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DEPARTMENT

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MAR 30 2016

Mayor and City Council  
Planning Commission  
City of Highland  
27215 Base Line  
Highland, CA 92346

*cc: Council  
P.C.*

*Joe  
Kim  
Larry M.*

Re: Response to Comments Letter on Draft EIR for Harmony Specific Plan

Dear Mayor and City Council and Planning Commission:

This letter is in regards to the Response to Comments letter (referred to as "Response to Comment Letter") received from the City of Highland. Based on staff's review of the responses to the City of Redlands' comments on the Draft Environmental Impact Report (EIR) for the Harmony Specific Plan (dated May 5, 2014), there remain a number of unresolved issues in the EIR that have not been adequately addressed in the Response to Comments letter. The following summarizes the City of Redlands' comments on the Response to Comment Letter prepared by the City of Highland, the Harmony Specific Plan – Supplemental Traffic Analysis (dated August 18, 2014, prepared by LSA) and the Harmony Specific Plan Air Quality Technical Report (dated August 2014, prepared by Environ International Corporation). Staff requests that the Final EIR for the Harmony Specific Plan should not be certified until the following deficiencies in the Final EIR have all been adequately addressed and either mitigated to a level of less than significant, or lessen the potential impacts as best possible.

**TRAFFIC ANALYSIS COMMENTS**

**NEW COMMENT ON RESPONSE TO COMMENT 19-C**

The response states that all CMP intersections with more than 50 trips were included in the analysis, but fails to address City of Redlands concern about impacts on intersections and roadways within Redlands. How does the Project mitigate its impacts to non-CMP intersections and roadways with collector or higher classification where the Project contributes 50 or more peak hour trips?

**NEW COMMENT ON RESPONSE TO COMMENT 19-D**

As the Project trip distribution has not been updated in the Supplemental Traffic Analysis, the response fails to address the comment that some of the Project traffic projected to use SR-38 would use San Bernardino Avenue, which provides direct access to SR-210 Freeway.

**NEW COMMENT ON RESPONSE TO COMMENT 19-F**

The response states that Redlands Unified School District (RUSD) has an open enrollment policy and therefore students from the Project are likely to be distributed among the available schools. However, the RDEIR does not evaluate the potential impacts of the students likely being distributed among various schools in the City of Redlands. The trip distribution assumptions in the supplemental traffic analysis does not take into account the likely travel patterns that reflect the distribution of Project's students to various schools in the City of Redlands. The supplemental traffic analysis should be revised to fully evaluate the Project's potential impacts to the roadways and intersections in the vicinity of schools.

**NEW COMMENT ON RESPONSE TO COMMENT 19-K AND 19-L**

The responses do not clarify why additional intersections on Lugonia Avenue west of Orange Avenue were not included in the analysis although Figure 15 from the TIA shows 105 PM peak hour Project trips west of Orange Street on Lugonia Avenue.

**NEW COMMENT ON RESPONSE TO COMMENT 19-M**

The comment is consistent with Caltrans Guide for the Preparation of Traffic Impact Studies (December 2002). Caltrans traffic study guidelines state that if 50 to 100 peak hour trips are assigned to a State highway facility and, affected State highway facilities are experiencing noticeable delay; approaching unstable traffic flow conditions (LOS "C" or "D"), then the State facility has to be included in the analysis.

**NEW COMMENT ON RESPONSE TO COMMENT 19-N**

The TIA acknowledges that SBTAM was not available when the analysis was done and states "...forecast volumes on major roadways from the Modified SCAG model used for this project are very similar to those forecast by the SBTAM" (page 6). Additional information or back-up is not provided to substantiate this claim.

**NEW COMMENT ON RESPONSE TO COMMENT 19-P**

Although the methodology for determining vehicular delay and LOS in HCM 2010 may be similar to HCM 2000, HCM 2010 has several enhancement to take into consideration the effects of pedestrians and bikes on intersection operations. This is critical in particular at locations with high pedestrian activity (eg., near schools).

**NEW COMMENT ON RESPONSE TO COMMENT 19-S**

Please include the select zone plots for the study area intersections in the Appendix of the Supplemental Traffic Analysis.

**NEW COMMENT ON RESPONSE TO COMMENT 19-V**

While it is true that the installation of the traffic signal should be based on signal warrant analysis conducted prior to the installation, it is common for traffic studies to include volume based signal warrant analysis based on future forecasts to determine locations where traffic signals would be potentially required. It appears that recommendations for installation of traffic signal have been made solely based on delay and LOS, not considering the traffic signal warrant analysis.

**NEW COMMENT ON RESPONSE TO COMMENT 19-W**

CMP guidelines state lane utilization factors of 1 may be used as the lane group approaches a volume to capacity (v/c) ratio of 1.0. However, the EIR traffic study uses a lane utilization factor of 1.0 for all study area intersections, even when the v/c ratio is not approaching 1.0.

**NEW COMMENT ON RESPONSE TO COMMENT 19-X**

CMP guidelines state that optimized signal timing/phasing have to be used for future signal analysis, unless assumed to be in a coordinated system. The intersections have not been analyzed as part of coordinated network in the EIR traffic study. Even the closely spaced freeway ramp intersections, which are typically analyzed in Synchro have been analyzed as isolated intersections. Therefore, it is recommended that optimized signal timings be used consistent with CMP guidelines.

Further, the response does not clarify why the splits were not optimized for a given cycle length in the analysis.

**COMMENTS ON SUPPLEMENTAL TRAFFIC ANALYSIS**

**TEXAS STREET / PIONEER AVENUE INTERSECTION ANALYSIS**

The Supplemental Traffic Analysis shows the intersection of Texas Street and Pioneer Avenue is currently operating at LOS "C" during AM peak hour. This intersection located adjacent to Citrus Valley High School experiences significant delays. Queues extending to Orange Street have been observed during AM peak hour. The methodology used to calculate delay and LOS does not take into account stopped delay due to spill back and the effect of pedestrian crossings on the intersection operations. Recent traffic studies in City of Redlands have found this intersection to be operating at LOS "F" during AM peak hour.

The analysis needs to be modified to correct the delay and LOS. The Project has to pay its fair share towards the required improvements at the intersection.

### **DELAY AND LOS FOR FUTURE PHASES**

The delay shown for several study intersections during AM peak hour for Phase III, Phase IV, Phase V and Year 2035 with Project conditions (Tables E through K) are lower than delay shown for Existing conditions (Table B), Phase I (Table C) and Phase II (Table D).

How will the delay and LOS get better with increasing traffic for subsequent phases and years, especially at all-way-stop controlled intersections? Please review the analysis and correct as necessary. If any additional impacts are found based on modified Phase III, Phase IV, Phase V and Year 2035 analyses, recommend appropriate mitigation measures.

### **AIR QUALITY / GREEN HOUSE GAS ANALYSIS COMMENTS**

#### **NEW COMMENT ON RESPONSE TO COMMENT 19-KK**

The response states that the greenhouse gas emissions have been re-calculated using CalEEMod 2013.2.2 and even provides supplemental tables in Response 19-KK that claim GHG emissions were further reduced by using CalEEMod 2013.2.2.

The response states that the revised GHG modeling CalEEMod outputs are included as Attachment B to the FEIR.

The FEIR fails to produce Attachment B and a review of all the RDEIR files and technical appendices available on the City's website do not include Attachment B. As such, there is no way to verify the validity of the revised GHG emissions. This information should be provided to the City of Redlands and public at large for review.

#### **Failure to Utilize GHG Reduction Targets Specified in Executive Order B-30-15**

Governor Brown recently issued an executive order to establish an even more ambitious GHG reduction target. Executive Order B-30-15<sup>13</sup> requires emissions reductions above those mandated by AB 32 to reduce GHG emissions 40 percent below their 1990 levels by 2030. 1990 statewide GHG emissions are estimated to be approximately 431 million MTCO<sub>2</sub>e (MMTCO<sub>2</sub>e).<sup>14</sup> Therefore, by 2030 California will be required to reduce statewide emissions by 172 MMTCO<sub>2</sub>e (431 x 40%), which results in a statewide limit on GHG emissions of 259 MMTCO<sub>2</sub>e. 2020 "business-as-usual" levels are estimated to be approximately 509 MMTCO<sub>2</sub>e.<sup>15</sup> Therefore, in order to successfully reach the 2030 statewide goal of 259 MMTCO<sub>2</sub>e, California would have to reduce its emissions by 49 percent below the "business-as-usual" levels.

This 49 percent reduction target should be considered as a threshold of significance against which to measure Project impacts. Because the proposed Project is not anticipated to undergo additional development prior to 2030, the 2030 goals are applicable to any evaluation of the Project's impacts

(p. 4.3-29). An updated RDEIR should be prepared to demonstrate the Project's compliance with these more aggressive measures specified in Executive Order B-30-15. Specifically, the Project should demonstrate, at a minimum, a reduction of 49 percent below "business-as-usual" levels. It should be noted, however, that this reduction percentage is applicable to statewide emissions. As a result, an additional analysis would need to be conducted to translate the new statewide targets into a project-specific threshold against which Project GHG emissions can be compared. An environmental impact report should be prepared to quantify any reductions expected to be achieved by mitigation measures, shown by substantial evidence that such measures will be effective and should demonstrate how these measures will reduce the emissions below the new 2030 significance threshold. (S)

#### **NEW COMMENT ON RESPONSE TO COMMENT 19-MM**

The response does not fully address the request to provide a specific examination of the impacts of diesel and criteria pollutant exhaust emissions on neighborhoods in Redlands.

First, we acknowledge that the RDEIR includes a localized emissions analysis for construction activity. However the response is incorrect in stating that a localized emissions analysis is not required since the project does not include stationary source and/or on-site mobile equipment. The South Coast Air Quality Management District's (SCAQMDs) *Final Localized Significance Threshold Methodology* (June 2003), clearly states that localized emissions from construction and operational activity should be considered. Page 1-4 of the guidance explicitly requests that operational activity be evaluated and simply notes that the primary source of operational emissions "include but are not limited to" stationary sources and/or on-site mobile equipment. Given that the Project will generate a substantial amount of passenger cars and delivery trucks that have the potential to idle. These emissions should be considered and operational LSTs should be included in a revised document.

Similarly, the response dismisses the original request to determine potential impacts from diesel exhaust by stating that the Project is not a truck stop, warehouse/distribution center, or transit center. Notwithstanding, the response to comment itself clearly indicates that the guidance being cited actually states that a diesel health risk assessment should be conducted for uses including the aforementioned but clearly states that these are simply examples and this is not an all-inclusive list. The Project has the potential to generate a substantial amount of vehicular trips of which include diesel vehicles specifically associated with commercial deliveries. These emissions should be quantified and a health risk assessment should be prepared as previously requested.

#### **NEW COMMENT ON RESPONSE TO COMMENT 19-NN**

The response does not fully address the request to provide a cumulative analysis for both construction and operational activity. Further, the response underscores recent CEQA case law in the City of Visalia Walmart Project where the Court found that the EIR deficient for purposes of cumulative toxic air contaminant discussion. In the Visalia case, the Court directed the City to select a cumulative threshold

to apply to cumulative analysis that should be undertaken actually explicitly stated that the City could not solely rely on the local air districts rules for determining significance. As such, the City of Highland is directed to evaluate the City of Visalia Walmart's EIR and discussion on cumulative projects.

#### **NEW COMMENT ON RESPONSE TO COMMENT 19-OO**

We disagree with the responses assertion that no methodology exists for determining significance of overlapping construction and operational activities. In fact, the South Coast Air Quality Management District (SCAQMD) has explicitly commented on other EIR's and asked for an inclusion of overlapping activity for determining significance.

For example, the SCAQMD as recently as June 2015 has commented on Projects (see Comment #1 at <http://www.agmd.gov/docs/default-source/cega/comment-letters/2015/june/deirenrada.pdf>) as follows:

*"In the Draft EIR, project construction is planned to start in 2015 with project occupancies anticipated to begin in 2018 reaching buildout in 2024. Construction activities would occur for up to nine years with the project being built out in phases or all at once. That would create the situation with on-going construction continuing while portions of the project becoming operational causing construction and operation air quality impacts to overlap. If construction and operational phases will overlap, the construction activity could contribute more PM10 fugitive dust emissions to the combined total emissions with the remaining emissions, i.e., NOx, CO, SOx and PM10 (exhaust) sources being contributed from both short and long term activities substantially increasing total project emissions. The SCAQMD therefore recommends that the Lead Agency determine the worst-case construction and operational daily air quality impact scenario; total the construction and operational emission estimates together; and then compare those totals with the SCAQMD operational daily significance thresholds in the Final EIR. The reasoning is that the proposed nine year construction period is a long period of time making the project emissions overlapping from 2018-2024 with project occupancies seemingly more long-term in nature. Therefore, the use of the operational daily significance thresholds approach would be more conservative than separating the emissions and comparing the short- and long-term estimates to the respective SCAQMD recommended daily significance thresholds."*

As recommended by SCAQMD, the operational significance threshold should be used for overlapping activities when determining significance. Since the RDEIR fails to use this approach, the potential impacts from construction and operational activity have been understated and revisions are required.

