead in the water, and some of the close neighbors cannot drink water from their faucets. How can the developer make sure that the veterans will be safe?

13-5

As I said, this part of town, the Northside has suffered too much. The Northside is also the only place in the city that has low-income housing projects. That is O.K. because we need it for people with low income. We also need housing for young families to help them become homeowners. We need housing to improve the lives of the current residents on the Northside.

13-6

I understand that we want to help homeless veterans but what about the current residents of the Northside? We cannot bring more problems, like air pollution, more noise, and more traffic into the Northside when the current residents are not receiving the services they need. Let's first fix the problems on the Northside before this project is considered.

Sincerely,

Joe Gonzales


- 13-4 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please refer to response to comment 6-10 which addresses the Teledyne issues. At this time the facility does not appear to pose any hazards for residences or other properties in the Teledyne site vicinity. The research described in this Initial Study (refer to the Hazards Subchapter, 8.0, and Appendix F) verifies that the Teledyne facility and its operations do not pose a threat to future residents of the Liberty Lane project.
- 13-5 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 13-6 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. The detailed analysis in the Initial Study verifies that air emissions will be a less than significant impact on the environment; the proposed project will not generate or contribute to significant noise impacts; and the traffic can be accommodated by the existing circulation system with minor modifications.

COMMENT LETTER #14



DEPARTMENT OF CALIFORNIA

PHILIP MARMOLEJO POST 650

American Legion

MEETS SECOND AND FOURTH WEDNESDAY

Legion Hall, 1532 North Church Street

P. O. Box 413, Redlands, California 92373



RECEIVED

AUG 07 2017

REDLANDS CITY CLERK

August 4, 2017

Mayor Paul Foster
Mayor Pro Tem Paul Barich and City Council
City of Redlands
35 Cajon Street, Suite 200
Redlands, CA 92373

Re: Proposed Liberty Lane Apartments
Southwest Corner of Texas Street and Lugonia Avenue

Dear Mayor Foster, Mayor Pro Tem Barich, and City Council:

14-1

I am the Commander for American Legion Post 650. We held a general membership meeting on May 24, 2017, at which our board and its members unanimously voted to OPPOSE the proposed Liberty Lane Apartments.

14-2

Our organization of veterans dating from World War II to the current war on terror desire housing for all veterans whether homeless or not. Yet, we want to see veterans treated with the respect they deserve. Attached you will find the petition where Redlands Veterans are speaking out against this project. We grew up in the Northside of Redlands and know what is most needed for our community.

14-3

We oppose this proposed supportive housing for the following reasons:

- Its location within the single-family residential home community is not welcomed. Many of these families have been here for decades, if not more

RESPONSES TO COMMENTS
LETTER #14
AMERICAN LEGION
PHILIP MARMOLEJO POST 650

- 14-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project
- 14-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 14-3 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Please refer to responses to comments 5-1, 6-2, 6-24, 6-26 and 10-1 which addresses the land use and compatibility issue.

14-3
cont.

than a century. They desire a project that will improve property values and lift the community that has been neglected for so long.

14-4

- Its location next to Texonia Park is of grave concern. We finally have received the much-needed upgrades so that children and youth can participate in sports and other activities.

14-5

- Its location next to the Teledyne Battery Factory is unacceptable. We cannot allow returning soldiers and veterans exposed to agent orange to be exposed to further environmental hazards.

14-6

- Our homeless veterans need housing that will help them integrate into the community. This project proposes to place 225 people with special needs within 80 units. The project is too large in scale.

14-7

- Housing for our homeless veterans should be smaller and integrated into the various neighborhoods. They should not be crowded in a "compound" surrounded by an 8' wall.

14-8

- Our homeless veterans deserve to live in smaller homes, with more intensive services. Those services proposed by the developer are not adequate and do not meet the recommended standards.

14-9

We welcome organizations that want to promote housing and services for our veterans. We also ask that our participation in the design and development of future housing and services be solicited so that we can jointly develop housing and services that show respect for our veterans.

Respectfully submitted,



Norman Cosme
Commander
American Legion Post 650

- 14-4 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Access to park and recreation facilities is a positive benefit for the future residents of the Liberty Lane project. The project includes onsite open space and recreation, but the proximity to the park can enhance the local environment for the project's future residents. For discussion regarding the site density refer to responses to comments 6-6 and 6-28.
- 14-5 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. First, the project site is not adjacent to the Teledyne facility. It is located about 600 feet northeast of Teledyne and extensive residential development exists between the two sites. Please refer to response to comment 6-10 which addresses the Teledyne issues. At this time the facility does not appear to pose any hazards for residences or any other properties in the Teledyne site vicinity. The research in this Initial Study (refer to the Hazards Subchapter, 8.0, and Appendix F) verifies that the Teledyne facility and its operations do not pose a threat to future residents of the Liberty Lane project.
- 14-6 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. For discussion regarding the site density refer to responses to comments 6-6 and 6-28.
- 14-7 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. For discussion regarding the site density refer to response to comment 11-2.
- 14-8 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. It is unclear what the commenter refers to by "recommended standards" for on-site services for future residents of the project, and the services mentioned are not required by the Redlands Municipal Code.
- 14-9 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

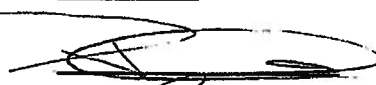
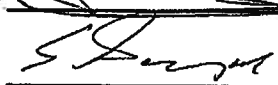
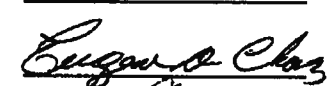
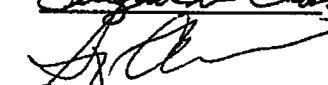
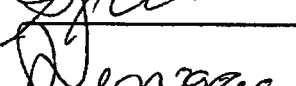
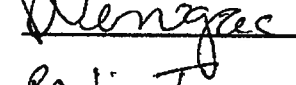
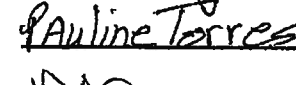
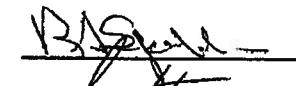
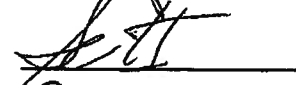
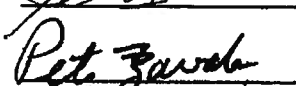
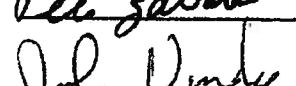
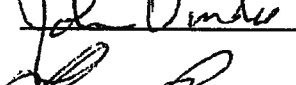
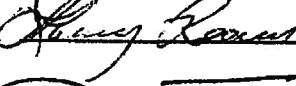
COMMENT LETTER #15

American Legion
Concerned Citizens of Redlands
1257 650 Veterans

We the undersigned are concerned with the proposed project **Liberty Lane Apartments** that's being proposed for the southwest corner of **Lugonia Avenue** and **Texas Street** in the town of Redlands, CA. **We oppose the project moving forward for the following reasons:**

15-1

- Land use (high density apartments adjacent to single family residential)
- Density of dwelling units (80 units on 4.7 acres with up to 225 people; 68 of the units are designated for seriously mentally ill adults)
- Increase in traffic and air pollution at an already impacted intersection (532 day trips)

	<u>Name (Print)</u>	<u>Signature</u>	<u>Address</u>
1.	<u>RICHARDO ALVAREZ</u>		<u>1011 N. UNIVERSITY</u>
2.	<u>ED GONZALES</u>		<u>10353 ROCK ST. MONTONE</u>
3.	<u>EUGENE CHAVEZ</u>		<u>1715 CLAY, ST REDLANDS, CA</u>
4.	<u>GEORGE OLIVARES</u>		<u>912 KIMBRICK AVE REDLANDS</u>
5.	<u>Paula Venegas</u>		<u>1719 Alta St. Redlands</u>
6.	<u>Pauline Torres</u>		<u>930 Herald St. Redlands</u>
7.	<u>BISQUITA</u>		<u>1203 E. CROOK AVE REDLANDS</u>
8.	<u>George Olivares</u>		<u>912 KIMBRICK AVE Red</u>
9.	<u>PETE ZAVALA</u>		<u>707 BALDWIN AV. REDLANDS</u>
10.	<u>John Vindola</u>		<u>524 Baldwin Ave Redlands</u>
11.	<u>Larry Reeves</u>		<u>1607 E. BURT ST. Redlands CA</u>
12.	<u>NORMAN COSME</u>		<u>342 S. 4th St Redlands CA</u>
13.	<u>Irene Rael</u>		<u>1336 Malachite Ave 92359</u> MONTONE, CA
14.	<u> </u>	<u> </u>	<u> </u>
15.	<u> </u>	<u> </u>	<u> </u>

Our email: concernedcitizensofredlands@gmail.com

**RESPONSES TO COMMENTS
LETTER #15
AMERICAN LEGION PETITION**

- 15-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Each of the issues raised in this petition (land use, density, air pollution and traffic have been evaluated in previous comments. Please refer to the following responses to comments: 5-1, 5-2, 6-2, 6-6, 6-17, 6-18, 6-19, 6-24, 6-25, 6-26, 6-27, 6-28, 6-29 and 7-2. Fundamentally, the residential activities associated with an apartment complex are the same as for single family residences, except at a slightly higher intensity. The density of this project is consistent with the General Plan and based on the overall analysis in the Initial Study, the use of this site for higher density multifamily use is not forecast to cause any significant land use incompatibility impacts. Further, the air and traffic data in the Initial Study clearly demonstrate that air and traffic impacts associated with the project will be less than significant.

COMMENT LETTER #16

Farris, Lorelee

From: Dana Dauser <ddauser@eadiepaynellp.com>
Sent: Tuesday, August 08, 2017 10:02 AM
To: Lorelee Farris
Subject: Liberty Lane
Attachments: doc08497820170808115318.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Please see attached.

Dana Dauser
Office Manager



E. ddauser@eadiepaynellp.com T. 909.793.2406
C. 909.557.0870 F. 909.792.3516

1839 W Redlands
Blvd Redlands, CA 92373

[Click here](#) to upload files.



CERTIFIED PUBLIC ACCOUNTANTS & BUSINESS ADVISORS



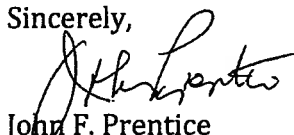
**CERTIFIED
PUBLIC
ACCOUNTANTS
& BUSINESS
ADVISORS**

August 7, 2017

Attn: Lorelee Farris, City of Redlands, Department of Planning

- 16-1 This letter expresses our support of the Mitigated Negative Declaration for Liberty Lane, the 80-unit affordable housing project for veterans and their families, proposed by the Community of Friends. We agree with the Environmental Review Committee that the declaration is the appropriate environmental determination for the proposed project.
- 16-2 We believe this project, as well as others like it, will help stabilize the lives of our veterans and help them to become even more productive members of our community after they return from military service.
- 16-3 The Liberty Lane project, located on the corner of Texas and Lugonia in Redlands, will not only bring vibrancy and life to a neglected vacant lot, it will bring hope and safety to neglected members of our community, a group that deserves so much more from the country it served and protected.
- 16-4 Ending veteran homelessness is a priority for the County of San Bernardino and something we believe is a priority as well.
- We support the Liberty Lane project and adoption of the Mitigated Negative Declaration without reservation.

Sincerely,



John F. Prentice
Managing Partner

RESPONSES TO COMMENTS
LETTER #16
JOHN F. PRENTICE
EADIE + PAYNE

- 16-1 The comment letter in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project
- 16-2 The comment letter in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 16-3 The comment letter in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.
- 16-4 The comment letter in support of the project is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project.

COMMENT LETTER #17

Farris, Lorelee

From: Abigail A. Smith <abby@socalceqa.com>
Sent: Monday, August 07, 2017 2:27 PM
To: Lorelee Farris
Subject: Liberty Lane Apts - Attachments D thru G to comment letter
Attachments: Liberty Lane_Comment Letter_Revised IS Exh D thru G.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Ms. Farris,
Attached are further exhibits to our comment letter regarding the Liberty Lane Apartments project. Thank you again,

Abby Smith

PLEASE NOTE THE NEW FIRM NAME AND ADDRESS BELOW

Abigail Smith, Esq.
Law Offices of Abigail Smith
1455 Frazee Road, Suite 500
San Diego, CA 92108
Tel: 951-506-9925
Fax: 951-506-9725
Cell: 619-379-6394

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Abigail A. Smith, Esq.

Email: abby@socalceqa.com

Telephone: (951) 506-9925

Facsimile: (951) 506-9975

VIA U.S. MAIL AND E-MAIL

August 7, 2017

City of Redlands
Development Services Department
c/o Lorelee Farris, Principal Planner
35 Cajon Street, Suite 20
Redlands, CA 92373
lfarris@cityofredlands.org

Re: Liberty Lane Apartments Project Revised Initial Study/Mitigated Negative Declaration

To the City of Redlands:

Please accept this letter on behalf of local residents, Citizens for Equitable Redlands, regarding the Revised Initial Study/Mitigated Negative Declaration ("IS/MND") for the Liberty Lane Apartments Project.

17-1 The Project is a request for a Conditional Use Permit for the construction of six, two-story residential buildings with a total of 80 units and one community building on a 4.72-acre site on the southwest corner of Texas Street and Lugonia Avenue. The applicant requests a zone change from R-1 (single family residential) to R-2 (multi-family residential). The Project also requests a density bonus of 20%. The Project site is currently vacant and it is surrounded to the north, south, east and west by existing single-family residential homes in the R-1 zone. There is also an existing public park in the Open Space zone to the north.

A. General Comments

17-2 For the reasons outlined below, the Revised Initial Study/Mitigated Negative Declaration ("IS/MND") is legally inadequate and an Environmental Impact Report ("EIR") is required. CEQA requires the preparation of an EIR for any project that *may* have significant adverse effects on the environment. (Public Resources Code § 21151.) "Said another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." (State CEQA Guidelines, §15064 (f)(1).) The Project meets these standards as discussed further below. Additionally, a mitigated negative

RESPONSES TO COMMENTS
LETTER #17
ABIGAIL SMITH, ESQ.
LAW OFFICES OF ABIGAIL SMITH

- 17-1 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Generally, the project summarized in this comment is accurate with the following exceptions. First, the density bonus is actually about 14%, not 20% (the 4.72 acre site will support up to 70 units under the MDR land use designation [$4.72\text{ acres} \times 15 \text{ DU/acre} = 70.8 \text{ DU maximum}$] and 10 additional units constitutes 14.2% of this 70 units). This summary also fails to address the undeveloped property to the west and the actual General Plan land use designations. Even though there are two residential units west of the site on West Lugonia Avenue, all of the property on the south side of Lugonia from the Texas Street/Lugonia intersection west is either designated Medium Density Residential (MDR) or Commercial, including the adjacent single family residential properties on the south side of Lugonia, west of Texas Street. As noted in the Initial Study and in response to comment 6-2, the project site and the property on the south side of Lugonia west of Texas Street have been designed for MDR uses in the General Plan for over 20 years.
- 17-2 The comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. For the same reasons stated in this comment, the responses provided in the following text demonstrate that the assumption of significant impact is not accurate, and the City concludes that the adoption of a Mitigated Negative Declaration (MND) is the appropriate CEQA environmental determination which is fully supported by the data (facts), analysis and findings in this Initial Study. Public controversy, speculation, or unsubstantiated opinion unsupported by substantial evidence do not constitute evidence of any potentially significant environmental effect (per CEQA Guidelines §15064(f)(4,5)). Speculation is not to be further analyzed (CEQA Guidelines §15145). Economic and social impacts that do not contribute to or are not caused by physical changes in the environment do not constitute substantial evidence of a potentially significant effect on the environment (per CEQA Guidelines section 15064(f)(6)).

17-3

declaration is only appropriate when revisions in the proposed project “would avoid the effects or mitigate the effects to a point where *clearly* no significant effects would occur, and [t]here is *no* substantial evidence, in light of the whole record before the agency, that the project as revised *may* have a significant effect on the environment.” (State CEQA Guidelines, § 15070 (b) [emphasis added].) The IS/MND does not demonstrate that significant impacts are mitigated to a point where “clearly no significant effects would occur.” Additionally, in some respects, the IS/MND does not provide sufficient information by which the City can make an informed decision about the Project. *See, Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1200.

B. Aesthetic Impacts

17-4

The IS/MND acknowledges that residences to the south of the Project site currently have views of the San Bernardino Mountains. By constructing 32-foot buildings and 8-foot walls on the vacant site, the Project will obstruct this viewshed. This represents an adverse change to the physical environment within the meaning of CEQA, and therefore by definition is a significant impact. In particular, Figure 5.1-2 indicates a significant impact with respect to “Station A”: the view of natural elements and the mountains is wholly replaced with a large block wall and towering buildings.

17-5

In addition, the community takes issue with the following statement of the IS/MND: “The General Plan provides the following summary of visual setting for the project area (North Redlands, Section 11.0, Visual-2): Citrus Groves, the University of Redlands, and views from the Santa Ana River bluff of the San Bernardino Mountains are important assets in this section of the City. However, *minimum topographic change, uniform, large-scale street grid, longtime market designation for lower priced homes, and little attention to street landscaping, have characterized parts of north Redlands as having a less desirable image.*” (p. 5.0-3) (emphasis added) This self-serving statement reflects a callous attitude towards the effects of the Project on the surrounding community. Indeed the community very much disagrees with this disparaging description of north Redland’s character and aesthetic values. The people who live in north Redlands *like* where they live and desire to protect it from encroachment by higher density development that *brings* unwanted traffic, light, and noise to the residential area. Moreover, the IS/MND appears to be making a policy judgment about the value of the community in general, rather than evaluating whether the Project brings adverse changes to the local environment.

C. Air Quality

17-6

The IS/MND states that Project construction will require the import of 1,075 cubic yards of soil, and therefore it requires approximately 132 round-trip truck trips to a location(s) unknown (the IS/MND implies the location is outside the City limits where it states that the haul route will include travel on freeways). Importantly, the 2015 air

- 17-3 Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Again, contrary to the conclusion stated in this comment, the City finds that the data (facts), analysis and findings in this Initial Study appropriately support the adoption of an MND for the proposed project.
- 17-4 The cited text is from the General Plan Master Environmental Assessment, on page 2 of Section 11.0, Visual 2. The intent in referencing this statement is to identify areas of North Redlands that may have City recognized important scenic views or not. In reviewing the identified important views as defined by the City's General Plan, the cited text draws a distinction between the views from the bluff (near the Santa Ana River) and those from the developed areas within North Redlands. The difference between scenic views, as characterized by the cited text, is clearly shown by comparing the views from Figure 5.1-1 and Figure 5.1-5. The important scenic view is clearly from the bluff and the highly modified view that was deemed not to be as important (as documented by the City's General Plan EIR) is shown on Figure 5.1-1. Individuals may appreciate the highly disturbed scenic views shown on Figure 5.1-1, but it is clear that the important scenic view from a CEQA standpoint occurs where man-made features do not dominate or obstruct the view to the San Bernardino Mountains. Visual access to the disturbed scenic view will be substantially modified for three residences south of the site. For the remainder of the homes to the east and south, their views will be slightly modified, but access to the disturbed scenic view of the San Bernardino and San Gabriel Mountains will be maintained. In weighing the significance of the impact on scenic views, the highly disturbed quality of the scenic view to the mountains and the few residences affected by the substantial change in view were evaluated and the City concluded that the scenic view impact of the proposed project does not rise to a level of significant adverse impact. Further, this finding is consistent with the City's previously stated findings in the General Plan EIR which established an appropriate threshold of significance for evaluating visual impact north of the 1-10 Freeway.
- 17-5 Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. Refer to response 17-4 above. This comment is not meant to be disparaging. It was abstracted from the published General Plan EIR and it reflects the actual visual setting situation for most residents in this portion of the City of Redlands, including the adjacent residents. All of the views from local area residences to the San Bernardino Mountains are actually highly disturbed by man-made features and are thus of much lower scenic quality than the recognized high quality views to the Mountains from the bluff area. This finding by the City is not intended to be self-serving or to contradict individual perceptions of their views, but this finding reflects that all of the homes oriented to north/south roadways north of the I-10 Freeway do not have an unobstructed view from their property and in most cases the view is of another house that obstructs ground level views towards the San Bernardino Mountains. As shown by the visual simulations for Station B, all of the residences located on the east side of Texas south of Lugonia will continue to have a highly disturbed view of the San Bernardino Mountains. In weighing the significance of the impact on scenic views, the highly disturbed quality of the scenic view to the San Bernardino Mountains and the few residences affected by the substantial change in view were evaluated and the City concluded that the scenic view impact of the proposed project does not rise to a level of significant adverse impact. As stated above, this finding is consistent with the City's adopted findings regarding scenic views in the General Plan EIR which established an appropriate threshold of significance for evaluating visual impact north of the 1-10 Freeway. The City's finding for the proposed

project is consistent with this published finding. Furthermore, interested residents and other persons have represented themselves, and submitted comments separately to the City (a handful of which made reference to the Aesthetics section of the Initial Study).

- 17-6 First, it should be noted that not all 132 trips for delivery of the fill material will occur on the same day. Typically, these trips will be spread over a ten-day period, or only 13 trips per day. Second, a review of the Air Quality Appendix to the Initial Study (Appendix A) documents the following finding. The construction emissions summary remains unchanged from the construction emissions summary of the original Air Quality Report as the maximum daily emissions for the criteria pollutants do not occur during the "Grading" phase of the project. The maximum daily emissions for VOCs occur during the overlap between the "Framing/Finish Construction" and "Architectural Coating" phases of construction and the maximum daily emission for NOx, CO, Sox, PM10, and PM2.5 occur during the "Trenching" phase. As such, the addition of soil quantity to the "Grading" phase would not alter any of the findings made in the previous Air Quality Report as it does not contribute to or alter the maximum daily emissions. The Air Emissions study was updated and the findings remain the same. The data presented in Section 5.3 are fully accurate and document the finding that air emissions are well below the SCAQMD thresholds.

17-6
cont.

quality study was not updated to reflect the new information that off-site/on road truck trips for soil transport will be part of the Project. Table 3-4 of the air quality study concludes that the Project will generate 54.73 lbs per day of NOx emissions, which is identical to the conclusion for NOx in the “updated constructions emissions” estimates of IS/MND Table 5.3-1. Thus NOx emissions (NOx being a component of diesel) are unchanged with the addition of 132 diesel truck haul trips to/from a location unknown. It is imperative that all off-site/on road truck trips are accounted for in the analysis as well as a reasonable assumption made for trip lengths. Without such information, the air quality analysis is incomplete.

17-7

The discussion of construction air quality impacts notes that the emission calculations of the air quality model “assume the use of standard construction practices, such as compliance with SCAQMD Rule 403...” (p. 5.0-16). To the extent that the Project relies upon certain regulatory requirements to find that impacts will be less than significant, these should be specified. Elsewhere, for instance, the IS/MND states that the Project will implement dust control measures as required by Rule 403 (pp. 5.0-18), while the air quality study states that impacts are significant as to PM10 and PM2.5 without the implementation of BACM AQ-1 and BACM AQ-2. Moreover, the air quality study recommends that, “grading plans shall reference that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.” This recommendation is not carried through to the IS/MND or MMRP. In short, the conditions of approval and/or MMRP must clarify what measures are required.

17-8

The construction air quality analysis is based on an outdated version of the CalEEMod model. *See*, <http://www.caleemod.com>¹. CalEEMod 2016.3.1 is currently in effect. *Id.* The Project should also evaluate impacts pursuant to the 2016 Air Quality Management Plan (“AQMP”). *See*, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>

17-9

The IS ignores any discussion of environmental justice in terms of air quality or other impacts. “Environmental justice” is defined by law as “the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” (Cal. Gov’t Code § 65040.12 subd. (e).)².

17-10

In total, the air quality study should be updated.

¹ This hyperlink and all hyperlinks cited in this letter are fully incorporated herein by reference.

² *See*, https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

- 17-7 The most important emission controls are for fugitive dust and the Initial Study references some of the required dust control measures on page 5.0-16. Although compliance with South Coast AQMD Rules 403, 1113, 431.2, and 1186/1186.1 are mandatory and compliance with the requirements to shut off construction equipment engines before five minutes expire and fill delivery trucks to deliver fill material outside of peak hours (note at 13 trips per day, this equates to slightly less than two truck trips per hour), the City has imposed both the general measures and some specific measures to be used for this project as conditions of approval on the project. Emissions will be controlled in accordance with the referenced rules and commitments in this response.
- 17-8 The 2016 AQMP does not alter the evaluation process for determining consistency with regional planning documents or conformance with the SCAQMD's CEQA significant thresholds. The analysis in the Initial Study of the project's consistency with the regional planning documents is accurate and the proposed project is consistent with the regional growth thresholds. Further, the proposed project has not changed the CEQA emission thresholds and the air quality data in both the Initial Study and Air Quality analysis in the Appendices clearly demonstrate that the proposed project's emission are well below the SCAQMD's emission thresholds.
- 17-9 There were no environmental justice issues associated with the proposed project, there remain none identified at this time, and none are anticipated. Air quality emissions from the proposed project fall well below the SCAQMD emission thresholds of significance and with implementation of mandatory measures to control construction emissions, the proposed project will not result in unfair treatment of the neighborhood, City of Redlands, County of San Bernardino, or South Coast Air Basin. Implementation of the proposed project would not result in the unfair treatment or unfair environmental effects upon persons within the neighborhood or the northerly part of the City.
- 17-10 The Initial Study accurately predicts a less than significant impact from implementation of the proposed project, both during construction and with future occupancy/operation. The Air Quality study was updated after the decision was made to bring in fill material to the site and as the preceding responses indicate this project will result in a less than significant air quality impact during both construction and occupancy/operation. No further update is required.

D. Hazards

17-11 The Teledyne Battery Factory³ produces batteries and is located in very close proximity to the Project site. Though the IS/MND describes it as 600 feet in distance, this is not entirely accurate. 600 feet might be accurate if measuring distance to the front of the Teledyne facility which is located at 840 West Brockton Avenue from the corner of Texas and Lugonia, but the proposed project and the Teledyne factory nearly abut each other on the back side of each property. Furthermore, the plant sits southwest of the proposed project. The Phase I Environmental Site Assessment (ESA) on page 32 and at photographs 2,4,14, and 15 provide evidence of the close proximity of Teledyne relative to the Project site.

17-12 As a result of this close proximity to this facility, which is known to emit lead⁴, the Project and its future residents may be exposed to lead at unsafe levels, which can lead to a variety of health problems^{5 6 7}. (See, Exhibit “A” hereto [Prop. 65 Warning].) The IS/MND states that, “A discussion of the Teledyne Battery Products facility, which is located approximately 600 feet south of the Project site, is found on pages 16 and 17 of the Phase I ESA.” Therefore, the IS states it “does not specifically address the Teledyne Battery Products facility.” (State CEQA Guidelines, §§ 15002 (a)(1), 15003 (c), (d).) However, the soil contamination referenced in the Phase I ESA concerns the *previous* “release” of contaminated material and the purported determination that the release did not contaminate area groundwater. But the Phase I ESA does not address ongoing operations at the facility and the potential for future environmental or public safety harms. Redlands officials have discussed the potential for lead poisoning due to factory operation. (See, Exhibit “B” hereto [October 18, 2016 City Council agenda referencing Redlands City officials being concerned with lead exposure].) For instance, a fire at the factory forced evacuations in 2014⁸. Note that this fire occurred after the preparation of the 2013 ESA.

17-13 There has also been no mention or analysis in the IS/MND of the Crafton-Redlands Plume. (See, Exhibit C attached [color map].)⁹

³ <http://www.gillbatteries.com/about.aspx>

⁴ Lead is a highly toxic material. See, <https://occup-med.biomedcentral.com/articles/10.1186/1745-6673-3-30>

⁵ See, <http://www.latimes.com/local/california/la-me-ln-dangerous-lead-levels-20160714-snap-story.html>

⁶ See also, <https://www.osha.gov/SLTC/batterymanufacturing/hazards.html>

⁷ See also, <http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/What-is-the-Exide-Cleanup-06-02-2016.pdf>

⁸ <http://www.redlandsdailyfacts.com/general-news/20141217/fire-at-redlands-battery-manufacturing-facility-causes-25000-worth-of-damage>

⁹ See also, <http://www.lockheedmartin.com/us/who-we-are/eesh/remediation/redlands.html>

- 17-11 The Phase 1 ESA identifies the location of the Teledyne battery site as 607 feet from the project site. The analysis of the battery site and its potential effects was clearly considered in the ESA (pages 16 and 17). Even with the identified proximity of the Teledyne site to the project site, the ESA concluded “Based on the relative distance, and current regulatory oversight, the release at this site is not expected to represent a significant environmental concern for the subject property.” The Teledyne facility was extensively tested and only one location on the property was found by DTSC to have lead concentrations above the unrestricted, residential land use threshold. This site was remediated and the Teledyne site itself is considered suitable for residential use.
- 17-12 The Teledyne site operates with extensive regulatory oversight, including SCAQMD. If any lead is emitted from the site, it would immediately deposit on the Teledyne site, which according to regulatory reports and tests lead concentrations are not at levels that could pose a hazard for residential use. The SCAQMD has issued appropriate permit(s) for the facility, and the business is in compliance according to the SCAQMD’s Facility Information Detail website. (Refer to Attachment 1 to these responses.) Therefore, routine operations at the Teledyne facility have not historically and do not currently have any known significant adverse effect on adjacent property, including residential uses. The accidental fire circumstance referenced in this comment is not related to routine operations, and the City Fire Department obviously has a plan to deal with such an accidental situation as demonstrated by the evacuation referenced in this comment. Just like all other surrounding property, the proposed project would be subject to and protected by the same hazard management program by the Fire Department. With these protections the proposed project’s existing proximity to the Teledyne facility does not qualify as a significant adverse effect.

As for the comment about groundwater, the State Department of Toxic Substances Control has inspected and reviewed the Teledyne property, and determined that no groundwater contamination or soil gases are a danger to human health. According to the DTSC’s Envirostor website, DTSC states, “Under DTSC supervision, a groundwater investigation was also conducted to assess groundwater conditions at the facility. Based upon investigation, contamination in the soil did not reach groundwater. Based on the information provided, DTSC considers Teledyne to have taken all necessary actions to remediate the site to unrestricted, residential land use.” On May 11, 2000, DTSC issued a public notice regarding no further action at the Teledyne site and DTSC will no longer have involvement at the site. In a June 28, 2004, letter to Teledyne for the Approval of Corrective Measures Study, DTSC stated, “Community concerns were addressed by DTSC staff as they were presented and no formal or written comments were received.” On January 9, 2012, DTSC issued a notice regarding completion of all final remedies and decisions for the site.

- 17-13 The Crafton-Redlands Plume does underlie the project site, as it does much of the City of Redlands. This issue was not raised because the plume does not affect the ground surface, but occurs at substantial depth (more than 100 feet in most instances) where it affects groundwater quality. None of the project’s activities will interact directly with this source of contamination, and groundwater extracted from within this plume is removed by the City of Redlands (where City wells intersect the plume) is treated to reduce concentrations of plume contaminants below the maximum contaminant level. The water that is supplied to City residents, including the future residents of the proposed project, will not expose these residents to a significant health impact.

E. Land Use

17-14 | As members of the community have expressed, the proposed Project is *inconsistent* with the surrounding neighborhood comprised of single-family residential homes, open space, a church, and a park area. Moreover, the density bonus is not compatible with the surrounding neighborhood¹⁰.

17-15 | The Project has significant land use impacts because it conflicts with the applicable requirements and policies of the single-family (R-1) zone, the current zoning designation of the site and that of surrounding properties. City of Redlands Municipal Code § 18.44.010 states that “[t]he purpose of the R-1 single-family residential district is to provide an environment conducive to the development of low density single-family homes, with no mixing of incompatible uses” (emphasis added). The Project is manifestly inconsistent with this purpose.

Also, the R-1 zone restricts development to one home per lot, and provides that each lot shall be no smaller than 7,200 square feet. (Municipal Code §§ 18.44.100, 18.44.080) This equates to one unit per 7,200 square feet. Thus for the 4.72 acre site, this would equate to 28.5 units *total*. Thus the density created by the Project (80 units) is not consistent with the existing zoning and surrounding “low density” land uses that are subject to the R-1 development standards. Also, there are not “substantial setbacks” between the Project site and adjacent residential uses.

17-16 | The proposed zone change does resolve the impacts that flow from the land use conflicts or the inconsistency between uses (traffic, air quality, noise, etc.). For instance, assuming 28 units under the R-1 zone for the 4.72-acre site, and assuming 10 trips per day per unit or house¹¹, this would equate to 290 vehicle trips per day compared to the 532 trips per day generated by the Project. Noise and other impacts are heightened when the use is intensified. Also there are no R-2 zones in the area. *See*, IS/MND land use map.

17-17 | Finally, the community wishes to express that it is not opposed to affordable or supportive housing; however, these projects are more appropriately located elsewhere. There are other sites in the City that make more practical sense for this type of project, as they are closer to transit and medical facilities, including the Veteran’s hospital (*See*, Exhibits “D”, “E”, and “F” hereto [color maps].)

¹⁰ Additionally, we submit that the findings cannot be made in support of the Conditional Use Permit or pursuant to the Municipal Code to justify the permit and/or the allowable use.

¹¹ <http://www.ci.apple-valley.mn.us/DocumentCenter/Home/View/717>

- 17-14 The issue of consistency of the land use with surrounding residential use has been raised by a number of commenters. Please refer to responses to comment 2-1, 5-1, 6-2, 6-6, 6-24, 10-1, 11-1, and 12-2. The fundamental issue of consistency is whether a higher density residential use conflicts with or is inconsistent with single family residential uses. As indicated in the referenced responses, there is no fundamental inconsistency in the activities of residential uses at different densities. The activity patterns of each use are similar and the presence of a church, open space and parks benefits all residents. Based on the Initial Study and the technical studies, none of the activities at a higher density will have a significant conflict with or be significantly inconsistent with the surrounding single family residential uses. The density bonus is fully consistent with the City's underlying land use designation, MDR, based on merit. The slightly higher density allowed by the density bonus has been accounted for in the analysis of the eighteen Initial Study topics, and again the density issue does not cause conflicts or incompatibility with the surrounding neighborhood.
- 17-15 Regarding the issue of consistency and compatibility of higher density residential uses with single family residential uses, please refer to comment 17-14. Regarding the R-1 zoning issue, this is a specious issue to raise because it is the existing zoning that is inconsistent with the basic land use designation in the General Plan. By looking at the General Plan designations provided in Figure 2-3 it is clear that the City intended MDR uses to extend from Texas Street to Karon Street on the south side of Lugonia. The inclusion of the zone change is specifically intended to make the zone designation on the property consistent with the General Plan, which clearly intended MDR uses to be located at the project site and the area to the west. Also note that the existing roadways (Lugonia and Texas) and the onsite design, provide setbacks that separate the apartments onsite from the adjacent residential uses. More than 60 feet on Lugonia and about 45 feet on Texas create an adequate setback from the MDR use proposed at the project site.
- 17-16 The traffic study clearly shows that the maximum number of trips per day, 532 trips based on the highest population density at the site can be accommodated on the surrounding circulation system without cause a significant degradation in Level of Service using the City's standards. As noted in the Initial Study and as noted in responses to comments 6-6 and 6-28, the use of the maximum trip generation provides a conservative analysis for issues like air quality, noise and traffic. However, the Initial Study documents that even under these conservative assumptions impacts under these issues will be less than significant. In actuality not only will there likely be substantially less persons occupying the future project, but how many homeless have automobiles. One of the positive benefits of this project site is access to public transportation (refer to response to comment 1-1) within 100 feet of the project site.
- 17-17 Your comment is noted and will be made available to the Redlands City Council for consideration along with many other public speakers/commenters prior to a decision on the proposed project. Contrary to the comment's assumption and statement that "these projects are more appropriately located elsewhere... that make more practical sense for this type of project...", the City's *2013-2021 Housing Element* specifically identifies this subject property in Appendix B (Table B-2, site #57, "Other Parcels") for sites that could accommodate low income or very low income projects. Table B-2 also correctly identifies the existing General Plan land use designation (MDR – Medium Density Residential) for the site, as well as development constraints such as the Zone Change that is necessary to achieve the desired density in accordance with the General Plan. Furthermore, the proposed project is a rare opportunity to implement

numerous Housing Element policies encouraging affordable and supportive housing, not the least of which are:

Policy 7.2a: "Encourage the development of housing affordable to extremely low-, very low-, low-, and moderate income households."