#### **NEW COMMENT ON RESPONSE TO COMMENT 19-TT**

We have identified several additional mitigation measures that the RDEIR failed to incorporate, which would further reduce the Project's operational NOx emissions, potentially to a less than- significant

level. Therefore, until all feasible mitigation is reviewed and incorporated into the Project design, operational NOx emissions cannot be considered as significant and unavoidable.

Mitigation measures that should be considered in a revised DEIR include the following measures recommended in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*<sup>1</sup>, which provides recommended methods for quantifying emissions reductions for criteria air pollutants, such as NOx and other ozone precursors. These measures should include:

*Increase Transit Accessibility*

Transit-oriented development and having transit near the project site will facilitate the use of transit by people traveling to or from the project site. The use of transit results in a mode shift and therefore reduced vehicle miles traveled (VMT). The following features will increase transit accessibility:

- A transit station/stop with high-quality, high-frequency bus service located within a 5-10 minute walk (or roughly ¼ mile from stop to edge of development), and/or
- A rail station located within a 20 minute walk (or roughly ½ mile from station to edge of development)
  - Fast, frequent, and reliable transit service connecting to a high percentage of regional destinations.
  - Neighborhood designed for walking and cycling.

*Provide Pedestrian Network Improvements*

Pedestrian network improvements provide pedestrian access networks that internally link all uses and connect to all existing or planned external streets and pedestrian facilities contiguous with the project site. This will minimize barriers to pedestrian access and interconnectivity and physical barriers such as walls, landscaping, and slopes that impede pedestrian circulation will be eliminated. This results in people driving less and thus a reduction in VMT.

*Provide Traffic Calming Measures*

Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. Project design will include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways will be designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others. This will result in a decrease in VMT.

*Provide Bike Parking on Project Site*

Providing short-term and long-term bicycle parking facilities to meet peak season maximum demand, along with other mitigations measures to encourage bicycling can result in a decrease in VMT. This

<sup>1</sup> <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

measure is more effective with encouraged bicycling by providing strengthened street network characteristics and bicycle facilities.

#### *Limit Parking Supply*

This mitigation measure will change parking requirements and types of supply within the Project site to encourage “smart growth” development and alternative transportation choices by Project employees. This can be done using the following strategy:

- Elimination (or reduction) of minimum parking requirements;
- Creation of maximum parking requirements; and
- Provision of shared parking.

#### *Unbundle Parking Costs from Property Costs*

The Project could unbundle parking costs from property costs. Unbundling separates parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space. An assumption is made that the parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces. Additionally, an assumption is made that this will promote walking/bicycling, use of public transit, or carpooling to avoid additional parking costs.

#### *Implement Commute Trip Reduction Program*

The Project could implement a voluntary Commute Trip Reduction (CTR) program with employers to discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The main difference between a voluntary and a required program is:

- Monitoring and reporting is not required
- No established performance standards (i.e. no trip reduction requirements)

The CTR program will provide employees with assistance in using alternative modes of travel. The CTR program should include all of the following to apply the effectiveness reported by the literature:

- Carpooling encouragement
- Ride-matching assistance
- Preferential carpool parking
- Flexible work schedules for carpools
- Half time transportation coordinator
- Vanpool assistance
- Bicycle end-trip facilities (parking, showers and lockers)

Other strategies may also be included as part of a voluntary CTR program, though they are not included in the reductions estimation and thus are not incorporated in the estimated VMT reductions. These include: new employee orientation of trip reduction and alternative mode options, event promotions



and publications, flexible work schedule for all employees, transit subsidies, parking cash-out or priced parking, shuttles, emergency ride home, and improved on-site amenities.

*Implement Subsidized or Discounted Transit Program*

This Project could provide subsidized/discounted daily or monthly public transit passes. The Project may also provide free transfers between all shuttles and transit to participants. These passes can be partially or wholly subsidized by the employer or development. Many entities use revenue from parking to offset the cost of such a Project.

*Provide End-of-Trip Facilities*

Providing "end-of-trip" facilities for bicycle riders that include showers, secure bicycle lockers, and changing spaces encourage the use of bicycling as a viable form of travel to destinations, especially to work. End-of-trip facilities provide the added convenience and security needed to encourage bicycle commuting.

*Encourage Alternative Work Schedules*

Encouraging alternative work schedules reduces the number of commute trips and therefore VMT traveled by employees. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks. The table below, taken from the *Moving Cooler: an Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions*, summarizes the reduction in commuter vehicle trips based on employee participation and work schedule.<sup>2</sup>

	Employee Participation				
	1%	3%	5%	10%	25%
	% Reduction in Commute VMT				
9-day/80-hour work week	0.07%	0.21%	0.35%	0.70%	1.75%
4-day/40-hour work week	0.15%	0.45%	0.75%	1.50%	3.75%
telecommuting 1.5 days	0.22%	0.66%	1.10%	2.20%	5.5%
<b>Source: Moving Cooler Technical Appendices, Fehr &amp; Peers</b> <b>Notes: The percentages from Moving Cooler incorporate a discount of 25% for rebound effects. The percentages beyond 1% employee participation are linearly extrapolated.</b>					

<sup>2</sup> <http://www.reconnectingamerica.org/assets/Uploads/2009movingcoolerexecsumandappend.pdf>



*Implement Transit Access Improvements*

Improving access to transit facilities through sidewalk/ crosswalk safety enhancements and bus shelter improvements will encourage the use of public transportation to and from the Project site and decrease VMTs.

*Prohibit Gas Powered Landscape Equipment*

Electric lawn equipment including lawn mowers, leaf blowers and vacuums, shredders, trimmers, and chain saws are available. When electric landscape equipment is used in place of conventional gas-powered equipment, direct emissions from natural gas combustion are replaced with indirect emissions associated with the electricity used to power the equipment.

*Implement Lawnmower Exchange Program*

When electric and rechargeable battery-powered lawnmowers are used in place of conventional gas powered lawnmowers, direct emissions from fuel combustion are displaced by indirect emissions associated with the electricity used to power the equipment. The indirect emissions from electricity generation are expected to be significantly less than the direct emissions from gasoline or diesel fuel combustion. Since the magnitude of the emissions reduction depends on the equipment model (including electric power efficiency and battery recharge time), hours of operation, fuel displaced, and number of lawnmowers replaced, the exact emissions reduction is not quantifiable at this time. Therefore, this mitigation measure should be incorporated as a Best Management Practice to allow for educated residents and commercial tenants to reduce their contribution to emissions from landscaping. Many California Air Districts, including eight air districts supported by the CARB Lawn and Garden Equipment Replacement (LGER) Project, already have lawnmower exchange programs in place. This Best Management Practice could involve participating in these established lawnmower exchange programs, supplementing the established programs, or implementing a new program for the Project. The Project Applicant should check with the local air district regarding participating in established programs. The Project Applicant could take quantitative credit for this mitigation measure if detailed and substantial evidence were provided.

All feasible mitigation, including the above measures, should be considered in a revised DEIR in an effort to further reduce the Project's operational NOx emissions, potentially to a less-than-significant level.

## **NOISE COMMENTS**

### **New Comment on Response to Comment 19-BBB**

As indicated in New Comment on Response 19-D above, the Project trip distribution has not been updated in the Supplemental Traffic Analysis, and the response fails to address the City of Redlands' comment that some of the Project traffic projected to use SR-38 would use San Bernardino Avenue,

which provides direct access to SR-210 Freeway; which is largely a residential corridor. Thus, the Final EIR fails to evaluate the potentially significant increase in CNEL to the existing residential noise environment in this area along San Bernardino Avenue.

## CONCLUSION

In conclusion, the City of Redlands is requesting that the Final EIR fails to adequately address the comments provided by the City of Redlands, as demonstrated in this letter, and the Final EIR should not be certified unless and until the significant issues identified have been addressed in the Final EIR, including the appropriate mitigation necessary to either mitigate the potential impacts to a less than significant level, or lessen the potential impacts as best possible.

Further, the City of Redlands is requesting receipt of any and all CEQA and public hearing notices regarding the Harmony Specific Plan and EIR. If you have any questions concerning the above comments, please contact me at (909) 798-7562 or by e-mail at: [rddalquest@cityofredlands.org](mailto:rddalquest@cityofredlands.org).

Sincerely,



Robert D. Dalquest, AICP  
Assistant Director

CC: Larry Mainez, Community Development Director  
Kim Stater, Assistant Community Development Director  
N. Enrique Martinez, Redlands City Manager  
Oscar Orci, Redlands Development Services Director

## Comment Letter 19– City of Redlands

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May 5, 2014

Kim Stater, City Planner  
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Re: Comments on Draft EIR for Harmony Specific Plan

Dear Ms. Stater:

This letter is in regards to the Notice of Availability of a Draft EIR (referred to as "EIR") for the Harmony Specific Plan that was received by the City of Redlands. The City would like to thank you for the opportunity to comment on the EIR. The following provides the City of Redlands' comments and concerns on the deficiency in the EIR relative to the potential significant impacts to the City of Redlands in the following areas: traffic and transportation, air quality, climate change, noise and aesthetics.

19-A

**I. TRAFFIC AND TRANSPORTATION:**

The following summarizes comments on the Traffic Impact Analysis (TIA) prepared for the Harmony Specific Plan ("Project") by LSA (dated March 17, 2014). Upon review of the EIR and TIA, several deficiencies are noted and the City of Highlands' failure to provide relevant documentation and analysis as to the project's potential to impact traffic, circulation, and pedestrian activity within the City of Redlands' street system and infrastructure necessitate preparation of a more detailed analysis.

19-B

The following comments underscore concern for the project's potential to meet the test of significance, and the technical inadequacy of the EIR under the California Environmental Quality Act (CEQA). As currently constructed the TIA and EIR fail as an informational document and the revisions herein may necessitate recirculation of the EIR and associated appendices.

**TRAFFIC IMPACT ANALYSIS REVIEW**

The EIR inadequately assesses the potential traffic impacts in the City of Redlands resulting from the proposed project, especially in light of the following:

19-C

- The proposed project is estimated to generate more than 33,000 daily vehicle trips, of which a significant portion are anticipated to travel through the City of Redlands, yet the project fails to provide adequate mitigation measures to address impacts to intersections within the City of

Redlands. If fact, the only intersection under the jurisdictional control of the City of Redlands identified in the TIA is the intersection of Orange Street at Lugonia Avenue (SR-38). 19-C cont.

- Furthermore, the project TIA fails to analyze potential impacts to intersections and roadway segments in the City of Redlands along San Bernardino Avenue, which provides direct access to the SR-210 Freeway, and is a parallel travel route to SR-38. This deficiency in the EIR and TIA is especially concerning since the City of Redlands formally requested analysis of these facilities during consultation with the traffic study preparer during the traffic study scoping process. 19-D

A more detailed summary of the numerous deficiencies of the analysis is provided below. The TIA is not divided into chapters and section numbers are not provided. As such, the review comments are presented for relevant section headers consistent with the TIA.

#### PROJECT DESCRIPTION

1. On Page 1, the third paragraph states 3,515 residential units in the discussion of the Project description, however the first bullet point after the third paragraph states 3,466 residential units. It is unclear which residential unit count is utilized in the TIA. Additional analysis may be needed to fully disclose the Project's potential impacts as vehicle trips associated with residential units may be understated. 19-E
2. The Project proposes to include an elementary school to serve students of the community, while the trip distribution likely includes travel patterns associated with the Project and elementary school, it is unclear how trip distribution to other middle school and high schools have been accounted for. It is our understanding that residents of the Project could likely be served by Citrus Valley High School. Please clarify which middle school and high schools will serve the Project as this may alter the Project's trip distribution patterns and result in additional undisclosed impacts in the City of Redlands. 19-F
3. The Project description states a 600 student elementary school is proposed, however Table D Trip Generation states an 832 student elementary school is proposed. Although this may not necessarily result in additional external vehicle trips, the TIA and EIR fail to provide a consistent project description as required under CEQA. 19-G
4. It is unclear how the square footage of the commercial/retail uses were derived by phase, this information should be provided in the Project Description. It is unclear how square footages were derived and which Floor Area Ratio's (FAR's) were used and whether or not these are consistent with the City's adopted zoning code. 19-H

## ANALYSIS METHODOLOGY

### STUDY AREA DETERMINATION

The study area is not consistent with the requirements of County of San Bernardino Congestion Management Program (CMP), Caltrans and recommendations by City of Redlands based on review of the Project's traffic study scoping document.