Policy 7.2b: "Ensure that units produced for extremely low-, very low-, low-, and moderate income households are made available to those groups and maintained as affordable units."

Policy 7.3b (Housing for People with Special Needs): "Provide incentives for development of affordable housing for seniors, single parents, large households, disabled persons, and other special needs groups on sites where proximity to services and other features make such housing desirable."

There is no supporting data that mass transit is more readily available at any other location. Further, this mass transit provides good connections to shopping and medical facilities located within the community and at this location Omnitrans Route #15 passes on Lugonia Ave. directly in front of the project site, and Route #8 can be accessed at the intersection of Lugonia/Orange (approximately 2,500 ft. to the east of the project site). Both routes also provide direct access to the Transit Center in downtown Redlands for connections to other local and regional transit options (including Omnitrans Route #19 which provides direct access to the Loma Linda VA Medical Center and Loma Linda University Medical Center). Seniors and persons with disabilities may also utilize Omnitrans' Access ADA Service as well as discounted programs such as RIDE Taxi & Lyft Program for medical appointments, work, grocery shopping and other trips that may be difficult to make on public transportation.

See also:

<http://ciredlandscsa.us/community/PDFs/DowntownEIR/4.7%20Land%20Use%20and%20Planning.pdf>

17-17
cont.

[p. 4.7-2 - Downtown Redlands General Plan states that more intense land uses should be located near transit and access routes]

See also, Figure 4-2 of Redlands General Plan Update [indicating low income housing sites in Downtown Specific Plan Area]:

http://cityofredlands.hosted.civiclive.com/UserFiles/Servers/Server_6255662/File/City%20Hall/Departments/Development%20Services/Planning%20Division/General%20Plan/Redlands_HE_ADOPTED_02-07-14.pdf

F. Noise

17-18

Noise measurements of existing ambient conditions were taken at the roadways, rather than at the property line or boundary of existing homes internal to the Project site, where background noise can be expected to be less. The IS/MND notes that, “the background ambient noise levels in the Project study area are dominated by transportation-related noise associated with the arterial roadway network” (p. 32). Therefore, it imperative to measure existing ambient noise at the backyards of residences nearer to the interior of the proposed Project development, such as at the northeast corner of the southerly homes, or the southeast corner of the northerly homes. These backyards will be exposed to noise from the Project such as interior traffic noise and mechanical equipment as well as short-term noise events such as trash trucks or compactors. Both noise measurement locations are located “on” the street, not at the homes or their shared boundary with the Project. While not “every noise-sensitive location in the project area” must be measured, it is simply unreasonable to measure ambient noise *only* at the roadways. We strongly suspect that the existing ambient noise, at locations farther away from roadways and more interior to the Project, would be quieter than what are claimed to be the existing ambient noise conditions.

17-19

Contrary to the IS/MND’s conclusion, construction noise is significant. First, construction noise exceeds applicable noise standards: it exceeds the City’s residential noise standard of 60 dBA (exterior) (noise study, Exhibit 3-B); it is the range of “normally incompatible” and “clearly incompatible” under the noise/land use compatibility matrix (noise study, Exhibit 3-A); and, it exceeds State of California permissible noise levels.¹² Therefore, an EIR is required to evaluate this impact. Compliance with the City’s construction noise ordinance in terms of limiting hours of construction does not eliminate the CEQA impact. Case law interpreting CEQA

¹² <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/peir/noise.pdf>

- 17-18 Your comment is noted and will be made available to the Redlands City Council for consideration prior to a decision on the proposed project. First, the project property boundaries occur at the edge of both roadways, Lugonia and Texas. Therefore, the noise levels are valid and they create an existing environment on both roadways that is higher than would normally be allowed for single family residential uses. Second, the noise levels for onsite uses were examined in detail and none of these onsite noise levels approach the background noise exposure for the nearby residences. The noise at existing residences will remain the predominant noise source for all residences, including backyards. Further, none of the activities identified in this comment are continuous or exceed the residential noise threshold, even at the location where they occur on the project site. The revised noise study and the data presented in the Initial Study fully contradict the shrill comments regarding noise in this comment.

The long-term noise level measurements were positioned to measure the existing ambient noise levels in the Project study area. Both Caltrans and the Federal Transit Administration (FTA) recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, "sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources." Further, FTA guidance states, "that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community." Therefore, based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at the backyards nearer to the interior of the proposed Project, as the comment suggests, because each measurement represents a group of receivers that share acoustical equivalence.

Further, the ambient noise levels measured at locations L1 and L2 are representative of a typical urban residential environment, with daytime ambient noise levels ranging from 57.8 to 64.4 dBA Leq, and nighttime ambient noise levels between 49.8 to 52.0 dBA Leq. In addition, the operational noise level analysis provided in the Noise Study presents a conservative approach, with all operational activities occurring simultaneously, 24-hours a day, and the Project operational noise level increase over ambient conditions is shown to be zero (0) dBA under these worst-case operational conditions.

- 17-19 This comment provides no data to support this comment. First, construction noise will be controlled on this site more rigorously than required by the City (limit construction activities to essentially daylight hours, 7 am to 6 pm) because extensive construction noise mitigation has been required (NOI-1). This comment ignores that during the night hours (actually for 13 hours per day) no construction activities will be conducted and with the construction limited as noted, the 60 dBA threshold will likely not be exceeded. The comment cites the 60 dBA CNEL transportation noise level criteria for residential uses as a construction noise level threshold, however, the Community Noise Equivalent Level is used to assess transportation noise sources which occur over 24-hour periods, such as traffic and aircraft noise levels, and is not an appropriate threshold of significance for the daytime-only Project construction noise activity. This is

consistent with the use of the 60 dBA CNEL criteria as a planning tool by the City of Redlands to assess compatibility of future residential land uses with the existing and future transportation noise environment. In addition, the commenter provides no detail as to how construction noise levels would exceed 60 dBA CNEL, since all noise levels presented in the Noise Study for Project construction are expressed in dBA Leq based on worst-case, hourly noise level projections. Any dBA Leq noise levels presented in the Noise Study cannot be compared with CNEL criteria unless first converted to a 24-hour CNEL, which as previously stated, would be an inappropriate comparison given the type and duration of the Project construction noise source. The Noise Study does not rely on the City of Redlands Municipal Code permitted hours of construction to demonstrate less than significant construction noise impacts, but instead, identifies a noise level threshold for impact determination under CEQA noise guidelines, as further discussed in response to comment #17-21.

17-19
cont. provides that a fair argument can be made of significant environmental impacts despite a project's purported compliance with a regulatory standard such as a noise ordinance. (*Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 732.)

17-20 Second, construction noise is significant because it represents a "substantial temporary noise increase" over existing noise conditions. A "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse *change* in any of the physical conditions within the area affected by the project, including ... ambient noise." (State CEQA Guidelines, § 15382.)

The IS/MND attempts to avoid a finding of significance by adopting a self-serving construction noise threshold of 85 dBA. The source of this "standard" is a 1998 document entitled, *Criteria for Recommended Standard: Occupational Noise Exposure* by NIOSH. The 20-year old study postulates that exposure *to workers* of noise levels exceeding 85 dBA can be hazardous to health. This study does not address noise exposure to residents and sensitive receptors such as children or the elderly and is therefore inapplicable to this project. Nor does the study discuss what would be considered an acceptable *increase* in noise to these receptors.

17-21 This "new" construction noise standard of 85 dBA must be rejected. It would allow noise levels 25 dBA above what is normally considered acceptable for residential uses (60 dbA exterior). This is unacceptable. Note that each 10 decibel increase in sound level is perceived as approximately a doubling of loudness¹³. The City of San Jose considers construction noise significant if a project located within 500 feet of residential uses would involve substantial noise generating activities continuing for more than 12 months. *Id.* In this case, residents will be exposed to noise levels as high as 80.1 dbA for a period of 18 months.

17-22 Furthermore, as discussed above, the IS/MND does not provide information on existing ambient noise levels at residential receivers. Receivers are *identified* within the analysis, but existing noise *measurements* at these locations were not taken. Therefore, the record does not disclose the *increase* in noise over ambient conditions during construction phases.

17-23 Nevertheless, the IS/MND plainly shows that construction noise levels at virtually all Receivers (R1 through R8) are significant (above 60 dBA) during virtually all phases of Project construction (*e.g.*, as high as 80.1 dbA during grading and site preparation phases at R-7). 80 dBA is the noise equivalent of a garbage disposal at 3 feet.^{14 15} Furthermore, the noise calculations are predicated on "calculated noise barrier

¹³ <http://www.sanjoseca.gov/DocumentCenter/View/28042>

¹⁴ *Id.*

¹⁵ <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/peir/noise.pdf>

- 17-20 Again, this comment reaches a conclusion that is not supported by the data at the project site. The background noise at the existing residences is between 66 and 71 dBA CNEL (Table 5-1 of the Noise Appendix). Thus, even if the construction noise equals 60 dBA CNEL it would be lost in the existing background noise at these properties. Thus, the substantial short-term change in noise level hypothesized in this comment cannot occur at the project site due the much higher background noise level.
- 17-21 The Project construction noise levels presented in the Noise Study represent a conservative approach, with the highest reference noise source of each stage of Project construction operating near the sensitive receiver locations. Therefore, the construction noise levels presented in the report are expected to overstate the noise levels of actual Project construction activities. In addition, the vibration mitigation measures identified in the Noise Study, which include a 65-foot buffer for large construction equipment, would further reduce construction-related noise level increases on the ambient noise environment from the highest noise-generating mobile equipment. Additional barrier attenuation would also be provided by the construction of the planned Project 6 and 8-foot high noise barriers prior to the commencement of Project construction activities per mitigation measures NOI-1 of the Initial Study. Therefore, less than significant noise level increases over ambient conditions would occur during Project construction, since the Project construction noise levels are based on a conservative approach, and would be further reduced during actual Project construction activities with the mitigation measures identified in the Initial Study.

As indicated in the Noise Study, the City of Redlands Municipal Code and General Plan Noise Element do not identify any thresholds of significance for construction noise. Rather, Section 8.06.120(G) indicates that construction noise is considered exempt from the ordinance. Based on CEQA Noise Guideline A, the Project construction noise levels must be evaluated based on “applicable standards of other agencies.” Therefore, the Noise Study relies on the 85 dBA Leq NIOSH threshold, which is consistent with both the less conservative Occupational Safety and Health Administration 90 dBA Leq threshold, and the FTA *Transit Noise and Vibration Impact Assessment* criteria for construction noise, prepared in May 2006. The FTA identifies an hourly construction noise level threshold of 90 dBA Leq during daytime hours, and 80 dBA Leq during nighttime hours for construction for general assessment. Detailed assessment, according to the FTA, identifies an 8-hour dBA Leq noise level threshold specific to residential uses of 80 dBA Leq. Therefore, the Noise Study relies on the NIOSH 85 dBA Leq threshold, which is generally consistent with NIOSH, OSHA, and FTA general and detailed assessment criteria for residential uses and represents an appropriate threshold for construction noise analysis.

Consistent with the response above, the Noise Study 85 dBA Leq construction noise level threshold is based on both NIOSH and FTA thresholds for construction noise, and in the case of the FTA, is specifically applicable to residential uses. The comment again incorrectly compares the 24-hour 60 dBA CNEL transportation noise criteria with hourly, dBA Leq construction noise levels found in the Noise Study, and cites City of San Jose significance criteria which is not applicable to the jurisdictions of the City of Redlands, nor the County of San Bernardino in which the Project resides. Further, the comment overstates construction noise levels in assuming the highest construction noise levels presented in the report would occur over 18-months. The construction noise levels presented in the Noise Study represent worst-case, conservative estimates of Project construction that would be reduced with the mitigation measures identified in the Initial Study to less than significant levels, since construction activities

will vary in location and intensity throughout the site, and will decrease as the use of mobile equipment becomes less frequent over the duration of Project construction, i.e., the transition from site preparation to building construction.

The comment identifies a new 80 dBA Lmax standard after previously claiming construction noise levels should be compared with a 24-hour 60 dBA CNEL criteria. However, the Noise Study already identifies an appropriate noise level threshold for construction based on NIOSH, OSHA, and FTA guidance, and demonstrates a less than significant noise level impact based on a conservative approach to construction noise analysis. In addition, both the Noise Study and Initial Study identify mitigation measures to reduce construction noise and vibration levels at the closest sensitive receiver locations during temporary Project construction activities. Further, there are no specific construction noise level standards identified in the City of Redlands Municipal Code noise ordinance requiring analysis using Lmax thresholds, and this would directly contradict the previous comments which identified a "60 dBA" threshold which the comment previously claimed should be used for construction noise analysis. As such, the thresholds identified in the Noise Study are based on construction-specific thresholds adopted by NIOSH, OSHA, and the FTA, and are applicable to residential uses based on hourly construction noise levels.

As shown in the Noise Study, unmitigated construction noise levels are shown to satisfy the 85 dBA Leq threshold. Therefore, the noise barriers identified as mitigation "if feasible" in the Initial Study are not required to reduce construction noise levels to less than significant levels at the nearby sensitive receiver locations. Further, mitigation in the form of a 65-foot buffer for large construction equipment will further reduce these noise levels, regardless of the construction of the noise barriers prior to the commencement of Project construction.

Car horns, people conversing, doors slamming, and vehicles idling are already included in the parking lot vehicle movement reference noise levels analyzed in the Noise Study. Trash trucks, picking up and dropping of trash bins, delivery trucks, back up beepers, and trash compactors all represent, as the comment points out, short-term noise events that will not occur on a typical basis. Further, at the time the Noise Study was prepared, no trash compactors were known to be included as a part of Project operation, and this activity is not being proposed. The short-term noise levels associated with trash trucks (picking up and dropping of trash bins, delivery trucks, back up beepers) identified by the commenter do not represent typical operational activities associated with the Project, and, if incorporated into the worst-case hourly operational noise levels, would not contribute a significant increase to Project operational noise levels since these activities would occur over a few seconds to minutes in the overall peak hour condition. For example, a truck backup alarm reference noise level collected by Urban Crossroads, Inc. during concrete paving activities (which are more intensive than a trash truck), approach an unmitigated noise level of 78.8 dBA Lmax at a reference distance of 50 feet. With the existing and planned noise barriers in the Project study area, this reference noise level would be further reduced and remain below the City of Redlands Municipal Code 80 dBA Lmax threshold, and trash truck activities would not occur during nighttime hours per City hours for truck loading/unloading (Municipal Code Section 8.06.090(E)). In addition, the Noise Study and Initial Study show the Project operational noise levels with all activities operating simultaneously will satisfy the 80 dBA Lmax noise level standard at all receiver locations.

- 17-22 This comment is totally unsupported. The two homes on the south side of Lugonia are setback about 30 feet from the noise measurement line shown on Exhibit 5-A. At most the front of each house is exposed to a CNEL of 68 dBA based on attenuation of 3 decibels from the noise measurement location, if that. At the back of the homes another 3 decibel reduction might occur, leaving backyards with 65 dBA CNEL exposure. This is still much higher than the CNEL sound level from construction activities. Also, keep in mind that construction will occur over the whole site and no attenuation has similarly been taken from construction activities at the south end or middle of the property. Ultimately, the existing background noise dominated by traffic is highly likely to exceed the construction noise CNEL at existing properties.
- 17-23 This comment is not consistent with noise metrics and acoustical measurement. The 60 dBA threshold is not for a single event; it is based on the 24-hour integration of noise into a CNEL value. The 80.1 dBA noise level discussed in the Initial Study is for a single event, not CNEL. Again, there will be no construction for 13 hours per day at the project site and even during construction there will be extensive pauses when equipment is not operating or is being operated at the opposite end of the property. The Noise Study in the Initial Study Appendix clearly indicates when and how barriers and mitigation measures will be implemented for this project.

17-23 cont. attenuation” from “existing noise barriers” and the tables cite to Appendix 10.1 in support. This appendix is not included within the noise study to the best of our review. Therefore, it is unclear what “existing noise barriers” refers to, and thus whether the noise “attenuation” at the various receiver locations is appropriate.

17-24 Construction noise is not measured in terms of the Lmax standard that prohibits noise in excess of 80 dBA *for any period of time*. Construction noise is only measured in terms of the dBA Leq standard. The noise study must assess construction noise in reference to all applicable noise standards to ensure that the public is provided with a complete view of project impacts.

17-25 Construction noise mitigation is illusory where, for instance, noise barriers will only be constructed “if feasible.”

17-26 Operational noise measurements should include “short-term” noise events at the Project site including trash trucks, picking up and dropping of trash bins, delivery trucks, back up beepers, car horns, people conversing, doors slamming, vehicles idling, and trash compactors. (See Exhibit “G” hereto). These activities can be expected to occur throughout the day and night as residents and other non-residential vehicles arrive and leave parking lot areas. And these activities should be measured against the Lmax noise standard.

G. Traffic

17-27 The IS/MND’s statements regarding construction traffic are based on assumptions and deferred study. For instance, there is nothing to support the statement that “[t]he haul trips would be required to occur outside of the peak hours and during the permissible hauling hours identified along the haul route to be approved by the City.” There is no mitigation proposed for construction traffic, and there is no haul route currently identified. There is nothing to ensure that construction vehicles will not use or park on residential streets.

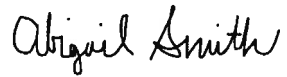
17-28 Mitigation Measure TRA-1 is inadequate. First, it is unclear to what impact TRA-1 even applies. Second, the measure merely states that the “necessary off-site improvement recommendations shall be implemented as described in the Traffic Impact Analysis”. Referring to the TIA (Appendix I), it appears the measure pertains to certain project-related traffic improvements. However, mitigation measures must be *certain* and fully enforceable in order to satisfy CEQA.

H. Conclusion

17-29 Based on the above, an environmental impact report is warranted for the proposed Project. Thank you for your consideration of these comments.

- 17-24 The statement in the comment does not have any supporting data. The City is the arbiter of noise standards, and one of those standards that the City can apply is the 80 dBA threshold “for any period of time.” Project-related construction noise is measured over time and it is appropriate to apply this threshold as well as others. Note that applying a CNEL (a 24-hour average) threshold to a noise source that will occur over less than one-half of each day can be interpreted as being more inappropriate than a maximum noise limit (i.e., maximum at a given moment in time) as attempted in this comment.
- 17-25 The intent of the mitigation regarding noise barriers is that it would further reduce noise levels at the adjacent residences. This measure is not needed to meet the construction CNEL value.
- 17-26 This comment has no basis in acoustical measurement techniques. Aside from the 80 dBA maximum noise level, all other residential noise activities are measured under the CNEL value (a 24-hour average) which does not focus on the single event noise levels. For example, note that each residence already has trash collection and generates the noise from this activity. The residences already have landscape activities, such as cutting grass, and generate noise from this activity. As acknowledged in the comment, these noise sources will not be continuous at the proposed apartments. The issue of individual noise sources at the proposed apartments is addressed in the Initial Study (pages 5.0-65 through 5.0-67) and none of these noise sources were evaluated as posing a significant impact on the noise environment, compared to either the residential noise threshold or the background noise levels from the adjacent roadways.
- 17-27 This comment ignores that the fact that construction traffic will be no more than 50 vehicles per day (100 total trips) and the project traffic (maximum estimate of 532 trips per day) will not cause any significant effect on the adjacent roadway, including no substantial increase in noise on these roadways. The reason for this is that daily traffic on Lugonia Avenue west of Texas Street is 14,800 trips per day and on Texas south of Lugonia Avenue is 9,000 trips per day. The addition of 100 trips (50 round trips) per day to these roadways is significantly less than either existing traffic or trip generation during occupancy, 532 trips. Therefore, the potential impact from construction traffic will clearly be less than significant. Regarding fill haul trips being restricted to non-peak hour times, the City has imposed a condition of approval to implement this measure.
- 17-28 Exhibit 1-3 of the Traffic Study (Appendix G) shows the improvements referenced in mitigation measure TRA-1. These measures have been accepted by the City as being adequate to address the affected circulation system improvement requirements. The implementation of TRA-1 is fully adequate and will be implemented by the site developer as both a mitigation measure (Mitigation Monitoring and Reporting Program) and condition of approval.
- 17-29 Argument, speculation, or the existence of public controversy (in the absence of substantial evidence) does not demonstrate a potentially significant effect on the environment or justify preparation of an EIR (CEQA Guidelines section 15064(f)). Based on the findings of fact, the analysis and the conclusions in the Initial Study and as reviewed and summarized in the responses to comments above, the City concludes that an EIR is not needed for the proposed project.

Sincerely,

A handwritten signature in cursive script that reads "Abigail Smith".

Abigail Smith
Law Offices of Abigail Smith

Enclosures (color versions of documents submitted by e-mail only)

EXHIBIT A

Redlands Daily Facts

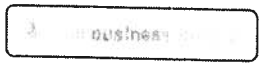


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TELEDYNE CONTINENTAL MOTORS. BATTERY PRODUCTS OPERATION. OPERATES A BATTERY MANUFACTURING FACILITY AT 840 WEST BROCKTON AVENUE, REDLANDS, CALIFORNIA. WHICH EMITS LEAD INTO THE ATMOSPHERE. PERSONS WITHIN THE APPROXIMATE AREA SHOWN IN WHITE MAY BE EXPOSED TO LEAD AT OR ABOVE THE LEVEL DETERMINED BY THE STATE OF CALIFORNIA TO REQUIRE A WARNING. LEAD IS A CHEMICAL KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER, BIRTH DEFECTS, AND REPRODUCTIVE HARM.

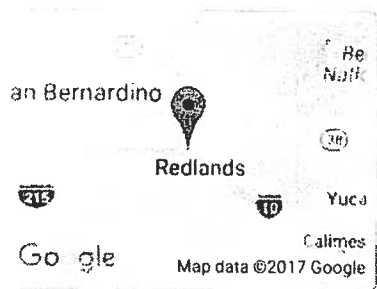
Teledyne Battery Products operates under permit and oversight of the South Coast Air Quality Management District and the statutes and regulations of the United States, the State of California, and local governments.

TELEDYNE BATTERY PRODUCTS OPERA UNA MANUFACTURERA DE BATERIAS AL 840 OESTE DE LA AVENIDA BROCKTON, REDLANDS, CALIFORNIA. QUE EMITE PLOMO A LA ATMOSFERA. PERSONAS DENTRO DE LA AREA CERCANA(MOSTRADA EN BLANCO) SON EXPUESTAS AL PLOMO A NIVELES EN O MAS ALTOS DE LOS CUALES EL GOBIERNO ADETERMINADO QUE REQUIEREN ADVERTENCIA. EL ESTADO DE CALIFORNIA RECONOCE QUE PLOMO ES UNA SUBSTANCIA QUIMICA QUE CAUSA CANCER, DEFECTOS DE NACIMIENTO, Y OTROS DANOS REPRODUCTIVOS.

Teledyne Battery Products opera bajo permiso y vigilancia del South Coast Quality Management District, y los estatutos y regulaciones de los Estados Unidos, el Estado de California, y gobiernos locales.



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EXHIBIT B

MINUTES: of a regular meeting of the City Council of the City of Redlands held in the Council Chambers, Civic Center, 35 Cajon Street, on October 18, 2016 at 5:00 P.M.

PRESENT: Paul Foster, Mayor
Jon Harrison, Mayor Pro Tem
Pat Gilbreath, Councilmember
Paul Barich, Councilmember
John James, Councilmember

ABSENT: None

STAFF: Enrique Martinez, City Manager; Dan McHugh, City Attorney; Sam Irwin, City Clerk; Robert Dawes, City Treasurer; Janice McConnell, Assistant to the City Manager; Carl Baker, Public Information Officer; Jeff Frazier, Fire Chief; Mark Garcia, Police Chief; Danielle Garcia, Management Services/Finance Director; Chris Diggs, Municipal Utilities and Engineering Director; Chris Boatman, Quality of Life Director; James Troyer, Interim Development Services Director

Mayor Foster called the meeting to order and offered those present the opportunity to provide public comment on any item on the agenda for the closed session.

PUBLIC COMMENT:

Property Policy - Steve Rogers cited the two items on the closed session agenda, noted an unsolicited proposal to purchase and no apparent appraisal of the property. He called for an overall policy in dealing with the acquisition, retention and disposal of the real property assets of the City.

CLOSED SESSION:

The meeting recessed to a closed session to discuss the following:

1. Conference with real property negotiator – Government Code §54956.8
Property: APNs 0171-101-01, -02, -03, -04, & -05 and 0171-211-15, -17 & -25 (212 Brookside Avenue)
Agency negotiators: N. Enrique Martinez, James Troyer, Chris Boatman
Negotiating party: Vantage One Real Estate Investments V, LLC
Under negotiation: Terms of payment and price for the purchase of City property
2. Conference with real property negotiator – Government Code §54956.8
Property: APNs 0171-211-13, -14, -16, -18, -19, -20 & -21 (216 Brookside Avenue)
Agency negotiators: N. Enrique Martinez, James Troyer
Negotiating party: County of San Bernardino
Under negotiation: Terms of payment and price for the purchase of property by the City

The meeting reconvened at 6:00 P.M. with an invocation by Mayor Foster and the pledge of allegiance to the American flag.

CLOSED SESSION REPORT:

City Attorney McHugh announced that no reportable action was taken by the City Council during the closed session.

PRESENTATIONS:

RUDY Pet Adoptions – Animal Control Officer Bill Miller introduced “Crimson”, a two year old female terrier mix, who is available for adoption along with thirty-one other dogs and eighty-one cats at the Redlands Animal Shelter. Officer Miller announced that fourteen dogs and forty cats were adopted since the last City Council meeting.

PUBLIC COMMENTS:

Quiet Zones – Eamonn McGloin, Tandy Hill and Allie Blackburn restated their support and a request for funding for a railroad quiet zone at the intersection of Alessandro and San Timoteo Canyon Roads.

Safety Employees Support - Carolyn Hays described the sight of the memorial ceremony for two officers killed in the line of duty in Palm Springs and expressed her gratitude for the great job done by members of the Redlands Police and Fire Departments.

Debate - Greg Brittain cited several recent issues addressed by the Redlands City Council and expressed his dissatisfaction with the level of discussion and debate involved in the decision-making process. He called for better information to the public during the process.

CONSENT CALENDAR:

Minutes – On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved the minutes of the regular meeting of October 4, 2016.

Proclamation – On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved a proclamation declaring October 20, 2016 as *ShakeOut Awareness Day*.

Proclamation – On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously approved a proclamation declaring the period from October 23 to 29, 2016 as *National Lead Poisoning Prevention Week*. As public comment Mario Saucedo cited a warning advertised in the Redlands Daily Facts and discussed the potential lead poisoning threat of the Teledyne Continental Motors Battery Products Operation at 840 West Brockton Avenue.

Solar Challenge – Cecilia Griego, of the Municipal Utilities and Engineering Department, provided details on the 2017 Inland Solar Challenge. As public comment Greg Brittain criticized the Challenge as being too one-sided in the information it presents to students. On motion of Councilmember James, seconded by Mayor Pro Tem Harrison, the City Council unanimously approved authorization for the City of Redlands to participate in the 2017 Inland Solar Challenge to promote water conservation.

Grant Acceptance - On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved the acceptance of the Department of Homeland Security, Federal Emergency Management Agency 2016 Emergency Management Performance Grant.

Truck Parts - On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved the annual purchase order with Truck Pro for the purchase of heavy duty truck parts for the Quality of Life Department Equipment Maintenance Division.

Alcohol Consumption Permit – On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved a request for permission to consume alcoholic beverages in Jennie Davis Park for the *Veterans Day Celebration* to be held on November 11, 2016.

Tree Donation - Quality of Life Director Chris Boatman provided background on a gift of trees to the City. As public comment, Andy Hoder expressed support for the donation of trees, but cautioned the City Council to remain cognizant of the maintenance and operating fund requirements to keep the trees alive and beautiful. On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously approved the acceptance of a donation of fifty shade trees from the Neighborhood Grows Community Grant Project of the University of Redlands for Israel Beal and Texonia Parks.

Resolution No. 7683 – Investment Authority – On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously approved Resolution No. 7683 for the naming of properties located in San Timoteo Canyon.

COMMUNICATIONS:

Lobbyist Update - Public Information Officer Carl Baker introduced Letitia White, of Innovative Federal Strategies, who presented an update of issues and legislation being addressed in our nation's capital which may impact federal funding targeted for the Redlands area. As public comment, Greg Brittain asked how much the City pays for the services of Innovative Federal Strategies and cited problems associated with the use of federal funds for local projects.

PUBLIC HEARINGS:

Resolution No. 7671 - Fees Schedule - Mayor Foster opened the hearing and called upon Management Services/Finance Director Danielle Garcia to summarize proposed changes to the City of Redlands fee schedule. As public comment, Gordon Nichols, of the Building Industry Association, thanked the City Council for the opportunity to review and discuss the fee schedule prior to approval of the resolution and requested more time for the exchange of ideas with staff associated with the ninety page document. On motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council agreed to continue the public hearing for two weeks to allow further discourse on suggested changes to the proposed fee schedule.

Resolution No. 7648 - General Plan Amendment No. 131 - Mayor Foster opened the hearing and called upon Karen Peterson, of the Development Services Department, to provide details on a request to change the land use designation for certain property located in the unincorporated community of Mentone. At the request of the applicant, and on motion of Councilmember Gilbreath, seconded by Mayor Pro Tem Harrison, the City Council unanimously agreed to continue the public hearing for General Plan Amendment No. 131 to the regular City Council meeting scheduled for November 15, 2016.

Resolutions No. 7680 and 7681 - Street Vacation No. 157 and Parcel Map No. 19412 - Mayor Foster opened the hearing and called upon Emily Elliot, of the Development Services Department, to provide details on a request for a street vacation and parcel map change within the R-E (Residential Estate) District south of Margarita Drive and north of Palo Verde Drive. At the request of the applicant, and on motion of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council agreed to continue the public hearing for Street Vacation No. 157 and Tentative Parcel Map No. 19412 (Minor Subdivision No. 334) to the regular City Council meeting scheduled for November 15, 2016. Councilmember James recused himself from discussion and voting on this motion due to his ownership of a residence in close proximity to the subject property.

Resolution No. 7679 - Historic Resource No. 129 - Mayor Foster opened the hearing and called upon Lorelee Farris, of the Development Services Department, to provide details on an application from Thomas B. Elliott, the property owner, seeking designation the property at 47 1st Street (Assessor Parcel No. 0171-034-01) as a Historic Resource. On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously agreed, based on the whole of the administrative record, that the adoption of Resolution No. 7679 is exempt from the California Environmental Quality Act Guidelines pursuant to Section 15061(b)(3), and approved Resolution No. 7679 designating a single story building, originally constructed as a single-family dwelling and adaptively reused as a commercial office located at 47 1st Street within the C-3 (General Commercial) District, as a Historic Property (Historic and Scenic Resource No. 129).

MEC Decision Appeal - Mayor Foster opened the hearing and called upon Sean Reilly, of the Development Services Department, to provide details on an appeal from Harminder Chera to reconsider a Minor Exception Committee (MEC) decision to approve Minor Exception Permit No. 550 to install a six-foot (6) foot high wrought iron fence within the twenty-five-foot (25') front yard setback where four (4) feet is permitted for 204 linear feet for reuse of the subject site as a rental car agency located at 1325 Industrial Park Avenue within the EV/CG (General Commercial) District of the East Valley Corridor Specific Plan. On motions of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously agreed that Minor Exception Permit No. 550 is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303 of the CEQA Guidelines, affirmed the MEC decision and approved Minor Exception Permit No. 550.

NEW BUSINESS:

Janitorial Services - Quality of Life Director Chris Boatman presented details on contract to provide city wide janitorial services. On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously approved an agreement between the City of Redlands and Valley Maintenance Corporation, in the amount of \$15,198.00 per month for a term of three years, with a total agreement amount not-to-exceed \$547,128.00, for city wide janitorial services.

Senior Centers Improvements – Quality of Life Director Chris Boatman presented a plan to fund improvements to the City's senior citizen facilities with proceeds from the sale of the Palmetto Grove. He introduced Ryan Johnson, of the Parks and Recreation Advisory Commission, who expressed support for the projects. On motion of Mayor Pro Tem Harrison, seconded by Councilmember James, the City Council unanimously agreed to table the proposal to allow staff adequate time to provide a prioritized list of all projects which might be funded with Palmetto Grove proceeds. Timing for the list would be as soon as possible, but no later than the end of calendar year 2016.

Cemetery Planning - Armando Valles, of the Quality of Life Department, introduced Allison Rush, the City's consultant from Community Works Design Group, who provided an overview of new cremation estate designs for the City cemetery. On motions of Councilmember James, seconded by Councilmember Barich, the City Council unanimously agreed approval of the design of Block 11 within the Hillside Memorial Park Cemetery is exempt from further review in accordance with Section 15301 of the California Environmental Quality Act guidelines and approved the proposed design. Mayor Foster and Councilmember Gilbreath recused themselves from discussion and voting on this motion due to his and her ownership of property within the cemetery.

Purchase and Sale Amendment – Quality of Life Director Chris Boatman summarized proposed changes to a pending purchase and sale agreement. On motions of Councilmember Gilbreath, seconded by Councilmember Barich, the City Council unanimously agreed that the Second Amendment to the Purchase and Sale Agreement and Escrow Instructions for APNs 0171-101-01, -02, -03, -04 & -05 and 0171-211-

15, -17, & -25 (212 Brookside Avenue), by and between the City of Redlands and VantageOne Real Estate Investments V, LLC., is exempt from the California Environmental Quality Act pursuant to Section 15061(b)(3) guidelines, approved the Amendment extending the closing date to October 20, 2016, and authorized the Mayor to execute the Closing Documents.