5. When the scoping document was reviewed by City of Redlands, the staff recommended that the intersections along San Bernardino Avenue from the project site to SR-210 Freeway ramps should be included in the analysis. The intersections along San Bernardino Avenue have not been evaluated in the TIA. No rationale is provided as to why the request was ignored. The TIA fails to provide analysis that could identify potential impacts and therefore the EIR fails to provide appropriate mitigation measures related to the Project's impacts on intersections along San Bernardino Avenue in the City of Redlands. 19-I
6. The TIA fails to evaluate the impacts on the intersections in the vicinity of Citrus Valley High School in the City of Redlands. Analysis at the intersection of Orange Avenue and Pioneer Street was recommended for evaluation when the scoping document was reviewed. This intersection will clearly be impacted by Project traffic traveling to and from the Citrus Valley High School (which will likely serve the Project). The TIA fails to analyze this intersection or the Project's potential impacts to the intersections in the vicinity of the Citrus Valley High School and consequently fails to provide appropriate mitigation measures that may be required in the City of Redlands. 19-J
7. The TIA does not analyze all the intersections with 50 or more peak hour Project trips as required by San Bernardino County CMP guidelines. The CMP guidelines state that analysis of projects in isolated areas with few access routes should be continued until 50-trip threshold is met. It is our understanding that the TIA limits non-CMP study area intersection analysis to a 5-mile radius from the Project site. This rationale fails to disclose potential impacts beyond a 5-mile radius that are likely to occur given the size of the Project. The Project is determined to be of regional significance as defined by CEQA and therefore limiting the study area to 5-miles is not appropriate and likely understates impacts that will occur beyond a 5-mile radius. 19-K
8. Phase V trip distribution (Figure 8) shows 3% of Project traffic on Lugonia Avenue west of Orange Avenue and 2% of Project traffic on Orange Avenue south of Greenspot Road. This equates to about 105 and 70 PM peak hour Project trips respectively. All the intersections along Lugonia Avenue west of Orange Avenue and along Orange Avenue south of Greenspot Road where the Project contributes more than 50 peak hour trips should be analyzed to comply with CMP and CEQA requirements. As currently constructed, the TIA and EIR fail to disclose potential impacts to study area intersections, no discussion is provided as to why these intersections in the City of Redlands were ignored in the analysis. 19-L
9. The study area for Freeway analysis does not comply with Caltrans requirements. Freeway segments where the Project adds more than 100 two-way peak hour trips have been included in 19-M

the study area. However, Caltrans requires inclusion of freeway segments where the Project adds 50 or more peak hour trips. Therefore the TIA and EIR fail to disclose the Project's potential impacts to the state highway system.

19-M  
cont.

#### DEVELOPMENT OF TRAFFIC MODEL

10. The TIA does not use the most recent modeling tool available for the development of the traffic model. The TIA states that the forecast volumes are based on Modified Southern California Association of Government (SCAG) Regional Transportation Plan (RTP) model. It is recommended that the latest San Bernardino Traffic Analysis (SBTAM) be used to develop the traffic forecasts and distribution patterns.

19-N

Use of the outdated SCAG RTP model has the potential to understate long-range traffic forecasts and is not the most relevant tool available for use. It is recommended that the analysis be revised based on the available SBTAM modeling tool. Although the text states that the SCAG RTP and SBTAM model forecasts are "similar" no information is provided to substantiate this claim. Further information should be included that provides clear evidence that forecasts are not understated.

#### EXISTING (2011) TRAFFIC VOLUMES

11. The traffic volumes used are 3 to 4 years old and do not comply with Caltrans requirements which state that Existing traffic volumes should be based on data not older than two years. Use of outdated data can potentially understate traffic impacts and underscore the analysis that was prepared.

19-O

#### DEVELOPMENT OF PHASE I, II, III, IV AND V WITHOUT PROJECT TRAFFIC VOLUMES

12. The TIA may have understated background traffic for interim years. The background traffic volumes at the study area intersections for interim years were developed by interpolating between 2011 and 2035 traffic volumes. The CMP recommends each jurisdiction's growth rates should be used for intersections and segments within that jurisdiction. The TIA and EIR do not provide rationale for why a background growth rate was ignored. It is recommended that a minimum background growth of 2% per year (compounded) be used for interim year background traffic forecasts which is consistent with standard traffic engineering practice.

#### LEVEL OF SERVICE DEFINITIONS AND PROCEDURES

13. Although certain jurisdictions still allow Highway Capacity Manual (HCM) 2000 methodologies to be used, HCM 2010 methodologies, which have been in use for several years are recommended for intersection analysis as well as freeway mainline and ramp merge / diverge analysis.

19-P

#### LEVEL OF SERVICE STANDARDS / PERFORMANCE CRITERIA

14. For freeway facilities, a LOS standard "E" has been utilized to determine impacts in the TIA and

19-Q



EIR however, the Caltrans Traffic Impact Study (TIS) guidelines state that "Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D".." Therefore the significance thresholds for impacts to the freeway system appear to be misstated; use of the incorrect threshold for determining impacts to freeway facilities likely understates traffic impacts and required mitigation that may be needed.

19-Q  
cont.

## PROJECT TRAFFIC

### PROJECT TRIP GENERATION

15. The text on page 11 states ITE Trip Generation (8th Edition) rates were used, whereas the footnote on Table C states ITE Trip Generation (9th Edition) rates were used. Please provide clarification as to which rates were used as this may have an impact on the intersection analysis.
16. The TIA understates the trip generation from commercial uses. The trip generation rates for Shopping Center should be based on regression equation from the ITE Trip Generation (9th Edition), especially for the PM peak period, as the average rates used understates the trips for the proposed size of commercial uses. It appears as though the PM peak period trips related to commercial use may be understated by a magnitude of 200 or more trips.
17. The peak hour trip rates for City Park are shown as zero. Other sources such as SANDAG rates or local counts should be used to determine peak hour City Park trip rates. The analysis as prepared, understates traffic impacts since it does not include ANY traffic associated with City Park.

19-R

### TRIP DISTRIBUTION AND ASSIGNMENT

18. The select zone run plots are not provided for the entire study area. Only external distribution at the Project entrance is shown in the model plots provided in Appendix A. In order to provide full disclosure in the TIA and EIR, the select zone model plots for the entire study area, including San Bernardino Avenue, Orange Avenue and Pioneer Avenue should be provided.
19. The trip distribution presented in the TIA does not represent likely travel patterns based on adjacent cumulative uses and available parallel routes. The trip distribution shows the majority of trips using Greenspot Road and SR-38. However, some Project trips are likely to use parallel routes such as San Bernardino Avenue and Pioneer Avenue, either to avoid congestion or as a diverted trip to destinations such as retail shopping and schools. The trip distribution presented in the TIA does not take into account possible trips to the Citrus Valley High School located at the northeast corner of Texas Street and Pioneer Avenue in Redlands. Revising the trip distribution to account for the above routes and analysis of the intersections along San Bernardino Avenue from the Project to SR-210 ramps may reveal additional traffic impacts in the City of Redlands that have not been fully disclosed.

19-S

19-T

### INTERSECTION ANALYSIS (ALL SCENARIOS)

The TIA does not use the recommended parameters for the intersection analysis inputs.

20. For two-way stop (TWSC) intersections, LOS / delay for the worst approach is reported, this has the potential to understate the actual traffic impacts. It is recommended that the analysis report LOS / delay for the worst movement in lieu of the worst approach consistent with standard engineering practice. 19-U
21. The TIA does not provide any signal warrant analysis based on California MUTCD for the unsignalized study area intersections. It is unclear whether or not the TIA and EIR consider which unsignalized intersections would warrant a traffic signal. As constructed the TIA and EIR fail to provide information that has the potential to understate traffic impacts and also the potential traffic safety concerns of not providing traffic signals where they may be warranted. 19-V
22. Lane Utilization factor 1 has been used for all intersections, which likely overstates the capacity of multi-lane groups. CMP guidelines recommend use of default Lane Utilization Factor from HCM unless the v/c ratio for the lane group is approaching 1. 19-W
23. The cycle lengths and splits are not optimized. A cycle length of 100 seconds has been used for all intersections. It is recommended that existing signal timing be used for interim year intersection analysis. If existing signal timing is not available, the optimized cycle length should be used based on default input parameters. Use of non-optimized cycle lengths may understate the potential traffic impacts on certain turning movements. 19-X
24. The overall intersection PHF values are not provided in the count data sheets for some intersections. This information has the potential to affect intersection analysis and should be provided for purposes of full disclosure. 19-Y
25. The TIA does not address the likely pedestrian impacts on all the study area intersections. A minimum green time of 10 seconds has been used for a majority of the intersections. This does not provide adequate time for pedestrian clearance. The delay and LOS should be calculated with minimum green based on reasonable time provided for pedestrian clearance for signalized intersections with crosswalks. Use of inadequate minimum green time likely understates the impacts at certain intersections within the study area. 19-Z

### CIRCULATION IMPROVEMENTS

26. The TIA ignores potential impacts on intersections along San Bernardino Avenue from the Project to SR-210 Freeway ramps. Improvements to mitigate the Project's direct and cumulative impacts for intersections along San Bernardino Avenue in the City of Redlands are not presented in the TIA or EIR. 19-AA
27. The TIA or EIR does not recommend any mitigation to the City of Redlands intersections except for one (Orange Street / SR-38). Given the size of the Project and its proximity to the City of 19-BB

Redlands, intersections as mentioned previously should be analyzed and improvements should be provided to mitigate the Project impacts. 19-I  
con

**FUNDING OF IMPROVEMENTS AND FAIR SHARE COST ESTIMATES**

28. The fair share percentage has been calculated based on Project percentage of total growth from the outdated 2011 traffic counts to 2035. The fair share percentage values are likely to increase based on the correct growth factors if they were based on current existing traffic count volumes. 19-C

29. The improvement cost calculations do not indicate if any inflation factor has been applied to the cost estimates used to reflect current costs.

**FREEWAY ANALYSIS**

Several deficiencies are noted related to the freeway analysis that likely understate the Project's potential impacts and may not fully disclose impacts as required by CEQA.

30. The Freeway mainline analysis does follow the HCM 2010 methodology. The Freeway mainline analysis is based on v/c ratio. It is recommended that the density and LOS be calculated based on HCM 2010 methodology for Basic Freeway Segments. 19-D

31. The Freeway Ramp Merge / Diverge analysis does follow the HCM 2010 methodology. The analysis is based on older HCM 2000 methodology.

32. The Freeway analysis understates the likely impacts as a PHF of 0.98 has been used in Freeway Ramp Merge / Diverge analysis. Caltrans TIS guidelines require the analysis to be performed using a PHF of 0.92. 19-E

33. The influence of adjacent ramps has not been considered in the Ramp Merge / diverge analysis. 19-F

34. The Freeway off-ramp queuing analysis has not been provided. 19-G

**QUEUING ANALYSIS ON GREENSPOT ROAD**

35. It is not clear from the TIA or EIR where the worksheets for the queuing analysis results presented in Tables GGGG and HHHH are included. 19-H

**CONSTRUCTION TRAFFIC**

36. Based on the size of the Project and overlapping schedule of various phases, significant construction related employee as well as truck traffic is expected to use the existing transportation infrastructure in the City of Redlands. The TIA does not provide any information or analysis of the expected construction traffic and its potential to impact intersections in the City of Redlands. 19-II

37. Given the substantial amount of construction traffic and more specifically truck traffic related

to vendor and hauling related trips, the TIA and EIR fail to provide analysis and discussion on the adequacy of study area roadways to support substantial amounts of truck traffic based on pavement wear and tear. A Traffic Index (TI) calculation for the truck traffic should be provided and mitigation for pavement due to wear and tear from the expected construction truck traffic should be required. The TIA and EIR fail to provide a rationale for why a TI calculation was not prepared and impacts to pavement on roadways in the City of Redlands due to wear and tear from construction truck traffic, as well as project operational vehicle traffic, is ignored.

19-II  
cont.

## II. AIR QUALITY & CLIMATE CHANGE

The following summarizes comments on the Air Quality Technical Report (AQTR) (dated January 13, 2014) and Climate Change Technical Report (CCTR) (dated December 20, 2013) prepared for the Harmony Specific Plan by ENVIRON.

Upon review of the EIR and associated documents, several deficiencies are noted and the City of Highland's failure to provide relevant documentation and analysis as to the project's potential to impact air quality and climate change necessitate preparation of a more detailed analysis.

19-JJ

The following discussion underscores concern for the project's potential to meet the test of significance, and the technical inadequacy of the EIR under the California Environmental Quality Act (CEQA). As currently constructed the AQTR, CCTR, and EIR fail as an informational document and the revisions herein may necessitate recirculation of the EIR and associated appendices.

### GENERAL COMMENTS

1. Both the Air Quality Technical Report and Climate Change Technical Report utilize an outdated version of the California Emissions Estimator Model (CalEEMod). The EIR utilizes the CalEEMod 2011.1.1 version to estimate construction and operational impacts. CalEEMod 2011.1.1 relies on the EMFAC2007 and OFFROAD2007 emission inventories for the state.

It should be noted that *several* updated versions of CalEEMod were released prior to publication of the AQTR, CCTR, and EIR. Notably, the CalEEMod 2013.2 was released in July 2013, the purpose of the updated model was the use of the latest emission factors available from the California Air Resources Board (CARB), notably EMFAC2011 and OFFROAD2011. The model also corrected several errors in input and output parameters related to CalEEMod 2011.1.1. It should also be noted that CalEEMod 2013.2.1 was released in September 2013 and finally the most recent version of CalEEMod 2013.2.2 was released in October 2013.

19-KK

The AQTR, CCTR, and EIR must be revised to utilize the most recent version of CalEEMod. The AQTR, CCTR, and EIR as constructed rely on an outdated model that has since been revised three times (even before publication of the EIR). Use of an outdated model may result in understating potential impacts and/or inadvertent errors and omissions that have been corrected with the most recent versions of CalEEMod.

2. Both the AQTR and CCTR are difficult to follow and have references to tables and exhibits at the back of the report. It is recommended that the report be revised to include tables after pages where they are referenced. The document as constructed makes it difficult to review and potential understand for both technical professionals and the public at-large. 19-LI
3. The air quality impacts addressed in the EIR should include specific examination of the impacts of diesel and criteria pollutant exhaust emissions on neighborhoods in Redlands adjacent to the roadways that will carry vehicle and truck traffic from the proposed Project. 19-MI
4. The cumulative effect of construction and operational activity emissions on neighborhoods in Redlands is not provided in the EIR. 19-N

#### EXECUTIVE SUMMARY

5. The AQTR executive summary provides both construction and operational emissions estimates. It is our understanding that the Project construction will be "phased". There is no discussion regarding the potential overlap from construction and operational activities. This overlapping scenario of construction and operational activities would likely provide a reasonable worst-case estimate of emissions that are likely to occur. Therefore the report, as constructed understates potential impacts. 19-OI
6. The AQTR relies on outdated air monitoring station values from years 2008, 2009, and 2010. More recent data from 2011, 2012, and 2013 is available and should be utilized. Use of outdated data has the potential to understate significant impacts that may occur related to criteria air pollutant concentrations. 19-P

#### PROJECT DESCRIPTION

7. There are inconsistencies between the Project description land uses in the AQTR and CCTR when compared to the Traffic Impact Analysis report.
8. The project description does not include relevant discussion on the different modeled phases and different land use types that were modeled. A review of the outdated version of CalEEMod outputs makes it difficult to determine if the correct land uses were evaluated or not. Some of the outdated CalEEMod reporting limitations have since been corrected in the most recent versions of the model available, as previously discussed and use of the latest version of the model would likely provide a clearer picture of what was modeled for purposes of full disclosure. 19-QC

#### CONSTRUCTION EMISSIONS AND MITIGATION MEASURES

9. The CalEEMod outputs show emissions generated for various phases of construction activity during "trenching" however no such mention exists in the AQTR write up. Please provide clarification on how construction activity was modeled. 19-RF
10. The AQTR cites an ARB load factor adjustment of 33% due to an "overestimation of load factors", 19-SS

although we do not dispute that the previous version of CalEEMod overstates load factors, use of the correct (recent) version of CalEEMod would not have required the AQTR to make off-model adjustments that are not supported by model documentation and have been frequently questioned by the SCAQMD<sup>1</sup>.

19-SS  
cont.

11. Construction activity emissions will significantly exceed the criteria pollutant thresholds established by the South Coast Air Quality Management District (SCAQMD) for emissions of VOCs and NOx which are ozone precursors. Notwithstanding, the AQTR and EIR provide NO MITIGATION to reduce these impacts to the maximum extent possible as required under CEQA.

In fact, the only two "mitigation" measures listed reference back to compliance with SCAQMD Rule 403 for fugitive dust and SCAQMD Rule 1113 regarding architectural coatings.

19-TT

The AQTR and EIR fail to provide any relevant mitigation measures to reduce the Project's emissions of VOCs and NOx which far exceed the established thresholds. The AQTR and EIR provide no rationale as to why no mitigation is being offered. Simply relying on two regulatory requirements cannot be a substitute for mitigation.

The SCAQMD provides reference to several mitigation measures that have the potential to reduce the Project's impacts to VOCs and NOx to less than significant levels: [http://aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://aqmd.gov/ceqa/handbook/mitigation/MM_intro.html). These mitigation measures should be included in the FEIR.

12. The AQTR and EIR do not provide any information on the potential overlap of construction phases with the exception of Phase 4 and Phase 5.

19-UU

#### OPERATIONAL EMISSIONS AND MITIGATION MEASURES

13. The AQTR, CCTR, and EIR state that: "The estimated emissions also reflect the Project's commitment to construct buildings that are 35% more energy efficient than the 2008 Title 24 part 6 building code"

It should be noted that the 2013 Title 24 part 6 building code requirements were adopted prior to completion of the AQTR, CCTR, and EIR publication. The reference to "35% more energy efficient than the 2008 Title 24 part 6 building code" is misleading. The EIR implies that the Project in some way through project design and/or in good faith is exceeding the applicable Title 24 standards, however a 35% efficiency beyond 2008 Title 24 is essentially a REQUIREMENT after the 2013 Title 24 standards go into effect for buildings constructed after July 1, 2014.

19-VV

<sup>1</sup> <http://www.aqmd.gov/ceqa/igr/2012/January/MNDiohnWnorth.pdf>: "Currently, it is the AQMD staff's understanding that CARB does not approve of reducing the default settings in the current OFFROAD2007 at a project level because the 33% reduction in statewide emissions of diesel exhaust is not necessarily reflected in individual pieces of equipment. In fact, for some equipment types, OFFROAD2007 may underestimate emissions while others may be overestimated." ...

14. Operational emissions will substantially exceed the applicable criteria pollutant emission thresholds established by SCAQMD for emissions of VOCs, NOx, CO, and PM10. However as with construction emissions, NO MITIGATION is provided to reduce these impacts to the maximum extent possible as required under CEQA.

The AQTR, CCTR, and EIR should be revised to include appropriate mitigation measures to reduce impacts to the maximum extent possible. The SCAQMD ([http://aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)) and CAPCOA (<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>) provide several mitigation measures that should be considered to minimize impacts as required under CEQA.

19-W

15. The AQTR appears to include a CO Hotspots screening assessment in the appendices, however there is no discussion in the AQTR on the applicability and use of this screening procedure and how impacts are determined to be less than significant. The AQTR simply says impacts are less than significant and refers back to the appendices. Additional discussion is necessary to substantiate this claim.

19-X)

16. The CCTR appears to erroneously take credit for the statewide goal of 75% solid waste diversion without providing rationale on how this will be implemented on a Project-level. Taking credit for this measure in the modeling has the potential to overstate the actual reductions that will occur. It is our opinion that this measure should not be included without justification, if this measure is removed, it is likely that the Project would not achieve the applicable reduction targets and may necessitate additional mitigation or a finding of significant impacts.

19-Y

17. The CCTR appears to list several "project design features" that are actually "mitigation" options within CalEEMod however no discussion on how these measures will be enforced is provided. Furthermore, it is unclear based on the use of the outdated CalEEMod version how or which mitigation options were enabled. It is recommended that the latest version of CalEEMod be used to determine the Projects emissions and that the "Mitigation Output Report" be provided that will summarize all the changes to model defaults and enabling of mitigation measures.

19-Z

18. The AQTR, CCTR, and EIR should be revised based on the latest version of CalEEMod, as previously discussed. Use of the latest version of CalEEMod may result in new impacts that have not already been disclosed and/or mitigated. If new impacts are identified it is possible that recirculation of the EIR may be required.

19-AA

### III. NOISE

The EIR does not adequately address the potentially significant noise impacts generated from the increase in vehicular and construction traffic that will be generated by the Harmony Specific Plan during the AM and PM peak hours and throughout the day. The residents in the City of Redlands that reside along the streets that will receive a significant amount of traffic will be significantly impacted. As

19-BE

indicated in the Traffic and Transportation section of this letter, the trip distribution shows the majority of trips using Greenspot Road and SR-38. However, some Project trips are likely to use parallel routes such as San Bernardino Avenue and Pioneer Avenue, either to avoid congestion or as a diverted trip to destinations such as retail shopping and schools. The trip distribution presented in the TIA does not take into account possible trips to the Citrus Valley High School located at the northeast corner of Texas Street and Pioneer Avenue in Redlands. Thus, these residential areas may be significantly impacted by noise generated from an increase in vehicular trips and construction trips through these neighborhoods. The City of Redlands' General Plan provides for a maximum 60 dBA CNEL exterior noise environment that is measured at the property line in residential areas. The EIR fails to analyze the impacts of this threshold of significance in these identified areas.

19-BB

#### IV. AESTHETICS

The EIR fails to evaluate the cumulative light and glare impacts from the significant increase in vehicle trips through the residential streets in Redlands. The project will contribute to the alteration of the lighted character of residential neighborhoods in Redlands, and potentially add to the creation of significant nighttime light and glare impacts. Cumulative development would result in ongoing changes to the visual character of these neighborhoods and pose a potentially significant impact.

19-CC

In conclusion, it is the City of Redlands' opinion that the EIR fails to adequately address the issues mentioned in this letter, as well as the appropriate mitigation necessary that either mitigates the impact to a less than significant level or lessens the impact as best possible. Further, the City of Redlands is requesting receipt of any and all CEQA and public hearing notices regarding the Harmony Specific Plan and EIR. Lastly, the City of Redlands is requesting that the residents in the City of Redlands who will be impacted by the increased traffic be sent CEQA and public hearing notices concerning this project. If you have any questions concerning the above comments, please contact me at (909) 798-7562 or by e-mail at: [rddalquest@cityofredlands.org](mailto:rddalquest@cityofredlands.org).

19-DD

Sincerely,



Robert D. Dalquest, AICP  
Assistant Director

CC: N. Enrique Martinez, City Manager  
Oscar Orci, Development Services Director



## Response to Comment Letter 19– City of Redlands

### Response to Comment 19-A:

Comment noted.

### Response to Comment 19-B:

No substantial evidence is provided in this comment letter to support the allegation that the EIR and *Traffic Impact Analysis* (TIA) are deficient or fail as informational documents. As shown in the below responses, the EIR and TIA provided a thorough analysis of potential Project-related impacts.

### Response to Comment 19-C:

The Project’s trip distribution was based on the use of a modified SCAG model and all CMP intersections with more than 50 trips were included in the analysis (DEIR, p. 5.16-4). This approach is consistent with CMP guidelines and City procedures. In accordance with the CMP guidelines, the TIA evaluated eight intersections in the City of Redlands. Six of these intersections are also subject to Caltrans jurisdiction. **Table 5.16-C** of the DEIR will be modified as shown below for these eight intersections to clarify the agency with jurisdiction.

**Table 5.16-C – Existing (2011) Conditions Intersection LOS**

Intersection	Jurisdiction	LOS Standard	Control	Existing LOS	
				AM Peak Hour	PM Peak Hour
22. Orange St/SR-38	City of Redlands / Caltrans	C	Signal	C	C
23. Orange St/Colton Ave	City of Redlands	C	Signal	B	B
26. Orange St/ Pearl Ave	City of Redlands	C	Signal	B	B
27. Church St/SR-38	City of Redlands / Caltrans	C	Signal	C	C
28. University St/SR-38	City of Redlands / Caltrans	C	Signal	A	B
31. Judson St/SR-38	City of Redlands / Caltrans	C	Signal	B	B
32. Dearborn St/SR-38	City of Redlands / Caltrans	C	Signal	B	B
33. Wabash Ave/SR-38	City of Redlands / Caltrans	C	Signal	C	C
40. Newport Ave/SR-38	City of Redlands / Caltrans	C	TWSC	Does Not Exist	Does Not Exist

In fact, as shown in DEIR **Table 5.16-J**, the only intersection under jurisdiction of the City of Redlands that requires mitigation is intersection 19, Orange Street/SR-38. With the development of Phase II (2017) of the proposed Project, this intersection is projected to operate at level of service (LOS) D in the AM peak hour (DEIR, p. 5-16-47). In year 2021, this intersection is projected to operate at LOS D in the AM peak hour without Project traffic (DEIR, p. 5.16-52)

**Response to Comment 19-D:**

As stated in Response to Comment 19-C, above, all CMP intersections with more than 50 trips were evaluated in the TIA and DEIR. However, to address the concerns in this comment, the City of Highland conducted supplemental traffic analysis of intersections along San Bernardino Avenue and recirculated portions of the DEIR.