Purchase and Sale Agreement – Interim Development Services Director James Troyer presented details of a purchase and sale agreement for property at 216 Brookside Avenue. On motions of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously agreed that Purchase and Sale Agreement and Escrow Instructions for APNs 0171-211-13, -14, -16, -18, -19, -20, and -21, by and between the City of Redlands and County of San Bernardino, is exempt from the California Environmental Quality Act pursuant to Section 15061(b)(3) guidelines and approved the Purchase and Sale Agreement and Escrow Instructions.

Grant Amendment – Municipal Utilities and Engineering Director Chris Diggs explained the need to extend the performance period for an on-going grant. On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously approved Amendment 2 to Grant Agreement R54018-0 with the California Natural Resources Agency, extending the performance period to October 31, 2016, for the Orange Blossom Trail Phase II Project.

Vehicle Purchase - Bassam Alzammar, of the Municipal Utilities and Engineering Department, defined the need for a new vehicle to better meet the needs of the Department. On motion of Councilmember Gilbreath, seconded by Councilmember James, the City Council unanimously approved the purchase, in the amount of \$125,123.10, for a new Ford F-550 truck with a service body from Sunrise Ford.

COUNCILMEMBER ANNOUNCEMENTS AND ACTIVITIES:

All members of the City Council except Mayor Pro Tem Harrison attended the East Valley Association of Realtors installation of officers.

Councilmembers James and Barich attended the Open House at Fire Station No. 1 and the Art for Heaven's Sake event on the weekend of October 15, 2016.

Councilmembers James attended the Farm Bureau Awards Dinner on October 13, 2016.

Councilmember Gilbreath attended a meeting of the A.K. Smiley Board of Trustees on October 11, 2016.

Mayor Pro Tem Harrison attended various meetings of the San Bernardino Associated Governments board and committees where discussion centered on the Redlands Passenger Rail Project and the Alabama Street overpass on Interstate 10.

Mayor Pro Tem Harrison attended a tour of the San Bernardino County Housing Authority project on Lugonia Avenue and the Memory Walk event at Plymouth Village on October 16, 2016.

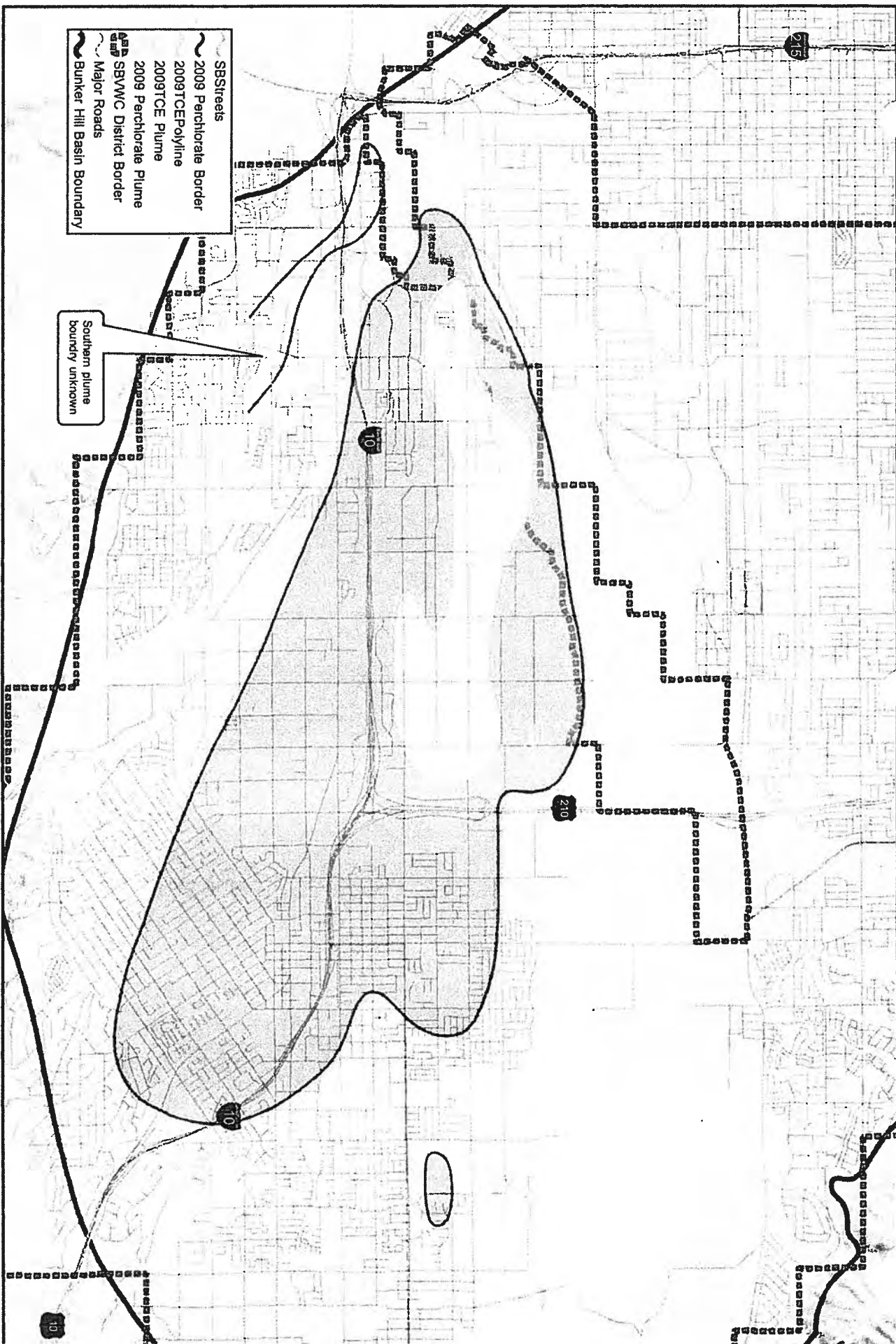
Tied up recently with weddings, Mayor Foster managed to attend the Redlands Conservancy Candidate Forum on October 12, 2016 and meetings of the Omnitrans Board of Directors.

ADJOURNMENT:

There being no further business to address Mayor Foster adjourned the meeting at 7:35 P.M. in honor and memory of James Cunningham, son of former Mayor of Redlands Bill Cunningham. The next regular meeting of the Redlands City Council is scheduled on November 1, 2016.

EXHIBIT “C”

EXHIBIT “C”



State Plane
NAD 83, Zone V, feet
10M DEM DWK
Data Sources:
TetraTech
Plume Data 2009

0 0.5 1 2 Miles

Groundwater Contamination Plumes

2012

Operational Management Manual

Operational Management Manual
February 2012

Map Creation: SBWCD GIS
L. Pierce, M. O'Carroll, R. Hejka

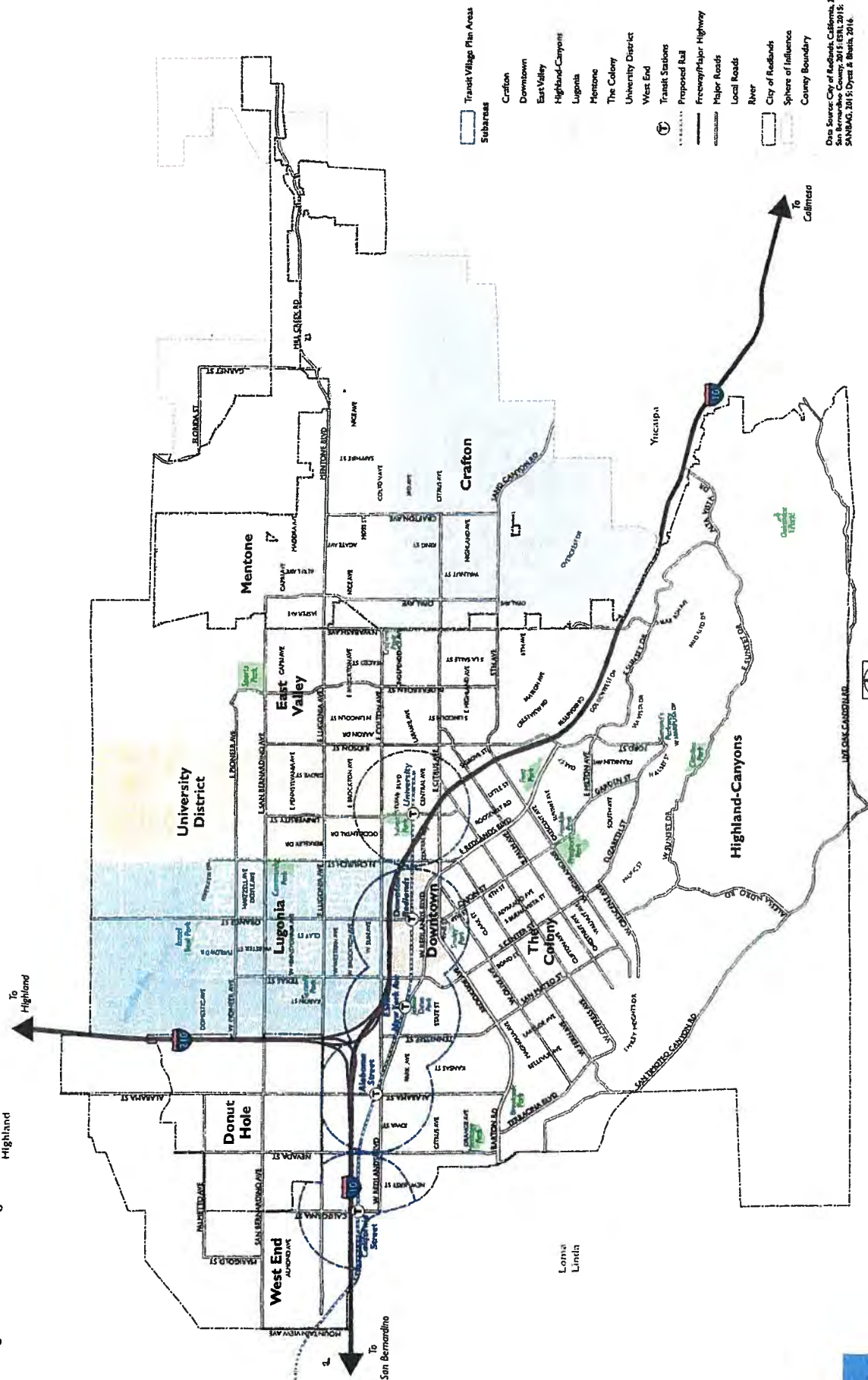


Figure 4.

EXHIBIT “D”

EXHIBIT “D”

Figure 1-3: Planning Subareas
Highland



Data Source: City of Redlands, California, 2014; San Gabriel Valley Council of Governments, 2012; SANBAG, 2011; Dym & Bents, 2014.

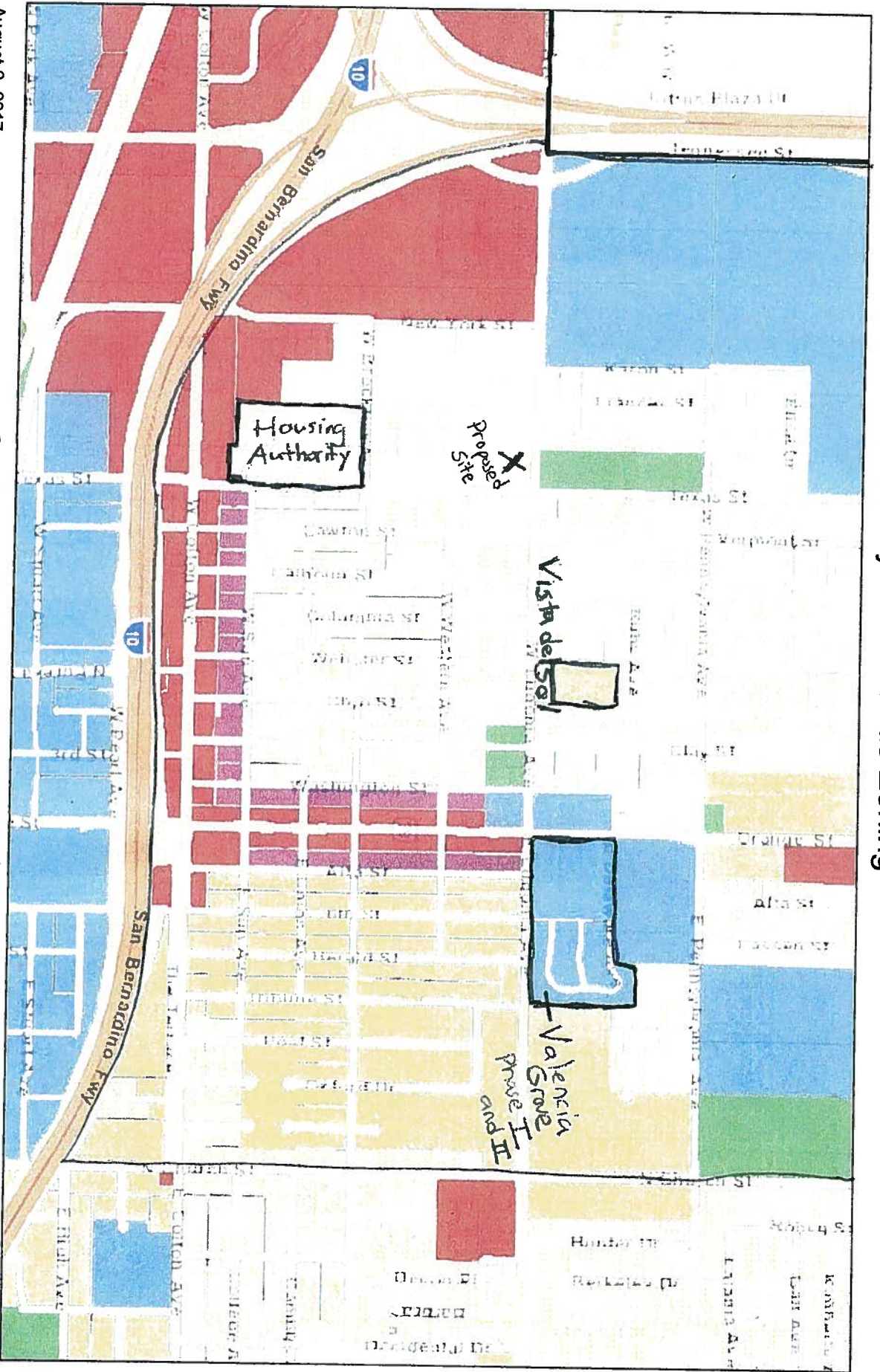
INTRODUCTION



EXHIBIT “E”

EXHIBIT “E”

City of Redlands Zoning



August 2, 2017

SB County Housing Authority
 Sites in Laguna Planning
 Subarea in North Redlands

Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), Swatch

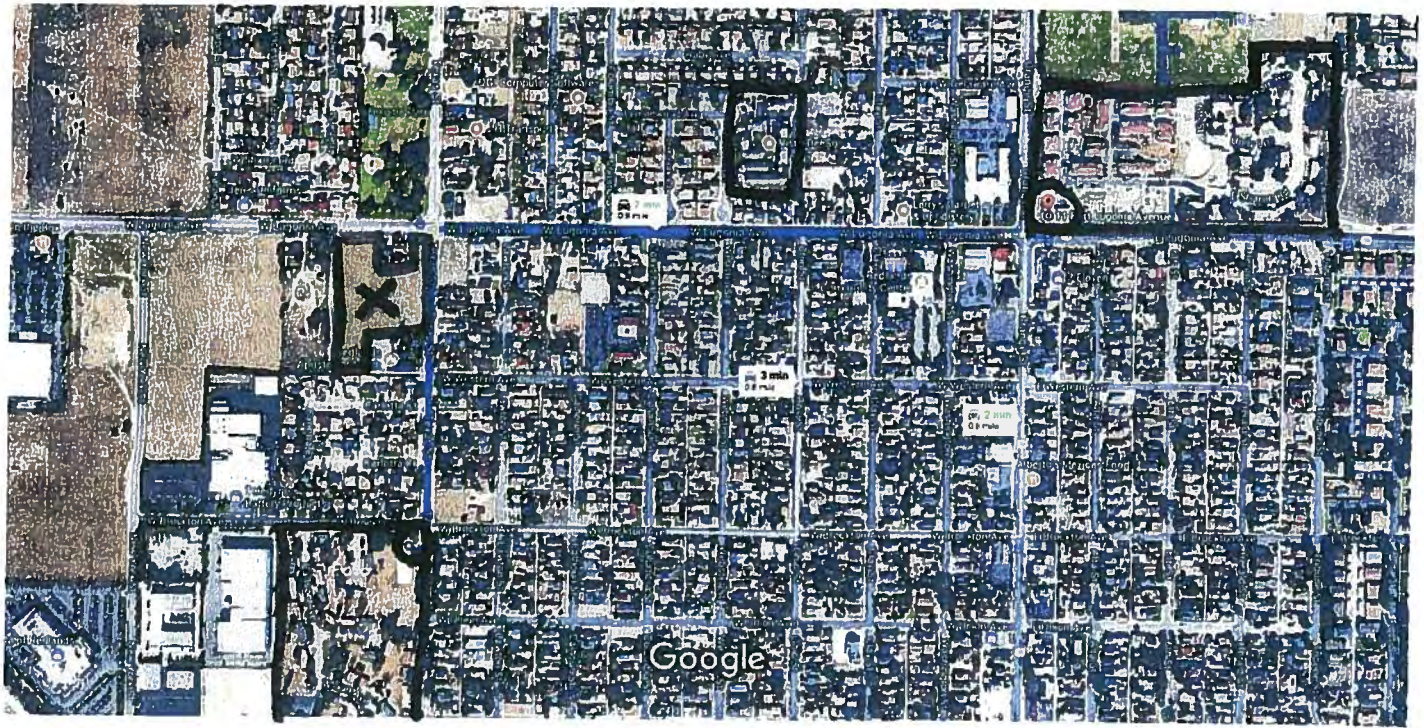
0 0.125 0.25 0.5 km
 0 0.125 0.25 0.5 mi
 1:15,159

EXHIBIT “F”

EXHIBIT “F”

34.0662283, -117.1914542 to 11 E Lugonia Ave, Redlands, CA 92374

Drive 0.8 mile, 2 min



Imagery ©2017 Google, Map data ©2017 Google United States 200 ft



via Texas St and W Lugonia Ave

Fastest route, the usual traffic

2 min

0.8 mile



via W Brockton Ave and Orange St

2 min

0.8 mile



via W Brockton Ave, Ohio St and W Lugonia Ave

3 min

0.8 mile

Corner of Brockton and Texas
to
Corner of Lugonia and Orange

EXHIBIT “G”

EXHIBIT “G”

- The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the project site.
- All on-site demolition and construction activities, including deliveries and engine warm-up, shall be restricted to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday. No such activities shall be permitted on Sundays or federal holidays.

Operational Noise Impacts

The proposed project would include new stationary noise sources, such as typical parking lot activities. Typical parking lot activities such as people conversing, doors slamming, or vehicles idling can generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. The proposed project tentative site map shows 62 potential parking spaces. These activities are expected to occur sporadically throughout the day, as visitors and staff arrive and leave the parking lot areas. Although there would be occasional high single-event noise exposure of up to 70 dBA L_{max} from parking lot activities, such activities spread out over the project site parking areas would not result in an increase above existing ambient noise levels. In addition, these single-event maximum noise levels are not expected to occur for more than a cumulative one minute within any hour; and would therefore not exceed the applicable daytime noise performance standard of 70 dBA L_{eq} . Therefore, project-related parking lot activities would not result in exposure of persons to noise levels in excess of existing noise levels, nor would they result in noise levels from parking lot activities that would exceed established standards.

Implementation of the project would also include occasional delivery truck loading/unloading activities. Typical medium truck (step-van type with roll-doors) loading and unloading activities result in maximum noise levels from 70 dBA to 80 dBA L_{max} at 50 feet. These activities are expected to occur at most a couple of times throughout a typical day, as supplies are delivered or packages are picked up at the proposed facility. Noise impacts from these activities would be considered significant if they would occur between the hours of 10:00 p.m. and 7:00 a.m. and result in a noise disturbance across a residential property line or at any time exceeds the maximum permitted noise level for the underlying land use category. The nearest residential property line is located approximately 150 feet from the potential delivery areas. Because of distance attenuation, maximum noise levels from these activities would range up to 70 dBA L_{max} at this nearest residential property line. These single-event maximum noise levels are not expected to occur for more than a cumulative 1 minute within any hour; and would therefore not exceed the applicable daytime noise performance standard of 70 dBA L_{eq} . Therefore, project-related delivery activities would not result in exposure of persons to noise levels in excess of existing noise levels nor result in noise levels that would exceed established standards.

Implementation of the project would also include weekly trash collection by the designated city agency. Typical trash collection activities result in maximum noise levels ranging from 75 dBA to 85 dBA L_{max} at 50 feet. The proposed trash collection bin would be located approximately 195 feet from the nearest off-site residential land use. Because of distance attenuation, maximum noise levels from these activities would range up to 73 dBA L_{max} at this nearest residential property line. These noise levels are below existing maximum noise levels that were documented by the ambient noise measurements taken on the project site. In addition, according to Section 7.35.020 of the Municipal Code, trash collection activities operated by approved city agencies are exempt from the noise performance standards of the Municipal Code. Therefore, project-related trash collection activities would not result in exposure of persons to noise levels in excess of existing noise levels nor result in noise levels that would exceed established standards.

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the project. Therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Rooftop mechanical ventilation systems could be located as close as 35 feet from the nearest off-site sensitive receptor. In addition, the roof parapet would block the line of sight from all rooftop equipment to off-site receptors, providing a minimum of 6 dBA in shielding reduction. Therefore, noise generated by rooftop mechanical ventilation equipment would attenuate to less than approximately 51 dBA L_{eq} at the nearest off-site residential receptor. These noise levels are above the City's exterior nighttime noise performance thresholds of 45 dBA for such uses. However, according to City policy, in the event the ambient noise level exceeds the nighttime noise limit categories, the cumulative period applicable to said category shall be increased to reflect the ambient noise level. The existing measured nighttime average noise level in the project vicinity is documented through the long-term ambient noise measurement to be 51.5 dBA L_{eq} . Therefore, rooftop mechanical ventilation equipment operational noise levels, as measured at the nearest off-site sensitive receptor, would not exceed existing ambient noise levels. Stationary operational noise levels would result in a less than significant impact.

On-Site Traffic Noise Impacts

A significant impact would occur if the project would be exposed to transportation noise levels in excess of the City's "normally acceptable" land use compatibility standard of 60 dBA CNEL. The exterior noise level standard applies at outdoor activity areas for multi-family land uses. The proposed outdoor active use areas of the project would be located within the enclosed interior courtyard. Because of distance attenuation and the additional shielding that the two-story structure would provide, noise levels from traffic on surrounding roadways would be reduced at this location by a minimum of 12 dBA compared with levels experienced at the nearest façades of the proposed project. Thus, noise from traffic on surrounding roadways would be below 47.4 dBA CNEL at the outdoor active use area of the project. This is well below the City's "normally acceptable" land use compatibility standard of 60 dBA CNEL.

A significant impact would also occur if the project would be exposed to noise that would result in an exceedance of the interior noise exposure standard of 45 dBA CNEL for the proposed land use.

ATTACHMENT 1

DEPARTMENT OF TOXIC SUBSTANCES CONTROL **ENVIROSTOR**

TELEDYNE BATTERY PRODUCTS (80001578)

[SIGN UP FOR EMAIL ALERTS](#)

840 W BROCKTON AVE
REDLANDS, CA 923730000
SAN BERNARDINO COUNTY
SITE TYPE: CORRECTIVE ACTION

PROJECT
MANAGER: KATHERINE GOULD
SUPERVISOR: JU-TSENG LIU
OFFICE: ENGINEERING & SPECIAL PROJECTS

Site Information

CLEANUP STATUS

ACTIVE AS OF 1/1/2008

SITE TYPE: CORRECTIVE ACTION

NATIONAL PRIORITIES LIST: NO

ACRES: 5 ACRES

APN: NONE SPECIFIED

CLEANUP OVERSIGHT AGENCIES:

DTSC - SITE CLEANUP PROGRAM

ENVIROSTOR ID:

80001578

SITE CODE:

400255

SPECIAL PROGRAM:

FUNDING:

ASSEMBLY DISTRICT:

40

SENATE DISTRICT:

23

Regulatory Profile

PAST USE(S) THAT CAUSED CONTAMINATION

BATTERY MANUFACTURING

POTENTIAL CONTAMINANTS OF CONCERN

LEAD

TETRACHLOROETHYLENE (PCE)

1,1,1-TRICHLOROETHANE (TCA)

TRICHLOROETHYLENE (TCE)

POTENTIAL MEDIA AFFECTED

SOIL

Site History

Entered 11/15/07. Teledyne Continental Motors, Battery Products Operations (TBP) is located in Redlands, CA and occupies approximately five acres of land surrounded by 15 acres of vacant land also owned by Teledyne. The TBP facility began operations at this location in 1967. TBP manufactures lead-acid storage batteries for aircraft, emergency lighting systems, and vehicles. TBP handled and stored hazardous materials or wastes on several locations at the facility. Environmental studies at the facility were carried out under two administrative processes; Resource Conservation and Recovery Act (RCRA) closure and RCRA corrective action. The results of soil, soil gas, and groundwater investigations conducted at the facility were presented in the RCRA Facility Investigation Report and Closure Reports which indicated the presence of chemical residues in different areas of the facility. Three areas required soil remediation prior to RCRA closure. The cleanup of the three areas included excavating soil with chemical residues and disposing the excavated soil at a permitted off-site disposal facility. Approximately 350 cubic yards of soil contaminated with lead and sulfate were excavated from the former evaporation pond and percolation pond. In addition, approximately 10 cubic yards of soil contaminated with lead, solvents (TCE, PCE, and 1,1,1-TCA), and sulfate were excavated from the Old Container Storage Unit.

DTSC issued public notice of the proposed RCRA corrective action program cleanup plan for the TBP facility during two public notice periods between May 2000 and August 2000. DTSC required cleanup via excavation of small areas of lead residues at the Acid Scrubber Water Storage Tanks and Waste Water Treatment Plant. An Open House to receive comments on the soil removal plan was held on July 26, 2001. Approximately one cubic yard of soil was excavated and disposed of at an off-site hazardous waste disposal facility. Sampling conducted after excavation indicated that the levels of lead remaining after the excavation are below health-based levels for unrestricted, residential land use. Cleanup goals for soil were 200 milligrams per kilogram (mg/kg) for lead; 0.5 mg/kg for TCE and PCE; 20 mg/kg for 1,1,1-TCA; and

4,250 mg/kg for sulfate.

Under DTSC supervision, a groundwater investigation was also conducted to assess groundwater conditions at the facility. Based upon investigation, contamination in the soil did not reach groundwater. Based on the information provided, DTSC considers Teledyne to have taken all necessary actions to remediate the site to unrestricted, residential land use.

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0.578125 seconds

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

ENVIROSTOR

TELEDYNE BATTERY PRODUCTS (80001578)

SIGN UP FOR EMAIL ALERTS

840 W BROCKTON AVE
REDLANDS, CA 923730000
SAN BERNARDINO COUNTY
SITE TYPE: CORRECTIVE ACTION

PROJECT
MANAGER:
SUPERVISOR:
OFFICE:

KATHERINE GOULD
JU-TSENG LIU
ENGINEERING & SPECIAL
PROJECTS

Site Information

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ACRES: 5 ACRES

APN: NONE SPECIFIED

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ENVIROSTOR ID:

80001578

SITE CODE:

400255

SPECIAL PROGRAM:

FUNDING:

ASSEMBLY DISTRICT:

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SENATE DISTRICT:

23

Regulatory Profile

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POTENTIAL CONTAMINANTS OF CONCERN

LEAD

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1,1,1-TRICHLOROETHANE (TCA)

TRICHLOROETHYLENE (TCE)

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Completed Activities

	<u>AREA NAME</u>	<u>SUB-AREA</u>	<u>DOCUMENT TYPE</u>	<u>DATE COMPLETED</u>	<u>COMMENTS</u>
VIEW DOCS	PROJECT		Remedy Constructed	1/9/2012	
	WIDE				
	PROJECT		Remedy Constructed	10/18/2011	document will be uploaded shortly.
	WIDE				
	PROJECT		Remedy Constructed	1/18/2011	
	WIDE				
VIEW DOCS	PROJECT		Corrective Measures Study Report	6/28/2004	
	WIDE				
VIEW DOCS	PROJECT		Corrective Measure Implementation Workplan	6/28/2004	
	WIDE				
VIEW DOCS	PROJECT		Consent Agreement	6/29/2001	
	WIDE				
VIEW DOCS	PROJECT		Groundwater Migration Controlled	5/15/2000	
	WIDE				
VIEW DOCS	PROJECT		Human Exposure Controlled	5/15/2000	
	WIDE				
VIEW DOCS		<u>ENTIRE SITE</u>	RFI Report	1/19/2000	
VIEW DOCS	PROJECT		Human Exposure Controlled	6/3/1999	
	WIDE				
	PROJECT		RCRA Facility Assessment Report	11/27/1996	
	WIDE				
	PROJECT		RFI Workplan	10/25/1995	
	WIDE				
	PROJECT		RFI Report	12/17/1993	
	WIDE				
	PROJECT		RFI Report	8/20/1993	
	WIDE				
	PROJECT		RFI Workplan	11/10/1992	
	WIDE				
	PROJECT		Unilateral Order (I/SE, RAO, CAO, EPA AO)	5/1/1990	
	WIDE				
	PROJECT		Consent Order	2/27/1990	
	WIDE				
	PROJECT		Amendment - Order/Agreement	2/27/1990	
	WIDE				
	PROJECT		* Historical Operating Permit Authority	2/27/1990	
	WIDE				
	PROJECT		Consent Order	5/25/1989	
	WIDE				
		<u>SURFACE</u>	Unilateral Order (I/SE, RAO, CAO, EPA AO)	2/24/1989	
		<u>IMPOUNDMENTS</u>			
VIEW DOCS	PROJECT		RCRA Facility Assessment Report	9/30/1987	
	WIDE				
		<u>WHSE SITE</u>	RFI Workplan	10/25/1985	

CONSTRUCTION COMPLETE

**US EPA Region 9 GPRA Measure Signature Page
RCRA Corrective Action Assessment of CA550
(Remedy Construction Complete)**

Facility Name	Teledyne Continental Motors Battery Products Operation
Facility Address	840 West Brockton Avenue, Redlands, California
U.S. EPA ID#	CAD008386641

To get an overall YES determination for the "Construction Complete" milestone, ALL final remedy decisions and ALL remedy construction necessary for protection of human health and the environment must be made for ALL portions of the site, completely installed and operating according to specifications stated in the remedy decision documents or approved work plans.

Remedy Construction Completed (Site-wide) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Remedy Construction Complete determination for remedial activities overseen by: <input type="checkbox"/> USEPA Region 9 <input checked="" type="checkbox"/> California Department of Toxic Substances Control (DTSC) <input checked="" type="checkbox"/> California Regional Water Quality Control Board <input type="checkbox"/> DTSC Site Mitigation & Brownfields Reuse Program <input type="checkbox"/> Arizona Department of Environmental Quality <input type="checkbox"/> Nevada Department of Environmental Protection
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I (we) agree that the factual information I (we) have provided concerning the remedial activities overseen by the lead regulatory agency at this facility, as the basis for this assessment is, to the best of my (our) knowledge, accurate.

Completed by:

Name(s) (print)	Title	Signature and Date
Kathy San Miguel, PE	Project Manager	<i>Kathy San Miguel</i>
Ju-Tseng Liu, PE	Unit Supervisor	<i>Ju-Tseng Liu</i> 12/20/2011
Rizgar Ghazi, PE	Unit Supervisor	<i>Rizgar Ghazi</i> 1/6/2012
Dan Ward, PE	Branch Chief	<i>Dan T. Ward</i> 1/9/12

REVISION 1 DECEMBER 20, 2011

CA 550 – REMEDY CONSTRUCTION

Event Code Name: CA550 - REMEDY CONSTRUCTION

Description: The event when the State or EPA acknowledges in writing that the RCRA facility has completed construction of a facility's remedy that was designed to achieve long-term protection of human health and the environment and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved. Remedy construction may also acknowledge the event where no remedy is constructed. This event code applies when: 1) construction of the remedy(ies) have been completed, or 2) the Remedy Decision and Response to Comments or other appropriate decision document indicates that no physical construction of a remedy has been needed since site characterization activities began or no construction is necessary beyond what has been implemented prior to the remedy decision as in the case of stabilization measures. Remedy Construction for comprehensive remedies that address the entire facility (including off-site migration of contaminants) must be linked to the "Entire Facility" area. Phased or partial remedies are to be attached to specific areas of implementation and not to the "Entire Facility" area.

Status Codes: **NR – No Remedy Constructed;** This status code applies on the actual date of the CA400-Remedy Decision if no physical construction of a remedy has been needed since site characterization activities began. **RC - Remedy Constructed;** This status code applies after the actual date of the CA400 - Remedy Decision when either: 1) all necessary physical construction of the last corrective measure has been completed and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) if all necessary physical construction of all remedial systems is fully functional as designed as a result of stabilization measures implemented prior to the actual date of the CA400 - Remedy Decision whether or not final cleanup levels or other requirements have been achieved.

Initiating Sources: 1) State or EPA document(s) (e.g. letter to facility, memorandum to file, etc.) acknowledging the completed construction of the final remedy in accordance with the requirements of permits, administrative orders, other agreements (including modification of existing instruments), or voluntary facility submissions containing equivalent information; or 2) a Remedy Decision and Response to Comments or other appropriate decision document indicating that no further physical construction of a remedy is needed.

Nationally Required: Yes

Scheduled Date: 1) The date the State or EPA is expected to acknowledge, in writing, that any necessary physical construction of the last corrective measure is complete and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) the scheduled date for the remedy decision if no further physical construction of a remedy is expected to be needed.

Actual Date: 1) The date the State or EPA acknowledges, in writing, that any necessary physical construction of the last corrective measure is complete and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) the date for the remedy decision if no further physical construction of a remedy is needed.

Guidance: 1. The Remedy Construction measure is an important milestone of Corrective Action progress designed to measure the progress of remedy implementation. The measure Completion with Controls or Completion Without Controls (CA900 and CA999) will likely be used to indicate the true status of completion at RCRA Corrective Action facilities. 2. Stabilization measures implemented prior to the Remedy Decision should be recorded under CA600 and CA650.