Pursuant to State *CEQA Guidelines* Section 15088.5(f)(2), the City of Highland need only to respond to: (1) comments received during the initial circulation period for the DEIR that relate to chapters or portions of the document that were not revised and recirculated, and (2) comments received during the recirculation period that relate to the chapters or portions of the RDEIR. Portions of section 5.16 of the RDEIR and the Harmony Specific Plan – Supplemental Traffic Analysis prepared by LSA in August 2014 (RDEIR Appendix Q.1) addressed the topics in this comment.

**Response to Comment 19-E:**

The TIA analysis evaluated 3,466 dwelling units (DU), consistent with the Project land use plan, as shown in Table D of the TIA. Reference to 3,515 units is a typographical error. The analysis in the TIA is not understated and no additional analysis in this regard is required.

**Response to Comment 19-F:**

The Project site is within the boundaries of the Redlands Unified School District (RUSD), the agency with the authority to determine school attendance boundaries. Based on the current boundary maps available on the RUSD website, the Project's students would attend the Mentone Elementary School until the on-site school is available, the Moore Middle School, and Redlands East Valley High School. However, RUSD has an open enrollment policy. Therefore, students are likely to be distributed among the available schools. These schools are all outside the City of Highland.

Given the variety of factors taken into consideration by RUSD in developing its school attendance boundaries and enrollment and that the City does not have any authority in such determination, trip distribution would be speculative. Nonetheless, the City of Highland conducted supplemental traffic analysis of intersections that would be used to access Redlands East Valley High School and recirculated portions of the DEIR. As stated in Response to Comment 19-D, above, the City need not respond to comments on the DEIR if the comments relate to portions of the DEIR that were recirculated.

**Response to Comment 19-G:**

The TIA analysis evaluated 832 students, based on student generation factors provided by RUSD, as shown in Table D of the TIA. Reference to 600 students is a typographical error. The analysis in the TIA is not understated and no additional analysis in this regard is required.

**Response to Comment 19-H:**

The square footages were calculated based on FARs proposed in the Specific Plan, which range from 0.23 to 0.25 (DEIR, Table 3-B, p. 3-16). It is unclear what the commenter means by the question regarding the City's adopted Zoning Code.

A Zone Change is a part of the proposed Project applications. The City will consider Zone Change No. ZC 011-003 to change the existing zoning classification from Planned Development to "Harmony Specific Plan SPR 011-001." (DEIR, p. 3-17)

As described in Section 1.2 of the Specific Plan, the Harmony Specific Plan changes the zoning on the Project site from Planned Development to Harmony Specific Plan thereby establishing the Harmony Specific Plan as the zoning regulations for the Project site.

**Response to Comment 19-I:**

During the TIA scoping process, the City of Redlands requested analysis of intersections along San Bernardino Avenue since it was the City's understanding that the students from the Project would attend Citrus Valley High School. However, based on consultation with RUSD, the students from the project are likely to be distributed to Redlands East Valley High and Citrus Valley High. This was discussed with the City during the scoping process and the City of Redlands agreed to the assumptions verbally. However, at the request of the City, although minimum trip thresholds are not met, the San Bernardino Corridor has been analyzed in a separate memo and included in the recirculated portions of the DEIR. As stated in Response to Comment 19-D, above, the City need not respond to comments on the DEIR if the comments relate to portions of the DEIR that were recirculated.

**Response to Comment 19-J:**

See Response to Comment 19-F and Response to Comment 19-I, above.

**Response to Comment 19-K:**

The TIA analyzes all CMP intersections with more than 50 trips and does not restrict the study area to 5 miles. As stated on page 4 of the TIA and page 5.16-4 of the DEIR:

The project would not contribute more than 50 trips to any CMP intersection beyond a 5-mile radius. However, the project would add more than 100 two-way peak hour trips to freeway segments beyond the 5-mile radius established by SANBAG. Therefore, this analysis includes locations where the project would generate more than 100 trips on freeway segments beyond the 5-mile radius.

**Response to Comment 19-L:**

As stated in Response to Comment 19-K, above, the TIA analyzes all CMP intersections with more than 50 trips and does not restrict the study area to 5 miles.

However, at the request of the City, although minimum trip thresholds are not met, the intersections of Texas Street/Pioneer Avenue, Orange Street/Pioneer Avenue, Orange Street/San Bernardino Avenue, and three intersections on Colton Avenue were analyzed in a separate memo and included in the recirculated portions of the DEIR. As stated in Response to Comment 19-D, above, the City need not respond to comments on the DEIR if the comments relate to portions of the DEIR that were recirculated.

**Response to Comment 19-M:**

The comment is incorrect that Caltrans requires inclusion of freeway segments where a project adds 50 or more peak hour trips. As stated in the SANBAG CMP,<sup>20</sup> "... the study area must include all freeway links with 100 or more peak-hour project trips (two-way)." (SANBAG CMP, p. C-4). The CMP process was vetted and approved by Caltrans. Therefore, the TIA and the EIR adequately analyzed the Project's impacts to the state highway system.

**Response to Comment 19-N:**

The commenter may be confused between the RTP model and the CTP (Comprehensive Transportation Plan, also known as the RivSan Model) model. The CTP model is outdated and SCAG does not support the CTP model any longer. At the time the TIA analysis was initiated, SBTAM was not completed. The Project TIA was based on the RTP model, which is the basis of the SBTAM meaning the underlying socioeconomic data for the RTP model and the SBTAM are the same. The SCAG model was modified, in part, to include additional cumulative projects not reflected in the base model (TIA, p. 6). Therefore, the TIA and the EIR did not use understated forecast volumes.

**Response to Comment 19-O:**

Traffic counts were conducted in May 2014 at several roadway segments in the area. Based on the data obtained, the traffic volumes in 2014 are very similar to and primarily less than the traffic volumes observed in 2011, as shown in the table below. Therefore, the TIA did not understate the Project's traffic impacts.

Intersection	AM Peak			PM Peak		
	Peak Hour Volume	2011 TIA Traffic Count	Percent Change	Peak Hour Volume	2011 TIA Traffic Count	Percent Change
Lugonia Ave. east of Orange St.	793	948	-16%	1,035	1,160	-11%
University St. south of Lugonia Ave.	578	587	-2%	676	624	8%
Greenspot Rd. between Boulder & Orange Aves.	2,083	2,443	-15%	1,826	2,294	-20%
Greenspot Rd. west of Garnet St.	254	309	-18%	253	312	-19%

Regarding the statement that the TIA may have understated the background traffic in interim years is incorrect. Prorated growth based on the traffic model was used in the TIA. While the growth from the traffic model was different in different segments, a comparison of total intersection approaches between 2011 and the 2015 "without project conditions" shows that the growth in traffic was a little over 2% per annum during the a.m. peak hour and a little over 2.5% per annum during the p.m. peak hour. Therefore, the commenter's concern regarding minimums growth rates purported to be "standard traffic engineering practice" are met.

<sup>20</sup> [http://www.sanbag.ca.gov/planning2/cmp/cmp\\_app-c\\_02-09.pdf](http://www.sanbag.ca.gov/planning2/cmp/cmp_app-c_02-09.pdf)

**Response to Comment 19-P:**

At the time the TIA was started in 2010, HCM2000 was in use and HCM2010 was not published. The City of Redlands is familiar with the SANBAG CMP. The CMP states that HCM2000 methodologies should be used for operational analyses (SANBAG CMP, p. C-12). In addition, the City of Redlands has utilized HCM2000 methodologies for projects within its jurisdiction as late as 2013. In addition, based on the Transportation Research Board (TRB), there is no change in methodology in HCM2010 from HCM2000.<sup>21</sup> The only changes besides a multimodal approach, according to TRB are: (1) for Signalized intersections, HCM2010 can model actuated signals and incremental queue accumulation; (2) for TWSC intersections, HCM2010 can analyze six lane streets which HCM2000 could not; and (3) for AWSC intersections, a queue estimation model has been included. The findings of the TIA for intersections in Redlands, City of Highland, Yucaipa or the County of San Bernardino do not include any of the above scenarios and are therefore anticipated to remain unchanged due to the updated methodology.

**Response to Comment 19-Q:**

The SANBAG CMP guidelines state that freeway segments should be mitigated to LOS E. This has been common practice in District 8, where even for its own projects, the district uses LOS E as a standard for Freeway Mainline Operations. Further, in discussions with Caltrans during the TIA scoping process, it was recommended by the district that the CMP guidelines be used for freeway facilities.

**Response to Comment 19-R:**

Regarding comment 15 in the comment letter, the TIA analysis utilized trip generation from ITE's 9<sup>th</sup> Edition, as shown in Table C of the TIA and discussed on page 5.16-31 of the DEIR. Reference to the 8<sup>th</sup> Edition is a typographical error. No additional analysis in this regard is required.

Regarding comment 16 in the comment letter, a trip generation analysis was conducted using fitted curve rates (regression method) for all uses at which fitted curve equations were available. The results shown in the table below indicate that the net trip generation of the Neighborhood Commercial Overlay alternative was calculated to be 2,087 trips in the AM peak hour, 2,415 trips in the PM peak hour, and 27,533 daily trips. For the "without neighborhood commercial overlay alternative" the corresponding trip generation forecasts are 2,074 trips in the AM peak hour, 2,415 trip in the PM peak hour and 26,172 daily trips. The trip generation using the fitted curve equations is less than the trip generation used in the TIA, which evaluated 2,350 trips in the AM peak hour, 3,496 trips in the PM peak hour, and 33,749 daily trips (DEIR, Table 5.16-l). Therefore, the TIA presents a worst case analysis since it overestimates the impacts of the Project with a higher trip generation.

<sup>21</sup> <http://onlinepubs.trb.org/onlinepubs/trnews/trnews273HCM2010.pdf>

**Fitted Curve Trip Generation**

	Project Without NC Overlay			Project With NC Overlay		
	AM Peak	PM Peak	Daily	AM Peak	PM Peak	Daily
<b>Gross Trip Generation</b>	<b>2,871</b>	<b>3,190</b>	<b>34,105</b>	<b>2,960</b>	<b>3,725</b>	<b>39,871</b>
<b>Internal Trips</b>						
Residential	399	314	3,269	436	491	5,185
City Park	0	0	52	0	0	52
Recreation Center	33	44	541	33	44	541
Elementary School	334	112	955	334	112	955
Commercial	31	157	1,721	69	334	3,637
<b>Total Internal</b>	<b>797</b>	<b>627</b>	<b>6,538</b>	<b>872</b>	<b>981</b>	<b>10,370</b>
Pass-By Trips (Retail Only)	0	148	1,395	0	207	1,968
<b>Net Trip Generation</b>	<b>2,074</b>	<b>2,415</b>	<b>26,172</b>	<b>2,087</b>	<b>2,536</b>	<b>27,533</b>

Regarding comment 17 in the comment letter, trips to the park are anticipated to be internal to the Project because they are likely to be used by residents of the Project (TIA, Table D). It is not anticipated that trips to the park will be made through the City of Redlands. However, larger recreational facilities that may draw external trips were included within the Project trip generation. Trip generation and distribution was performed for uses that may generate external trips, such as the park in Planning Area 44 (TIA Table D). Therefore, the analysis in the TIA and EIR accurately evaluated traffic impacts from the Project.

**Response to Comment 19-S:**

Select Zone Plots for the entire study area are included in Appendix A of the TIA. It appears the commenter only reviewed the plots for the internal analysis.

As stated in Response to Comment 19-D, above, the City of Highland conducted supplemental traffic analysis of intersections along San Bernardino Avenue and recirculated portions of the DEIR.

As requested, the select zone plots for intersections including San Bernardino Avenue, Orange Avenue, and Pioneer Avenue were provided to the City of Redlands.

**Response to Comment 19-T:**

Refer to Response to Comment C, above. Further, trip distribution used in the TIA was provided to the City of Redlands during the TIA scoping process and no comments were received in that regard.

**Response to Comment 19-U:**

HCM2000 states that LOS for two-way stop controlled (TWSC) intersections should not be based solely on the worst movement. As stated in HCM2000, "At TWSC intersections the critical movement, often the minor street left-turn, may control the overall performance of the intersection." If only the worst movement is considered, an unacceptable level of service at the intersection may be triggered when the volume of traffic does not meet any of the MUTCD volume or delay warrants for signalization. The traffic analysis took this into account and exercised caution when analyzing the TWSC intersections to accurately reflect the level of service at these intersections, as recommended in HCM2000

methodology. Therefore, the impacts were analyzed consistent with standard engineering practice. It should be noted that several analyses in Redlands also include worst approach (not worst movement) as the metric (e.g. the Downtown Redlands Specific Plan EIR).

Also, under future conditions, most TIA intersection locations are signalized. Only three intersections (external to the Project) under Existing Plus Project "with improvements" are two way stop controlled intersections: Greenspot Rd-Garnet St./Newport Ave., Orange St/I-10 WB Ramps, and Bryant St/SR-38 (TIA Table S).

**Response to Comment 19-V:**

The request is premature. Standard traffic engineering practice for installation of a traffic signal is that a signal warrant analysis is conducted prior to installation of the traffic signal. However, as stated in the California MUTCD (Section 4C.01 Studies and Factors for Justifying Traffic Control Signals), the satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal. Traffic signals should not be installed unless one or more of these eight warrants are satisfied. Because these are minimum requirements, satisfaction of a warrant is not necessarily justification or a mandate for a traffic signal. Delay, congestion, crash experience, confusion, or other evidence of the need for right-of-way assignment must be shown. Geometric changes which may eliminate the need for a signal should be considered. The decision to install a traffic signal should not be based solely upon the warrants, since the installation of a traffic signal may increase certain types of collisions, and increase delays to pedestrians, bicyclists and drivers who use the intersection. Further, DEIR Table 5.16-J identifies and recommends locations where traffic signal warrants will be evaluated. Thus, the TIA and EIR evaluated the potential safety concerns related to traffic signals.

**Response to Comment 19-W:**

Lane Utilization factors account for the unequal use of lanes when there are two or more lanes. When lane use isn't balanced, i.e., there isn't equal traffic in each lane, the analysis needs to account for this fact. Lane Utilization factors from HCM were used in the TIA, consistent with CMP guidelines. The CMP guidelines state that lane utilization factors of 1 may be used as the lane group approaches a volume to capacity (v/c) ratio of 1.0. Due to the high traffic volumes, the v/c ratio was calculated at 1 or very close to 1. Therefore, an appropriate lane utilization factor was used in accordance with the CMP Guidelines and capacity was not overstated; thus, no modification to the TIA or DEIR is required.

**Response to Comment 19-X:**

Standard traffic engineering practice is to keep the same cycle length along a particular corridor to allow better progression of traffic. Use of optimized timing for intersections along one corridor makes traffic flow along the corridor worse, although each intersection appears to work better on paper. Therefore, a consistent cycle length has been used in the TIA and does not understate the potential traffic impacts.

**Response to Comment 19-Y:**

The peak hour factors (PHFs) are included for existing intersections in Appendix E of the TIA. PHF of 0.95 has been used for intersections that do not exist. Thus, the TIA disclosed the PHF used in the analysis.

**Response to Comment 19-Z:**

Minimum green times in the TIA were used based on the MUTCD at intersections where pedestrian activity was observed. At intersections where pedestrian activity was not observed, the minimum green times were based on SANBAG guidelines. This is acceptable since at locations where no pedestrian activity was observed over a four hour period, it is unlikely that pedestrian calls would occur at every cycle to cross the major street. Assuming a cycle length of 100 seconds (36 cycles per hour), a 10 second minimum green time equates to 360 seconds per hour. This would allow 10 pedestrian calls per hour long enough to cross approximately 9 lanes of traffic. Cycles at which pedestrian calls occur will have a LOS that is worse than reported, however, over the course of the hour, the results will be similar to those reported in the analysis. Therefore, impacts on intersections evaluated in the TIA were not understated.

**Response to Comment 19-AA:**

See Response to Comment 19-C, above. As stated in Response to Comment 19-C, above, all CMP intersections with more than 50 trips were evaluated in the TIA and DEIR. San Bernardino Avenue is forecast to have less than 50 peak hour trips. However, to address the concerns in this comment, the City of Highland conducted supplemental traffic analysis of intersections along San Bernardino Avenue and recirculated portions of the DEIR.

Pursuant to State *CEQA Guidelines* Section 15088.5(f)(2), the City of Highland need only to respond to: (1) comments received during the initial circulation period for the DEIR that relate to chapters or portions of the document that were not revised and recirculated, and (2) comments received during the recirculation period that relate to the chapters or portions of the RDEIR. Portions of section 5.16 of the RDEIR and the Harmony Specific Plan – Supplemental Traffic Analysis prepared by LSA in August 2014 (RDEIR Appendix Q.1) addressed the topics in this comment.

**Response to Comment 19-BB:**

See Response to Comment 19-C, above. Eight intersections within the City of Redlands were analyzed and only one (Orange Street/SR-38) required improvements. For year 2021 traffic conditions without the proposed Project, the Orange Street/SR-38 intersection would operate at LOS D in the AM peak hour. The City of Highland conducted supplemental traffic analysis of intersections along San Bernardino Avenue and recirculated portions of the DEIR.

**Response to Comment 19-CC:**

As stated in Response to Comment 19-O, above, the 2011 counts are very similar to 2014 counts. Therefore, the assertion that the fair share values are likely to increase is incorrect.

Inflation factors were not used in the improvement cost calculations. The cost estimates in the TIA are based on the SANBAG CMP factors. However, it should be noted that fees cover most circulation improvements, as reflected in **Table 5.16-J** of the DEIR.



**Response to Comment 19-DD:**

Please see Response to Comment 19-P, above, regarding HCM2000 vs. HCM2010 methodology. HCM2000 has been used for locations within a 5-mile radius. The HCM states that v/c ratio is an acceptable metric to evaluate freeway operations.

**Response to Comment 19-EE:**

The TIA was prepared pursuant to SANBAG CMP Guidelines. The SANBAG CMP Guidelines recommend using a PHF of 0.98 for freeway analyses (SANBAG CMP, p. C-14). Caltrans District 8 also uses a PHF of 0.98 for freeway operations analyses.

**Response to Comment 19-FF:**

According to the HCM, "Ramps on four-lane, eight-lane, and ten-lane freeways are always analyzed as isolated merge or diverge areas. The nature of the procedure for predicting v12 makes the four-lane case trivial, and data are insufficient to determine the effects of adjacent ramps on eight-lane and ten-lane freeways". In the study area, there are two merge/diverge areas with 6 lanes:

- I-10 EB Live Oak Canyon Road On-Ramp
- I-10 WB Live Oak Canyon Off-Ramp

The reasons for not including adjacent ramp analyses for these locations are discussed in detail below:

In the eastbound direction, the next off ramp has minimal traffic as it services a rest area. Therefore, the equilibrium separation distance ( $Leq$ ) between ramps described by the formula  $Leq = Vd / (0.1096 + 0.000107 La)$  where  $Vd$  is the demand at the adjacent ramp and  $La$  is the distance between ramps is minimal. Hence, the distance between ramps is greater than the  $Leq$ . Under such cases, the HCM recommends using "Equation 1" which disregards the presence of upstream (or downstream) ramps.

The presence of upstream or downstream ramp for off-ramps is not discussed in the HCM in much detail. However, the basic principle remains the same. In the westbound direction, the distance between County Line Road and Live Oak Canyon Off Ramp is two miles (10,560 feet). The traffic volume in 2030 is 1500 per hour at the on ramp (according to the Freeway Corridor Specific Plan TIA). Under 2030 conditions, the calculated  $Leq$  is equal to 1,210 feet. Since the distance between the two ramps is 2 miles,  $La \gg Leq$ . Based on the HCM, again, Equation 1 is recommended for use. As stated earlier, Equation 1 is the equation that disregards the presence of adjacent ramps.

**Response to Comment 19-GG:**

Freeway off-ramp queuing is included in the intersection analyses. The intersection LOS reports (TIA Appendix E) shows these numbers. Further, there are no thresholds for queues in either Caltrans or SANBAG guidelines. Queue details are included in the ramp termini analyses (TIA Appendix E). It should be noted that neither Redlands nor any other jurisdiction in San Bernardino County has requested this analysis in the past.

**Response to Comment 19-HH:**

The queuing analysis results are from the LOS worksheets, included in Appendix E of the TIA.

**Response to Comment 19-II:**

The Project is anticipated to be built out in five phases, as analyzed in the TIA. Within each phase, several construction activities (i.e., grading, building construction, paving) will occur and some of them may overlap (DEIR Table 5.3-C). This potential overlap was evaluated in the air quality and greenhouse gas (GHG) emissions analyses. As shown in Table 5.3-E of the DEIR, no soil import or export is anticipated during Project grading, which is due to site topography. The number of construction worker and vendor trips and truck trips were also accounted for in the air quality and (GHG) emissions analyses based on CalEEMod program defaults and the Project's off-road construction equipment list. The total number of one-way construction worker and vendor trips estimated to occur if overlap of each Project construction phase (including all construction activities) overlaps is 3,269 trips per day. As shown in Table 5.16-I of the DEIR, the Project total daily traffic generated at Project build-out is 33,749 trips per day. This means that total daily construction-related trips are approximately 9.7 percent of the Project's operation-related trips. Additionally, the smallest phase will generate more trips than the largest construction trips, even if trucks are converted to passenger car equivalents (PCEs). Traffic volumes during operations will be significantly higher than during construction. This is similar to the analysis Redlands conducts for projects. For example, the Redlands Crossing EIR discusses construction traffic but does not discuss any numbers or levels of service. Since the entire Project will not be under construction all at once, the contribution of construction-related trips would not be substantial compared to the existing traffic volumes on local roads and the anticipated traffic volumes including Project-related trips.

Further, in response to a comment provided by the City of Redlands on the Notice of Preparation of this DEIR (July 2012), the DEIR included mitigation measure **MM TRANS 2**, which requires the developer or contractor of implementing development projects within the Harmony Specific Plan to include truck routes in their construction specifications requiring truck access to the Project site through the City of Highland. Therefore, substantial amounts of truck traffic will not be traveling through the City of Redlands to access the Project site and a TI calculation is not necessary. Moreover, calculation of traffic indices is not a requirement for TIAs. The Project is not a truck intensive project and will not generate many trucks during operations. This is consistent to studies for development projects in the City of Redlands, where an EIR does not analyze traffic indices. For example, the Redlands Crossing EIR did not calculate traffic indices. The City does not require warehousing projects within the City, which are more truck intensive uses when compared to the proposed Project, to calculate traffic indices either.

**Response to Comment 19-JJ:**

As documented in the following responses, the DEIR was not technically inadequate and in fact contained a thorough and appropriately detailed analysis and disclosure of the Project's air quality and greenhouse gas (GHG) emissions impacts.

Section 15088.5 of the State *CEQA Guidelines* requires recirculation of an EIR when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification." "Significant new information" requiring recirculation includes, disclosures that: "(1) A new significant environmental impact would result from

the project or from a new mitigation measure proposed to be implemented; (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." As discussed in response to each specific comment raised by this comment letter, with regard to GHG emissions, none of the four factors above have been established by the comment that would require recirculation of this DEIR. The Harmony Specific Plan Project has been described in a manner that provides for meaningful environmental review and comment such that the public and decision makers will be fully informed regarding the scope of the Project and the potential environmental impacts that could result from Project implementation. With regard to air quality impacts, portions of the Air Quality Section of the DEIR (Section 5.3) were recirculated to provide the public and decision makers with adequate review of the updated CalEEMod model output.

**Response to Comment 19-KK:**

The comment correctly states that the Project's *Air Quality Technical Report (AQTR)* and *Climate Change Technical Report (CCTR)* utilize CalEEMod version 2011.1.1. This model version was the available version at the time the analysis was conducted; thus, the DEIR used what was the most appropriate model at that time. The air quality and GHG analysis was updated using the current version of CalEEMod (version 2013.2.2) to address the comment. The results for the GHG analysis are discussed below. The results for the air quality analysis are included in a revised *Air Quality Technical Report* (Appendix C of the RDEIR) and the recirculated portions of the DEIR.

**GHG Results Using CalEEMod (version 2013.2.2)**

The updated GHG emissions inventory showed lower emissions and a higher reduction from the California Air Resources Board (CARB) 2020 NAT scenario than the original results presented in the DEIR. Based on these updated results, the Project still meets the reduction targets established for purposes of reducing GHG emissions consistent with AB 32 (whether one uses ARB's 28.5 percent target or the BAAQMD's 26.2% reduction target for land use driven GHG emissions), for both "with" and "without" the neighborhood commercial (NC) overlay. A summary of these results is included below. The CalEEMod files are included as Attachment B to this FEIR.

**Construction Emissions**

The same assumptions related to construction activity, schedule, off-road equipment mix, and on-road vehicles for worker, and vendor and hauling were used in this analysis. These assumptions are described in Section 5.7 of the DEIR and Appendix G.1 (CCTR). The calculation of total GHG emissions from construction off road emissions is no longer adjusted to account for a 33% reduction attributable to overestimation of load factors, since CalEEMod™ version 2013.2.2 relies upon the OFFROAD2011 model, which has corrected for this issue.

The revised construction-related GHG emissions are shown in the following table. The GHG emissions from construction activities are estimated to be 567 MT CO<sub>2</sub>e/yr (amortized over 30 years). They were previously estimated to be 784 MT CO<sub>2</sub>e/yr.

CalEEMod 2013.2.2 Summary of GHG Construction Emissions

Construction Phase	MT CO <sub>2</sub> e Emissions		
	Equipment	Vehicles	Total
1	3,477	1,423	4,900
2	3,566	1,175	4,741
3	2,329	782	3,111
4/5	3,406	852	4,259
Total	12,779	4,232	17,011
		<b>30-yr Amortized</b>	<b>567</b>

Source: CalEEMod output, Attachment B.