Responsible Agency: EPA or State

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CONSTRUCTION COMPLETE

RCRA Corrective Action Assessment of CA550 (Remedy Construction Complete) Basis for Approval

Teledyne Continental Motors Battery Products Operation, 840 West Brockton Avenue, Redlands, California, June 28, 2004, CAD008386641

Introduction – The Teledyne Continental Motors Battery Products Operation Facility (TBP) consists of a main battery manufacturing building, a detached storage shed, a process water treatment plant, parking lots, and outside storage areas that occupy approximately five acres of land. TPB is fenced and surrounded by curbing with access through two south-facing gates. TPB is situated on approximately 5 acres of land and is located in a mixed commercial (light industrial) and residential area. TPB is bounded to the north and west by approximately 15 acres of vacant land (owned by Teledyne) with no structures or improvements, to the east by residential buildings, and to the south by West Brockton Avenue. Commercial businesses and residential buildings are located south of West Brockton Avenue. Residential developments are present further to the north and east. Highway 10 overpasses are located further to the west.

The TBP facility has been in operation since 1967. The primary product manufactured at the plant includes lead-acid storage batteries used mainly in general aviation aircraft, emergency lighting systems, and government vehicles. The battery manufacturing process at the facility utilizes bulk lead ingots and lead oxide to manufacture the lead plates used in the batteries. This manufacturing process involves the melting and casting of the lead ingots into plate grids.

Investigation and cleanup of environmental conditions at TBP was carried out under two Resource Conservation and Recovery Act (RCRA) administrative processes; corrective action and closure. TPB handled and stored hazardous materials or wastes on several locations at the facility. These locations were identified as Solid Waste Management Units (SWMUs) or other areas of concern by the U.S Environmental Protection Agency during a corrective action RCRA facility assessment conducted in 1987(RFA). Of these locations, four were further classified as Hazardous Waste Management Units (HWMUs) regulated by RCRA and subject to RCRA closure. Further discussions of any of these locations include a reference to the section number in the RFA wherein they are first described and evaluated.

Based on this evaluation, the RFA indicated no further action for 16 SWMUs. At another nine SWMUs/HWMUs, additional information gathering and/or data collection was recommended. These nine SWMUs/HWMUs were: Four Rain/Spill Runoff Sumps (SWMU 4.1), Southwest Corner Sump (SWMU 4.2), Acid Storage Area Sump (SWMU 4.5); Percolation Pond (HWMU 4.4); Tank 2 (SWMU 4.7); Treated Water Holding Tanks (SWMU 4.10), Tanks 9, 9A, 10A, and 10B (SWMU 4.19), Acid Scrubber Water Storage Tank (SWMU 4.23); and Old Container Storage Area (HWMU 4.15). Although not part of the original list of nine SWMUs/HWMUs slated

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for investigation, DTSC requested TBP to investigate the Former 1,1,1-TCA Drum Accumulation Area, and the Former Solvent Distillation Unit (SWMU 4.17).

The RCRA regulated areas were: (1) Two Surface Impoundments (Evaporation Pond, HWMU 4.3 and Percolation Pond, HWMU 4.4); (2) Hazardous Waste Container Storage Unit (Old Container Storage Area, HWMU 4.15); and (3) Former Waste Sulfuric Acid Storage Unit (Spent Sulfuric Acid Storage Tank, HWMU 4.13). These units were subject to the RCRA closure process. Of these four units, only the Percolation Pond, HWMU 4.4 and the Old Container Storage Area, HWMU 4.15 were included in the RFA listing of unites recommended for further action.

Investigations – Subsequent to the RFA, a number of soil and groundwater investigations and a baseline human health risk assessment, which in total constituted the RCRA Facility Investigation (RFI), were conducted under DTSC-approved work plans to determine if there had been releases to the subsurface from WMUs or other areas and to determine cleanup goals. Subsurface soil conditions at WMUs were defined in the following reports: Site Characterization/Assessment Report, Plan I, Revised, Teledyne Battery Products, August 1991 (Ebasco, 1991); Site Characterization/Assessment Report, Part II, Revision I, Teledyne Battery Products, January 21, 1993 (Ebasco, 1993a); and Ebasco report entitled Site Characterization/Assessment Report, Phase III, Teledyne Battery Products, July 1993 (Ebasco, 1993c). Groundwater conditions at the facility were addressed in a groundwater RFI and summarized in a Foster Wheeler Environmental Corporation report, Report on the Groundwater RCRA Facility Investigation (RFI), Teledyne Continental Motors, Battery Products Operation, June 1997. Soil gas conditions were evaluated in the following reports: Results of Soil Gas Investigation and RCRA Facility Investigation, Water Treatment Plant Area, Teledyne Continental Motors, Battery Products Operation, February 19, 1999; Addendum, Teledyne Continental Motors-Battery Products Operation, Redlands, California, 1999b. DTSC approved the RFI reports including the Baseline Human Health Risk Assessment, Teledyne Aircraft Products, Battery Products Unit, Redlands, California, January 1994.

Solid Waste Management Units / Hazardous Waste Management Units (SWMUs/HWMUs)
– Rainwater Runoff Sump (SWMU 4.1) - This Rainwater Runoff Sump unit is located in the northern portion of the facility, south of the percolation pond. Results of initial soil sampling conducted in 1991 did not indicate the presence of volatile organic compounds (VOCs) in the subsurface soil. The soil concentrations met the DTSC-approved cleanup goals.

Rainwater Runoff Sump (SWMU 4.2) - This Rainwater Runoff Sump unit is located in the southwest corner of the facility, west of the wastewater treatment plant. This concrete sump collects runoff from the vicinity of the wastewater plant. Results of initial soil sampling indicated the presence of minor concentrations of VOCs at 2 feet bgs in a soil boring drilled adjacent to the sump. Lead was not detected in the soil samples collected. Additional borings were drilled near the sump to define the VOC-affected soil. Results of the soil sampling indicated the presence of low concentrations of TCE. The soil concentrations met the DTSC approved cleanup goals.

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Acid Storage Area Sump (SWMU 4.5) - The Acid Storage Area Sump unit is located at the west side of the plant building. The sump collects runoff and accidental spills from the acid storage area. Results of soil sampling indicated the presence of lead at 1,200 mg/kg at 2 feet bgs and 2.5 mg/kg at 6 feet bgs. Lead was not detected at greater depths. The soil concentrations met the DTSC-approved cleanup goals.

Surface Impoundments (HWMUs 4.3 and 4.4) - Two surface impoundments were utilized at the facility: the Evaporation Pond (HWMU 4.3) and the Percolation Pond (HWMU 4.4). These surface impoundments were located in the northwest corner of the facility. The ponds were characterized as part of the 1990, 1992, and 1993 site characterization and assessment activities conducted by Ebasco. The lateral and vertical extent of affected soil was adequately defined and no additional sampling was required by DTSC. Because TBP wished to discontinue use of the ponds, clean closure activities were performed at the surface impoundments to remediate elevated lead concentrations in soil.

Wastewater Treatment Plant (SWMUs 4.7 and 4.10) - The Wastewater Treatment Plant is located outside of the southwest corner of the plant building. Two units were identified: Tank 2 (SWMU 4.7), a 5,000-gallon partially below-grade fiberglass tank for collecting influent water to the Wastewater Treatment Plant and a 40,000-gallon underground tank. The soil concentrations met the DTSC-approved cleanup goals.

Tanks 9, 9A, 10A, and 10B (SWMU 4.19) - These four tanks are located along the west side of the plant building. The tanks were underground concrete structures that were at one time used for the storage of lead oxide paste (Tanks 10A and 10B), filtered water (Tanks 9 and 9B) from the Emtrol Wet Scrubber, and associated filter press. In 1987, soil sampling was conducted from six borings located near the four tanks, as part of sampling mandated by San Bernardino County's tank closure standards. The soil concentrations met the DTSC-approved cleanup goals.

Acid Scrubber Water Storage Tank (SWMU 4.23) - The Acid Scrubber Water Storage Tank is an inactive tank that is located in the same containment area with the Acid Scrubber and the Acid Storage Area. In 1987, soil sampling was conducted in borings located near the Acid Scrubber Water Storage Tank and the adjacent Acid Storage Area Sump as part of sampling mandated by San Bernardino County's tank closure standards. The soil concentrations met the DTSC approved cleanup goals.

Hazardous Waste Container Storage Unit (HWMU 4.15) - The Hazardous Waste Container Storage Unit, also known as the Old Container Storage Area, was located north of the plant building adjacent to and south of the Evaporation Pond (HWMU 4.3). At one time, this RCRA-regulated unit was used for storage of wastes generated during on-site operations. Site characterization and assessment activities were conducted by Ebasco (Ebasco, 1991, 1993a, and 1993c). VOCs were not detected at 10 feet bgs at this location. The lateral and vertical extent of affected soil was adequately defined and DTSC did not require additional sampling. Because TBP wished to discontinue container storage at this location, clean closure activities were performed at the unit.

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Former Solvent Distillation Unit (SWMU 4.17) - The Former Solvent Distillation Unit (SWMU 4.17) was located along the eastern side of the plant building. This unit formerly distilled 1,1,1-TCA for reuse in the plant. Based on the sampling results, the lateral and vertical extent of affected soil was adequately defined and DTSC did not require additional investigation for this area. The soil concentrations met the DTSC-approved cleanup goals.

Former 1,1,1-TCA Drum Accumulation Area - The former 1,1,1-TCA drum accumulation area was located along the eastern property boundary and was identified during the site characterization and assessment process (Ebasco, 1993b and 1993c). The area was apparently used to store either pure or waste 1,1,1-TCA contained in drums. The lateral and vertical extent of affected soil was adequately defined and DTSC did not require additional investigation. The soil concentrations met the DTSC-approved cleanup goals.

Clean Closures – The RCRA regulated areas were: (1) Two Surface Impoundments (Evaporation Pond, HWMU 4.3 and Percolation Pond, HWMU 4.4); (2) Hazardous Waste Container Storage Unit (Old Container Storage Area, HWMU 4.15); and (3) Former Waste Sulfuric Acid Storage Unit (Spent Sulfuric Acid Storage Tank, HWMU 4.13). Clean closure was completed for all four units and at locations where soil excavation was required. Cleanup was achieved to the cleanup level established for future residential use.

Baseline Human Health Risk Update - In 1999, the HRA was updated to incorporate the findings of a soil gas investigation conducted in 1998 and 1999. A risk update was prepared for an onsite worker exposure scenario however, the results were also within acceptable ranges for residential uses. In summary, exposure to soil gas concentrations under a theoretical residential use scenario yield calculated risks and hazards that are within the acceptable range for residential use. The Soil Gas Risk assessment evaluation concluded that the risks from hypothetical exposures to VOCs in soils were negligible.

Groundwater - Under DTSC supervision, a groundwater investigation was also conducted to assess groundwater conditions at the facility. Based upon investigation, contamination in the soil did not reach groundwater and the groundwater was not impacted by on-site activities. The concentrations of VOCs in groundwater did not pose any significant risk to human health and appear to be from upgradient off-site sources.

DTSC Approval of Corrective Measures Study and Corrective Measures Implementation - DTSC issued public notice of the proposed No Further Action for Corrective Measures for TBP during two public notice periods between May 11, 2000 through June 12, 2000 and July 20, 2000 through August 21, 2000. Based on the public comments received, DTSC reevaluated the site's lead concentration in soil, held an Open House to receive comments on the soil removal plan on July 26, 2001, and required two locations of lead residues be addressed prior to final approval of the No Further Action Remedy for the site. To fulfill DTSC's requirements, the facility removed the lead contaminated soil on July 30, 2001 at two boring locations at the Acid Scrubber Water Storage Tanks (SWMU 4.23) and Wastewater Treatment Plant (SWMUs 4.7 and 4.10) areas. A report submitted by the facility on August 8, 2001 documented the removal of approximately one cubic yard of contaminated soil, disposal of the contaminated soil at an off-site hazardous waste disposal facility, backfilling the excavation with clean soil, and the results of confirmation sampling. The report concluded that the contaminated soil had been removed.

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Based on the confirmation sampling, the concentrations of lead in site soils are below health-based levels for unrestricted, residential land use. Cleanup goals for soil were 200 milligrams per kilogram (mg/kg) for lead; 0.5 mg/kg for TCE and PCE; 20 mg/kg for 1,1,1-TCA; and 4,250 mg/kg for sulfate.

Corrective Action Construction Complete - *Based on the multiple evaluations, no further action for the soil, soil gas, or groundwater at the facility was deemed necessary by DTSC. On June 28, 2004 DTSC considered TBP to have taken all necessary actions to remediate the site to unrestricted, residential land use.*

REFERENCES

A. T. Kearney Inc., and Science Applications International Corporation (SAIC), 1987, RCRA Facility Assessment, Teledyne Battery Products, Redlands, California.

Department of Toxic Substances Control, Acceptance of Closure Certification: Surface Impoundment, Teledyne Aircraft Products, Redlands, California, June 25, 1995.

Department of Toxic Substances Control, Acceptance of Closure Certification for Clean Closure Certification Report for the Hazardous Waste Container Storage Unit and the Former Waste Sulfuric Acid Storage Unit at Teledyne Battery Products, Redlands, California, June 15, 1991.

Site Characterization Assessment Report, Plan I, Revised, Teledyne Battery Products, Redlands, California, August 1993.

Site Characterization/Assessment Report, Plan II, Revision I, Teledyne Battery Products, Redlands, California, January 21, 1993.

Site Characterization/Assessment Plan, Plan III, Revision I, Teledyne Battery Products, Redlands, California, January 21, 1993.

Site Characterization Assessment Report, Phase III, Teledyne Battery Products, 840 West Brockton Avenue, Redlands, California, July 1993.

Former Subsurface Impoundment Clean Closure Plan, Revision II, Teledyne Battery Products, Redlands, California September 1994.

Baseline Human Health Risk Assessment, Teledyne Aircraft Products, Battery Products Unit, Redlands, California, 1995.

Former Surface Impoundments Clean Closure Report/or Teledyne Aircraft Products, Battery Products Operations, Redlands, California, April 1996.

Clean Closure Certification Report for the Hazardous Waste Container Storage Unit and the Former
REFERENCES Cont.

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Waste Sulfuric Acid Storage Unit at Teledyne Continental Motors, Battery Products Operations, Redlands, January 1997.

Report on the Groundwater RCRA Facility Investigation (RFI), Teledyne Continental Motors, Battery Products Operation, Redlands.

Results of Soil Gas Investigation and RCRA Facility Investigation Final Addendum, Water Treatment Plant Area, Teledyne Continental Motors, Battery Products Operation, Redlands.

Memorandum, Risk and Mobility Assessment and Supplemental Soil Gas Investigation Addendum, Teledyne Continental Motors -Battery Products Operation, Redlands, California, May 19, 1999.

Corrective Measures Study Teledyne Continental Motors Battery Products Operation 840 West Brockton A Venue, Redlands, California, February 8, 2000.

Limited Soil Removal Report, Teledyne Continental Motors Battery Products Operation 840 West Brockton A Venue, Redlands, California, August 8, 2001

Department of Toxic Substances Control, Approval of Corrective Measures Study and Corrective Measures Implementation for Teledyne Continental Motors - Battery Products Operations, Redlands, California, June 28, 2004.

Revised December 20, 2011



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630-4732



Arnold Schwarzenegger
Governor

June 28, 2004

Mr. Jesus Luna
Environmental Health & Safety
Teledyne Battery Products
840 West Brockton Avenue
Redlands, California 92375

APPROVAL OF CORRECTIVE MEASURES STUDY AND CORRECTIVE MEASURES IMPLEMENTATION FOR TELEDYNE CONTINENTAL MOTORS- BATTERY PRODUCTS OPERATIONS, 840 WEST BROCKTON AVENUE, REDLANDS, CALIFORNIA 92375 (EPA ID NO CAD008386641)

Dear Mr. Luna:

The Department of Toxic Substances Control (DTSC) approves the Corrective Measure Study (CMS) dated February 8, 2000 and the Limited Soil Removal Report, dated August 8, 2001 for the Teledyne Continental Motors - Battery Products Operations (Teledyne), Redlands, California. Both documents were prepared under the authority of the California Health and Safety Code Section 25187. These documents satisfy requirements of the United States Environmental Protection Agency 3008(h) Administrative Order on Consent docket number RCRA 09-0026.

DTSC issued public notice of the proposed No Further Action (NFA) for Corrective Measures at the Teledyne facility during two public notice periods between May 11, 2000 through June 12, 2000 and July 20, 2000 through August 21, 2000. An Open House was held on July 25, 2000 and public comments were received. Following public comments, DTSC reevaluated the site's lead concentration in soil and determined surface soil (hot spot) contamination was present in two locations. DTSC required the two locations of lead residues be addressed prior to final approval of the NFA remedy for the site. An Open House to receive comments on the soil removal action was held on July 26, 2001. Community concerns were addressed by DTSC staff as they were presented and no formal or written comments were received.

To fulfill DTSC's requirements, Teledyne removed the lead contaminated soil on July 30, 2001 at two boring locations (SB-12 and SB-22) at the Acid Scrubber Water Storage Tanks and Waste Water Treatment Plant areas, respectively. Teledyne submitted a report for the soil removal action to DTSC on August 8, 2001. The Report documented the removal of approximately one cubic yard of contaminated soil, disposal

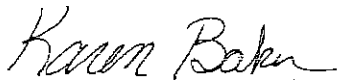
Mr Jesus Luna
June 28, 2004
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of the contaminated soil at an off-site hazardous waste disposal facility, backfilling the excavation with clean soil, and the results of confirmation sampling. The report concluded that the contaminated soil has been removed. Based on the confirmation sampling, the concentration of lead in soil are below health-based levels for unrestricted, residential land use.

Based on the information provided, DTSC considers Teledyne to have taken all necessary actions to remediate the site to unrestricted land use. This determination, however, is limited to information provided by Teledyne. Teledyne must notify DTSC orally within 24 hours of discovery of any new Solid Waste Management Units not previously identified and follow up with a written notification within 10 days of such discovery to summarize the findings including the immediacy and magnitude of any potential threat to human health and/or the environment. DTSC may require Teledyne to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment.

Finally, I apologize that a lack of resources resulted in the delay in providing this approval letter. DTSC appreciates Teledyne's completion of remedy selection and the soil removal action. If you have any questions, please call me at (714) 484-5423 or call Mr. Aaron Yue, Unit Chief, at (714) 484-5439.

Sincerely,



Karen Baker, C.H.G., C.E.G., Chief
Geology, Permitting and Corrective Action Branch

cc: Ms. Nennet Alvarez, Chief
Statewide Compliance Branch
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

Mr. David Wright, P.E., Chief
Permitting Program Development Section
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr Jesus Luna

June 28, 2004

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cc: Ms. Deirdre Nurre
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Mr. Gary Phelps
City of Redlands
Municipal Utilities Water Division
35 Cajon Street
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Mr. Ed Muehlbacher
Engineering Supervisor
Engineering and Compliance Office
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, California 91765-4182

Mr Jesus Luna

June 28, 2004

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bcc: Ms. Karen Baker, C.H.G., C.E.G., Chief
Geology, Permitting and Corrective Action Branch
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Ms. Stacy Lear
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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: Teledyne Continental Motors - Battery Products Operations
Facility Address: 840 W. Brockton Ave., Redlands, CA 92375
Facility EPA ID #: CAD 008 386 641

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 x If yes - check here and continue with #2 below.

 If no - re-evaluate existing data, or

 If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains **ONLY** to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database **ONLY** as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

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2. Is **groundwater** known or reasonably suspected to be “contaminated”¹ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

_____ If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.

 X If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”

_____ If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

In the past, TCE had been detected above MCLs in groundwater through hydropunch sampling. Subsequently, monitoring wells were installed and no TCE was detected above MCLs, except for 2 wells (TCE at 7 & 10 ppb). There is the Crafton-Redlands regional plume near the site, which contains TCE and DBCP. DTSC has concluded that the regional plume may be contributing to the groundwater beneath the Teledyne facility. The low concentrations of VOCs detected in the up-gradient well compared to down-gradient well sample results show no significant increases in the concentrations of VOCs. Based on the results of soil investigation, the concentrations of lead, sulfates, and VOCs were below the Health Risk Assessment Cleanup goals. Also, soil contamination did not impact groundwater at the site. In addition, soil gas investigation results indicated the presence of low concentrations of VOCs in soil gas. Based on the modeling results, VOCs in soil gas do not present a threat to human health or groundwater. As a result, it is believed that there is no groundwater contamination on the site, originating from Teledyne operations.

References

- 1) June 1997, Report on the Groundwater, RFI
- 2) Closure Certification: Surface Impoundment, 6/25/95
- 3) Closure Certification: Container Storage Area and Waste Sulfuric Acid Storage Unit 01/96
- 4) Human Health Risk Assessment, 1/94
- 5) Public Notice Fact Sheet, May 2000

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

Page 3

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

_____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

References

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 4

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

References

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 5

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

References

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 6

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

—— If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

—— If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

—— If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

References

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

Page 7

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

References

RCRA Corrective Action Environmental Indicator Forms Addendum

Completed by: Tayseer Mahmoud, DTSC Mike Choe, DTSC Jenny Wu, EPA	Date: 5/15/00
--	---------------

Facility Name: Teledyne Continental Motors (include a.k.a) Street Address: 840 W. Brockton Avenue City, State: Redlands, California 92375 EPA ID#: CAD 008 386 641	"X" all that apply:	
	NPL Site?	
	BRAC Site?	
	GPRA Baseline?	X
	EJ Site?	
	Near-bankrupt?	
Facility Contact Name: Ms. Nahid Toossi Company: (same as facility address) Street Address: City, State: Phone: (909)793-3131, ext. 26 E-mail:		

Agencies Involved in Remedial Oversight (Mark an "x" at the left of the boxes that apply:)			
<input type="checkbox"/>	DTSC Site Mitigation - Region __	<input type="checkbox"/>	Federal CERCLA
<input type="checkbox"/>		<input type="checkbox"/>	RWQCB - Region __
X	DTSC Permit Unit - Region <u>4</u>	<input type="checkbox"/>	Federal RCRA
<input type="checkbox"/>		<input type="checkbox"/>	Other (specify)

Project Manager Interviewed: Tayseer Mahmoud Agency: DTSC Permitting Cypress Phone: (714)484-5419 email: tmahmoud@dtsc.ca.gov
--

Site Summary:

(Most of this information is from the May 2000 Public Notice fact sheet for no further action at the site.)

This facility is a battery manufacturer, which operated under interim status, in the past. Most of the operations occupy approximately five acres of land. The facility is fenced and surrounded by 15 acres of vacant land owned by Teledyne. Since 1967, Teledyne Continental Motors has manufactured lead-acid storage batteries for aircraft, emergency lighting systems, and vehicles. The DTSC project manager is Tayseer Mahmoud.

In the past there were surface impoundments, an old container storage area, and several other SWMUs, all of which the contaminated soil has been removed. In the past, there were detections of VOCs through hydropunch sampling. However, subsequent groundwater sampling only detected contaminants below MCLs, with TCE detected slightly above MCLs (7 and 10 ppb). There is VOCs contamination from the Crafton-Redlands regional plume, which is upgradient of the site, and it is believed the VOCs contamination is coming from the plume. The low concentrations of VOCs detected in the upgradient well compared to downgradient well sample results show no significant increases in the concentrations of VOCs. Based on the results of soil investigation, the concentrations of lead, sulfates, and VOCs were below the Health Risk Assessment Cleanup goals. Also, soil contamination did not impact groundwater at the site. In addition, soil gas investigation results indicated the presence of low concentrations of VOCs in soil gas. Based on the modeling results, VOCs in soil gas do not present a threat to human health or groundwater. As a result, it is believed that there is no groundwater contamination on the site, originating from Teledyne operations.

The units and SWMUs have been clean-closed, and DTSC issued a public notice on May 11, 2000 for no further action at the site. Additionally, the facility no longer stores waste more than ninety days. Therefore, DTSC will no longer have involvement at this site, if the no further action is approved for the site.

CA 725 Current Human Exposures Under Control

Current Human Exposures Under Control Determination ("x" appropriate box)		If determination is NO or IN , the likelihood of achieving Els by 2005 is ("x" appropriate box):	
X	YES		Likely by _____ (insert year)
	NO		Unlikely
	IN (Insufficient information)		Difficult to determine
	No determination was made		
If determination is YES , it falls under the following categories: ("x" all that apply)		If determination is NO or IN , it falls under the following categories: ("x" all that apply)	
X	Final stages of C/A		Early stages of C/A
	Stabilization measures implemented		Indoor air issues
X	No groundwater contamination		Abandoned, near-bankrupt
	Undergoing redevelopment		Technical limitations Please specify (complex hydrogeology, contaminants, large area):
	Other:		Uncooperative
			Administrative delays
			Other:

For sites with **NO or IN** determinations, provide a description of the next steps which will be taken to achieve the Current Human Exposures El:

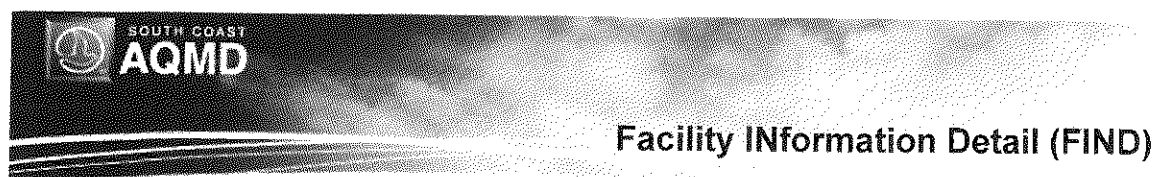
This site is at the end of the corrective action process, and no media is believed to be contaminated.

CA750 Migration of Contaminated Groundwater Under Control

Migration of Contaminated Groundwater Under Control ("x" appropriate box)		If determination is NO or IN , the likelihood of achieving Els by 2005 is ("x" appropriate box):	
X	YES		Likely by ____ (insert year)
	NO		Unlikely
	IN (Insufficient information)		Difficult to determine
	No determination was made		
If determination is YES , it falls under the following categories ("x" all that apply):		If determination is NO or IN , it falls under the following categories ("x" all that apply):	
	Final stages of C/A		Early stages of C/A
	Stabilization measures implemented		GW/SW issues
X	No groundwater contamination		Abandoned, near-bankrupt
	Undergoing redevelopment		Technical limitations, Please specify (complex hydrogeology, contaminants, large area):
	Other:		Uncooperative
			Administrative delays
			Other:

For sites with **NO or IN** determinations, provide a description of the next steps which will be taken to achieve the Migration of Contaminated Groundwater Under Control El:

It is believed the VOC levels detected slightly above MCLs on the facility come from the Crafton-Redlands regional plume, upgradient of the site.



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Facility Details

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Status ACTIVE

Are there any back fees due?

No.

SIC Code	Description
3691	STORAGE BATTERIES



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Equipment List

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
 REDLANDS, CA 92374

Appl. Nbr	Permit Nbr	Issued Date	Permit Status	Eq. Type	Equip. Description	Appl. Date	Appl. Status
584825				Basic	R-1420.2-Ambient Lead Monitoring Plans	4/19/2016	APPLICATION ON HOLD
546138	G26035	8/1/2013	ACTIVE	Basic	BATTERY CHARGING	12/26/2012	PERMIT TO OPERATE GRANTED
546137	G26030	8/1/2013	ACTIVE	Basic	BATTERY MANUFACTURING	12/26/2012	PERMIT TO OPERATE GRANTED
546136	G26036	8/1/2013	ACTIVE	Basic	BATTERY MANUFACTURING	12/26/2012	PERMIT TO OPERATE GRANTED
546135	G26037	8/1/2013	ACTIVE	Basic	BATTERY MANUFACTURING	12/26/2012	PERMIT TO OPERATE GRANTED
546134	G43301	10/14/2016	ACTIVE	Basic	BATTERY MANUFACTURING	12/26/2012	PERMIT TO OPERATE GRANTED
546127	G25939	7/26/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546133	G26038	8/1/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546132	G26039	8/1/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546130	G26041	8/1/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546129	G26042	8/1/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546128	G26043	8/1/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546144	G26047	8/2/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546145	G26048	8/2/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546146	G26049	8/2/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546147	G26050	8/2/2013	ACTIVE	Basic	FURNACE POT LEAD & TYPE METAL	12/26/2012	PERMIT TO OPERATE GRANTED
546140	G26033	8/1/2013	ACTIVE	Basic	LEAD OXIDE BLENDING	12/26/2012	PERMIT TO OPERATE GRANTED
546139	G26034	8/1/2013	ACTIVE	Basic	LEAD OXIDE BLENDING	12/26/2012	PERMIT TO OPERATE GRANTED
546142	G26031	8/1/2013	ACTIVE	Basic	STORAGE TANK LEAD OXIDE	12/26/2012	PERMIT TO OPERATE GRANTED
546141	G26032	8/1/2013	ACTIVE	Basic	STORAGE TANK LEAD OXIDE	12/26/2012	PERMIT TO OPERATE GRANTED
546131	G26040	8/1/2013	ACTIVE	Basic	VACUUM MACHINE	12/26/2012	

							PERMIT TO OPERATE GRANTED
546143	G26046	8/2/2013	ACTIVE	Control	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	12/26/2012	PERMIT TO OPERATE GRANTED
546149	G26051	8/2/2013	ACTIVE	Control	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	12/26/2012	PERMIT TO OPERATE GRANTED
546150	G26052	8/2/2013	ACTIVE	Control	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	12/26/2012	PERMIT TO OPERATE GRANTED
546151	G26053	8/2/2013	ACTIVE	Control	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	12/26/2012	PERMIT TO OPERATE GRANTED

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Equipment List

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Appl Nbr	Permit Nbr	Issued Date	Permit Status	Eq Type	Equip Description	Appl Date	Appl Status
546148	G43302	10/14/2016	ACTIVE	Control	DUST COLLECTOR/HEPA, OTHER R-1401 TOXICS	12/26/2012	PERMIT TO OPERATE GRANTED
546152	G26054	8/2/2013	ACTIVE	Control	MIST CONTROL	12/26/2012	PERMIT TO OPERATE GRANTED
546153	G26055	8/2/2013	ACTIVE	Control	SCRUBBER, VENTURI VENTING m.s.	12/26/2012	PERMIT TO OPERATE GRANTED

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Compliance

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Notices Of Violaton: NONE

Notices To Comply

Notice Number	Violation Date	Re-Inspection Date	Status
E30040	3/30/2016	3/30/2016	In Compliance

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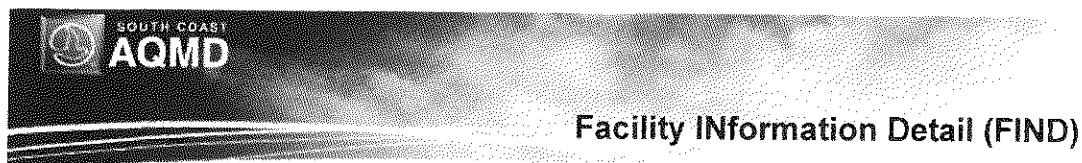
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NOV/NC Details

Notice Number	E30040	Violation Date	3/30/2016	Issue Date	3/30/2016	Notice Type	NC
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Facility ID	173302
Company Name	TELEDYNE BATTERY PRODUCTS
Address	840 W BROCKTON REDLANDS, CA 92374
Violation Description	PROVIDE PROOF OF THE FOLLOWING: SUBMITTING A LEAD AMBIENT AIR MONITORING & SAMPLING PLAN; & A SOURCE TEST OF ALL LEAD POINT SOURCES.
Equipment Description	BATTERY MFG
Status	In Compliance
Re-inspection Date	3/30/2016
Rule No.	Rule Description
1420.2	Emission Standards for Lead from Metal Melting Facilities



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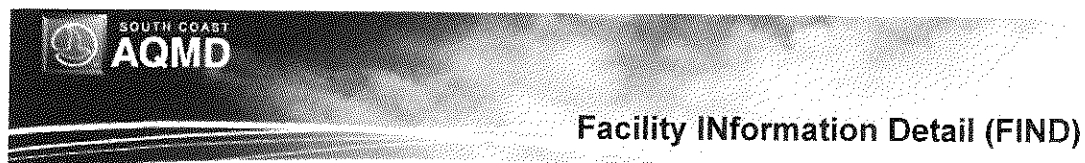
Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year:

Criteria Pollutants: Not Available

Toxic Pollutants: Not Available


Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Select AER Year: 

Criteria Pollutants: Not Available

Toxic Pollutants: Not Available

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year: 2015

Criteria Pollutants (Tons per Year):

Pollutant ID	Pollutant Description	Annual Emissions
PM	Particulate Matter	0.000

Toxic Pollutants (Pounds per Year):

Pollutant ID	Pollutant Description	Annual Emissions
7439921	Lead (inorganic)	0.003

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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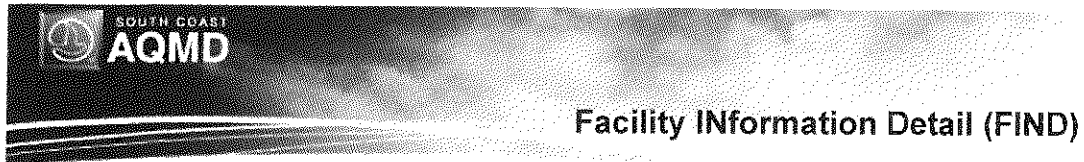
Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year: ▼

Criteria Pollutants: Not Available


Toxic Pollutants: Not Available

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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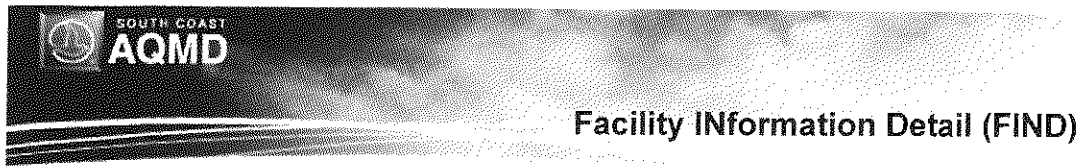
Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year: 

Criteria Pollutants: Not Available

Toxic Pollutants: Not Available

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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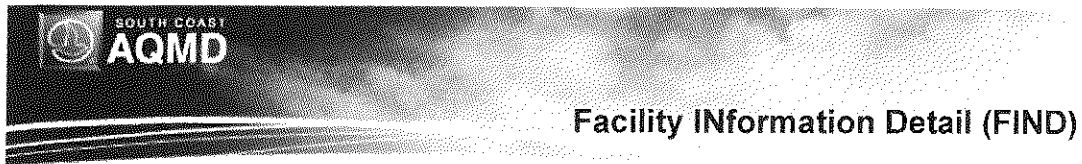
Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year: 2012

Criteria Pollutants: Not Available

Toxic Pollutants: Not Available


Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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Emissions

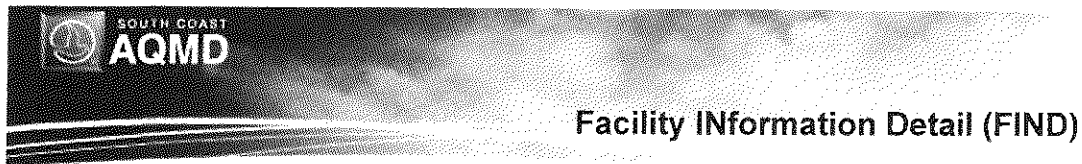
Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Select AER Year: 

Criteria Pollutants: Not Available


Toxic Pollutants: Not Available

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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Emissions

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374
Select AER Year: 

Criteria Pollutants: Not Available

Toxic Pollutants: Not Available

Note - Data for 2007 represents the six-month transitional period, July through December 2007, when the rules requiring annual emissions reporting changed from a fiscal year to a calendar year basis.