Note: Maximum daily emissions are representative of both the "with" and "without" NC overlay.

### Operational Emissions

The same Project-specific operational assumptions were used in this analysis. These assumptions are described in Section 5.7 of the DEIR and Appendix G.1 (CCTR).

The revised GHG emissions inventory analysis are shown in the following tables, which show the total GHG emissions for construction and operations of the Project and the CARB 2020 NAT scenario for the "with" and "without" NC overlay options, respectively. The Project "with" NC overlay GHG emissions inventory is 75,797 MT CO<sub>2</sub>e per year and the CARB 2020 NAT GHG emissions inventory is 106,463 MT CO<sub>2</sub>e per year. The Project "without" NC overlay GHG emissions inventory is 73,966 MT CO<sub>2</sub>e per year and the CARB 2020 NAT GHG emissions inventory is 103,806 MT CO<sub>2</sub>e per year. The Projects "with" and "without" NC overlay shows an emission reduction of 28.80 and 28.75 percent reduction from the NAT scenarios, respectively. Based on these results, the Project meets the reduction targets established for purposes of reducing GHG emissions consistent with AB 32 (whether one uses ARB's 28.5 percent target or the BAAQMD's 26.2% reduction target for land use driven GHG emissions) for both "with" and "without" the NC overlay options. It is also noteworthy that the revised analysis shows a lower GHG emissions inventory for the "with" and "without" NC overlay options compared to the original analysis presented in the DEIR. The Project "with" NC overlay GHG emissions inventory decreased 7,020 MT CO<sub>2</sub>e per year (or 8.5%), and the Project "without" NC overlay GHG emissions inventory decreased 5,813 MT CO<sub>2</sub>e per year (or 7.3%). Therefore, the analysis contained in the DEIR is more conservative and need not be revised based on the modeling results presented herein.

**CalEEMod 2013.2.2 Summary of GHG Emissions from Project with NC Overlay**

Emission Category	CO <sub>2</sub> e Emissions		% Change from NAT
	2020 Project (MT/yr)	2020 NAT (MT/yr)	
Area	544	809	-32.79%
Energy use	7,610	15,408	-50.61%
Street Lighting	56	141	-60.22%
Water Use	4,681	6,330	-26.05%
Solid Waste Disposed	485	1,008	-51.92%
Traffic	61,551	81,740	-24.70%
<b>Sub-total</b>	<b>74,927</b>	<b>105,436</b>	<b>-28.94%</b>
Construction Amortized	567.02	567.02	0.00%
Vegetation Amortized	302.79	459.30	-34.08%
<b>Total</b>	<b>75,797</b>	<b>106,463</b>	<b>-28.80%</b>

Source: CalEEMod output, Attachment B.

**CalEEMod 2013.2.2 Summary of GHG Emissions from Project without NC Overlay**

Emission Category	CO <sub>2</sub> e Emissions		% Change from NAT
	2020 Project (MT/yr)	2020 NAT (MT/yr)	
Area	570	847	-32.77%
Energy use	7,730	15,051	-48.64%
Street Lighting	56	141	-60.22%
Water Use	4,681	6,330	-26.05%
Solid Waste Disposed	475	988	-51.92%
Traffic	59,584	79,422	-24.98%
<b>Sub-total</b>	<b>73,096</b>	<b>102,780</b>	<b>-28.88%</b>
Construction Amortized	567.02	567.02	0.00%
Vegetation Amortized	302.79	459.30	-34.08%
<b>Total</b>	<b>73,966</b>	<b>103,806</b>	<b>-28.75%</b>

Source: CalEEMod output, Attachment B.

**Response to Comment 19-LL:**

This comment does not raise any environmental issue; however the recommendation to reorganize the AQTR and CCTR to suit the City of Redlands is noted.

Both the AQTR and CCTR meet accepted industry standards for these types of technical reports with regard to organization, content and analytical methodology. It is accepted practice to include tables and exhibits in a separate section at the end highly technical reports, so as to avoid frequent breaks in the narrative especially when there are numerous tables as with the AQTR and CCTR.

Because highly technical reports can be difficult for some technical professionals and the public to understand, Section 15147 of the State *CEQA Guidelines* states that the information contained in an EIR shall include “summarized technical data, maps...and similar relevant information sufficient to permit

full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR.” Section 5.3, Air Quality and Section 5.7, Greenhouse Gas Emissions of the DEIR summarize the analysis within the AQTR and CCTR, respectively. These DEIR sections include the germane data from the tables contained in the technical reports and, as recommended in Comment 19-LL, include the tables after the discussion in which the table is cited to facilitate review by the reader. The AQTR and CCTR were prepared consistent with industry standards and summarized in the DEIR consistent with Section 15147 of the State *CEQA Guidelines*. Therefore, no revision to the AQTR or CCTR to suite a particular reviewer is warranted.

**Response to Comment 19-MM:**

The DEIR contained a thorough and appropriately detailed analysis of the Project’s air quality impacts in accordance with SCAQMD guidance and methodology. The mass daily emissions from both construction and operational activities were disclosed in DEIR Table 5.3-F and 5.3-G, respectively. The criteria pollutant emissions estimates in these tables (which include criteria pollutant emissions from diesel-fueled vehicles) disclose the amount of emissions that will be generated both on the Project site and off-site from the Project’s area-wide traffic, which includes the roadways in the City of Redlands. The results of this regional emissions analysis indicates that the Project’s emissions will exceed applicable SCAQMD thresholds of significance during construction and operation and, as such, will result in a significant impacts to the air quality in the region.

Localized emissions analysis was also conducted using air dispersion modeling for the Project’s construction related emission pursuant to SCAQMD’s Final Localized Significance Threshold Methodology. Dispersion modeling was conducted to evaluate the Project’s construction impacts to the nearest sensitive receptors in the vicinity of the Project site for the following criteria pollutants: NO<sub>2</sub>, CO, PM-10, and PM-2.5 (DEIR, pp. 5.3-16-17). As shown in Figure 3 of the AQTR, residents within the City of Redlands, adjacent to Mill Creek and SR-38, were modeled as sensitive receptors in this analysis. Table 5.3-H of the DEIR shows that the Project’s on-site construction activities will not result in localized impacts to sensitive receptors in the Project vicinity. Localized impacts from the Project’s operational activities were not evaluated because the Project does not include stationary sources (e.g., flares and turbines) and/or on-site mobile equipment. According to SCAQMD methodology, a localized analysis would only apply to the operational phase of a project if the project includes such uses (DEIR, p. 5.3-16). Similarly, a health risk assessment analyzing the cancer risk from mobile source diesel idling and movement was not conducted because the Project does not contain applicable uses (such as, but not limited to trucks stops, warehouse/distribution centers, or transit centers).<sup>22</sup>

Additionally, impacts associated with CO hot spots were evaluated in the DEIR. The Project would not result in the creation of CO hot spots in the Project area because the intersection with the greatest amount of traffic is below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP (DEIR, p. 5.3-19).

<sup>22</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

**Response to Comment 19-NN:**

As described above in Response to Comment 19-MM, the mass daily emissions from both construction and operational activities were disclosed in DEIR Table 5.3-F and 5.3-G, respectively. The results of this regional emissions analysis indicates that the Project's emissions will exceed applicable SCAQMD thresholds of significance during construction and operation and, as such, will result in a significant impacts to the air quality in the region, which includes the neighboring City of Redlands. The SCAQMD considers the project-specific and cumulative significance thresholds to be the same such that projects that exceed the project-specific significance thresholds are cumulatively considerable (DEIR, p. 5.3-23). Further, SCAQMD has identified different thresholds of significance for construction and operational emissions, which are provided in DEIR Table 5.3-B. Because there is no combined SCAQMD threshold for construction and operation emissions, there is no meaningful analysis is provided if both construction and operation emissions are combined.

Nonetheless, Response to Comment 19-OO, below, provides an example of the results of overlapping construction and operational emissions from the proposed Project that indicate emissions of PM-2.5 may exceed the operation threshold when combined with maximum construction emissions.

**Response to Comment 19-OO:**

The AQTR and DEIR analysis do not understate potential air quality impacts and in fact present a conservative analysis of the Project's air quality impacts. The construction emissions estimates were based on conservative assumptions to represent the maximum level of construction activity that may occur on the Project site assuming each piece of equipment is operated for 10 hours per day, 6 days a week and that the entire Project will build-out within approximately nine years (AQTR, p. ES 2; DEIR, p. 5.3-12). Conservative assumptions were also used in the operational emissions estimates related to traffic which assumed that there were no diverted trips (a person going from home to work and on its way making a diversion to shop) and only assumed 12.7% of Project trips were internal (6.8% in the "without" Neighborhood Commercial Overlay)(AQTR, pp. 16-17).

As stated in Response to Comment 19-NN, above, SCAQMD has identified different thresholds of significance for construction and operational emissions. Because there is no combined SCAQMD threshold for construction and operation emissions, there is no meaningful analysis provided if both construction and operation emissions are combined.

Nonetheless, the table below shows a comparison, for informational purposes, of the maximum daily emissions during Project construction combined with maximum operational emission from the Project (represented by the "with NC Overlay" scenario). The table shows that emissions from each criteria pollutant would increase when construction is overlaps with operation. Emissions of PM-2.5 would exceed the construction and operation thresholds of 55 pounds per day, if the maximum construction and operation emissions were combined. However, as stated above, there is no combined threshold of significance and therefore no change in conclusions of the DEIR.

Activity	Maximum Daily Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM-10	PM-2.5
Construction Maximum	108	283	189	0	36	20
Project with NC Overlay	349	575	2,042	6	623	39
Total	457	858	2,231	6	659	59

Source: DEIR Table 5.3-E and 5.3-F.

### **Response to Comment 19-PP:**

The ambient air quality monitoring data utilized in the AQTR was the data available at the time the analysis was conducted. Data for the years 2010, 2011, and 2012 were unavailable when the DEIR was prepared and was presented in DEIR Table 5.3-A. As shown in the table below, the more recent monitoring data, including data for 2013, shows that ambient concentrations of CO and NO<sub>2</sub> are lower than the data used in the AQTR, which provides a more conservative analysis. As discussed in the AQTR, ambient concentrations are not used in the PM-10 and PM-2.5 analysis because the Project is within a non-attainment designation and thus background concentrations for these pollutants are not applicable. Thus, the Project's potential impacts were not understated.

	CO	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM-10	PM-2.5
<b>Carbon Monoxide (CO):</b>						
Max 1-Hour Conc. (ppm)	2	3	2	--	--	--
Max 8-Hour Conc. (ppm)	1.8	1.9	1.7	1.7	1.7	1.7
<b>Nitrogen Dioxide (NO<sub>2</sub>):</b>						
Max. 1-Hour Conc. (ppb)	90	80	69.2	61.9	67.0	72.2
Annual Average (ppb)	21.7	19.6	18.8	16.9	18.8	17.6

Source: DEIR Table 5.3-A and <http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year>

Notes: -- indicates no data available; ppm = parts per million; ppb = parts per billion

Data obtained from Central San Bernardino Valley 2 monitoring station in SRA 34.

### **Response to Comment 19-QQ:**

It is unclear what inconsistencies the comment is referring to. The AQTR, CCTR, and TIA evaluated the same land use plan. Tables 1 and 2 of the AQTR and CCTR provide clear tables of the Project's land uses and the correlation to CalEEMod assumptions.

The CalEEMod 2013.2.2 output used in the revised AQTR and GHG estimates also shows the land uses analyzed.

### **Response to Comment 19-RR:**

The Project's construction emissions estimates include a phase for trenching and installation of underground infrastructure. Tables 5 and 6 of the AQTR clearly identify how the activity was modeled by providing a construction schedule and equipment list. No further clarification is required.

### **Response to Comment 19-SS:**

See Response to Comment 19-KK, above. The revised emissions estimates provided in the RDEIR no longer account for a 33% reduction of load factors since CalEEMod 2013.2.2 relies upon the OFFROAD2011 model, which has corrected the load factor issue.



**Response to Comment 19-TT:**

The SCAQMD website contains the following categories of mitigation measures:

- Fugitive Dust
- Greenhouse Gases
- Harbor Craft
- Locomotives
- Ocean Going Vessels
- Off-road engines
- On-road engines

Of this list, only off-road and on-road engines, fugitive dust, and greenhouse gas emissions apply to the Project. Harbor craft, locomotives, and ocean going vessels are not applicable to this proposed Project. As discussed in Section 5.7 of the DEIR, GHG emission impacts were determined to be less than significant and therefore no mitigation is required. Similarly, Table 5.3-F of the DEIR shows that the Project's fugitive dust emissions from construction are below the SCAQMD thresholds and thus do not require mitigation.

Regarding on-road engine mitigation, Table 10 of the AQTR shows that the on-road vehicle emissions from Project construction are limited. Because the Project site grading balances, no haul truck trips will be required. Therefore, the only on-road vehicle trips are from construction workers and vendors delivering construction materials. Construction worker vehicles are outside the control of the City and the developer and thus infeasible to regulate. Deliveries of materials from vendors may be limited to vendors in the area that may not have new truck fleets. Thus, imposing a restriction that only newer or retrofitted trucks be used would likely result in increased emissions, as new trucks would have to be brought in from distant locations to serve the Project's construction needs. Further, imposing this restriction would not reduce the Project's construction emissions below SCAQMD thresholds it is estimated to exceed (AQTR, Tables 9-11).

Regarding off-road engine mitigation, the SCAQMD website provides information on new and repowered engines and diesel particulate filters (DPF). DPF are not required for this Project because construction emissions do not exceed SCAQMD thresholds for particulate matter. New or repowered engine mitigation is applicable to off-road equipment of all sizes and is classified into four categories, called Tiers. The Tiers correspond to engine emission standards approved by CARB/U.S. Environmental Protection Agency (EPA) between 1996 and 2004, with each Tier becoming more stringent. The RDEIR included a new mitigation measure, **MM AQ 5**, which incorporates Tiered construction equipment similar to that used by the City of Redlands in the EIR for the Redlands Crossing Center. **MM AQ 5** was subsequently determined to be difficult to monitor and has been replaced as shown below to simplify implementation and achieve a more enforceable and effective method to mitigate potential emissions compared to the impacts previously evaluated in the RDEIR.

**MM AQ 5:** During construction, all developers shall use construction equipment (i.e., excavators, graders, scrapers, dozers, tractor/loader/backhoes, pavers, rollers, cranes, etc.) that is CARB/U.S. Environmental Protection Agency Tier 3 certified. Proof of compliance shall be reviewed by the City of Highland's Building Division prior to issuance of grading permit. one of the following scenarios shall be applied:

- ~~A maximum of 15,700 horsepower hours per day for the off road equipment shall be used and the off road equipment shall have Tier 2 engines or higher.~~
- ~~A maximum of 12,100 horsepower hours per day for the off road equipment shall be used.~~

Revised **MM AQ 5** was evaluated by Ramboll Environ (see *Emissions Assessment of Tier 3 Construction Equipment for the Harmony Specific Plan in Highland, California* in Appendix C.3) and as shown in the table below does not result in a new significant impacts or substantial increase in the severity of previously discussed significant impacts compared to those previously evaluated in the RDEIR.

Scenario	VOC	NOx	CO	SO <sub>2</sub>	PM-10 Total	PM-2.5 Total
	Maximum Daily Emissions (lbs/day)					
<b>RDEIR Analysis Results</b>	<b>101</b>	<b>388</b>	<b>291</b>	<b>0.5</b>	<b>35</b>	<b>24</b>
Original MM AQ 5 (15,700 hp-hr/day; Tier 2)	97	162	171	0.3	20	12
Original MM AQ 5 (12,300 hp-hr/day; Tier1)	104	187	242	0.2	21	14
<b>Maximum Daily Construction Emissions Original MM AQ 5</b>	<b>104</b>	<b>187</b>	<b>242</b>	<b>0.3</b>	<b>21</b>	<b>14</b>
<b>Revised MM AQ 5 Maximum Daily Construction Emissions (Tier 3)</b>	<b>97</b>	<b>164</b>	<b>240</b>	<b>0.4</b>	<b>22</b>	<b>14</b>
SCAQMD Threshold	75	100	550	150	150	55
RDEIR Analysis Above Threshold?	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Original MM AQ 5 Above Threshold?	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Revised MM AQ 5 Above Threshold	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
New or Substantial Increase in Severity of an Environmental Impact?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: The maximum daily construction emissions include the off-road equipment emissions and the on-road emissions estimates. The on-road emission estimates change consistent with the off-road equipment mix assumptions. The VOC emissions are primarily due to the VOC emissions from coatings during the architectural coating phase with a secondary contribution from off-road and on-road sources. All of the scenarios incorporate conservative assumptions regarding overlap of various construction activities consistent with the RDEIR analysis.

Source: Appendix C.3, Table 3

**Response to Comment 19-UU:**

See Response to Comment 19-NN, above, regarding the potential for overlapping construction phases and the Project's conservative analysis approach.

**Response to Comment 19-VV:**

The CCTR and DEIR include the discussion of the current 2013 Title 24 standards and disclosed that the 2013 standards are 25 and 30 percent more efficient than the 2008 standards for residential and commercial buildings, respectively (CCTR, p. 12; DEIR, p. 5.7-23). The DEIR also states that the Title 24 standards are updated periodically.

Both the CalEEMod 2011.1.1 and 2013.2.2 model do not include 2013 Title 24 standards; they are based on the 2008 standards. Thus, it was appropriate to include a comparison of the Project's commitment to the 2008 standards, which was correctly noted by the commenter as exceeding 2008 standards by 35 percent. Therefore, the Project's commitment to exceed the 2008 standards by 35 percent is more stringent than the new 2013 standards alone and the Project's analysis is not misleading.

**Response to Comment 19-WW:**

See Response to Comment 19-TT, above, for a list of the mitigation categories provided by SCAQMD. Similar to Project construction, harbor craft, locomotives, and ocean going vessels are not applicable to this proposed Project. Project operation does not result in off-road diesel-fueled equipment usage and therefore the off-road engine category does not apply. As discussed in Section 5.7 of the DEIR, GHG emission impacts were determined to be less than significant and therefore no mitigation is required and a discussion of the applicability of mitigation measures contained within the CAPCOA document "Quantifying Greenhouse Gas Mitigation Measures" cited in the comment is unnecessary.

As shown in **Table 5.3-G** of the DEIR, the majority of the Project's operational emissions are generated by on-road vehicles. These vehicle trips are from residents and customers of the proposed homes and neighborhood commercial uses that cannot be regulated by the City or applicants. On-road vehicles emissions have been reduced to the extent feasible through implementation of Project design features listed in Section 5.3.4 of the DEIR. These design features reduce vehicle trips by incorporating traffic calming features and infrastructure for bicycle, pedestrian, and transit.

**Response to Comment 19-XX:**

The AQTR does include discussion of applicability and use of the screening procedure. As stated in the AQTR and DEIR, the analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin (AQTR, p. 23; DEIR, p. 5.3-19). At buildout of the Project, the highest average daily trips at an intersection would be below the daily traffic volumes evaluated in the 2003 AQMP analysis prepared by SCAQMD that would be expected to generate CO exceedances (AQTR, p. 24; DEIR, p. 5.3-19). SCAQMD's analysis in the 2003 AQMP determined that no intersection would exceed CO standards. Since the Project's average daily traffic is lower than the volumes analyzed in the 2003 AQMP, the Project would not be expected to exceed CO standards. Because the buildout scenario has the highest average daily trips, earlier analysis years would also not result in CO exceedances.

The analysis goes on to state “There is no reason unique to SCAB meteorology to conclude that the CO concentrations at the Boulder Avenue/Greenspot Road intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. The supporting data for this analysis is included in Appendix E.” Therefore, the AQTR and DEIR include ample analysis of the Project’s potential CO hot spot impacts and no additional discussion is necessary.

**Response to Comment 19-YY:**

Contrary to the commenter’s assertion, the Project’s GHG emissions estimates did not “erroneously” take credit for the statewide goal of 75 percent solid waste diversion. As described in the DEIR, “AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state’s policy goal. CalRecycle conducted several stakeholder workshops and published a discussion document in May 2012 titled *California’s New Goal: 75 Percent Recycling*, which identifies concepts that CalRecycle believes would assist the state in reaching the 75 percent goal by 2020.” In 2013, CalRecycle published an update on the statewide strategies to achieve this goal.<sup>23</sup> The update included a refined concept list of six focus areas recommended to meet the 75 percent diversion goal. Therefore, it is reasonable to conclude that the statewide goal will be achieved and it was appropriate to include this goal in the Project’s analysis. It is also worth noting that the City of Highland’s per capita disposal rates show a downward trend for the years 2007 to 2013 and are below the per capita targets.<sup>24</sup> The Project will also incorporate a recycling program planning for construction throughout the community, and installation of recycling bins during operation will be a general landscape standard. Recycling receptacles will also be provided at each picnic table in the proposed community park (Planning Area 44) as well as the neighborhood parks (Planning Areas 19B and 47), and as part of the street furniture (DEIR, p. 5.17-46).

**Response to Comment 19-ZZ:**

The Project design features are not mitigation and not labeled as such in the CCTR or DEIR. The Project design features are clearly identified as part of the proposed Project in section 5.7-34 of the DEIR. The CCTR also provides the assumptions used in the modeling in Table 57, in addition to numerous places within the remainder of the report, which highlights the assumptions related to the Project design features. Nonetheless, the Project design features will be included in the Project’s conditions of approval.

**Response to Comment 19-AAA:**

See Response to Comment 19-KK, above. The Project’s emissions were estimated using CalEEMod 2013.2.2. Resulting GHG emissions did not change the conclusions presented in the DEIR and thus did not warrant recirculation. The revised air quality emissions were included in the revised AQTR and recirculated portions of the DEIR.

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<sup>23</sup> <http://www.calrecycle.ca.gov/75Percent/>

<sup>24</sup> <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=JurisdictionID%3d198%26ReportName%3dDPGraphPopEmpNumbers%26ShowParameters%3dfalse%26AllowNullParameters%3dFalse>

**Response to Comment 19-BBB:**

The comment offers unsupported opinion that the assertion that Redlands' residents will experience potentially significant noise impacts from Project-related traffic. As discussed in DEIR Section 5.12, Noise, the average healthy human ear can barely perceive changes of 3 dBA (DEIR, pp. 5.12-2) and, a change of 3 dBA or greater is considered significant (DEIR, p. 5.12-13). In order for a change of 3 dBA or greater to be achieved from an increase in vehicular traffic, the amount of traffic would have to double because each doubling of a sound source with equal strength increases the noise level by 3 dBA (DEIR, p. 5.12-36).

As described in the Recirculated Portions of the DEIR, a supplemental analysis was conducted for intersections along San Bernardino Avenue near Citrus Valley High School at the request of the City of Redlands although the SANBAG CMP guidelines do not require the analysis of these intersections because the Project does not add 50 peak hour trips to these intersections (Appendix Q.1 of the Recirculated DEIR). The analysis shows that none of the intersections analyzed along San Bernardino Avenue or Pioneer Avenue will experience a doubling of traffic as a result of the Project and therefore will not result in a significant noise impact to Redlands' residents along these roadways. Specifically, The Project's largest traffic contribution in these areas is only 22 Project trips on a given segment (Appendix Q.1, Figures 8 and 10).

See Response to Comment 19-II, above, regarding the Project's construction trips.

**Response to Comment 19-CCC:**

The comment provides unsupported opinion that there will be a significant increase in vehicular traffic on any residential street in Redlands or that the lighted character of any residential neighborhood will be substantially changed as a result of the Project. As shown on DEIR **Figure 3.5 – General Plan Land Use**, the general plan land use designation for the portion of Redlands adjacent to the Project site is Flood Control/Habitat Preservation (FC/HP). As shown on DEIR **Figure 3.6 – Zoning**, the portion of Redlands adjacent to the Project site is zoned Open Space (O). Redlands does not have any residentially-designated land uses in proximity to the Project site. The Project's traffic distributed south along Garnet Street into the City of Redlands is between 41 and 44 percent of daily trips with or without the Newport Avenue/SR-38 connection, respectively. This equals approximately 13,837 daily trips and 1,433 PM peak hour trips with the Newport/SR-38 Connection and 14,850 daily trips and 1,538 PM peak hour trips without the Newport/SR-38 connection. (TIA, Figure 7, 8)

It is noted that the issue of light and glare from vehicular traffic was not evaluated by Redlands in its environmental impact report for the Redlands Crossing Center project. The geographic scope for cumulative aesthetics, light and glare impacts used in the EIR for the Redlands Crossing Center project was the area surrounding that project site (Redlands Crossing Center Draft EIR, p. 4-6).

**Response to Comment 19-DDD:**

As set forth in the responses to the comments contained in the letter from the City of Redlands', the assertion that the DEIR is inadequate is without merit. The comment letter does not present any substantial evidence that contradicts the analysis in the DEIR.

With regards to the request that the City of Highland provide CEQA and public hearing notices to Redlands' residents, there is nothing in the CEQA statute or Guidelines that makes it incumbent on the City of Highland to inform Redlands' residents about City projects. Nonetheless, if the City of Redlands provides the names and addresses of the allegedly affected residents, then the City of Highland will mail future CEQA and public hearing notices regarding the Project.

2 LAWSUITS FILED  
THIS WEEK