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Hearing Board

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

[View Hearing Board Documents](#)

Cases from Year 2003

This Facility has no Hearing Board Cases



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Facility Information

Facility ID 173302
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

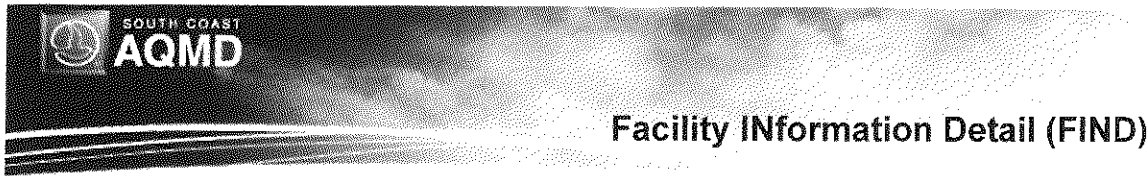
No Transportation Plan details exist for this facility.

Registration Information

Plan Sequence	Permanent Due Date
Program Year	Due Date
Program Type	Notification Date
Current Status	Current Status Date

Transportation Contact Information

Plan Reviewer	Phone	Email
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Facility Details

Facility ID	16732
Company Name	TELEDYNE BATTERY PRODUCTS
Address	840 W BROCKTON AVE REDLANDS, CA 92374
Status	SOLD
SIC Code	Description
3691	STORAGE BATTERIES



Facility Information Detail (FIND)

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Compliance

Facility ID 16732
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Notices Of Violation

Notice Number	Notice Issue Date	Violation Date	Disposition Date	Disposition
P14447	2/7/2001	11/13/2000	7/9/2002	Rejected
Z19609	12/4/1984	12/4/1984	11/5/1985	Closed Case
Z22657	11/14/1985	11/14/1985	3/31/1986	Closed Case

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Notices To Comply

Notice Number	Violation Date	Re-Inspection Date	Status
C45954	5/29/1998	6/6/1998	In Compliance
C66397	7/3/1998	8/16/2000	In Compliance
C97030	5/10/2005	5/17/2005	In Compliance

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NOV/NC Details

Notice Number	C45954	Violation Date	5/29/1998	Issue Date	12/31/9999	Notice Type	NC
---------------	--------	----------------	-----------	------------	------------	-------------	----

Facility ID	16732
-------------	-------

Company Name	TELEDYNE AIRCRAFT PRODS-BATTERY PRODS OP
--------------	--

Address	640 W BROCKTON REDLANDS, CA 92374
---------	--------------------------------------

Violation Description	HAVE APC IN FULL OPERATION WHEN FURNACE POT IS OPERATING-KEEP DAILY RECORDS OF POWDER USAGE LEAD & OXIDE USAGE BATTERY PRODUCED FOR 1997 BY 6-6-98
-----------------------	--

Equipment Description	
-----------------------	--

Status	In Compliance
--------	---------------

Re-inspection Date	6/6/1998
--------------------	----------

Rule No.	Rule Description
109	Recordkeeping for Volatile Organic Compound Emissions
203	Permit to Operate
42303	Supply Information, Plans, Specs, Etc.



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NOV/NC Details

Notice Number	C66397	Violation Date	7/3/1998	Issue Date	8/16/2000	Notice Type	NC
---------------	--------	----------------	----------	------------	-----------	-------------	----

Facility ID	16732
-------------	-------

Company Name	TELEDYNE BATTERY PRODUCTS
--------------	---------------------------

Address	840 W BROCKTON REDLANDS, CA 92374
---------	--------------------------------------

Violation Description	RULE 304(I) FAILURE TO PAY LAB FEES WITHIN 30 DAYS OF BILLING
-----------------------	---

Equipment Description	
-----------------------	--

Status	In Compliance
--------	---------------

Re-inspection Date	8/16/2000
--------------------	-----------

Rule No.	Rule Description
304	Equipment, Materials, and Ambient Air Analyses



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NOV/NC Details

Notice Number	C97030	Violation Date	5/10/2005	Issue Date	6/22/2005	Notice Type	NC
---------------	--------	----------------	-----------	------------	-----------	-------------	----

Facility ID	16732
-------------	-------

Company Name	TELEDYNE CONTINENTAL MOTORS
--------------	-----------------------------

Address	840 BROCKTON REDLANDS, CA 92374
---------	------------------------------------

Violation Description	SUBMIT APPLICATION FOR CENTRAL VACUUM SYSTEM (USED FOR LEAD).
-----------------------	---

Equipment Description	
-----------------------	--

Status	In Compliance
--------	---------------

Re-inspection Date	5/17/2005
--------------------	-----------

Rule No.	Rule Description
203	Permit to Operate



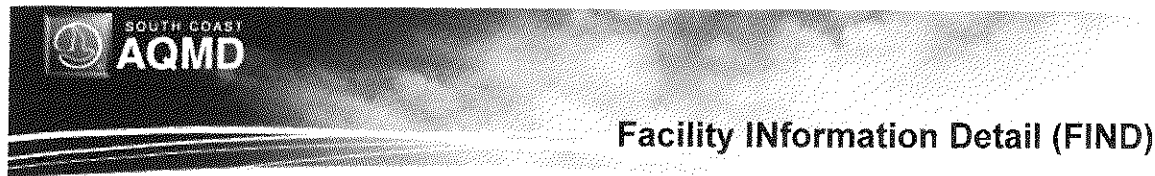
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NOV/NC Details

Notice Number	P14447	Violation Date	11/13/2000	Issue Date	2/7/2001	Notice Type	NOV
---------------	--------	----------------	------------	------------	----------	-------------	-----

Facility ID	16732
Company Name	TELEDYNE BATTERY PRODUCTS
Address	840 W BROCKTON REDLANDS, CA 92373
Violation Description	LEAD POTS MUST VENT TO OPERATING APC
Equipment Description	LEAD
Follow Up Status	In Compliance
Disposition	Rejected
Disposition Date	7/9/2002
Rule No.	Rule Description
1420	Emissions Standard for Lead
203	Permit to Operate



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NOV/NC Details

Notice Number	Z19609	Violation Date	12/4/1984	Issue Date	12/4/1984	Notice Type	NOV
---------------	--------	----------------	-----------	------------	-----------	-------------	-----

Facility ID	16732
Company Name	TELEDYNE BATTERY PRODUCTS
Address	840 W BROCKTON REDLANDS,

Violation Description
 Equipment Description
 Follow Up Status

Disposition	Closed Case
Disposition Date	11/5/1985

Rule No.	Rule Description
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NOV/NC Details

Notice Number	Z22657	Violation Date	11/14/1985	Issue Date	11/14/1985	Notice Type	NOV
---------------	--------	----------------	------------	------------	------------	-------------	-----

Facility ID	16732
-------------	-------

Company Name	TELEDYNE BATTERY PRODUCTS
--------------	---------------------------

Address	840 W BROCKTON REDLANDS,
---------	-----------------------------

Violation Description	
-----------------------	--

Equipment Description	LEAD CRUCIBLE
-----------------------	---------------

Follow Up Status	
------------------	--

Disposition	Closed Case
-------------	-------------

Disposition Date	3/31/1986
------------------	-----------

Rule No.	
----------	--

203	
-----	--

Rule Description	
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Permit to Operate	
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Hearing Board

Facility ID 16732
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

[View Hearing Board Documents](#)

Cases from Year 2003

This Facility has no Hearing Board Cases



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Facility Information

Facility ID 16732
Company Name TELEDYNE BATTERY PRODUCTS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Registration Information

Plan Sequence	2	Permanent Due Date	1/1/2000
Program Year		Due Date	1/1/2000
Program Type		Notification Date	3/9/1992
Current Status	Exempted	Current Status Date	

Transportation Contact Information

Plan Reviewer	LANE GARCIA	Phone	(909) 396-3297	Email	lgarcia@aqmd.gov
---------------	-------------	-------	----------------	-------	--



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Facility Details

Facility ID 123794
Company Name TELEDYNE CONTINENTAL MOTORS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Status INACTIVE

Are there any back fees due?

No.



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Equipment List

Facility ID 123794
Company Name TELEDYNE CONTINENTAL MOTORS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

No Equipment Listed



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Compliance

Facility ID 123794
Company Name TELEDYNE CONTINENTAL MOTORS
Address 840 W BROCKTON AVE
REDLANDS, CA 92374

Notices Of Violaton: NONE

Notices To Comply: NONE

ATTACHMENT 2



City of Redlands

2017

Consumer Confidence Report

Redlands Regular meeting of 9-19-17

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The Drought's Not Out

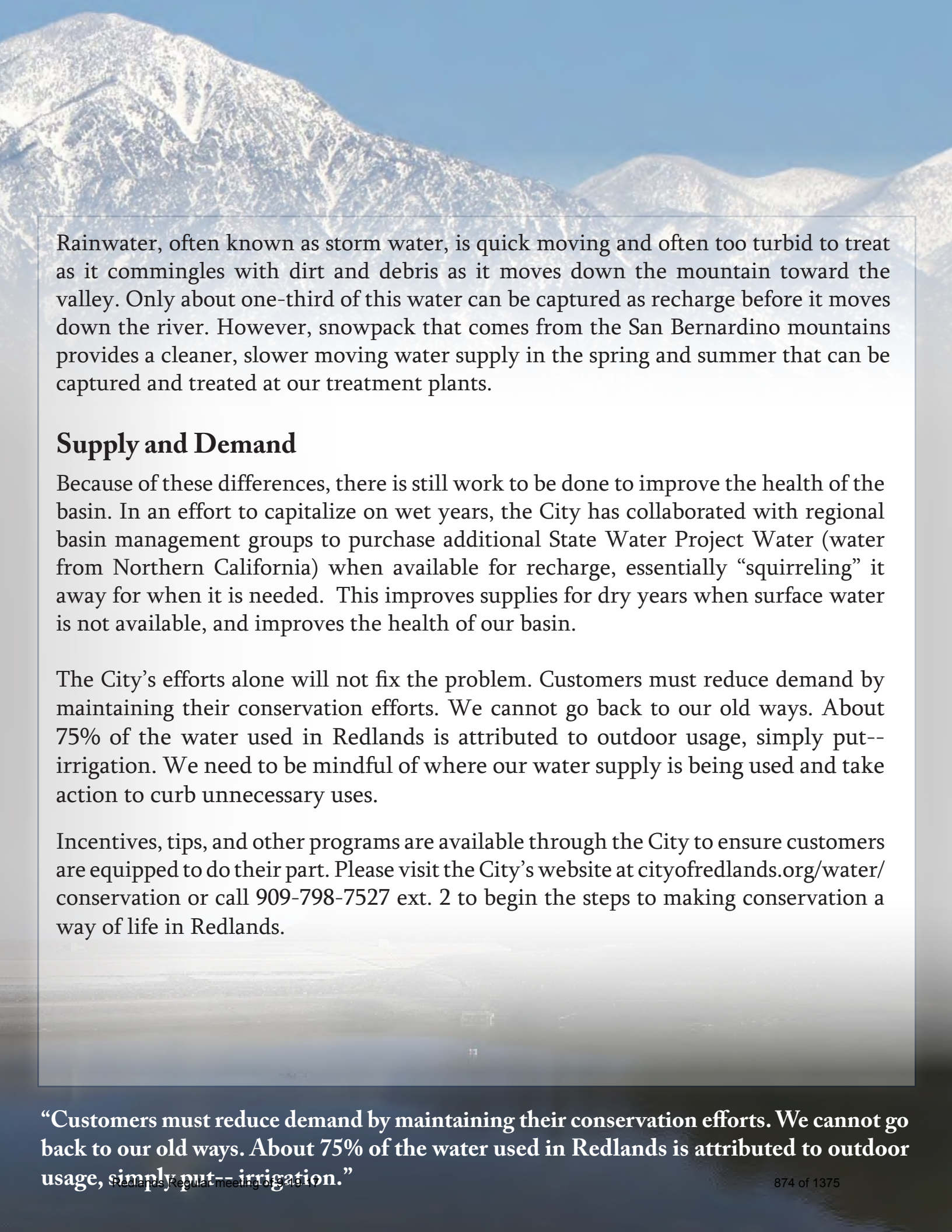
Making Conservation a Way of Life

It's difficult to think of water conservation when rivers are flowing full and 20 feet of snow in mountains were canvassed throughout media outlets this winter. It is probably even more difficult to think of watering restrictions now that California's Governor Jerry Brown declared the statewide emergency drought over. What is not widely publicized, however, are the significant differences in weather that Southern California received in comparison to Northern California. This is the challenge the City of Redlands is currently faced with as we try to reach reduction targets by choosing to make conservation a way of life.

Since the drought emergency was declared over in April, the City chose to stay in Stage II restrictions. This is for two reasons: one, the restrictions set forth in Stage II are water waste prohibitions still in effect in the State and two, the ramifications of the drought still linger in the San Bernardino Valley. Bunker Hill Basin, the valley's largest groundwater basin and the one Redlands sits on, is at the second lowest levels ever recorded. In fact, San Bernardino Valley Water Conservation District, which oversees recharge operations within the basin, estimates a half million acre-feet decrease in water storage from 1993. This is largely due to changes in weather patterns like the drought we recently experienced.

One of Them is Not Like the Others

Although this past winter was the wettest we've seen historically, our region received only 17% more than our historic average, whereas the Feather River, just north of Sacramento, received double its historic average. So, while Northern California reservoirs are at or near capacity, our basin, which is essentially our local reservoir, is not. In fact, it would take several record breaking wet years to fill the deficit left in our basin. Additionally, most of the water that fell locally was rain, most of which flows to the ocean, limiting the benefit to our water supply.



Rainwater, often known as storm water, is quick moving and often too turbid to treat as it commingles with dirt and debris as it moves down the mountain toward the valley. Only about one-third of this water can be captured as recharge before it moves down the river. However, snowpack that comes from the San Bernardino mountains provides a cleaner, slower moving water supply in the spring and summer that can be captured and treated at our treatment plants.

Supply and Demand

Because of these differences, there is still work to be done to improve the health of the basin. In an effort to capitalize on wet years, the City has collaborated with regional basin management groups to purchase additional State Water Project Water (water from Northern California) when available for recharge, essentially “squirreling” it away for when it is needed. This improves supplies for dry years when surface water is not available, and improves the health of our basin.

The City’s efforts alone will not fix the problem. Customers must reduce demand by maintaining their conservation efforts. We cannot go back to our old ways. About 75% of the water used in Redlands is attributed to outdoor usage, simply put--irrigation. We need to be mindful of where our water supply is being used and take action to curb unnecessary uses.

Incentives, tips, and other programs are available through the City to ensure customers are equipped to do their part. Please visit the City’s website at cityofredlands.org/water/conservation or call 909-798-7527 ext. 2 to begin the steps to making conservation a way of life in Redlands.

“Customers must reduce demand by maintaining their conservation efforts. We cannot go back to our old ways. About 75% of the water used in Redlands is attributed to outdoor usage, simply put--irrigation.”



Making Water Smart

It's no secret that people make better decisions when they have sufficient information about their choices. It's hard to know which option is best unless we have some basis for comparison, some way of measuring investments and returns. This is true for individuals, businesses, governments and especially water utilities. The Smart Redlands initiative is, at its core, about data. It's a program that supports staff efforts to be intentional about gathering quality information and making intelligent choices. The Redlands water utility is playing a big role in shaping this program by actively developing a set of digital field tools which empower repair crews, water waste investigators and utility operators to better understand the condition and needs of the water system – all in real time from anywhere in the city via any connected device!

Working smarter

These tools, which are being built on Esri's suite of mobile apps, will allow a seamless flow of data between residents, customer service clerks, utility managers and operations staff. For example, under the current approach, repair requests, service connections, leak alerts and other such items are generated by customer service staff upon receipt of request. This work order is routed to a service manager or crew leader who assigns the job to field staff to carry out necessary tasks to complete the work order. Once the field staff finish the job, they take notes on their progress and return the work order to customer service for entry in a department database.

Going mobile

The new app-based tools eliminate not only the paper work involved, but the extra time it takes for staff to drive back and forth to City Hall to pick up new work orders. Because field crews enter their notes directly into the database,

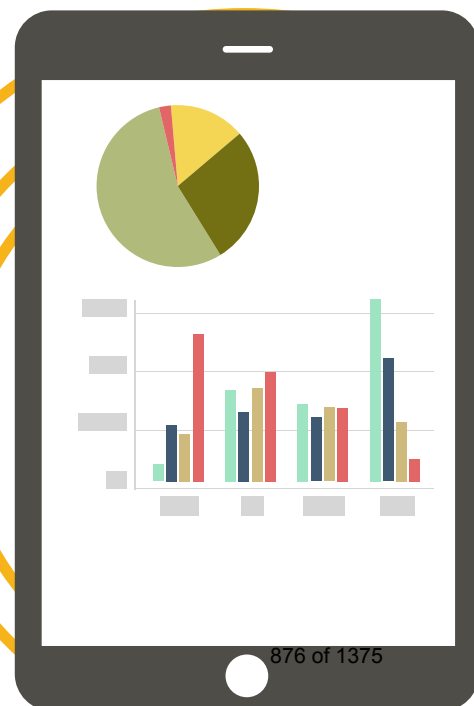


customer service staff are more efficiently equipped to close out work orders and provide more timely responses to customers. This allows customer service staff to tackle more human-centric tasks such as answering customer questions or thinking creatively about water conservation issues. Perhaps more importantly, the data will no longer be siloed in a single database but will be available across the City's new geographic information systems for review and action by any department or division that needs the information.

A data pipeline

As this new high-quality data is aggregated over time, management staff will soon be able to perform highly sophisticated analysis on the information in order to answer deeper questions about things like current performance, the efficacy of drought responses, efforts to contain system costs or energy efficiency outcomes. The intelligence created through this analysis will help City leaders more quickly respond to

problems, allow a proactive approach to solving potential problems before they arise, and make more informed decisions about much needed future infrastructure investments. These new tools will put Redlands on the cutting edge of water management and will allow the utility to do more with limited public resources. Ultimately, that means a better return on your water rate investments in the form of a safer and more sustainable supply of fresh water. That's Smart Redlands!



Meet Ira and Eva, the newest employees at the City of Redlands! They are on an important mission to help customers do their part to save water. Join them as they teach water efficient practices to little gators who live in Redlands.

The EduGators
IRA & EVA'S
ADVENTURES
in Water Conservation



Water Conservation in the City of Redlands

The City of Redlands is actively working to ensure sustainable groundwater supplies for its customers. Since the majority of water supplied falls locally, the recent drought has had significant impact on our groundwater basin, resulting in continued watering restrictions. For a detailed list of watering restrictions, please visit www.cityofredlands.org/water/conservation

Watering Restrictions

- **Even Addresses: Monday, Thursday and Saturday Only**
- **Odd Addresses: Tuesday, Friday and Sunday Only**
- **Irrigation is NOT allowed between Noon-8:00 PM**
- **Irrigation is prohibited during and 48 hours after significant rainfall**
- **Excessive water run-off and leaks are prohibited**
- **Use of water to wash sidewalks, pavement and structures is not allowed**

Ira and Eva's Top Ways to be Water Efficient



Install a weather-based irrigation controller that irrigates based on plant needs and current weather, or simply attach a weather sensor to your existing irrigation controller to shut off irrigation when it starts to rain.



Consider changing out spray irrigation to drip irrigation in flower beds and around trees and shrubs.



Did you know drought tolerant landscaping requires 75% less water than grass lawns? Convert unused grass areas, such as parkways, into water friendly landscapes using beautiful drought tolerant trees, shrubs or flowers.



Check your irrigation system often for broken or misaligned sprinklers and prolonged run times which can lead to excessive run-off.



Want to find out what Ira and Eva are up to?
www.facebook.com/muedredlands
[instagram@muedredlands](https://www.instagram.com/muedredlands)
www.cityofredlands.org/water/conservation

Water Source Protection

Redlands Municipal Utilities and Engineering Department is committed to protecting our water sources from possible contamination. Source water assessments have been completed for all of our drinking water supplies. You can view the source water assessments at our office: City of Redlands, 35 Cajon Street, Suite 15A, Redlands, CA 92373.

The assessments help to identify the vulnerability of drinking water supplies to contamination from typical human activities. These assessments are intended to provide basic information necessary for us to develop programs to protect our drinking water supplies. Possible contaminants can originate from: agricultural drainage, urban runoff, septic systems, sewer collection systems, junk/scrap/salvage operations, crop irrigation, underground storage tanks at automobile gas stations and illegal dumping.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the USEPA's Safe Drinking Water Hotline (1-800-426-4791).

Anyone interested in receiving a copy of the source water assessment should contact Bill Gane, Utility Operations Manager at (909) 798-7588 ext. 1. You can do your part to protect our precious water sources by properly disposing of household hazardous waste. To find out how to properly dispose of hazardous waste, so it does not contaminate groundwater, please phone our Customer Service office at (909) 798-7529, or visit www.cityofredlands.org/qol/recycling

Sampling Results Showing Treatment of Surface Water Sources - Turbidity is a measure of the cloudiness of water. We monitor turbidity because it is a good indicator of the effectiveness of our filtration system. Turbidity results, which meet performance standards, are considered to be in compliance with filtration requirements.

Turbidity Performance Standard No. 1 (TPS No. 1): The turbidity level of the combined filter effluent shall be less than or equal to 0.3 NTU in 95% of the measurements taken each month and shall not exceed 1.0 NTU for more than one hour. Additionally, the turbidity level of the combined filter effluent shall not exceed 1.0 NTU for more than eight consecutive hours while the plant is operating.

Treatment Technique: Conventional Filtration
Lowest Monthly % of Samples Meeting TPS No. 1: 100%
Highest single turbidity measurement during 2016: 0.18 NTU
Number of Violations to Any Surface Water Treatment Regulations: NONE

INFORMATION ABOUT RADON

Radon is a naturally occurring gas formed from the normal radioactive decay of uranium. In 2007 testing, radon was detected in our finished water supply. There are no regulatory limits prescribed for radon levels in drinking water – the pathway to radon exposure occurs primarily through its presence in the air. Exposure over a long period of time to air containing radon may cause adverse health effects. If you are concerned about radon in your home, testing is inexpensive and easy. For more information, call your State radon program (1-800-745-7236), the National Safe Council's Radon Hotline (1-800-SOS-RADON), or the EPA Safe Drinking Water Act Hotline (1-800-426-4791).

AIR BUBBLES IN THE WATER

Tap water that appears cloudy could simply have air (bubbles) in the water. Some well sources produce water with dissolved air that remains pressurized in the distribution pipelines until reaching the consumer. When the water flows from the faucet, the air is released and may form tiny air bubbles. After filling a glass, these bubbles will slowly rise and disappear.

Important Facts from the US EPA about Drinking Water

Sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in untreated source may include:

- Microbial contaminants, such as viruses and bacteria, that may come from sewage treatment plants, septic systems, agricultural livestock operations and wildlife.
- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff and residential uses.
- Organic chemical contaminants, including synthetic and volatile organic chemicals, that are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, agricultural application and septic systems.
- Radioactive contaminants, which can be naturally occurring or the result of oil and gas production, and mining activities.

In order to ensure water is safe to drink, the United States Environmental Protection Agency (U.S. EPA) and the State Water Resources Control Board (SWRCB) prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. SWRCB regulations also establish limits for contaminants in bottled water to provide the same protection for public health.

Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly and infants may be particularly at risk from infections. These people should seek advice from their health care providers about drinking water. The U.S. EPA/CDC (Centers for Disease Control and Prevention) guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants, as well as more information about contaminants and their potential health effects can be obtained by calling the U.S. EPA's Safe Drinking Water Hotline at (800) 426-4791 or visit water.epa.gov/drink/hotline.

Contact Us

City of Redlands
Municipal Utilities and Engineering Department
PO Box 3005
35 Cajon Street, Suite 15A
Redlands, CA 92373
909-798-7698

CONSUMER CONFIDENCE REPORT

From January 1, 2016 to December 31, 2016, the City of Redlands conducted 16,646 water quality tests from samples taken at various locations throughout the water system in accordance with state and federal laws. The following tables list only those contaminants that were detected. It is important to note, that the presence of these contaminants, as detected in the water does not necessarily indicate that the water poses a health risk.

PRIMARY DRINKING WATER STANDARDS

CONSTITUENT	YEAR	MCL (MRDL) [TT]	PHG (MCLG)	REDLANDS WATER		SOURCE
MICROBIOLOGICAL CONSTITUENTS						
Total Coliform	2016	5%	0%	0.08%		Naturally present in the environment
INORGANIC CONSTITUENTS						
Aluminum (mg/L)	2014	1	0.6	0.01	ND-0.05	Erosion of natural deposits; residue from some surface water treatment processes
Barium (mg/L)	2014	1	2	0.018	0.013-0.037	Discharges of oil drilling wastes and from metal refineries; erosion of natural deposits
Chromium (ug/L)	2014	50	100	0.6	ND-5.3	
Fluoride (mg/L)	2014	2	1	0.64	0.34-0.94	Erosion of natural deposits; water additive that promotes strong teeth; discharge from fertilizer and aluminum factories
Hexavalent Chromium ((ug/L)	2015	10	0.02	0.72	0.24-1.5	Runoff and leaching from fertilizer use; leaching from septic tanks and sewage; erosion of natural deposits
Nitrate as N (mg/L)	2016	10	10	1.16	ND-5.9	Run-off and leaching from fertilizer use; leaching from septic tanks and sewage; erosion of natural deposits
Perchlorate (ug/L)	2016	6	1	0.65	ND-4.0	Environmental Contamination from historic aerospace or other industrial operations; found in solid rocket propellant, fireworks, explosives, flares, matches, and a variety of industries.
LEAD AND COPPER RULE						
Copper (mg/L)	2014	AL=1.3	0.3	0.21	31 sites	No violation. Internal corrosion of household plumbing; erosion of natural deposits; leaching from wood preservatives
Lead (ug/L)*	2014	AL=15	0.2	3.34	31 sites	No violation. Internal corrosion of household plumbing; erosion of natural deposits; leaching from wood preservatives
DISINFECTION BY-PRODUCTS, DISINFECTION RESIDUALS, DISINFECTION BY-PRODUCT PRECURSORS						
Total Trihalomethanes (ug/L)	2016	80	N/A	35	ND-120	Byproduct of drinking water disinfection
Haloacetic Acids (ug/L)	2016	60	N/A	20	ND-59	Byproduct of drinking water disinfection
Chlorine as Cl2 (mg/L)	2016	4	4	0.76	0.59-0.95	Drinking water disinfectant added for treatment
Total Organic Carbon (mg/L)	2016	[TT]	N/A	1.38	0.53-2.48	Various natural and manmade sources
RADIOACTIVE CONSTITUENTS						
Gross Alpha (pCi/L)	2015	15	0	1.53	ND-4.6	Erosion of natural deposits
Gross Beta (pCi/L)	2014	50	0	3.8	N/A	Decay of natural and man-made deposits

*If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. The City of Redlands is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline (1-800-426-4791) or at <https://www.epa.gov/safewater>

TERMS USED IN THIS REPORT

Maximum Contaminant Level (MCL): The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically and technologically feasible. Secondary MCLs are set to protect the odor, taste, and appearance of drinking water.

Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs are set by the US Environmental Protection Agency (US EPA).

Maximum Residual Disinfectant Level (MRDL): The highest level of a disinfectant allowed in drinking water. There is convincing evidence that the addition of a disinfectant is necessary for control of microbial contaminants.

Maximum Residual Disinfectant Level Goal (MRDLG): The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLG's do not reflect the benefits of the use of disinfectants to control microbial contaminants.

N/A: Not applicable

ND: Not Detected
Redlands Regular meeting of 9-19-17

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SECONDARY DRINKING WATER STANDARDS

CONTITUENT	YEAR	SECONDARY MCL	REDLANDS WATER	RANGE	SOURCE
Aluminum (ug/L)	2014	200	10	ND-54	Erosion of natural deposits; residue from some surface water treatment processes
Chloride mg/L	2014	500	11.89	3.8-35	Runoff/leaching from natural deposits; seawater influence
Color (units)	2016	15	0.13	ND-15	Naturally occurring organic materials
Copper (mg/L)	2014	1	0.017	ND-0.2	Internal corrosion of household plumbing; erosion of natural deposits; leaching from wood preservatives
Iron (ug/L)	2014	300	57	ND-390	Leaching from natural deposits; industrial wastes
Manganese (ug/L)	2014	50	1.18	ND-5.6	Leaching from natural deposits
MBAS (Foaming Agents) (ug/L)	2009	500	0.003	ND-0.03	Municipal and industrial waste discharges
Odor - Threshold (TON)	2016	3	1.7	ND-17	Naturally-occurring organic materials
Specific Conductance (umhos/cm)	2016	1600	340	240-420	Substances that form ions when in water; seawater influence
Sulfate (mg/L)	2014	500	29	16-56	Runoff/leaching from natural deposits; industrial wastes
Total Dissolved Solids	2015	1000	235	180-378	Runoff/leaching from natural deposits
Turbidity, Laboratory (NTU)	2016	5	0.09	ND-0.64	Soil runoff

SAMPLING RESULTS FOR SODIUM AND HARDNESS

CONTITUENT	YEAR	MCL	PHG (MCLG)	REDLANDS WATER	RANGE	SOURCE
Sodium mg/L	2014	N/A	N/A	20	10-74	Generally naturally occurring
Hardness mg/L	2014	N/A	N/A	145*	100-190	Sum of polyvalent cations in the water, usually naturally occurring. *Equivalent to 8.5 grains per gallon

ADDITIONAL MONITORING FOR UCMR

CONTITUENT	YEAR	NOTIFICATION LEVEL	RANGE	SOURCE
Chlorate (ug/L)	2014	800	48-230	
Molybdenum (ug/L)	2014	N/A	ND-7.5	
Strontium (mg/L)	2014	N/A	ND-0.36	
Vanadium	2014	50	0.26-5.9	The babies of some pregnant women who drink water containing vanadium in excess of the notification level may have an increased risk of developmental effects, based on studies in laboratory animals.

TERMS USED IN THIS REPORT

Public Health Goal (PHG): The level of a contaminant in drinking water below which there is no known or expected risk to health. PHGs are set by the California Environmental Protection Agency.

Primary Drinking Water Standards (PDWS): MCLs and MRDLs for contaminants that affect health, along with their monitoring, reporting and water treatment requirements.

Units of Measure: Parts per million (ppm) or milligrams per liter (mg/L). Parts per billion (ppb) or nanograms per liter (ng/L). Picocuries per liter (pCi/L): a measure of radiation. Umhos/cm: A measure of conductivity in water.

Redlands Water: Water source site average for water supplied to customers.

Range of Detection: The range (lowest to highest) of detected constituents.

Treatment Technique (TT): A required process intended to reduce the level of a contaminant in drinking water.

Notification Level (NL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that a water system must follow.

Regulatory Action Level (AL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that water system must follow.

ADDITIONAL MONITORING CONSTITUENTS WITH NO MCLS

CONTITUENT	YEAR	NOTIFICATION LEVEL	REDLANDS WATER	RANGE
Alkalinity (mg/L)	2016	N/A	105	55-170
Bicarbonate (mg/L)	2014	N/A	153	110-190
Calcium (mg/L)	2014	N/A	44	30-58
Langelier Index at 25 C	2014	N/A	0.37	-0.13-0.7
Magnesium (mg/L)	2014	N/A	9	6.4-12
pH	2016	N/A	7.8	7.3-8.2
Potassium (mg/L)	2014	N/A	2.8	1.8-3.9

THIS REPORT CONTAINS IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER. TRANSLATE IT OR SPEAK WITH SOMEONE WHO UNDERSTANDS IT.

ESTE INFORME CONTIENE INFORMACIÓN MUY IMPORTANTE SOBRE SU AGUA POTABLE. TRADÚZCALO O HABLE CON ALGUIEN QUE LO ENTIENDA BIEN.

**City of
REDLANDS**

**PO Box 3005
Redlands, CA 92373**

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Paul Barich, Mayor Pro Tem

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Jon Harrison, Council Member

Eddie Tejeda, Council Member

N. Enrique Martinez, City Manager

Chris Diggs, MUED Director

POSTAL CUSTOMER

The EduGators
IRA & EVA'S
ADVENTURES
in Water Conservation



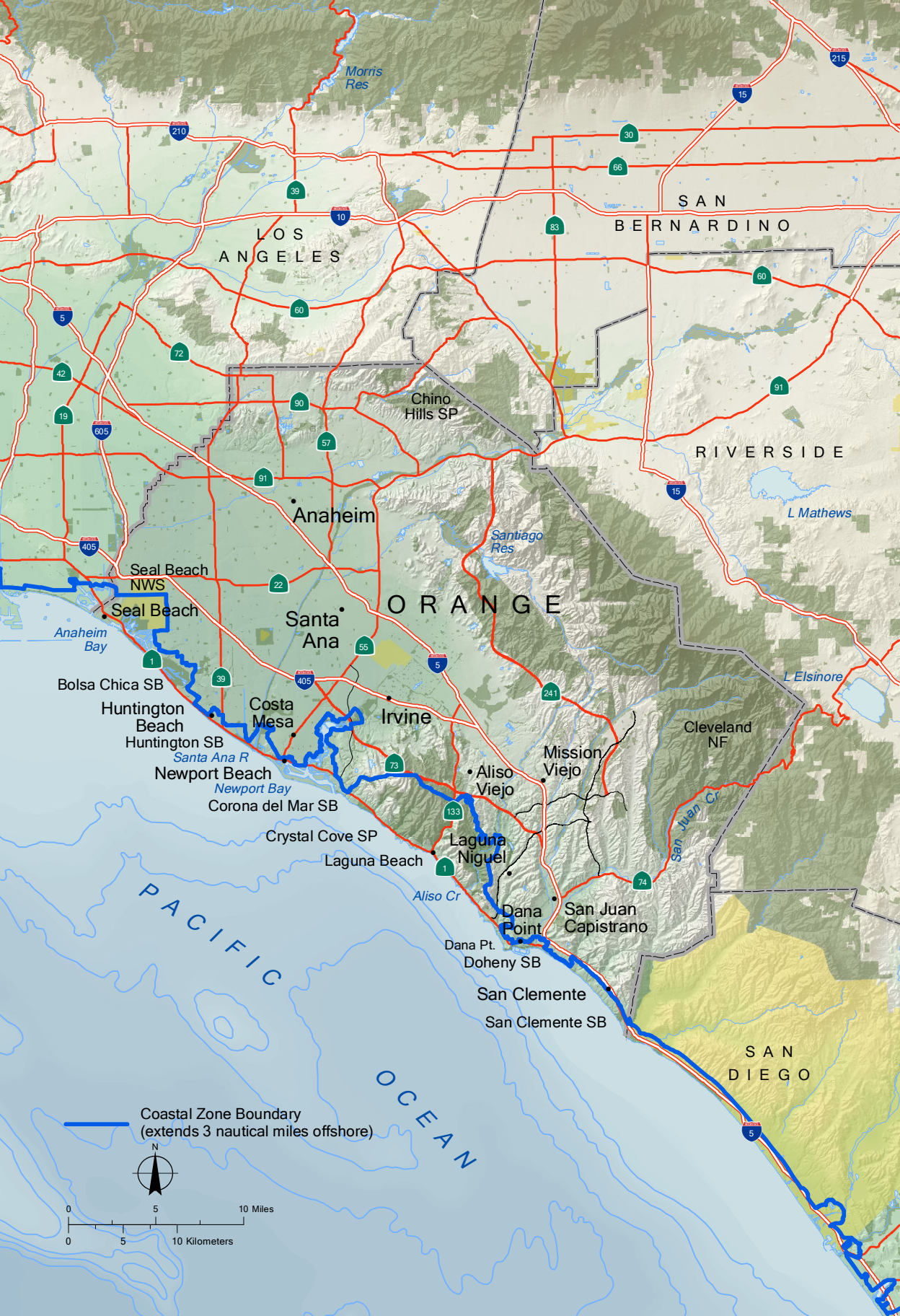
Learn more about our
water conservation
EduGators on pages 5-6!

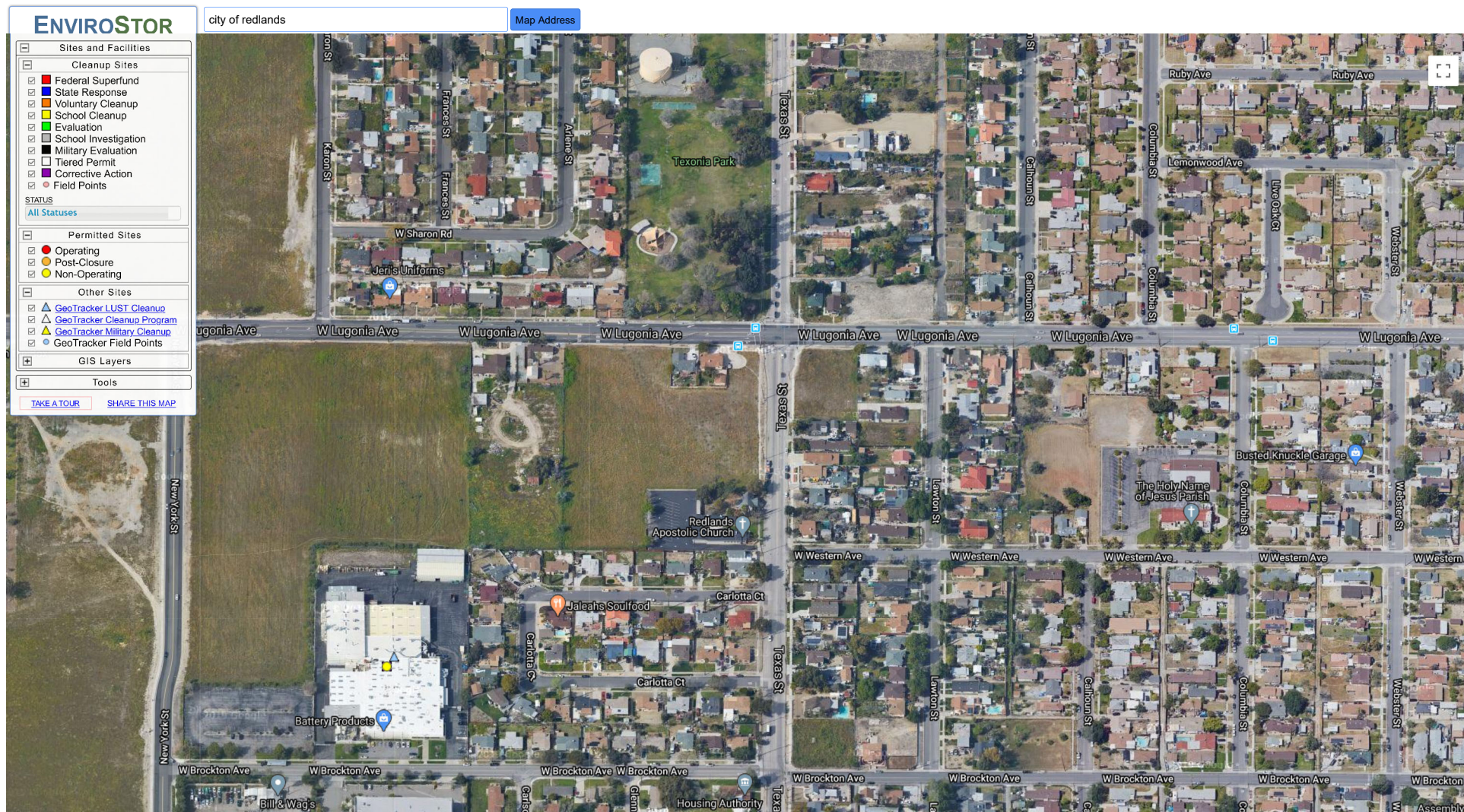
Redlands Regular meeting of 9-19-17



Fix broken sprinklers!

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SITE / FACILITY NAME	ENVIROSTOR ID	PROGRAM TYPE	STATUS	STATUS DATE	ADDRESS & CITY	ZIP	CAL ENVIR	COUNTY	SITE CODE	LATITUDE	LONGITUDE
FORMER J. H. BAXTER FACILITY, ALAMEDA	1240036	STATE RESPONSE	ACTIVE	10/26/2005	2189, 2199 ALAMEDA	94501	66-70%	ALAMEDA	201525, 2	37.77372	-122.242
FULTON SHIPYARD	7440009	STATE RESPONSE	ACTIVE	1/27/2005	307 FULTO ANTIOCH	94509	81-85%	CONTRA CI	201495	38.01659	-121.801
GBF / PITTSBURG DUMPS	7490038	FEDERAL SUPERFUND - DELISTED	ACTIVE - LA	1/1/1988	SOMERVILL ANTIOCH	94509	61-65%	CONTRA CI	200041	37.98815	-121.847
MCNAMARA AND PEEPE LUMBER MILL	12240115	STATE RESPONSE	ACTIVE - LA	1/2/2019	1619 GLEN ARCATA	95521	21-25%	HUMBOLD	200066	40.90077	-124.019
BROWN AND BRYANT, INC., ARVIN FACILITY	15280011	FEDERAL SUPERFUND - LISTED	ACTIVE	3/1/1985	600 S DERE ARVIN	93203	81-85%	KERN	100025	35.20315	-118.823
CALTRANS I-105 FWY PROJECT 3, PARCEL 15	19990002	STATE RESPONSE	CERTIFIED ,	4/9/1996	NE OF INTF ATHENS	90047	91-95%	LOS ANGEL	300202, 3	33.92366	-118.309
AREA 3 (SAN GABRIEL VALLEY SUPERFUND SITE)	60001335	FEDERAL SUPERFUND - LISTED	ACTIVE	5/12/2015	COVERS CI ALHAMBRA	91778	71-75%	LOS ANGEL	301178	34.09859	-118.117
DUCKETT REALTY ANAHEIM PROPERTY	60002000	STATE RESPONSE	ACTIVE	4/14/2014	2811 E. LIN ANAHEIM	92806	96-100%	ORANGE	401668	33.83722	-117.871
FORT MCDOWELL	71000007	STATE RESPONSE	ACTIVE	11/4/2019	4 MILES NC ANGEL ISLAND	93933	1-5%	MARIN	201263	37.8625	-122.423
BENHAM AND JOHNSON	15280253	STATE RESPONSE	ACTIVE	8/30/2010	340 DANIE BAKERSFIELD	93307	96-100%	KERN	100020	35.34933	-118.998
SAN JOAQUIN DRUM COMPANY	15340023	STATE RESPONSE	ACTIVE	9/1/2010	3930 GILM BAKERSFIELD	93308	81-85%	KERN	100128, 1	35.3897	-119.052
ENVIRONMENTAL PROTECTION CORPORATION - EASTSIDE DISPOSAL FACILI	15490019	STATE RESPONSE	ACTIVE	7/1/1994	ROUND MI BAKERSFIELD	93301	76-80%	KERN	100054	35.46213	-118.899
K & D SALVAGE	15500001	STATE RESPONSE	ACTIVE	6/29/1998	600 SOUTH BAKERSFIELD	93307	96-100%	KERN	101086	35.34895	-119.002
CHEMICAL AND PIGMENT COMPANY	7280017	STATE RESPONSE	CERTIFIED ,	11/18/2014	600 NICH0 BAY POINT	94565	71-75%	CONTRA CI	200019	38.04266	-121.989
LOCKHEED PROPULSION-BEAUMONT NO. 1	33370039	STATE RESPONSE	ACTIVE	5/13/2008	HIGHLAND BEAUMONT	92223	61-65%	RIVERSIDE	400200	33.8638	-116.933
LOCKHEED PROPULSION-BEAUMONT NO. 2	33370038	STATE RESPONSE	ACTIVE	12/15/2006	JACK RABB BEAUMONT	92223	61-65%	RIVERSIDE	400261	33.93	-117.031
J&S CHROME PLATING	19340358	STATE RESPONSE	ACTIVE - LA	8/15/1995	6863 FLOR BELL GARDENS	90201	81-85%	LOS ANGEL	300255, 3	33.96565	-118.141
CHROME CRANKSHAFT COMPANY	19350473	STATE RESPONSE	ACTIVE - LA	1/25/1999	6845 FLOR BELL GARDENS	90201	81-85%	LOS ANGEL	300736, 3	33.96572	-118.142
BENICIA ARSENAL (J09CA0756)	48970007	STATE RESPONSE	ACTIVE	1/12/2018	BETWEEN I BENICIA	94510	56-60%	SOLANO	201114	38.04598	-122.14
BORREGO SITES (J09CA701100 AND J09CA701800 AND OTHER ANZA BORREI	37970028	STATE RESPONSE	ACTIVE	12/18/2019	ANZA-BOR BORREGO SPRINGS	92004	41-45%	SAN DIEGO	400918	33.19611	-116.164
PUREGRO COMPANY	13070097	STATE RESPONSE	ACTIVE	3/25/2004	1025 RIVEF BRAWLEY	92227	86-90%	IMPERIAL	401121	32.98814	-115.526
SOUTHERN PACIFIC - BRISBANE (NORTH AREA)	41490037	STATE RESPONSE	ACTIVE - LA	5/13/2014	GENEVA A BRISBANE	94005	71-75%	SAN MATE	200093	37.70592	-122.404
BALDWIN PARK (SAN GABRIEL VALLEY SUPERFUND SITE)	60001336	FEDERAL SUPERFUND - LISTED	ACTIVE	5/12/2015	COVERS PI BALDWIN PARK	91706	91-95%	LOS ANGEL	300345	34.08679	-117.96
BAYWOOD PARK TRAINING AREA (J09CA0031)	71000008	STATE RESPONSE	ACTIVE	3/30/2005	13 MI NW BAYWOOD PARK	93402	6-10%	SAN LUIS C	101047	35.30611	-120.873
FORMER D.L. GIN CLEANERS & LAUNDRY	60001235	STATE RESPONSE	ACTIVE	11/1/2009	4032 GAGE BELL	90201	96-100%	LOS ANGEL	301486	33.97875	-118.195
BENICIA ARSENAL, AREA I, BUILDING 165	60001960	STATE RESPONSE	ACTIVE	6/24/2014	750 JACKS BENICIA	94510	56-60%	SOLANO	201993, 2	38.04709	-122.142
BENICIA ARSENAL, AREA I, BUILDING 50 COMPLEX	60001959	STATE RESPONSE	ACTIVE	6/24/2014	946 TYLER BENICIA	94510	56-60%	SOLANO	201994, 2	38.04582	-122.14
BODEGA HEAD GUNNERY RANGE - J09CA7290	80001096	STATE RESPONSE	ACTIVE	12/16/2015	BOLINAS		6-10%	SONOMA	201818	38.31813	-123.067
CARRIZO IMPACT AREA	71000046	STATE RESPONSE	ACTIVE	1/9/2020	ANZA-BOR BORREGO SPRINGS	92004	61-65%	SAN DIEGO	401280	32.8886	-116.092
NEW FASHION DRY CLEANERS	60001918	STATE RESPONSE	ACTIVE	5/28/2013	4548 BEAC BUENA PARK	90621	56-60%	ORANGE	401649	33.89515	-117.987
FORMER DYNAMIC PLATING COMPANY SITE	60000535	STATE RESPONSE	ACTIVE	1/31/2007	1102 WEST BURBANK	91506	76-80%	LOS ANGELES	34.18211	-118.323	
CRANE CO.	60002807	STATE RESPONSE	ACTIVE	4/9/2019	3000 WINC BURBANK	91504		LOS ANGEL	301853		0
LUBRICATION COMPANY OF AMERICA	19290153	STATE RESPONSE	ACTIVE	2/14/2012	12500 LAN CANYON COUNTRY	91350	36-40%	LOS ANGEL	300087, 3	34.4323	-118.37
ALCO PACIFIC, INC.	19340753	STATE RESPONSE	CERTIFIED ,	7/2/2013	16914 SOU CARSON	90248	96-100%	LOS ANGEL	300353, 3	33.87815	-118.278
MONSANTO CHEMICAL COMPANY	19281200	STATE RESPONSE	ACTIVE	4/23/1996	2100 EAST CARSON	90810	NA	LOS ANGEL	400266	33.82292	-118.238
GOLDEN EAGLE REFINERY (FORMER)	19290167	STATE RESPONSE	ACTIVE - LA	10/13/2014	21000 SOU CARSON	90745	86-90%	LOS ANGEL	400072	33.84074	-118.283
STAUFFER CHEMICAL, CARSON	19280083	STATE RESPONSE	ACTIVE - LA	4/25/1996	2112 EAST CARSON	90745	NA	LOS ANGEL	400264	33.82323	-118.236
VICTORIA GOLF COURSE (FORMER BKK CARSON DUMP)	19490191	STATE RESPONSE	ACTIVE	6/9/2006	340 EAST 1 CARSON	90746	96-100%	LOS ANGEL	400579, 4	33.85289	-118.27
CAL COMPACT LANDFILL	19490019	STATE RESPONSE	ACTIVE	4/18/1996	20400 MAI CARSON	90745	96-100%	LOS ANGEL	400721, 4	33.84261	-118.272
CASMALIA RESOURCES	42490025	FEDERAL SUPERFUND - LISTED	ACTIVE	5/8/1995	3300 NTU I CASMALIA	93429	71-75%	SANTA BAF	300208	34.8622	-120.547
CHICO GROUNDWATER - SOUTHWEST PLUME	4990002	STATE RESPONSE	ACTIVE - LA	8/14/2003	CHICO ARE CHICO	95926	66-70%	BUTTE	100504	39.73176	-121.84
NORTH VALLEY PLAZA CLEANERS	4720005	STATE RESPONSE	ACTIVE	7/1/1995	801 EAST A CHICO	95926	31-35%	BUTTE	100506	39.75812	-121.846
CHICO - SKYWAY SUBDIVISION GROUNDWATER PLUME	4880002	STATE RESPONSE	ACTIVE	6/21/2004	HAGEN LAI CHICO	95928	31-35%	BUTTE	101681	39.70665	-121.8
CHICO MUNICIPAL AIRPORT	4450006	STATE RESPONSE	ACTIVE - LA	1/1/1985	651 AND 6 CHICO	95926	21-25%	BUTTE	100036, 1	39.79508	-121.848
NORGE VILLAGE CLEANERS	4720004	STATE RESPONSE	CERTIFIED ,	2/14/2006	254 EAST F CHICO	95926	66-70%	BUTTE	101168	39.73158	-121.84
FLAIR CUSTOM CLEANERS	4720003	STATE RESPONSE	ACTIVE	7/26/2010	660 MANG CHICO	95926	41-45%	BUTTE	100185	39.735	-121.835
ESPLANADE CLEANERS	4720001	STATE RESPONSE	ACTIVE	2/7/2011	164 E 2ND CHICO	95926	41-45%	BUTTE	100263	39.73946	-121.846
FIRST AVENUE CLEANERS	4720002	STATE RESPONSE	ACTIVE	6/26/2003	1082 EAST CHICO	95927	26-30%	BUTTE	100264	39.74604	-121.831
LOUISIANA-PACIFIC CORP - CHICO	4240002	STATE RESPONSE	CERTIFIED ,	6/29/1999	WEST 16TH CHICO	95926	71-75%	BUTTE	100186	39.71579	-121.832
VICTOR INDUSTRIES - 20TH STREET	4360003	STATE RESPONSE	ACTIVE - LA	10/1/1990	365 E 20TH CHICO	95928	86-90%	BUTTE	100178	39.72091	-121.821
CHICO GROUNDWATER - CENTRAL PLUME	4990003	STATE RESPONSE	ACTIVE	6/13/1997	CHICO ARE CHICO	95926	41-45%	BUTTE	100035	39.73518	-121.835
SULPHUR BANK MERCURY MINE	17100001	FEDERAL SUPERFUND - LISTED	ACTIVE	1/1/1984	SULPHUR I CLEARLAKE	95422	31-35%	LAKE	100142	39.00389	-122.665
COALINGA ASBESTOS MINE	10140003	FEDERAL SUPERFUND - DELISTED	CERTIFIED ,	6/30/1994	PINE CANY COALINGA	93210	61-65%	FRESNO	100043	36.30963	-120.529
ATLAS ASBESTOS MINE	10320044	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1983	20 MILES N COALINGA	93210	61-65%	FRESNO	100161, 1	36.32119	-120.591
CITY OF COALINGA ASBESTOS SITE	10330041	FEDERAL SUPERFUND - DELISTED	CERTIFIED ,	6/25/1991	AREA SE OI COALINGA	93210	71-75%	FRESNO	100289, 1	36.12775	-120.37
SOUTHLAND OIL	19290003	STATE RESPONSE	CERTIFIED ,	8/16/2002	5619-5621 COMMERCE	90040	96-100%	LOS ANGEL	300148	33.97995	-118.165
WESTERN LEAD PRODUCTS, COMMERCE & UPR RIGHT-OF-WAY	19330383	STATE RESPONSE	ACTIVE	9/30/2014	4530 E PAC COMMERCE	90040	96-100%	LOS ANGEL	300590, 3	34.00564	-118.177
CAMEO	19390043	STATE RESPONSE	ACTIVE	12/8/1993	6904 EAST COMMERCE	90040	96-100%	LOS ANGEL	300546	33.98021	-118.141
PUREGRO-CORCORAN	16070076	STATE RESPONSE	ACTIVE	10/1/1990	6991 NEVA CORCORAN	93212	86-90%	KINGS	100274, 1	36.137	-119.581
THOMAS RANCH	33290115	STATE RESPONSE	CERTIFIED ,	5/22/2013	S OF PALIS. CORONA	91720	66-70%	RIVERSIDE	400158	33.88022	-117.614
DEL NORTE PESTICIDE STORAGE	8420001	FEDERAL SUPERFUND - DELISTED	CERTIFIED ,	9/26/2012	2650 W W. CRESCENT CITY	95531	21-25%	DEL NORTE	200025	41.7737	-124.232
FORMER APEX METAL POLISHING	19340792	STATE RESPONSE	ACTIVE	6/16/2006	5977 W. W CULVER CITY	90232	61-65%	LOS ANGEL	301290	34.03211	-118.376
CARMEL CLEANERS	60002209	STATE RESPONSE	ACTIVE	7/14/2015	SWC OF JU CARMEL	93921	1-5%	MONTEREY	202043	36.55934	-121.92
MARSHALL STEEL CLEANERS	60000250	STATE RESPONSE	ACTIVE	12/26/2017	20457 RED CASTRO VALLEY	94546	51-55%	ALAMEDA	201654	37.6969	-122.074
FLOWSERVE CORPORATION - CHICO	60001983	STATE RESPONSE	ACTIVE	3/4/2014	844 BROAI CHICO	95928	66-70%	BUTTE	102237	39.72509	-121.836

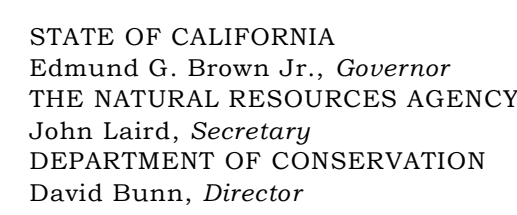
CHICO SCRAP METAL - 20TH STREET	60000800	STATE RESPONSE	ACTIVE	1/31/2008	878 EAST 2 CHICO	95928	86-90%	BUTTE	101937	39.72485	-121.817
AVALON PROPERTY	60001560	STATE RESPONSE	ACTIVE	10/6/2011	200 FALLS / CITY OF AVALON	90704	36-40%	LOS ANGE	404868	33.33852	-118.333
PUENTE VALLEY (SAN GABRIEL VALLEY SUPERFUND SITE)	60001338	FEDERAL SUPERFUND - LISTED	ACTIVE	10/23/2013	COVERS M CITY OF INDUSTRY	91744	86-90%	LOS ANGE	301404, 3	34.02933	-117.967
ELITE AUTO BODY	60002733	STATE RESPONSE	ACTIVE	9/27/2018	649 ALDER CITY OF INDUSTRY	91744	91-95%	LOS ANGE	301838	34.00796	-117.913
MOUNT OWEN RIFLE RANGE- IR/MMRP(J09CA0877)	71000033	STATE RESPONSE	ACTIVE	5/20/2008	APPROXIM CLOVIS	93911	31-35%	FRESNO	101191, 1	36.88951	-119.628
NEWCROW II	60000714	STATE RESPONSE	ACTIVE	4/14/2015	6141 TO 6; COMMERCE	90040	96-100%	LOS ANGE	301321	33.97853	-118.153
COSTA MESA SITE DISCOVERY PROJECT	60001245	STATE RESPONSE	ACTIVE	6/1/2016	AREA BOU; COSTA MESA	92627	76-80%	ORANGE	401385	33.63581	-117.934
SOUTHERN CALIFORNIA EDISON LAFAYETTE SUBSTATION	60001509	STATE RESPONSE	ACTIVE	1/5/2012	1680 MON COSTA MESA	92627	76-80%	ORANGE	401558	33.6354	-117.936
PRECISION OPTICAL INCORPORATED FACILITY	60001612	STATE RESPONSE	ACTIVE	12/13/2011	865 AND 8 COSTA MESA	92627	76-80%	ORANGE	401409	33.63608	-117.935
CLA-VAL FACILITY	60001550	STATE RESPONSE	ACTIVE	4/19/2011	1701 PLAC COSTA MESA	92627	76-80%	ORANGE	401579	33.63706	-117.933
DELIA'S CLEANERS	60000349	STATE RESPONSE	ACTIVE	10/26/2006	7335 BOLIF CUPERTINO	95014	16-20%	SANTA CLA	201670	37.31257	-122.034
MIDWAY VILLAGE	41650007	STATE RESPONSE	CERTIFIED ,	5/13/2003	47 MIDWA DALY CITY	94014	66-70%	SAN MATE	200212, 2	37.70212	-122.414
PG&E - MARTIN SERVICE DALY CITY YARD	41360100	STATE RESPONSE	CERTIFIED ,	5/4/1995	731 SCHWI DALY CITY	94014	66-70%	SAN MATE	200075, 9	37.70481	-122.412
PG&E - MARTIN SERVICE OU-2 AND LEVISON	41360093	STATE RESPONSE	CERTIFIED ,	6/30/2003	731 SCHWI DALY CITY	94014	71-75%	SAN MATE	200075	37.70287	-122.41
FRONTIER FERTILIZER	57070001	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	4/1/1985	SECOND ST DAVIS	95616	6-10%	YOLO	100060	38.55251	-121.703
H S MANN METAL WASTE COMPANY	10330038	STATE RESPONSE	ACTIVE - LA	1/1/1984	5404 SOUT DEL REY	93616	91-95%	FRESNO	100101, 1	36.65747	-119.59
SO CAL GAS/DINUBA MGP	54830001	STATE RESPONSE	ACTIVE	5/1/1986	216 S O ST DINUBA	93618	91-95%	TULARE	100050	36.53752	-119.392
CENTRAL VALLEY FERTILIZER CO., INC.	24280039	STATE RESPONSE	ACTIVE	6/29/1998	7657 AZUS DOS PALOS	93620	91-95%	MERCED	101085	37.04805	-120.63
OASIS CLEANERS	60002269	STATE RESPONSE	ACTIVE	11/19/2015	920 MAIN / DELANO	93215	66-70%	KERN	102276	35.76863	-119.245
FORMER NATIONAL CLEANERS	60002270	STATE RESPONSE	ACTIVE	11/19/2015	811 11TH / DELANO	93215	66-70%	KERN	102277	35.7705	-119.247
OAK LANE CLEANERS	60002268	STATE RESPONSE	ACTIVE	11/19/2015	910 MAIN / DELANO	93215	66-70%	KERN	102275	35.76822	-119.245
DELANO PCE PLUME	60001327	STATE RESPONSE	ACTIVE	8/4/2010	MAIN STRE DELANO	93215	66-70%	KERN	102044	35.76911	-119.246
DRY CANYON ARTILLERY RANGE	80000411	STATE RESPONSE	ACTIVE	7/1/2012	53 MILES N DRY CANYON	93222	31-35%	VENTURA	301338	34.75	-119.242
PARKS AIR FORCE BASE (J09CA0083)	80000158	STATE RESPONSE	ACTIVE	3/22/2013	DUBLIN		36-40%	ALAMEDA	202107	37.70306	-121.892
DUNNIGAN GROUNDWATER	60002311	STATE RESPONSE	ACTIVE	2/1/2016	29082 MAI DUNNIGAN	95937	56-60%	YOLO	102293	38.88499	-121.97
J R SIMPLOT, EDISON	15070030	STATE RESPONSE	ACTIVE - LA	5/1/1986	430 PEPPEI EDISON	93220	81-85%	KERN	100133	35.35148	-118.878
KETEMA AEROSPACE & ELECTRONICS	37370033	STATE RESPONSE	ACTIVE	9/28/2017	790 GREEN EL CAJON	92021	66-70%	SAN DIEGO	400433	32.81466	-116.953
CASPAN INC	13280019	STATE RESPONSE	CERTIFIED ,	6/30/1998	287 WEST / EL CENTRO	92243	56-60%	IMPERIAL	400201, 4	32.8218	-115.56
SAN GABRIEL GROUNDWATER BASIN (1-4)*	19990006	FEDERAL SUPERFUND - LISTED	ACTIVE	5/12/2015	10-20 MI E EL MONTE	91732	91-95%	LOS ANGE	300132, 3	34.0724	-118.033
WICKES FOREST INDUSTRIES	48240001	STATE RESPONSE	ACTIVE - LA	3/11/1996	INTERSECT ELMIRA	95625	61-65%	SOLANO	100164	38.35235	-121.907
IKEA (FORMER BARBARY COAST)	1440005	STATE RESPONSE	CERTIFIED ,	9/19/2000	4300 EAST: EMERYVILLE	94608	81-85%	ALAMEDA	200312, 2	37.8295	-122.292
MYERS DRUM - EMERYVILLE	1340110	STATE RESPONSE	CERTIFIED ,	5/11/2001	4500 SHELI EMERYVILLE	94608	66-70%	ALAMEDA	200144	37.83301	-122.293
CHATHAM BROTHERS BARREL YARD	37490029	STATE RESPONSE	ACTIVE	4/18/1996	2257 BERN ESCONDIDO	92029	16-20%	SAN DIEGO	400029	33.09303	-117.089
EL CENTRO ROCKET TARGET NO. 2 (#93)	80000101	STATE RESPONSE	ACTIVE	1/9/2020	E1/2, NW1 EL CENTRO	92244	61-65%	IMPERIAL	401361	32.94667	-115.683
CROWN CITY PLATING CO.	71002182	FEDERAL SUPERFUND - LISTED	ACTIVE	10/16/2018	4350 TEM EL MONTE	91731	76-80%	LOS ANGE	550024	34.08604	-118.055
AEROJET GENERAL CORP.	60000742	STATE RESPONSE	ACTIVE	10/19/2007	9100 FLAIR EL MONTE	91731	96-100%	LOS ANGE	301377	34.0715	-118.069
HYTONE CLEANERS	60000629	STATE RESPONSE	ACTIVE	5/1/2007	2702 MOU EL MONTE	91732	96-100%	LOS ANGE	301319, 9	34.05952	-118.025
EL MONTE (SAN GABRIEL VALLEY SUPERFUND SITE)	60001337	FEDERAL SUPERFUND - LISTED	ACTIVE	6/16/2015	COVERS PC EL MONTE	91732	76-80%	LOS ANGE	301369, 3	34.0801	-118.041
MERCHANT/WHITNEY	60001628	STATE RESPONSE	ACTIVE	2/7/2012	5679 HORT EMERYVILLE	94608	51-55%	ALAMEDA	201929, 2	37.83741	-122.291
SHERWIN WILLIAMS	60000189	STATE RESPONSE	CERTIFIED ,	1/23/2013	1450 SHER EMERYVILLE	94608	76-80%	ALAMEDA	200956, 2	37.83295	-122.29
SOUTHERN PACIFIC, SUISUN MARSH	48400001	STATE RESPONSE	CERTIFIED ,	8/25/1998	END OF CH FAIRFIELD	94585	41-45%	SOLANO	200444	38.17333	-122.079
PACIFIC COAST PIPE LINES	56130038	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	7/12/2012	67 EAST TE FILLMORE	93015	61-65%	VENTURA	300156	34.40436	-118.905
TRI-AIR, INCORPORATED	10070021	STATE RESPONSE	ACTIVE - LA	5/1/1986	915 TENTH FIREBAUGH	93622	81-85%	FRESNO	100149, 1	36.85669	-120.464
BRITZ FERTILIZERS, INC - FIVE POINTS	10280077	STATE RESPONSE	CERTIFIED ,	2/19/2004	21817 SOU FIVE POINTS	93624	81-85%	FRESNO	100024	36.4159	-120.122
GEORGIA-PACIFIC CORPORATION	23240008	STATE RESPONSE	ACTIVE - LA	8/1/2006	90 WEST R FORT BRAGG	95437	46-50%	MENDOCIN	200402, 2	39.4439	-123.808
EEL RIVER SAWMILLS, MILL A	12240119	STATE RESPONSE	ACTIVE	6/16/1999	1053 NORT FORTUNA	95540	41-45%	HUMBOLD	200757, 2	40.51469	-124.124
VALLEY FOUNDRY AND MACHINE WORKS	10390001	STATE RESPONSE	ACTIVE	5/16/2011	2510 SOUT FRESNO	93717	96-100%	FRESNO	101585	36.70974	-119.775
T H AGRICULTURE & NUTRITION, L.L.C.	10280334	FEDERAL SUPERFUND - DELISTED	CERTIFIED ,	1/12/2006	7183 EAST FRESNO	93727	31-35%	FRESNO	100146	36.76416	-119.66
FMC CORPORATION - FRESNO	10280013	STATE RESPONSE	ACTIVE	1/1/1985	2501 SOUT FRESNO	93725	96-100%	FRESNO	100056	36.71261	-119.77
WEIR FLOWAY INC.	10340137	STATE RESPONSE	CERTIFIED ,	6/11/2015	2494 SOUT FRESNO	93707	96-100%	FRESNO	101163, 1	36.70903	-119.77
FORMER BURLINGTON NORTHERN SANTA FE ICE HOUSE	10400004	STATE RESPONSE	ACTIVE	12/20/2001	3090 E CHI FRESNO	93721	96-100%	FRESNO	101503	36.71418	-119.773
SOUTH FRESNO REGIONAL GROUNDWATER PLUME	10400005	STATE RESPONSE	ACTIVE	11/26/2002	NORTH OF FRESNO	93721	96-100%	FRESNO	101491, 1	36.7185	-119.773
FRESNO SANITARY LANDFILL	10490097	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1989	SW CORNE FRESNO	93706	96-100%	FRESNO	100246	36.69717	-119.83
COMMERCIAL ELECTROPLATERS	10340074	STATE RESPONSE	ACTIVE	4/28/1993	2940 SOUT FRESNO	93706	96-100%	FRESNO	100044, 1	36.69437	-119.792
FRESNO AIR TERMINAL/OLD HAMMER FIELD (J09CA0823)	10450005	STATE RESPONSE	ACTIVE	1/1/1990	MCKINLEY FRESNO	93727	61-65%	FRESNO	100242, 1	36.76611	-119.71
CBS FENDER	60002051	STATE RESPONSE	ACTIVE	8/21/2017	500 SOUTH FULLERTON	92831	86-90%	ORANGE	401684	33.86636	-117.906
MCCOLL	30290001	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	8/26/2014	ROSECRAN FULLERTON	92633	51-55%	ORANGE	300093, 4	33.89513	-117.971
AUTONETICS/RAYTHEON	60002054	STATE RESPONSE	ACTIVE	8/21/2017	310 EAST V FULLERTON	92832	86-90%	ORANGE	401687	33.86813	-117.919
GOLDEN WEST TOWING EQUIPMENT	60002066	STATE RESPONSE	BACKLOG	8/26/2017	1850 EAST FULLERTON	92831	86-90%	ORANGE	401696	33.85962	-117.897
NORTHROP Y-19	60002053	STATE RESPONSE	ACTIVE	8/21/2017	1401 EAST FULLERTON	92831	86-90%	ORANGE	401686	33.86042	-117.904
FAIR ANSELM CENTER, INC.	60001218	STATE RESPONSE	ACTIVE	11/25/2009	709 & 711 FAIRFAX	94930	1-5%	MARIN	201866, 2	37.98578	-122.584
CITY OF FORT BRAGG COASTAL TRAIL	60002118	STATE RESPONSE	ACTIVE	11/5/2014	STATE HIGH FORT BRAGG	95437		MENDOCIN	900279	39.43579	-123.817
SOUTH FRESNO PCE GROUNDWATER PLUME	60000706	STATE RESPONSE	ACTIVE	10/17/2003	2376 S RA FRESNO	93721	96-100%	FRESNO	101591, 1	36.71498	-119.775
PCA METAL FINISHING, INC.	71002360	STATE RESPONSE	ACTIVE	6/27/2007	1726 E. RO FULLERTON	92831	86-90%	ORANGE	102224, 4	33.86398	-117.897
CHICAGO MUSICAL INSTRUMENTS (FORMER)	60001251	STATE RESPONSE	ACTIVE - LA	2/16/2010	350 SOUTH FULLERTON	92831	81-85%	ORANGE	401489, 4	33.86775	-117.906
ORANGE COUNTY METAL PROCESSING	71002520	STATE RESPONSE	ACTIVE	12/20/2007	1711 E. KIN FULLERTON	92831	86-90%	ORANGE	401605, 5	33.86319	-117.897

GARDENA SUMPS	19490135	STATE RESPONSE	ACTIVE	9/25/1995	1450 WEST GARDENA	90247	86-90%	LOS ANGEL	300067, 3	33.87235	-118.3
SAN FERNANDO VALLEY (AREA 2)	19990012	FEDERAL SUPERFUND - LISTED	ACTIVE	1/1/1984	CRYSTAL SI GLENDALE	91209	96-100%	LOS ANGEL	300127	34.1575	-118.285
SHELL- FORMER HERCULES GAS PLANT	42290014	STATE RESPONSE	ACTIVE - LA	4/19/1996	14730 HIGI GOLETA	93117	21-25%	SANTA BAF	300138	34.47643	-120.135
EMPIRE MINE STATE PARK	29100003	STATE RESPONSE	ACTIVE	11/1/2005	10791 E EN GRASS VALLEY	95945	66-70%	NEVADA	100235	39.20776	-121.043
LOS ANGELES DEFENSE AREA NIKE BATTERY 32	80000285	MILITARY EVALUATION	ACTIVE	12/16/2016	AREA BOU' GARDEN GROVE	92841	81-85%	ORANGE	900196	33.79351	-118.007
2403 MARINE AVENUE	60002922	STATE RESPONSE	ACTIVE	1/3/2020	2403 MARI GARDENA	90249	81-85%	LOS ANGEL	301892	33.89497	-118.32
INDUSTRIAL POLYCHEMICAL SERVICE CORP	60001937	STATE RESPONSE	ACTIVE	9/30/2013	17109 SOU GARDENA	90248	96-100%	LOS ANGEL	301601	33.87624	-118.277
PALACE CLEANERS GLENDALE	60002013	STATE RESPONSE	ACTIVE	6/2/2014	201 SOUTH- GLENDALE	91205	86-90%	LOS ANGEL	301655	34.14431	-118.249
GOFFS CPSITE	80000412	STATE RESPONSE	ACTIVE	12/13/2017	35 MILES V GOFFS	92363	76-80%	SAN BERN/	401352	34.925	-115.063
GOSHEN CARBON TET PLUME	60002004	STATE RESPONSE	ACTIVE	5/5/2014	BETTY DRIN GOSHEN	93227	86-90%	TULARE	102240	36.35571	-119.423
HAYWARD ARMY AIRFIELD	19700008	STATE RESPONSE	ACTIVE	1/22/2015	20301 SKYV HAYWARD	94541	76-80%	ALAMEDA	200635, 9	37.66279	-122.12
HERCULES INC	7280156	STATE RESPONSE	CERTIFIED ,	11/25/1992	CORNER O HERCULES	94547	31-35%	CONTRA CI	200044	38.01341	-122.28
HERCULES PROPERTIES, LTD.	7280016	STATE RESPONSE	CERTIFIED ,	6/9/1997	560 RAILRC HERCULES	94547		CONTRA CI	200045, 2	38.02071	-122.289
ASCON LANDFILL	30490018	STATE RESPONSE	ACTIVE	1/1/1984	21641 MAI HUNTINGTON BEACH	92646	1-5%	ORANGE	400007, 4	33.64776	-117.973
TALLEY BROTHERS INC	19290138	STATE RESPONSE	ACTIVE	9/14/2007	2007 LAUR HUNTINGTON PARK	90255	96-100%	LOS ANGEL	301368	33.98845	-118.236
HOLTVILLE ROCKET TARGET 1R #94	80000145	STATE RESPONSE	ACTIVE	1/9/2020	8 MILES NC HOLTVILLE	92250	71-75%	IMPERIAL	401355	32.91944	-115.271
MP ASSOCIATES, INC.	3390001	STATE RESPONSE	ACTIVE	3/31/2003	6555 JACK' IONE	95640	56-60%	AMADOR	101568	38.30763	-120.902
IRVINE PARK - ARMY CAMP	80000831	STATE RESPONSE	ACTIVE	12/16/2019	LOCATED C IRVINE PARK	92697	6-10%	ORANGE	401507	33.79583	-117.746
ARGONAUT MINE	31000002	FEDERAL SUPERFUND - LISTED	ACTIVE	2/5/1987	ARGONAU' JACKSON	95642	56-60%	AMADOR	100347	38.35252	-120.783
ALLEN RANCH TAILINGS	70000030	STATE RESPONSE	ACTIVE	8/26/2005	APPROXIM JACKSON	95968	51-55%	AMADOR	101767	38.38126	-120.814
PYRITE LEASING	60002153	STATE RESPONSE	ACTIVE	3/5/2015	3500 PYRIT JURUPA VALLEY	92509	96-100%	RIVERSIDE	401713, 4	34.02778	-117.456
UCSD (CAMP MATTHEWS)-J09CA111001	37970031	STATE RESPONSE	ACTIVE	7/13/2016	12 MILES N LA JOLLA	92103	11-15%	SAN DIEGG	401221	32.89167	-117.241
CALTRANS I-105 #16 & 17	19990003	STATE RESPONSE	CERTIFIED ,	6/30/1994	1-5 FWY BT LOS ANGELES	90047	96-100%	LOS ANGEL	300203	33.92856	-118.302
DAVIS CHEMICAL COMPANY	19281215	STATE RESPONSE	ACTIVE - LA	9/6/2000	1550 NORT LOS ANGELES	90063	96-100%	LOS ANGEL	300432	34.05918	-118.183
SAN FERNANDO VALLEY (AREA 1)	19990011	FEDERAL SUPERFUND - LISTED	ACTIVE	5/15/1996	NORTH HO LOS ANGELES	91601	96-100%	LOS ANGEL	300126, 3	34.1875	-118.384
CHARLES CAINE COMPANY, INC.	19281216	STATE RESPONSE	ACTIVE	7/2/2001	8325 HIND LOS ANGELES	90045	56-60%	LOS ANGEL	300997	33.96278	-118.374
SAN FERNANDO VALLEY (AREA 4)	19990009	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	1/1/1999	POLLOCK V LOS ANGELES	90086	96-100%	LOS ANGEL	300129	34.12944	-118.264
DEL AMO FACILITY	19300230	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	4/22/1996	DEL AMO F LOS ANGELES	90020	96-100%	LOS ANGEL	400048, 4	33.8497	-118.292
410 E. 32ND STREET & 317 E. 33RD STREET	60002760	STATE RESPONSE	ACTIVE	12/6/2018	410 E. 32N LOS ANGELES	90011	91-95%	LOS ANGEL	401862	34.01844	-118.268
PALACE PLATING	19340646	STATE RESPONSE	ACTIVE	7/13/2018	710 EAST 2 LOS ANGELES	90011	91-95%	LOS ANGEL	301391	34.01845	-118.263
AMTRAK REDONDO JUNCTION FACILITY	19400012	STATE RESPONSE	ACTIVE	1/10/2003	2435 E. W/ LOS ANGELES	90021	91-95%	LOS ANGEL	300719	34.01916	-118.226
FRANCISCAN CERAMICS, INC.	19320112	STATE RESPONSE	CERTIFIED ,	12/30/1994	2901 LOS F LOS ANGELES	90039	96-100%	LOS ANGEL	300065, 3	34.12656	-118.263
INTERNATIONAL LEAD CO. (A.K.A. WESTERN LEAD AND METAL CO.)	19390044	STATE RESPONSE	CERTIFIED ,	12/30/2007	2182 EAST LOS ANGELES	90021	91-95%	LOS ANGEL	300591	34.02421	-118.234
HARD CHROME PRODUCTS	19340231	STATE RESPONSE	ACTIVE	7/1/2001	617 EAST 5 LOS ANGELES	90011	96-100%	LOS ANGEL	300457, 3	33.99184	-118.264
WILLIAM MEAD HOMES	19290312	STATE RESPONSE	ACTIVE - LA	10/5/2001	1300 CARD LOS ANGELES	90012	96-100%	LOS ANGEL	300545, 3	34.06318	-118.23
LA HABRE NORGE VILLAGE CLEANERS	60002635	STATE RESPONSE	ACTIVE	4/11/2018	650 NORTH- LA HABRE	90631		ORANGE	401826	0	0
LOS ALTOS CLEANERS	60002524	STATE RESPONSE	ACTIVE	11/26/2018	392 1ST ST LOS ALTOS	94022	1-5%	SANTA CLARA		37.37551	-122.116
SERVICE PLATING COMPANY INC	60002166	STATE RESPONSE	ACTIVE	4/1/2015	1855 EAST LOS ANGELES	90001	96-100%	LOS ANGEL	301695, 3	33.98385	-118.239
SPENCE PROPERTY AKA DRY CLEANER IN EAGLE ROCK	60000305	STATE RESPONSE	ACTIVE	5/5/2006	7047-7051 LOS ANGELES	90042	51-55%	LOS ANGEL	301285	34.1305	-118.189
WATTS/JORDAN DOWNS PROJECT	60002017	STATE RESPONSE	ACTIVE	2/12/2016	VARIOUS A LOS ANGELES	90002	96-100%	LOS ANGEL	900272, 9	33.94876	-118.23
STANDARD NICKEL CHROMIUM PLATING CO.	71003183	STATE RESPONSE	ACTIVE - LA	6/4/2004	811,817/8: LOS ANGELES	90001	96-100%	LOS ANGEL	300683, 3	33.98292	-118.26
SOLVAY USA INC.	60002912	STATE RESPONSE	ACTIVE	12/5/2019	500 FEET V LOS ANGELES	90280	96-100%	LOS ANGEL	301887	33.95579	-118.186
MACGILLIS AND GIBBS	20240001	STATE RESPONSE	ACTIVE - LA	8/1/1985	11272 ROA MADERA	93639	86-90%	MADERA	100098	36.91366	-119.965
PURITY OIL SALES, INC	10500005	FEDERAL SUPERFUND - LISTED	ACTIVE	1/1/1985	3265 SOUT MALAGA	93726	96-100%	FRESNO	100122	36.68732	-119.746
CORNELL-DUBILIER ELECTRONICS	19360279	STATE RESPONSE	ACTIVE - LA	4/14/2015	4144 GLEN MARINA DEL REY	90292	41-45%	LOS ANGEL	300040	33.98898	-118.441
PEMACO CHEMICAL CORPORATION FORMER	19281217	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	7/1/2001	5040-5050 MAYWOOD	90270	91-95%	LOS ANGEL	300705	33.98559	-118.172
MODESTO GROUNDWATER CONTAMINATION	50950002	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1989	MCHENRY MODESTO	95351	81-85%	STANISLAU	100111, 1	37.65667	-120.994
PURDY COMPANY	15330010	STATE RESPONSE	CERTIFIED ,	2/28/1997	12901 UNI' MOJAVE	93501	76-80%	KERN	100176, 1	35.00929	-118.155
COMMODITY REFINING EXCHANGE	15330008	STATE RESPONSE	CERTIFIED ,	6/27/2003	11847 UNI' MOJAVE	93501	76-80%	KERN	100175	34.9935	-118.15
UNITED METAL RECOVERY	15330007	STATE RESPONSE	CERTIFIED ,	6/1/1995	12433 UNI' MOJAVE	93501	76-80%	KERN	100177	35.00249	-118.152
SILVER QUEEN JUNKYARD	15500002	STATE RESPONSE	CERTIFIED ,	6/30/2006	BACK LOT ' MOJAVE	93501	76-80%	KERN	100273	34.99468	-118.152
MOBILE SMELTING	15330011	STATE RESPONSE	ACTIVE	6/29/1998	UNITED ST MOJAVE	93501	76-80%	KERN	100188	34.98296	-118.151
OPERATING INDUSTRIES, INC. LANDFILL	19490207	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	8/2/2012	900 POTRE MONTEREY PARK	91755	71-75%	LOS ANGEL	300110, 3	34.0365	-118.104
PLESSEY MICRO SCIENCE	43360069	STATE RESPONSE	CERTIFIED ,	6/28/2007	2274 MOR. MOUNTAIN VIEW	94040	36-40%	SANTA CLA	200080, 2	37.40324	-122.101
MADERA PCE GROUNDWATER PLUME	60001450	STATE RESPONSE	ACTIVE	10/19/2010	SOUTH C S MADERA	93638	86-90%	MADERA	102045	36.9583	-120.056
RESOURCE RENEWAL TECHNOLOGY, INC. - MARICOPA FACILITY	70000045	STATE RESPONSE	ACTIVE	9/14/2011	24306 HIGI MARICOPA	93252	56-60%	KERN	101650	35.05835	-119.357
CAMP BEALE (J09CA0136) - MMRP	58970001	STATE RESPONSE	ACTIVE	7/12/2001	97.74 SQ N MARYSVILLE	95901	11-15%	YUBA	101188, 1	39.12833	-121.248
GZC	60002917	STATE RESPONSE	ACTIVE	12/16/2019	1678 GLEN MCKINLEVILLE	95519		HUMBOLD	202287	0	0
DERRY LANE MIXED USE DEVELOPMENT	60000286	STATE RESPONSE	ACTIVE	5/1/2006	DERRY LA MENLO PARK	94025	6-10%	SAN MATE	201659	37.45577	-122.185
FORMER NORGE / ATHERTON VILLAGE CLEANERS	60001376	STATE RESPONSE	ACTIVE	11/22/2010	1438 EL CA MENLO PARK	94025	6-10%	SAN MATE	201888, 2	37.45649	-122.188
TARGET MASTERS WEST	60002853	STATE RESPONSE	ACTIVE	7/1/2019	122 MINNI MILPITAS	95035	46-50%	SANTA CLA	202264	37.44864	-121.912
MOJAVE GUNNERY RANGE - (J09CA7281) MMRP	80000950	STATE RESPONSE	ACTIVE	9/14/2006	2 MILE SW MOJAVE	93505	41-45%	KERN	101450	35.07581	-117.998
OWL CLEANERS	60002357	STATE RESPONSE	ACTIVE	5/17/2016	153 WEBST MONTEREY	93940	21-25%	MONTEREY	202095	36.59615	-121.895
CAMP IBIS (J09CA028300)	36970011	STATE RESPONSE	CERTIFIED ,	1/6/2009	21 MILES N NEEDLES	92363	66-70%	SAN BERN/	400765	34.96694	-114.817
LAVA CAP MINE	29100004	FEDERAL SUPERFUND - LISTED	ACTIVE	11/25/1996	14501 LAV. NEVADA CITY	95959	41-45%	NEVADA	100337, 1	39.22867	-120.972
WYLE LABS - NORCO FACILITY	33730084	STATE RESPONSE	ACTIVE - LA	10/3/2004	1841 HILLS NORCO	92860	56-60%	RIVERSIDE	401144	33.91046	-117.542

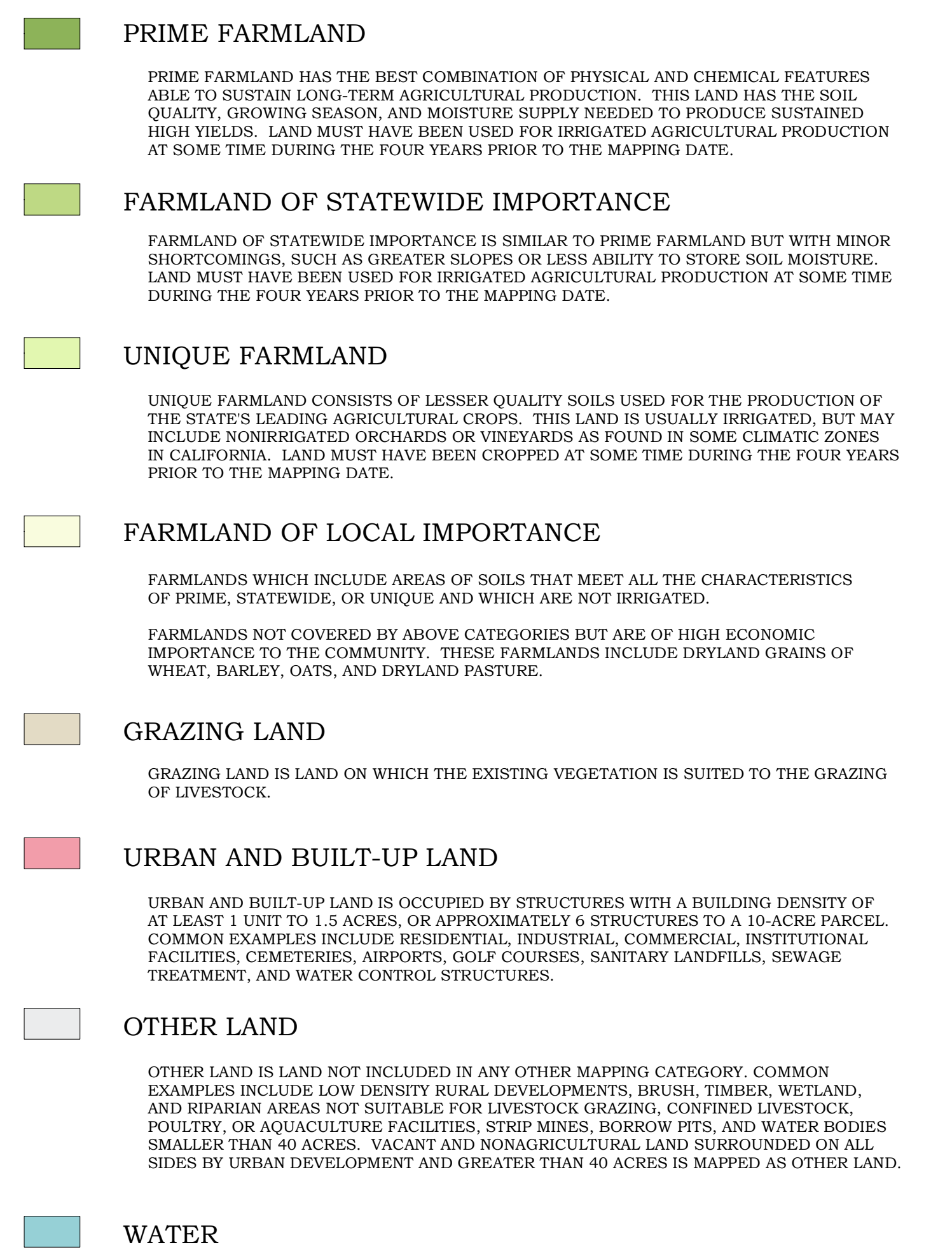
HAMILTON AAF - (J09CA7062) - NORTH ANTENNA FIELD - IR/MMRP	21970012	STATE RESPONSE	ACTIVE	7/20/1999	HIGHWAY NOVATO	94947	36-40%	MARIN	200714	38.06444	-122.492
NEEDLES SMELTER	60002607	STATE RESPONSE	ACTIVE	6/14/2018	799 N L STI NEEDLES	92363	66-70%	SAN BERN#	401813	34.85	-114.609
DAVIS MILL/HOGE MINE	60000691	STATE RESPONSE	ACTIVE	8/2/2018	13145 NOF NEVADA CITY	95959	31-35%	NEVADA	102007	39.29117	-120.985
HARD CHROME ENGINEERING	1870003	STATE RESPONSE	ACTIVE	4/30/2003	750 107TH OAKLAND	94603	81-85%	ALAMEDA	201529	37.73253	-122.175
UNION PACIFIC OAKLAND COLISEUM SITE	1400015	STATE RESPONSE	ACTIVE	4/4/2002	700 73RD OAKLAND	94621	86-90%	ALAMEDA	201420	37.75222	-122.198
PORT OF OAKLAND, BERTH 25 AND 26	1280092	STATE RESPONSE	CERTIFIED ,	9/20/2011	2500 7TH S OAKLAND	94607	81-85%	ALAMEDA	201392	37.81087	-122.322
DUTCH BOY #3	1390006	STATE RESPONSE	CERTIFIED ,	12/18/2008	4825 SAN I OAKLAND	94601	91-95%	ALAMEDA	201426	37.7665	-122.214
HARRIS DRY CLEANERS	1720109	STATE RESPONSE	ACTIVE	6/16/2000	2801 MAR OAKLAND	94609	86-90%	ALAMEDA	201253	37.81813	-122.272
SOUTHERN PACIFIC - WEST OAKLAND RAIL YARD	1400010	STATE RESPONSE	CERTIFIED ,	5/28/2009	CYPRESS C OAKLAND	94607	86-90%	ALAMEDA	200486	37.80306	-122.299
GENERAL ELECTRIC - OAKLAND	1360059	STATE RESPONSE	ACTIVE - LA	6/25/1997	5441 EAST OAKLAND	94601	91-95%	ALAMEDA	200135, 2I	37.76532	-122.206
AMCO CHEMICAL	1390001	FEDERAL SUPERFUND - LISTED	ACTIVE	5/1/2002	1414 THIRI OAKLAND	94607	86-90%	ALAMEDA	200687	37.80284	-122.295
PORT OF OAKLAND - EMBARCADERO COVE	1510021	STATE RESPONSE	CERTIFIED ,	3/28/1997	DENNISON OAKLAND	94606	86-90%	ALAMEDA	200083	37.77977	-122.243
HOWARD MARINE TERMINAL SITE	1440006	STATE RESPONSE	ACTIVE - LA	1/28/2020	EMBARCADI OAKLAND	94604	NA	ALAMEDA	201089, 2I	37.79722	-122.283
ACTION PLATING (2W)	1340116	STATE RESPONSE	CERTIFIED ,	4/30/2012	10132 EDE OAKLAND	94603	96-100%	ALAMEDA	201569	37.73513	-122.18
CAL TECH METALS	1340118	STATE RESPONSE	ACTIVE	5/2/2006	825, 829, 8 OAKLAND	94608	86-90%	ALAMEDA	200882	37.82087	-122.274
NORTHWESTERN VENETIAN SUPPLY CORP. SITE	1340123	STATE RESPONSE	ACTIVE - LA	5/27/2014	1218 24TH OAKLAND	94607	76-80%	ALAMEDA	201574, 2I	37.81775	-122.285
COMMERCIAL BUILDINGS	1720110	STATE RESPONSE	ACTIVE	6/10/2003	1250-1276 OAKLAND	94607	76-80%	ALAMEDA	201386, 2I	37.81655	-122.287
E-D COAT INC	60002501	STATE RESPONSE	ACTIVE	4/21/2017	715 4TH ST OAKLAND	94607	NA	ALAMEDA	202138, 2I	37.79974	-122.282
COOK BATTERY (OAKLEY BATTERY)	7360035	STATE RESPONSE	CERTIFIED ,	6/28/2006	139 HILL A OAKLEY	94561	51-55%	CONTRA CI	200072	37.9736	-121.692
TRI-CITY PLATING, INCORPORATED	37340034	STATE RESPONSE	ACTIVE	2/19/2019	1307 SOUT OCEANSIDE	92054	66-70%	SAN DIEGC	401562, 5I	33.18236	-117.369
ORLAND CLEANERS	11720001	STATE RESPONSE	CERTIFIED ,	10/23/2013	726 FIFTH O RLAND	95963	46-50%	GLENN	100348	39.74655	-122.196
PARMENTER AND BRYAN	54070063	STATE RESPONSE	ACTIVE	7/20/2018	13133 AVE OROSI	93647	86-90%	TULARE	100167, 1I	36.54472	-119.279
KOPPERS INDUSTRIES INC (OROVILLE PLANT)	4240001	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	2/14/2004	BAGGETT-I OROVILLE	95965	66-70%	BUTTE	100084	39.46949	-121.562
HALACO ENGINEERING COMPANY	56330002	FEDERAL SUPERFUND - PROPOSED	ACTIVE	3/28/2007	6200 PERK OXNARD	93033	81-85%	VENTURA	300075, 3I	34.13919	-119.183
LANE METAL FINISHERS	60000594	STATE RESPONSE	ACTIVE	3/15/2007	2942 SAN I OAKLAND	94608	86-90%	ALAMEDA	201736	37.82015	-122.276
OCEANSIDE SITE DISCOVERY	60002805	STATE RESPONSE	ACTIVE	1/22/2019	STUDY ARE OCEANSIDE	92054	66-70%	SAN DIEGC	401870	33.18358	-117.369
ALUMIN-ART PLATING COMPANY INC.	60001398	STATE RESPONSE	ACTIVE	2/1/2011	803 WEST O NTARIO	91762	96-100%	SAN BERN#	401867, 5I	34.05955	-117.663
HOLCHEM, INC.	19281213	STATE RESPONSE	ACTIVE	5/13/1997	13546 DES PACOIMA	91331	96-100%	LOS ANGEL	300593	34.27496	-118.427
AYDIN ENERGY	43360085	STATE RESPONSE	CERTIFIED ,	9/30/1997	3180 HANC PALO ALTO	94304	1-5%	SANTA CLA	200010	37.41465	-122.146
HEWLETT PACKARD BUILDING 15	43360078	STATE RESPONSE	CERTIFIED ,	7/31/1995	3215 PORT PALO ALTO	94304	1-5%	SANTA CLA	200119	37.40898	-122.148
TELEDYNE MEC	43360088	STATE RESPONSE	CERTIFIED ,	9/12/1995	3165 PORT PALO ALTO	94304	1-5%	SANTA CLA	200140	37.40902	-122.15
COHERENT INC	43360115	STATE RESPONSE	CERTIFIED ,	7/11/1996	3210 PORT PALO ALTO	94304	1-5%	SANTA CLA	200138	37.40725	-122.147
LOCKHEED MISSILES AND SPACE CO BLDG 255	43280130	STATE RESPONSE	CERTIFIED ,	4/30/1997	3170 PORT PALO ALTO	94304	1-5%	SANTA CLA	200139, 2I	37.4069	-122.152
WATKINS JOHNSON COMPANY (SRP)	43360076	STATE RESPONSE	CERTIFIED ,	8/30/1996	3333 HILLV PALO ALTO	94304	1-5%	SANTA CLA	200137	37.40809	-122.143
VARIAN	43360086	STATE RESPONSE	CERTIFIED ,	8/21/1997	611 HANSE PALO ALTO	94304	1-5%	SANTA CLA	200122	37.41999	-122.137
HILLVIEW PORTER PLUME	43360077	STATE RESPONSE	CERTIFIED ,	6/30/1997	HILLVIEW I PALO ALTO	94304	1-5%	SANTA CLA	200048	37.40778	-122.15
HEWLETT PACKARD BUILDINGS 28A, B, AND C	43350089	STATE RESPONSE	CERTIFIED ,	6/30/1995	CORNER O PALO ALTO	94304	1-5%	SANTA CLA	200142	37.40971	-122.152
SYNTEX	43360114	STATE RESPONSE	CERTIFIED ,	5/28/1996	3300 HILLV PALO ALTO	94304	1-5%	SANTA CLA	200141	37.40688	-122.146
TELEDYNE SINGER	43360073	STATE RESPONSE	CERTIFIED ,	7/31/1995	3176 PORT PALO ALTO	94304	1-5%	SANTA CLA	200096	37.40684	-122.149
SMITHKLINE AND FRENCH LABORATORIES	43360079	STATE RESPONSE	CERTIFIED ,	4/29/1996	3400 HILLV PALO ALTO	94304	1-5%	SANTA CLA	200118	37.40406	-122.149
PALOS VERDES SHELF	19460003	FEDERAL SUPERFUND - LISTED	ACTIVE	2/26/1999	PACIFIC OC PALOS VERDES	90000		LOS ANGEL	400645	33.7105	-118.322
JET PROPULSION LABORATORY	19970008	FEDERAL SUPERFUND - LISTED	ACTIVE	9/20/1993	4800 OAK I PASADENA	91109	6-10%	LOS ANGEL	300318	34.19865	-118.175
ROSEN'S ELECTRICAL EQUIPMENT	19360068	STATE RESPONSE	CERTIFIED ,	1/19/2010	8226 E. W# PICO RIVERA	90660	76-80%	LOS ANGEL	300369, 3I	34.0058	-118.096
VENDO COMPANY, THE	10590001	STATE RESPONSE	ACTIVE - LA	10/1/1990	7209 NORT PINEDALE	93650	66-70%	FRESNO	100249	36.84161	-119.806
DELTA AUTO WRECKERS	7750026	STATE RESPONSE	ACTIVE	6/5/2009	6 INDUSTR PITTSBURG	94565	76-80%	CONTRA CI	201333, 2I	38.02988	-121.876
HARMON FIELD	54070051	STATE RESPONSE	ACTIVE	5/1/1985	1494 SOUT PIXLEY	93256	91-95%	TULARE	100073	35.96153	-119.304
A Z DECASING COMPANY	19330371	STATE RESPONSE	CERTIFIED ,	9/29/2014	1420 SOUT POMONA	91766	96-100%	LOS ANGEL	300248	34.04629	-117.727
BECKMAN INSTRUMENTS, PORTERVILLE PLANT	54360008	FEDERAL SUPERFUND - LISTED	ACTIVE	9/30/2005	167 WEST I PORTERVILLE	93257	91-95%	TULARE	100019	36.05072	-119.022
BUENA VISTA/KLAU MERCURY MINES	60000405	FEDERAL SUPERFUND - LISTED	ACTIVE	9/15/2006	12 MILES V PASO ROBLES	93447	46-50%	SAN LUIS C	101804	35.6259	-120.897
PORTERVILLE MGP	60002076	STATE RESPONSE	ACTIVE	5/20/2014	309 S. MAI PORTERVILLE	93257	81-85%	TULARE	102238	36.05992	-119.017
MCDONNELL DOUGLAS - INACTIVE TEST SITE	34370069	STATE RESPONSE	ACTIVE - LA	1/12/1988	11505 DOL RANCHO CORDOVA	95742	46-50%	SACRAMEN	100295, 1I	38.5616	-121.211
PURITY OIL SALES - DELTA GUNITE	34170001	STATE RESPONSE	CERTIFIED ,	6/30/2014	WHITE ROC RANCHO CORDOVA	95670	36-40%	SACRAMEN	100123	38.58937	-121.269
AEROJET GENERAL CORPORATION	34370002	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1983	HIGHWAY RANCHO CORDOVA	95670	46-50%	SACRAMEN	100002, 1I	38.61497	-121.207
POINT VICENTE	19970023	STATE RESPONSE	CERTIFIED ,	1/6/2009	PALOS VER RANCHO PALOS VER	90275	1-5%	LOS ANGEL	400953, 4I	33.74472	-118.411
IRON MOUNTAIN MINE	45100001	FEDERAL SUPERFUND - LISTED	ACTIVE	1/1/1983	OFF HWY 2 REDDING	96001	36-40%	SHASTA	100077	40.67083	-122.528
FOLSOM PRISON	34920001	STATE RESPONSE	CERTIFIED ,	8/16/2005	N OF FOLSI REPRESA	95671	NA	SACRAMEN	100058	38.69394	-121.157
FMC CORPORATION - RICHMOND	7280011	STATE RESPONSE	CERTIFIED ,	5/29/1992	855 PARR I RICHMOND	94801	76-80%	CONTRA CI	200033	37.96783	-122.357
FASS METALS	7330030	STATE RESPONSE	CERTIFIED ,	11/6/2012	818 W. GEI RICHMOND	94801	91-95%	CONTRA CI	200037	37.95449	-122.378
DREW SALES	7500035	STATE RESPONSE	CERTIFIED ,	1/30/1990	1156 CAST RICHMOND	94804	66-70%	CONTRA CI	200026	37.94969	-122.368
HARBOUR WAY SOUTH	7340024	STATE RESPONSE	ACTIVE	10/15/2007	738 HARBC RICHMOND	94804	81-85%	CONTRA CI	200043	37.92173	-122.36
LIQUID GOLD OIL CORP	7290039	FEDERAL SUPERFUND - DELISTED	ACTIVE - LA	6/13/2013	HOFFMAN RICHMOND	94804	81-85%	CONTRA CI	200060	37.91011	-122.324
PORT OF RICHMOND (SHIPYARD #3)	7370030	STATE RESPONSE	CERTIFIED ,	9/22/2006	1312 CANA RICHMOND	94804	66-70%	CONTRA CI	200084, 2I	37.90777	-122.368
REACTION PRODUCTS	7280013	STATE RESPONSE	ACTIVE	11/7/1996	840 MORT RICHMOND	94806	76-80%	CONTRA CI	200599	37.98192	-122.357
ELECTRO FORMING CO. - RICHMOND	1330044	STATE RESPONSE	ACTIVE	5/2/2006	130 NEVIN RICHMOND	94801	91-95%	CONTRA CI	201414	37.93658	-122.368
ZENECA RICHMOND AG PRODUCTS	7280002	STATE RESPONSE	ACTIVE - LA	11/6/2004	1415 SOUT RICHMOND	94804	81-85%	CONTRA CI	201567, 2I	37.91244	-122.331
UNIVERSITY OF CALIFORNIA, RICHMOND SE	7730003	STATE RESPONSE	ACTIVE	7/20/2005	1301 SOUT RICHMOND	94804	81-85%	CONTRA CI	201605	37.91536	-122.335

RICHMOND TOWNHOUSE APARTMENTS	7990005	STATE RESPONSE	CERTIFIED ,	6/19/2002	2887 AND RICHMOND	94804	81-85%	CONTRA CI	201508	37.92862	-122.341
UNITED HECKATHORN	7280015	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1983	8TH & WRI RICHMOND	94804	66-70%	CONTRA CI	200059	37.92097	-122.367
BLAIR SOUTHERN PACIFIC LANDFILL	7490012	STATE RESPONSE	ACTIVE	12/22/2005	AT THE FOI RICHMOND	94804	81-85%	CONTRA CI	200060, 2I	37.91037	-122.327
COOPER CHEMICAL	7280154	STATE RESPONSE	CERTIFIED ,	3/7/1997	2801 GIAN RICHMOND	94806	76-80%	CONTRA CI	200023	37.97482	-122.356
CP ANZA (J09CA0267)	33970009	STATE RESPONSE	ACTIVE	11/5/2018	ARLANZA I RIVERSIDE	92505	91-95%	RIVERSIDE	400509	33.94494	-117.459
ALARK HARD CHROME	33340002	FEDERAL SUPERFUND - LISTED	ACTIVE	4/19/1996	2775 MAIN RIVERSIDE	92501	96-100%	RIVERSIDE	400003	33.9915	-117.368
STRINGFELLOW HAZARDOUS WASTE SITE - PLUME CHARACTERIZATION AND	33490001	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	6/1/2016	3450 PYRIT RIVERSIDE	92509	96-100%	RIVERSIDE	400152	34.02944	-117.454
STRINGFELLOW HAZARDOUS WASTE SITE – PLANT OPERATION AND MONIT	60002365	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	6/1/2016	3450 PYRIT RIVERSIDE	92509	96-100%	RIVERSIDE	400152	34.02944	-117.454
PALOS VERDES LANDFILL	19490181	STATE RESPONSE	CERTIFIED ,	4/13/1999	25706 HAV ROLLING HILLS ESTATES	90274	1-5%	LOS ANGEL	400116, 4I	33.78478	-118.348
GROSSI/CALANDRI PROPERTY	15100008	STATE RESPONSE	CERTIFIED ,	2/7/1997	INTERSECT ROSAMOND	93560	61-65%	KERN	100184	34.84956	-118.159
OSAGE INDUSTRIES, 60TH STREET WEST	15330005	STATE RESPONSE	ACTIVE	6/2/1994	60TH STRE ROSAMOND	93560	56-60%	KERN	101534	34.88333	-118.233
AVENUE A UNAUTHORIZED DISPOSAL SITE	15490015	STATE RESPONSE	ACTIVE	10/2/1996	AVENUE A ROSAMOND	93560	46-50%	KERN	101339	34.82008	-118.139
JOHN ALEXANDER RESEARCH INC	15330004	STATE RESPONSE	CERTIFIED ,	3/7/2003	1753 SIERR ROSAMOND	93560	61-65%	KERN	100006	34.84572	-118.16
BRIDGES AND SON TRUCKING	15280037	STATE RESPONSE	ACTIVE	5/1/2006	1200 ORAN ROSAMOND	93560	61-65%	KERN	100179	34.85704	-118.152
S R KILBY PROPERTY	15100009	STATE RESPONSE	ACTIVE	6/29/1998	2021 WEST ROSAMOND	93560	61-65%	KERN	100183	34.85038	-118.159
OSAGE INDUSTRIES, 15TH STREET	15330001	STATE RESPONSE	ACTIVE	12/27/2017	2001 15TH ROSAMOND	93560	61-65%	KERN	100257	34.85191	-118.158
SP-ROSEVILLE: NORTH YARD	31400006	STATE RESPONSE	ACTIVE	10/1/1990	SP ROSEVII ROSEVILLE	95678	56-60%	PLACER	100138	38.7473	-121.288
SP-ROSEVILLE-SOUTH YARD	31400007	STATE RESPONSE	ACTIVE	1/1/1983	SP ROSEVII ROSEVILLE	95678	56-60%	PLACER	100138	38.7291	-121.308
WHITE ROCK DUMPS 1 AND 2	60001748	STATE RESPONSE	CERTIFIED ,	6/22/2018	WHITE ROI RANCHO CORDOVA	95742	46-50%	SACRAMEN	102127	38.60124	-121.193
MODERN DRY CLEANERS	60001154	STATE RESPONSE	ACTIVE	5/6/2010	609 WALN RED BLUFF	96080	51-55%	TEHAMA	102020	40.17664	-122.239
1772 BROADWAY	60002678	STATE RESPONSE	ACTIVE	5/31/2019	1772 BROA REDWOOD CITY	94063	81-85%	SAN MATE	202258	37.487	-122.223
HARBORFRONT TRACT	70000178	STATE RESPONSE	ACTIVE	7/1/2005	MEADE SO RICHMOND	94804	81-85%	CONTRA CI	201734	37.91234	-122.328
CAMP HAAN (J09CA0279)	71000062	STATE RESPONSE	ACTIVE	2/16/2017	WEST AND RIVERSIDE	92518	96-100%	RIVERSIDE	401244	33.8678	-117.268
BLUE LEDGE MINE	60001382	FEDERAL SUPERFUND - LISTED	ACTIVE	3/2/2011	2 MILES SC ROGUE RIVER NATIONAL FOREST	0	21-25%	SISKIYOU	102152	41.95895	-123.107
UP, DOWNTOWN SAC - CENTRAL SHOPS	34400004	STATE RESPONSE	ACTIVE	1/1/1983	401 I STREI SACRAMENTO	95814	96-100%	SACRAMEN	100139	38.58586	-121.502
UP, DOWNTOWN SAC - LAGOON	34400008	STATE RESPONSE	ACTIVE - LA	6/3/1992	401 I STREI SACRAMENTO	95814	96-100%	SACRAMEN	100139	38.59246	-121.5
SACRAMENTO PLATING INC.	34370014	STATE RESPONSE	ACTIVE	6/12/1997	2809 S STR SACRAMENTO	95816	61-65%	SACRAMEN	100247	38.56411	-121.473
UP, DOWNTOWN SAC - PONDS AND DITCH	34400005	STATE RESPONSE	CERTIFIED ,	1/12/1996	401 I STREI SACRAMENTO	95814	96-100%	SACRAMEN	100139	38.59241	-121.498
PG&E - SACRAMENTO SITE	34490048	STATE RESPONSE	ACTIVE - LA	1/1/1987	2000 FRON SACRAMENTO	95818	86-90%	SACRAMEN	100160	38.57219	-121.511
UNION PACIFIC RAILROAD, CURTIS PARK	34400003	STATE RESPONSE	ACTIVE - LA	1/1/1987	3675 WEST SACRAMENTO	95818	11-15%	SACRAMEN	100151, 1I	38.54017	-121.483
BERMAN STEEL-SALINAS	27350001	STATE RESPONSE	CERTIFIED ,	12/22/1992	HIGHWAY SALINAS	93908	61-65%	MONTERE	200014	36.6125	-121.565
NEWMARK GROUNDWATER CONTAMINATION	36990002	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	4/22/1996	BUNKER HI SAN BERNARDINO	92408	76-80%	SAN BERN	400259	34.1821	-117.345
CAMP ELLIOTT-J09CA0067	37970025	STATE RESPONSE	ACTIVE	9/21/1998	NORTHERN SAN DIEGO	92103	36-40%	SAN DIEGC	400690	32.82278	-117.103
SUNFLOWER PROPERTIES INC.	37590003	STATE RESPONSE	ACTIVE	7/24/1998	9755 DISTF SAN DIEGO	92121	36-40%	SAN DIEGC	400700	32.88449	-117.162
1450 MARIN ST. LLC PROJECT / FEDERATED FRY METALS	38330005	STATE RESPONSE	CERTIFIED ,	7/6/2012	1901 CESA SAN FRANCISCO	94124	NA	SAN FRAN	201731	37.74907	-122.395
SCHLAGE LOCK COMPANY	38340157	STATE RESPONSE	ACTIVE - LA	4/30/1994	BAYSHORE SAN FRANCISCO	94134	66-70%	SAN FRAN	201789	37.71056	-122.403
PG&E - NORTH BEACH MARINA SUBSTATION	38490007	STATE RESPONSE	ACTIVE	2/23/2010	BAY STREE SAN FRANCISCO	94123	1-5%	SAN FRAN	201868	37.8039	-122.433
ALMADEN QUICKSILVER COUNTY PARK	43100001	STATE RESPONSE	CERTIFIED ,	12/29/1999	ALAMITOS SAN JOSE	95110	6-10%	SANTA CLA	200005	37.17392	-121.838
SOUTH BAY ASBESTOS AREA	43490060	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1985	FT OF LIBEI SAN JOSE	95002	81-85%	SANTA CLA	200091	37.44106	-121.983
TOWN & COUNTRY VILLAGE SHOPPING CENTER	43590001	STATE RESPONSE	CERTIFIED ,	3/23/2005	2980 & 30: SAN JOSE	95113	41-45%	SANTA CLA	200916	37.31985	-121.949
LORENTZ BARREL & DRUM COMPANY	43300026	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1985	1507 SOUT SAN JOSE	95112	86-90%	SANTA CLA	200061	37.31864	-121.866
KAISER AEROSPACE & ELECTRONICS COMPANY	1990015	STATE RESPONSE	CERTIFIED ,	1/25/2013	880 DOODI SAN LEANDRO	94577	81-85%	ALAMEDA	200559	37.72003	-122.188
DWA PLUME	1990002	STATE RESPONSE	ACTIVE	12/31/1999	SAN LEANI SAN LEANDRO	94578	61-65%	ALAMEDA	200327	37.70898	-122.143
CATERPILLAR INC	1350119	STATE RESPONSE	CERTIFIED ,	5/9/1997	800 DAVIS SAN LEANDRO	94577	71-75%	ALAMEDA	200113	37.72397	-122.165
CINTAS/DEDOMENICO SITE	1890017	STATE RESPONSE	CERTIFIED ,	10/2/2006	777 139TH SAN LEANDRO	94578	51-55%	ALAMEDA	200642	37.70991	-122.145
SINGER FRIDEN	1360094	STATE RESPONSE	CERTIFIED ,	4/28/2003	2350 AND SAN LEANDRO	94577	51-55%	ALAMEDA	200251	37.71594	-122.149
GATX ANNEX TERMINAL-SAN PEDRO	19420029	STATE RESPONSE	CERTIFIED ,	5/28/2002	208 EAST 2 SAN PEDRO	90731	NA	LOS ANGEL	400066, 4I	33.7268	-118.278
RICHARDS CLEANERS	60000408	STATE RESPONSE	ACTIVE	9/19/2013	538 WEST SAN PEDRO	90731	91-95%	LOS ANGEL	401317	33.73992	-118.289
SOUTHWEST MARINE TERMINAL ISLAND FACILITY	60000999	STATE RESPONSE	ACTIVE	11/5/2008	985 SEASIS SAN PEDRO	90731	NA	LOS ANGEL	401456	33.73449	-118.27
GALLADE CHEMICAL, INC	80001356	STATE RESPONSE	ACTIVE - LA	10/13/2009	1230 E SAIL SANTA ANA	92707	86-90%	ORANGE	400236, 4I	33.71926	-117.855
SO CAL GAS/SANTA BARBARA (QUARANTINA MGP	42490036	STATE RESPONSE	CERTIFIED ,	7/18/1994	630 EAST I SANTA BARBARA	93103	66-70%	SANTA BAR	300174	34.42197	-119.685
MANSION GROVE	43280031	STATE RESPONSE	CERTIFIED ,	11/15/1996	4101 LICK I SANTA CLARA	95054	26-30%	SANTA CLA	200117	37.39924	-121.944
NEVILLE CHEMICAL COMPANY	19280515	STATE RESPONSE	CERTIFIED ,	4/21/2006	12800 IMP SANTA FE SPRINGS	90670	NA	LOS ANGEL	300102	33.9165	-118.059
WASTE DISPOSAL, INC.	19490194	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	9/14/2006	12731 LOS SANTA FE SPRINGS	90670	96-100%	LOS ANGEL	300166	33.9486	-118.058
ANGELES CHEMICAL COMPANY INC	19290306	STATE RESPONSE	ACTIVE	4/22/2018	8915 SORE SANTA FE SPRINGS	90670	91-95%	LOS ANGEL	300301, 3I	33.95882	-118.063
SELBY SLAG	7330031	STATE RESPONSE	ACTIVE	1/1/1983	SHORELINE SELBY	94802	81-85%	CONTRA CI	200009, 2I	38.05384	-122.249
SELMA TREATING COMPANY	10240051	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1983	1735 DOCK SELMA	93662	96-100%	FRESNO	100129	36.55723	-119.605
SHAFTER AIRPORT	15070029	STATE RESPONSE	CERTIFIED ,	2/7/1992	LERDO HIGH SHAFTER	93263	NA	KERN	100130	35.5003	-119.183
BROWN AND BRYANT - SHAFTER FACILITY	15280010	STATE RESPONSE	ACTIVE	3/1/1985	135 COMM SHAFTER	93263	86-90%	KERN	100026, 1I	35.49884	-119.268
VALLEY PLATING COMPANY	45340001	STATE RESPONSE	CERTIFIED ,	6/30/2012	3872 EL CA SHASTA LAKE	96019	31-35%	SHASTA	100152	40.67722	-122.377
COOPER DRUM	19500052	FEDERAL SUPERFUND - LISTED	ACTIVE	12/12/1996	9316 ATLA SOUTH GATE	90280	96-100%	LOS ANGEL	300251	33.94715	-118.18
FIRESTONE - PARCEL 1A	19300231	STATE RESPONSE	ACTIVE	4/19/1996	2323 FIRES SOUTH GATE	90280	96-100%	LOS ANGEL	300341	33.95852	-118.229
TITAN TERMINAL & TRANSPORT	19280830	STATE RESPONSE	ACTIVE	9/29/2015	4570 ARDII SOUTH GATE	90280	96-100%	LOS ANGEL	301886	33.95643	-118.188
MCCORMICK & BAXTER CREOSOTING CO	39240001	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	5/1/1986	1214 W W STOCKTON	95203	96-100%	SAN JOAQU	100108	37.9486	-121.307
MARLEY COOLING TOWER COMPANY	39240014	STATE RESPONSE	CERTIFIED ,	2/11/2002	150 N SINC STOCKTON	95215	96-100%	SAN JOAQU	100102	37.96771	-121.234
CENTRAL EUREKA MINE	3100003	STATE RESPONSE	CERTIFIED ,	7/16/2008	OLD RIDGE SUTTER CREEK	95685	51-55%	AMADOR	100449	38.38394	-120.803

UP, DOWNTOWN SAC - MANUFACTURED GAS PLANT	70000034	STATE RESPONSE	ACTIVE	10/1/2004	400 I STREI SACRAMENTO	95814	96-100%	SACRAMEN	100139	38.58723	-121.504
KEN'S BUFF AND PLATING	70000051	STATE RESPONSE	ACTIVE	9/14/2010	1816 21ST SACRAMENTO	95814	86-90%	SACRAMEN	101737	38.56694	-121.483
SIMS METAL SITE	70000019	STATE RESPONSE	ACTIVE	10/30/2004	130 NORTH SACRAMENTO	95814	96-100%	SACRAMEN	101762	38.59031	-121.488
UP, DOWNTOWN SAC - SITE-WIDE	60001957	STATE RESPONSE	ACTIVE	1/8/2014	401 I STREI SACRAMENTO	95814	96-100%	SACRAMEN	100139	38.58422	-121.5
BOLINAS AVENUE CENTER	60001614	STATE RESPONSE	ACTIVE	12/19/2011	4&8 BOLIN SAN ANSELMO	94960	1-5%	MARIN	201927	37.96961	-122.561
CABRILLO POWER II LLC - MIRAMAR COMBUSTION TURBINE	60002519	STATE RESPONSE	ACTIVE	6/29/2017	6897 CONS SAN DIEGO	92121		SAN DIEGO	401788	0	0
ARLENE'S CLEANERS	60001242	STATE RESPONSE	ACTIVE	8/8/2011	2017 CHES SAN FRANCISCO	94123	1-5%	SAN FRAN	201871	37.80059	-122.437
SWISS CLEANERS	60001870	STATE RESPONSE	ACTIVE	2/25/2013	14540 CAN SAN JOSE	95124	21-25%	SANTA CLA	201961	37.26126	-121.923
MOYER CHEMICAL	60001663	STATE RESPONSE	ACTIVE	5/17/2012	1300,1310, SAN JOSE	95112	86-90%	SANTA CLA	201936, 2I	37.3663	-121.898
AJ COMMERCIAL LAUNDRY/ALL CHEM SUPPLY	60000133	STATE RESPONSE	ACTIVE	4/19/2005	1173-1175 SAN JOSE	95126	56-60%	SANTA CLA	201631	37.34627	-121.928
SAN LUIS OBISPO PCE PLUME	60001343	STATE RESPONSE	ACTIVE	9/14/2018	LOS OSOS ' SAN LUIS OBISPO	93401	16-20%	SAN LUIS C	102043	35.244	-120.682
CAMP SAN LUIS OBISPO - IR/MMRP	40910001	STATE RESPONSE	ACTIVE	12/21/2005	7 MILES W SAN LUIS OBISPO	93401	11-15%	SAN LUIS C	200604	35.33333	-120.7
SAN PEDRO BOAT WORKS	70000023	STATE RESPONSE	ACTIVE	4/1/2005	PORT OF LI SAN PEDRO	90731	NA	LOS ANGEL	401270, 9I	33.71592	-118.276
SOCO WEST INC./FORMER HOLCHEM FACILITY	60002003	STATE RESPONSE	ACTIVE	4/1/2014	1341 MAYI SANTA ANA	92705	86-90%	ORANGE	401671	33.71695	-117.853
ENGINEERING PLATING CORP.	71003391	STATE RESPONSE	ACTIVE	4/28/1999	1224 E. PO SANTA ANA	92707	86-90%	ORANGE	401052	33.72544	-117.855
WEST COAST AIR TRAINING CENTER	80000827	MILITARY EVALUATION	ACTIVE	7/20/2017	SANTA ANA		66-70%	ORANGE	33.75139	-117.883	
OLD ORCHARD SHOPPING CENTER	19720018	STATE RESPONSE	ACTIVE	6/12/2011	23357 LYO SANTA CLARITA	91355	16-20%	LOS ANGEL	301525	34.38094	-118.542
WHITTAKER/BERMITE FACILITY	19281087	STATE RESPONSE	ACTIVE	4/14/1995	22116 SOLI SANTA CLARITA	91350	21-25%	LOS ANGEL	300245, 3I	34.4141	-118.523
SONIC PLATING CO., INC. - SANTA FE SPRINGS	71002233	STATE RESPONSE	ACTIVE	9/10/2014	13002 LOS SANTA FE SPRINGS	90670	96-100%	LOS ANGEL	301179	33.94605	-118.055
PETER PAN CLEANERS	60000979	STATE RESPONSE	ACTIVE	9/8/2008	2231 MENI SANTA ROSA	95403	51-55%	SONOMA	201825	38.46181	-122.718
SIERRA LAUNDERERS & CLEANERS	60001220	STATE RESPONSE	ACTIVE	2/24/2011	407 N. WA SONORA	95370	26-30%	TUOLUMN	102061	37.99124	-120.385
WHITTIER NARROWS (SAN GABRIEL VALLEY SUPERFUND SITE)	60001340	FEDERAL SUPERFUND - LISTED	ACTIVE	5/12/2015	BETWEEN I SOUTH EL MONTE	91733	86-90%	LOS ANGEL	300132	34.03045	-118.059
SOUTH EL MONTE (SAN GABRIEL VALLEY SUPERFUND SITE)	60001339	FEDERAL SUPERFUND - LISTED	ACTIVE	6/16/2015	COVERS AL SOUTH EL MONTE	91733	96-100%	LOS ANGEL	300347	34.05337	-118.042
ONE DOLLAR CLEANERS	60002370	STATE RESPONSE	ACTIVE	7/1/2018	2106 MOU SOUTH EL MONTE	91733	96-100%	LOS ANGELES		34.05222	-118.034
GREEN'S CLEANERS	60002279	STATE RESPONSE	ACTIVE	12/1/2015	4600 FIRES SOUTH GATE	90280	96-100%	LOS ANGEL	301731	33.95219	-118.189
JERVIS WEBB	60000332	FEDERAL SUPERFUND - LISTED	ACTIVE	9/13/2014	9301 RAYO SOUTH GATE	90280	96-100%	LOS ANGEL	301286	33.94964	-118.178
FIRESTONE - ENGLE SOUTHERN PARCEL	70000165	STATE RESPONSE	ACTIVE - LA	4/19/1996	8440 ALAN SOUTH GATE	90280	96-100%	LOS ANGEL	301249	33.96036	-118.23
SEAM MASTER INDUSTRIES (SAIA)	60000483	FEDERAL SUPERFUND - LISTED	ACTIVE	9/13/2014	5211 SOUT SOUTH GATE	90280	96-100%	LOS ANGEL	301128	33.94623	-118.178
MONTROSE CHEMICAL CORP	19280024	FEDERAL SUPERFUND - LISTED	ACTIVE	4/22/1996	20201 NOF TORRANCE	90502	96-100%	LOS ANGEL	400100, 4I	33.8477	-118.302
VALLEY WOOD PRESERVING, INC.	50240001	FEDERAL SUPERFUND - LISTED	ACTIVE - LA	1/1/1983	2237 SOUT TURLOCK	95380	96-100%	STANISLAU	100153	37.47217	-120.824
TEMECULA BOMB TARGET #107	80001161	STATE RESPONSE	ACTIVE	1/9/2020	5 MILES EA TEMECULA	92593	46-50%	RIVERSIDE	401339	33.52917	-117.038
MOMIN LODGE	60001010	STATE RESPONSE	ACTIVE	8/18/2015	1918 ARTE TORRANCE	90504	66-70%	LOS ANGEL	401470	33.8727	-118.312
HARVEY MACHINE CO	80000078	MILITARY EVALUATION	ACTIVE	7/20/2017	TORRANCE		96-100%	LOS ANGELES		33.85556	-118.308
FREEMAN PRODUCTS / AVNET INC.	60000835	STATE RESPONSE	ACTIVE	2/29/2008	2040 ARTE TORRANCE	90504	66-70%	LOS ANGEL	401377	33.87166	-118.315
COAST WOOD PRESERVING	23240013	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	5/10/2011	PLANT RD. UKIAH	95482	31-35%	MENDOCIN	200021	39.11151	-123.194
PACIFIC STATES STEEL - PHASE III	1330031	STATE RESPONSE	CERTIFIED ,	9/22/2006	35124 ALV. UNION CITY	94587	46-50%	ALAMEDA	200073, 2I	37.5844	-122.01
READY PROPERTY	56750014	STATE RESPONSE	ACTIVE	5/16/2016	89 PEKING VENTURA	93001	76-80%	VENTURA	301405	34.2833	-119.306
AAD DISTRIBUTION & DRY CLEANING, INC.	19000031	STATE RESPONSE	ACTIVE	1/1/2007	2306 E. 38' VERNON	90058	NA	LOS ANGEL	300461, 3I	34.00779	-118.232
GOSHEN AVENUE AND SHIRK ROAD SITE	54270005	STATE RESPONSE	ACTIVE	5/1/1986	6941 AND VISALIA	93291	56-60%	TULARE	100022	36.3411	-119.367
SO CAL GAS/VISALIA MGP	54490015	STATE RESPONSE	CERTIFIED ,	6/25/1998	300 NORTH VISALIA	93277	81-85%	TULARE	100277	36.33243	-119.285
EXIDE RESIDENTIAL CLEANUP	60002267	STATE RESPONSE	ACTIVE	11/9/2015	VARIOUS L VARIOUS	90058	NA	LOS ANGEL	900291, N	34.0058	-118.194
EXIDE PARKWAYS RESIDENTIAL	60002705	STATE RESPONSE	ACTIVE	8/20/2018	VARIOUS L VARIOUS	90058	NA	LOS ANGEL	900316, 9I	34.0058	-118.194
VERNON PERCHLORATE	60002462	STATE RESPONSE	ACTIVE	12/13/2016	SACO ST VERNON	90058	NA	LOS ANGEL	301371	34.0103	-118.234
PECHINEY	60001187	STATE RESPONSE	ACTIVE	10/27/2009	3200 FRUIT VERNON	90058	NA	LOS ANGEL	301396, 3I	33.99667	-118.211
KAWEAH - SHANNON AND RITCHIE SHOP SITE	60001917	STATE RESPONSE	CERTIFIED ,	6/26/2009	11878 AVE VISALIA	93291	86-90%	TULARE	102187	36.38734	-119.307
COUNTRY CLUB CLEANERS, WHITENDALE	60001054	STATE RESPONSE	ACTIVE	8/3/2018	2000 W. W VISALIA	93277	51-55%	TULARE	101996	36.30593	-119.313
MILLER'S CLEANERS, WHITENDALE	60001050	STATE RESPONSE	ACTIVE	12/10/2015	2235 W. W VISALIA	93277	71-75%	TULARE	102001	36.30562	-119.316
VISALIA DRY CLEANER INVESTIGATION	60000403	STATE RESPONSE	ACTIVE	8/4/2006	CENTRAL C VISALIA	93277	76-80%	TULARE	101808	36.33028	-119.291
PARAGON DRY CLEANERS	60000240	STATE RESPONSE	ACTIVE	10/31/2008	119 SOUTH VISALIA	93291	76-80%	TULARE	102050	36.32955	-119.298
FORMER WEBSTER CLEANERS	60001352	STATE RESPONSE	ACTIVE	9/1/2010	4634 W. M VISALIA	93291	61-65%	TULARE	102107	36.328	-119.342
ONE HOUR MARTINIZING	60000236	STATE RESPONSE	ACTIVE	10/31/2008	717 WEST VISALIA	93291	76-80%	TULARE	102049	36.32993	-119.3
MISSION UNIFORM	60000969	STATE RESPONSE	ACTIVE	9/15/2008	520 E. MIN VISALIA	93292	81-85%	TULARE	102051	36.32774	-119.287
FORMER VILLAGE CLEANERS	60001053	STATE RESPONSE	ACTIVE	8/3/2018	2615 S. MC VISALIA	93277	71-75%	TULARE	101999	36.30698	-119.314
LAMOUR'S CLEANERS, MOONEY	60001052	STATE RESPONSE	ACTIVE	11/8/2010	2911 S. MC VISALIA	93277	71-75%	TULARE	102000	36.30492	-119.314
J H BAXTER CO	47240001	FEDERAL SUPERFUND - LISTED	CERTIFIED ,	5/14/2007	422 MILL S WEED	96094	61-65%	SISKIYOU	100016	41.43288	-122.37
BKK SANITARY LANDFILL / CLASS I AREA	19490005	STATE RESPONSE	ACTIVE - LA	11/18/2004	2210 SOUT WEST COVINA	91792	71-75%	LOS ANGEL	300012, 3I	34.0363	-117.913
OMEGA CHEMICAL CORPORATION	19280436	FEDERAL SUPERFUND - LISTED	ACTIVE	11/23/1993	12504 WHI WHITTIER	90602	91-95%	LOS ANGEL	300223, 3I	33.96957	-118.044
BASIN BY-PRODUCTS	19290278	STATE RESPONSE	ACTIVE	1/1/1985	3031 EAST WILMINGTON	90744	NA	LOS ANGEL	400015, 4I	33.78396	-118.226
TCL CORP./TCL2 (PORT OF LONG BEACH)	19510060	STATE RESPONSE	CERTIFIED ,	12/15/1997	420 N HEN WILMINGTON	90744	NA	LOS ANGEL	400431	33.77496	-118.241
TCL CORPORATION - TOYOTA PARCEL	19510062	STATE RESPONSE	CERTIFIED ,	8/2/1995	420 N HEN WILMINGTON	90744	NA	LOS ANGEL	400154	33.77496	-118.241
ECODYNE POND	49240001	STATE RESPONSE	ACTIVE	5/1/1986	930 SHILOI WINDSOR	95492	46-50%	SONOMA	200028	38.52135	-122.794
CUSTOM CHROME AND BUMPER	51340009	STATE RESPONSE	ACTIVE	12/23/2013	335 GARDE YUBA CITY	95991	81-85%	SUTTER	100047, 9I	39.12447	-121.61
OPHIR ROAD PROPERTY	60000689	STATE RESPONSE	ACTIVE	8/1/2007	ASSESSOR' OROVILLE	95965	66-70%	BUTTE	101886	39.46656	-121.571
DIESEL LOGISTICS	60001272	STATE RESPONSE	ACTIVE	4/6/2010	1331 E. W/ SANTA ANA	92705	86-90%	ORANGE	401519, 4I	33.71631	-117.853

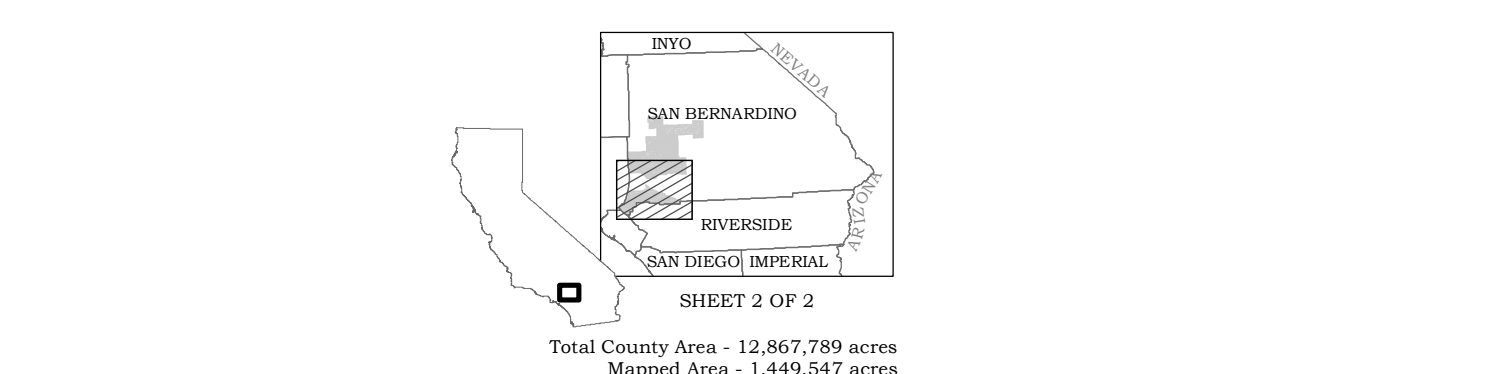


CALIFORNIA DEPARTMENT OF CONSERVATION
DIVISION OF LAND RESOURCE PROTECTION
FARMLAND MAPPING AND MONITORING PROGRAM



10 40 The minimum land use mapping unit is 10 acres, except Water, which is mapped to a minimum of 40 acres.

160 1 square mile = 640 acres.



Important Farmland Maps are compiled by the Farmland Mapping and Monitoring Program (FMMP) pursuant to Section 65570 of the California Government Code. To create the maps, FMMP combines current land use information with U.S. Department of Agriculture-Natural Resources Conservation Service (NRCS) soil survey data. Soil units qualifying for Prime Farmland and Farmland of Statewide Importance are determined by the NRCS. Changes to soil profiles subsequent to publication of NRCS Gridded Soil Survey Geographic (gSSURGO) Database for California, November 29, 2016 are not reflected on this map. This map was developed using NRCS gridded digital soil data (gSSURGO) and may contain individual soil units less than one acre.

Land use status is determined using current and historic aerial imagery, supplemental GIS data, and field verification. Imagery sources may include public domain datasets, web-based information, and commercially purchased data, depending on data availability. Supplemental data on land management status is obtained from federal, state, and local governments. Map reviewers at the local level contribute valuable information with their comments and suggestions. Please refer to FMFP field analyst reports for each county to obtain specific citations.


County boundaries for the 2016 Important Farmland Series are from the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP) 2009 version of California Counties GIS data.

Cultural base information for the Important Farmland Maps was derived from public domain data sets, based upon design of the U.S. Geological Survey, with updates generated by digitizing over current imagery.

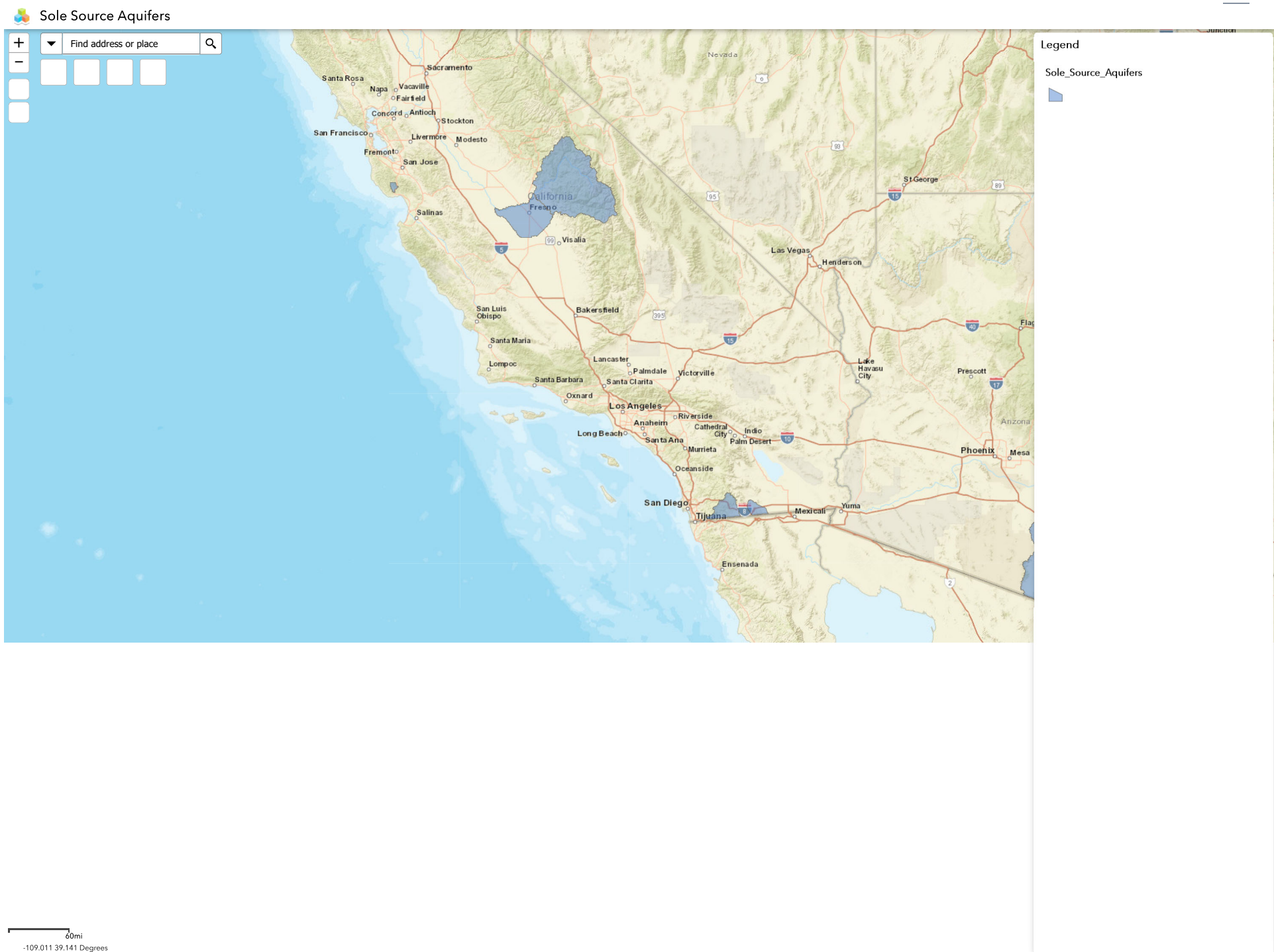
This map should be used within the limits of its purpose - as a current inventory of agricultural land resources. This map does not necessarily reflect general plan or zoning designations, city limit lines, changing economic or market conditions, or other factors which may be taken into consideration when land use policies are determined. This map is not designed for parcel-specific planning purposes due to its scale and the ten-acre minimum land use mapping unit. Classification of important farmland and urban areas on this map is based on best available data. The information has been delineated as accurately as possible at 1:24,000-scale, but no claim to meet 1:24,000 National Map Accuracy Standards is made due to variations in the quality of source data.

The Department of Conservation makes no warranties as to the suitability of this product for any particular purpose.

Additional data is available at www.conservation.ca.gov/dlrp/fmmp, including detail on the program, full size PDF maps, map categories, statistics, field summaries, and GIS data for download. Contact the:

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Map published August 2017.





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CALIFORNIA

California has approximately 189,454 miles of river, of which 1,999.6 miles are designated as wild & scenic—1% of the state's river miles.



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Choose A State
Choose A River

Seen as barren by the first explorers to today's first-time visitors, the rivers of the high desert simply hide their treasures well.

- Amargosa River
- American River (Lower)
- American River (North Fork)
- Bautista Creek
- Big Sur River
- Black Butte River
- Cottonwood Creek
- Deep Creek
- Eel River
- Feather River
- Fuller Mill Creek
- Kern River
- Kings River
- Klamath River
- Merced River
- Owens River Headwaters
- Palm Canyon Creek
- Piru Creek
- San Jacinto River (North Fork)
- Sespe Creek
- Sisquoc River
- Surprise Canyon Creek
- Smith River
- Trinity River
- Tuolumne River
- Whitewater River

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